



London Luton Airport

Sustainability report 2021



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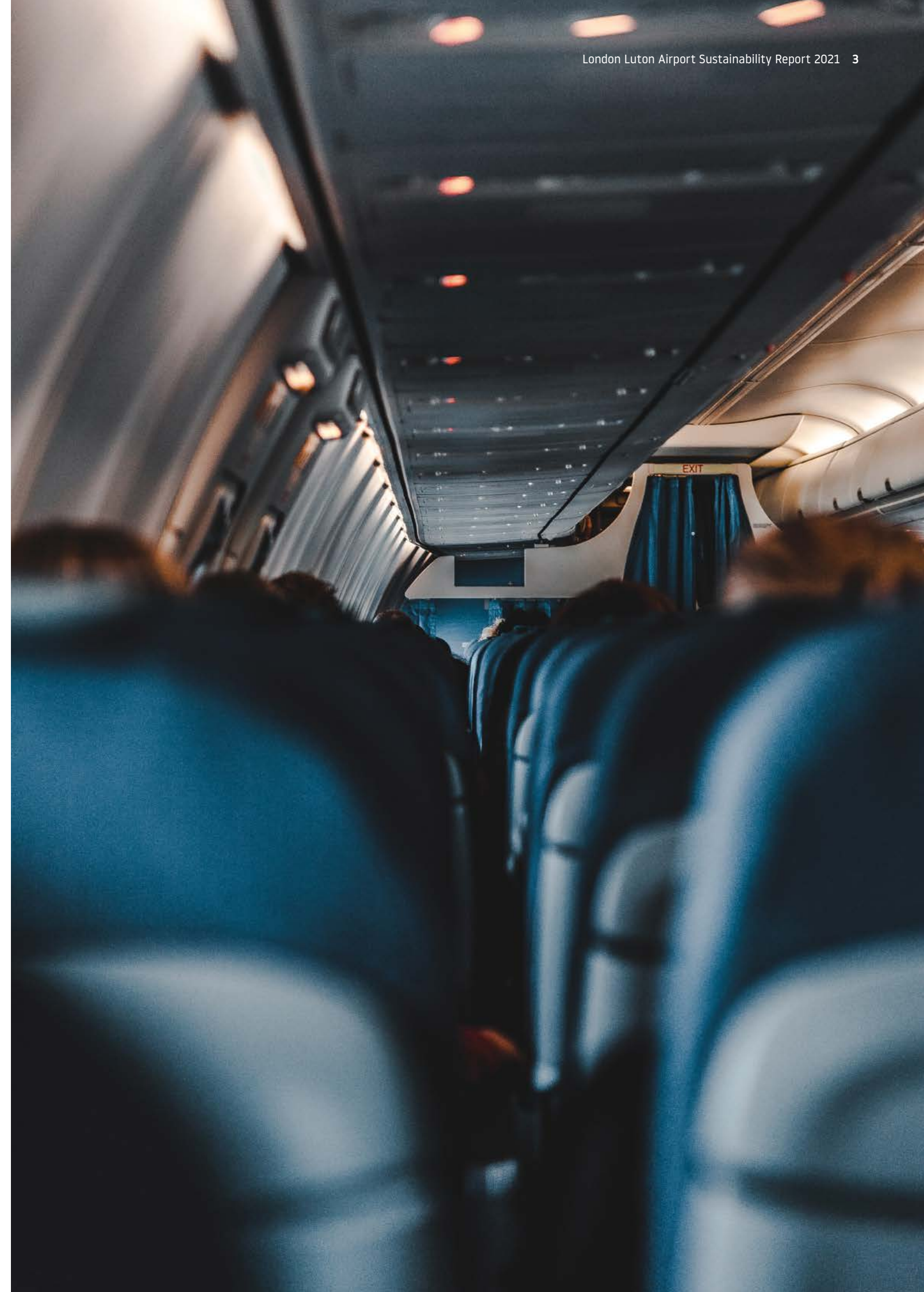
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Our responsible business strategy

At London Luton Airport (LLA), we believe that being a responsible business makes us a better business. As we continue to grow, the role we can play for our people, our community, the economy and our environment has never been more important. We are committed to playing a leading role in making aviation sustainable and we have brought together all our efforts into an ambitious plan: our Responsible Business Strategy (RBS). Given the progress we've made to date and the major changes caused by COVID-19 we will update the RBS in 2023, introducing new targets and objectives.

RECOGNITION



ACA airport carbon accreditation - optimisation



ACA airport carbon accreditation - reduction



ACI customer service accreditation: level 1



ACI airport health accreditation

REPORTING SCOPE AND BOUNDARIES

This Sustainability Report provides an account of the management approach and performance trends of the material environmental and social issues for London Luton Airport Operations Limited. The reporting period is the 2021 calendar year but the Report also includes historical performance data. This Report includes the activities and impacts that are under the control or significant influence of London Luton Airport Operations Limited.

This Report contains standard disclosures from the Global Reporting Initiative (GRI) Standard.

CAUTIONARY STATEMENT

This Report may contain forward-looking statements which are made in good faith and are based on current expectations or beliefs, as well as assumptions about future events. You can sometimes, but not always, identify these statements by the use of a date in the future or such words as "will", "anticipate", "estimate", "expect", "project", "intend", "plan", "should", "may", "assume" and other similar words. By their nature, forward looking statements are inherently predictive and speculative and involve risk and uncertainty because they relate to events and depend on circumstances that will occur in the future. You should not place undue reliance on these forward-looking statements, which are not a guarantee of future performance and are subject to factors that could cause our actual results to differ materially from those expressed or implied by these statements. The Company undertakes no obligation to update any forward-looking statements contained in this Report, whether as a result of new information, future events or otherwise.



Introduction from our CEO

The ongoing impact of the COVID-19 pandemic meant 2021 was a challenging year for London Luton Airport and the aviation sector in general. Our priority has been keeping staff and passengers safe, but we've also taken decisive action to secure the airport's future and lay the foundations for a strong recovery.

COVID-19 has not diminished the need to tackle the climate crisis or strive toward a more inclusive and healthy community, and I'm pleased that sustainability is a core component of our shared vision for the airport's future.

This year has been one of the toughest the airport or I have ever experienced, but each challenge we faced and overcame strengthened our resolve and belief in the airport's potential.

"A major milestone was working in partnership with our airport freeholder Luton Rising to put in place a joint investment package to support the airport's recovery following the impacts of the pandemic."

SECURING THE AIRPORT'S FUTURE

Travel restrictions placed on international travel during the pandemic saw passenger numbers drop to around 4 million, down from just under 18 million in 2019. This of course meant we had to closely manage our finances, cutting discretionary spending and seeking support from our shareholders.

Despite these challenges, we used the period to protect the business and build strong foundations and partnerships for the future, by investing in our people, in sustainability and in how we can best serve our passengers.

A major milestone was working in partnership with our airport freeholder Luton Rising to put in place a joint investment package to support the airport's recovery following the impacts of the pandemic. The package includes a range of new sustainability commitments and targets, including carbon emissions, and supporting the local economy and skills.

This all protects our most important asset - our people: our future success relies on them. It also helped reassure thousands of people and the many local businesses who rely on the airport through the supply chain.

OUR PEOPLE ARE AT THE HEART OF RECOVERY

Despite the enormous pressures on the airport, we knew that once restrictions were eased, traffic would quickly recover. When furlough ended in September all staff began to return to the business to prepare our operation for the increasing number of passengers using the airport.

We could not have kept going without the resolve and commitment of our staff, who worked in extremely challenging circumstances. Of all major UK airports, we furloughed the fewest people. Many staff volunteered to support the vaccine roll out and raised almost £20,000 for our charity partners, Luton Foodbank and the East Anglian Air Ambulance.

We continued to directly support local health, poverty and skills initiatives through the Luton Community Trust Fund, making a contribution of over £213,000 which will benefit around 10,000 people.

To support our staff to cope during such a difficult year we rolled out a hybrid working policy for office-based staff and made extra efforts to support people's wellbeing. We also provided regular opportunities to gather virtually and ask direct questions to senior staff.

BUILDING FOUNDATIONS FOR THE FUTURE

Having established our Responsible Business Strategy in 2020, last year was an opportunity to pause and reflect. We used this time to define a new corporate strategy focused on people, the passenger experience and sustainable growth. This will act as a guiding light throughout our recovery.

In 2022, we will start the foundation work for a new Responsible Business Strategy that will set out how we will deliver our commitment to Net Zero carbon for our direct emissions by 2040, and how we will work closely with our partners to reduce our scope 3 carbon footprint.

Work continued on the construction of Luton DART (Direct Air-Rail Transit), which will enable swifter, direct travel to the airport and shift a significant amount of passenger traffic from road to rail.

We also progressed with our plans to increase capacity at the airport from 18 to 19 million people per year to ensure the airport is on the best possible footing to bounce back.

These strong foundations mean we are well positioned to support the airport owner, Luton Rising, with their plans for growth to 32 million passengers in the long term. This will be underpinned by strong corporate governance and a commitment to decarbonisation, playing our part in limiting the climate crisis.

SUSTAINABILITY AT THE CORE OF OUR BUSINESS

Despite the challenges we faced this year, we continued to invest in making our operations more sustainable. We expanded our sustainability team, hiring two new employees, taking the total number to seven, and established a new board sustainability committee to oversee and drive our efforts.

We continued to reduce our greenhouse gas emissions. From April 2021, all the electricity we purchased was from renewable sources. We started a programme to replace inefficient lighting with LEDs, with plans to invest £600k over the next two years so that 100% of our lighting is energy efficient.

During the year, we also developed a climate resilience plan to help us prepare for the disruption the climate crisis will bring.

As both the aviation sector and local communities begin to recover from the devastating effects of COVID-19, we look forward to restarting the initiatives that have been paused due to the pandemic. We remain committed to creating a sustainable airport, providing an excellent passenger experience, and supporting our colleagues - without whom none of this would be possible.

Alberto Martin
CEO, London Luton Airport

About London Luton Airport

London Luton Airport (LLA) is one of the UK's busiest airports. Despite COVID-19, we carried **4.5 million passengers in 2021** (16.2% lower than 2020). Our airline partners include easyJet, Wizz Air and Ryanair and throughout this year they have continued to fly, **serving 160 destinations across 29 different countries**. The airport is owned by Luton Council through Luton Rising and operated on a concession basis by London Luton Airport Operations Limited (LLAOL). LLAOL is owned by Aena, the world's largest airport operator, and AMP Capital, a global investment manager. The airport's lifecycle covers four main areas:

1. SURFACE ACCESS: GETTING TO AND FROM THE AIRPORT

Passengers, staff and goods travel to and from the airport using a wide range of modes of travel. The airport is served by Luton Airport Parkway Railway Station and good road access, along with excellent coach, bus and taxi services. We directly operate short and long-stay car parks on-site and a kiss-and-fly facility, and work with other transport providers to make the airport accessible to everyone.

2. OUR OPERATIONS: TERMINAL, SECURITY, CARGO, MAINTENANCE, FIREFIGHTING AND ADMINISTRATION

Most of our operations occur within the terminal building. We maintain the buildings and airfield, and provide all airport security and firefighting functions. Our team also includes a wide range of office-based support functions, and we have an office next to the airport.

3. THIRD-PARTY OPERATIONS: CONCESSIONS, AIRLINE GROUND OPERATIONS AND GROUND CREW

Third parties are responsible for a large number of activities at London Luton Airport. Terminal shops and restaurants are all run by concessionaires, and our airline partners also have significant operations to manage and maintain aircraft. Baggage handling is also managed by third parties. We don't control these processes directly but work closely with all on-site partners.

4. AIRFIELD OPERATIONS: ARRIVALS AND DEPARTURES, AND AIRCRAFT GROUND MOVEMENTS

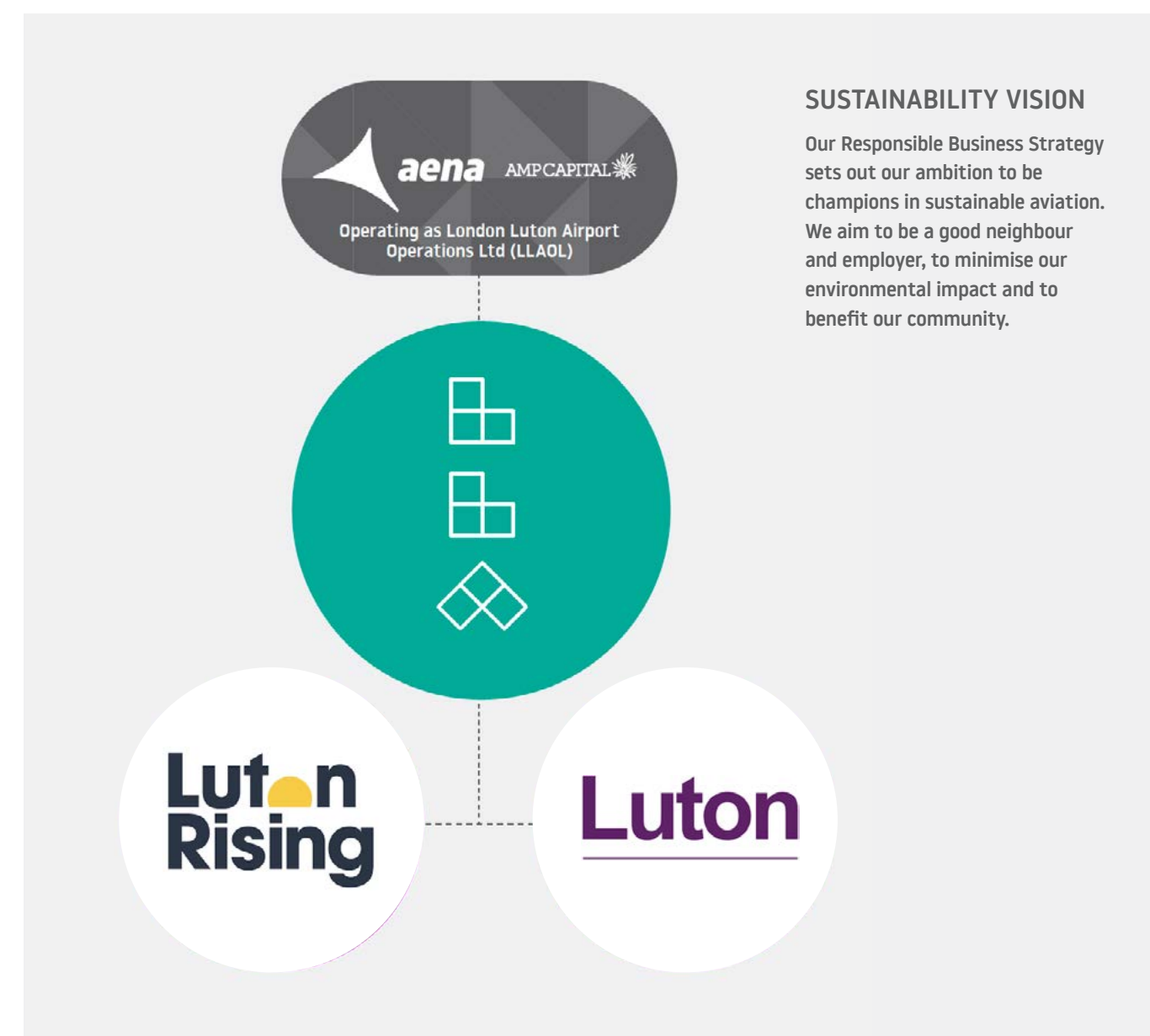
The airport's responsibility for aircraft includes their arrival and departures, and their movement on the ground. The airlines are responsible for aircraft, but we have a range of processes and controls in place to minimise noise, carbon emissions and risks.

OUR UNIQUE APPROACH

London Luton Airport is unique in that our freeholder, Luton Rising, is owned by Luton Council. We work in collaboration with our partners Luton Rising and LBC and engage closely with our neighbours, local residents and regional policy makers. This means we have a good view of our impacts as a neighbour and business partner.

We have developed our Responsible Business Strategy to align with Luton Council's sustainability objectives and have grown our sustainability team to deliver it. As a business owned by the world's leading airport operator and a global investor, we take our broader corporate responsibilities seriously.

We strive to deliver our corporate and societal objectives, from how we treat our staff and business partners, to reducing our environmental footprint and improving the customer experience. As a responsible business partner, we work hard to align our stakeholders' varied interests to ensure sustainable outcomes.



Meet our sustainability team

Our sustainability team leads the delivery of our Responsible Business Strategy, working alongside colleagues across the business. To understand each team member’s role, see the Environment and Community sections of the report on pages 16 and 56.



Liga Apsite
Climate Resilience Manager



Jude Hughes
Energy and Environment Manager



Louise Hanlon
Community & CSR Manager



Joshua Keating
Community & CSR Executive



Kelvin Chum
Environment Executive



Bethany Marx
Sustainability Executive



David Vazquez
Head of Sustainability

2021: Year in review



4.5m passengers
(2020: 5.5m passengers, 2019: 17.9m passengers)



16.2% lower
than 2020



61,558 aircraft movements
(2020: 63,693, 2019: 141,481)



3.2% lower
than 2020



26,108 tonnes of cargo
(2020: 32,693, 2019: 36,906)



20.1% lower
than 2020



160 destinations
(2020: 140, 2019: 141)



14.3% higher
than 2020



“Sustainability is a core part of our strategy. We’ve grown the team, bringing in the experience and skills to deliver our vision of a sustainable airport.”

— Oli Jaycock, Director of Corporate Affairs

COVID-19 impacts and response

COVID-19 has had a significant impact on the airport. We continued to adapt to the changing COVID-19 guidance, keeping the airport open throughout the year. Passenger numbers remained significantly lower than pre-pandemic levels, down 56%, from 17.9 million in 2019 to 4.5 million in 2021.

The airport and the wider aviation sector have continued to face significant challenges this year. However, by taking the opportunity to review and improve many of our processes during the year, we have laid a strong foundation that will support growth as the effects of COVID-19 recede.

During 2021, we developed a new corporate strategy that includes ambitious sustainability commitments, ensuring we build back better. We also updated our health and safety practices, staff wellbeing and internal communications, and have developed strong, new collaborations and partnerships. Our response to COVID-19 also accelerated our digitalisation processes. We implemented new infrastructure and rapidly provided digital literacy training to our teams.

We've also had to take a lot of hard decisions and in response to the loss of revenue from lower passenger numbers, we acted decisively to manage our finances.

We minimised job losses and made fewer redundancies than other UK airports. We protected jobs whenever possible, making full use of the Government's Job Retention Scheme. Through a mix of voluntary redundancy and a sabbatical scheme, we kept compulsory redundancies to just 50.

We are now able to return talent acquisition and training to the fore. As passenger numbers have increased, we've brought staff back from furlough. However, we are not expecting to be back to full capacity until 2024 at the earliest.



“2021 was a significant year for our partnership with London Luton Airport Operations Limited (LLAOL). Together, we were able to roll out a joint investment package to support the airport’s sustainable recovery following the severe impacts of the pandemic.

This was vital to support the thousands of people who rely on the airport for employment, the regional businesses in our supply chain, and many of the most vulnerable residents of Luton who rely on the significant £7.4m annual contribution Luton Rising makes to our vital voluntary and charitable services sector to support and improve people’s lives.”

— Graham Olver, CEO of Luton Rising

HEALTH AND SAFETY IN FOCUS: MAKING SAFETY PERSONAL

Maintaining a safe environment for staff and passengers was our priority during 2021. We completed risks assessments for all airport operations and introduced new management practices to reduce the risk of COVID-19 transmission. The airport has remained open throughout the pandemic, and we have maintained processes and infrastructure to keep staff and passengers safe. This includes increased cleaning and the removal of high touchpoint areas, such as customer satisfaction terminals. There are Perspex screens at check in, security and customer service desks. We continued our hybrid working policy to allow working from home where possible.

All members of the senior management team completed four safety tours across the airport, with many exceeding this number. COVID-19 has impacted our approach to health and safety, highlighting the individual responsibility every member of staff holds. As we return to work, our key objective is “Making Safety Personal”.

We aligned our health and safety policy to our new corporate strategy values to ensure we’re talking the same language across our business. At the end of 2021, we became a member of the Royal Society of the Prevention of Accidents (RoSPA). In 2022, we will use this as an opportunity to benchmark against industry peers and ensure wider recognition of LLA’s commitment to the health, safety and wellbeing of all who work or interact with us.

BUILDING BACK STRONGER AND GROWING SUSTAINABLY

We have started consultation on our goal to expand the airport’s capacity from 18 million passengers to 19 million. We call this ‘Project 19’. Given that 4.5 million passengers flew through Luton in 2021, this means we are preparing for a big recovery phase.

Project 19 also includes a greater commitment to the environment, including a pledge to achieve Net Zero by 2040. With a growing sustainability team and an upcoming review of our Responsible Business Strategy, we feel well prepared to face this challenge.

We have developed an interim carbon reduction plan, which outlines our strategy to grow while reducing our carbon impact. Alongside this, our new climate resilience plan explores the risks the airport faces from climate change.

In 2021, we reviewed our sustainability commitments and developed a plan for our Net Zero 2040 commitments, which we are planning to launch in 2022. The plan will include new on-site renewables and air quality commitments. We ran a procurement exercise to appoint a new framework of third-party sustainability specialists who will help us deliver on our environmental, social and governance (ESG) objectives. We also established a board ESG committee.

SUSTAINABLE TRAVEL UPDATE

We have made strong progress on improving sustainable access to the airport. A new half-hourly non-stop electric express train service run by East Midlands Railway has been introduced between London St Pancras and Luton Airport Parkway. The service is the first significant step towards achieving a stand-alone Airport Express service.

In addition, some of our travel operators have improved the efficiency of their fleets. For example, Arriva have upgraded their fleet to lower emissions Euro-6 buses and their excess Greenline service were used at LLA.

We established a new electric vehicle parking tariff and implemented further tethered charging points on the 2nd floor in Terminal Car Park 1 to incentivise and support low carbon travel to the airport.

With lower passenger numbers, we were able to move staff car parking closer to the terminal, enabling staff to walk from the car park rather than requiring a shuttle bus.

BUILDING STRONGER PARTNERSHIPS FOR A SUSTAINABLE FUTURE FOR THE AIRPORT

Our growth strategy requires strong partnerships. In particular, we are further improving our ties with the airport owner, Luton Rising, and with Luton Council.

Our priority issues

Our Responsible Business Strategy is focused on the most important environment, social and governance (ESG) issues for the airport. We defined these priority areas by completing a materiality assessment, following an approach based on the AA 1000 Assurance Standard.

These areas are important to our operations, local people, our staff and stakeholders. The materiality assessment involved conducting an in-depth analysis of our current ESG management to identify potential for improvement, collating extensive input from our network of local stakeholders. We also consulted our partners and departments across the business, ensuring our strategy would work for everyone by taking into account a broad range of challenges and opportunities. We also analysed sector peers and benchmarked our sustainability programme against best practice. We identified the most compelling ESG issues and prioritised them based on their impact on the airport and their importance to stakeholders.

STRATEGY FOCUS

Our Responsible Business Strategy concentrates on six key areas:



PAGE 16
Ensure environmental responsibility and efficiency



PAGE 84
Grow with our people



PAGE 56
Supporting our Community



PAGE 100
Deliver great customer experience



PAGE 68
A Safe and Secure Airport



PAGE 110
Sustainable supply chain

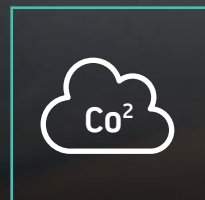
Our work in each area is supported by a robust governance structure which provides the leadership and resources for effective management. We have identified actions and targets for each focus area, covering all our key environmental, social and governance issues. These are outlined below.



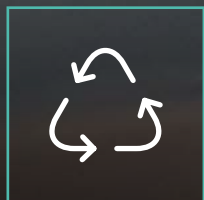
Ensure environmental responsibility and efficiency

Our aim is to minimise the environmental impacts from the airport. We set targets to address our key issues, including carbon emissions, noise, waste and air quality.

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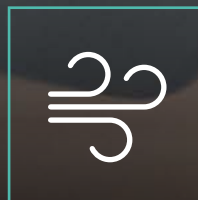
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Carbon emissions, energy and climate change



PAGE 35
Waste



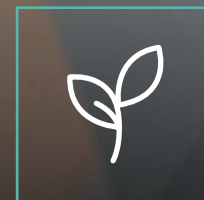
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Water



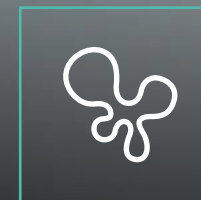
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Air quality



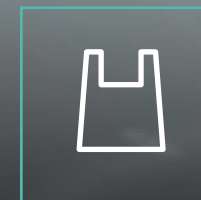
PAGE 41
Noise



PAGE 47
Sustainable travel



PAGE 50
Spills



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Single-use plastics



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Light pollution



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De-icing

Climate resilience plan update

In 2021, we assessed the risk that climate change poses to our business and explored both physical and transitional climate risks. We also developed a Climate Change Adaptation Report.

100% Renewable energy use

From April 2021, 100% of the electricity we purchased was from renewable energy sources.

85% Of lighting upgraded to LED lights

In 2021, we replaced more of our legacy lighting with super efficient LED lighting, achieving 85% LED lighting across the airport.

ACA level 3 certification for reducing carbon emissions with our partners

In 2021, we achieved our level 3 “Optimisation” certification from the Airport Carbon Accreditation (ACA), surpassing our target of level 2 “Reduction”. This involved engaging key partners on emissions reductions.

Net Zero strategy update

We committed to Net Zero Carbon for airport emissions by 2040, and to work closely with partners to reduce their emissions. In 2022, we will develop a detailed Net Zero roadmap outlining how we will achieve this target.

“I’m responsible for managing energy and environmental issues at the airport. I oversee our integrated ISO management system and this year I’ve been focussed on delivering energy reductions and working towards on-site renewables.”

— Jude Hughes, Energy and Environment Manager



Carbon emissions, energy and climate change

Climate change is one of the most pressing challenges our society faces. We are all increasingly aware of the need to protect our environment and rapidly decarbonise aviation.

In June 2019, the UK Government signed into law a commitment to make the UK a Net Zero greenhouse gas emitter by 2050. We recognise this target and commit to play our part in achieving it, including developing infrastructure to help airlines reduce their greenhouse gas emissions.

In 2020, we set a target to be Net Zero carbon by 2040. This is supported by our targets to source all electricity from renewable sources by 2021, to generate at least a quarter of our electricity demand from on-site renewables by 2026, and to work closely with our partners to address emissions across our entire value chain. We will also reduce our energy demand per passenger.

This year we also assessed climate change risks for the airport and will incorporate these into our business resilience plans. By the end of 2022, we aim to have an approved roadmap for our Net Zero strategy. Given Luton Rising’s ambition to grow passenger numbers to 32 million, meeting our Net Zero goals will require transformation and industry innovation such as alternative fuels, electrification of planes and a new approach to operations.

We are committed to growing in the most sustainable way possible. We will focus on equality, surface access, carbon reduction and noise reduction. We know that our goals are ambitious and we have expanded our sustainability team to meet these new challenges with additional capacity and expertise. We are also expanding our external network to better equip ourselves for success.



Carbon emissions

CARBON MANAGEMENT APPROACH

The airport’s carbon footprint is one of the most important themes in our Responsible Business Strategy. In 2019 our CEO, Alberto Martin, signed the aviation sector pledge to achieve Net Zero emissions before 2050. In 2020, we announced our ambitious target to achieve Net Zero carbon by 2040 and we are committed to working closely with our partners to reduce our carbon emissions accordingly. We have outlined a carbon reduction plan and will publish a detailed Net Zero roadmap in 2022.

The airport’s direct emissions account for only 3% of our total emissions, with most remaining emissions split roughly equally from aircraft landing and take-off (LTO) and passenger surface access. As such, our carbon reduction strategy focusses both on reducing our own emissions and working with airlines,

strategic partners (including Luton Council, Luton Rising and transport companies) and passengers to achieve Net Zero carbon.

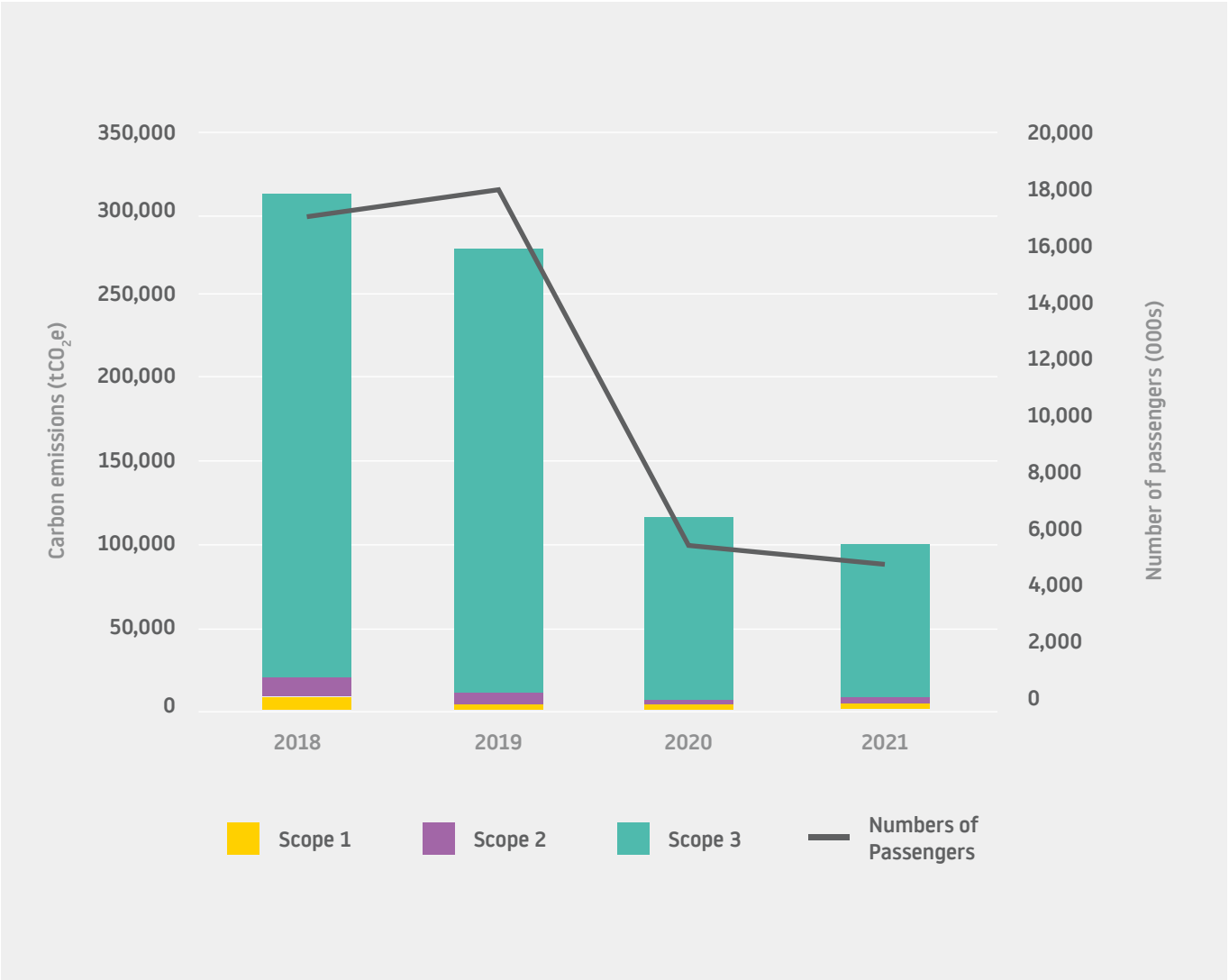
In 2019, we achieved level 1 of the Airport Carbon Accreditation programme (ACA) for mapping our carbon footprint. In 2021, we achieved our level 3 “optimisation” accreditation, which involves engaging partners in reducing their carbon emissions. Our Carbon Management and Stakeholder Engagement Plans are now accompanied by a carbon reduction plan outline and will be finalised with a detailed Net Zero strategy in 2022. This will include a new set of sustainability commitments. The stakeholder strategy also includes clear actions to engage with key partners to reduce our scope 3 emissions.

We will only reach our ambitious Net Zero target if the whole industry transforms. Hence, we engage in industry groups like Sustainable Aviation, a coalition of UK airlines, airports, aerospace manufacturers and air navigation service. We also engage with government, recognising the important role it plays.

CARBON PERFORMANCE

We have calculated our scope 1 and 2 carbon emissions in line with the ACA carbon reporting guidance since 2015. Our combined Scope 1 and 2 emissions have dropped by 71% from 2015 to 2021. Since we started accounting for Scope 3 emissions in 2019, our total carbon emissions have decreased by 65% in 2021. Although much of the decrease in recent emissions is attributable to the decline in passengers due to the COVID-19 pandemic, some of the decrease comes from improved practices in carbon efficiency, which we will continue to build upon.

OUR CARBON JOURNEY



More details about our carbon journey can be found in our [interim 2021 report – ‘Reducing our Carbon Emissions’](#).

To achieve Net Zero by 2040, we need our partners, particularly airlines, to join us in transforming their operations. In close collaboration with our partners, we have developed a Stakeholder Engagement Plan for reducing our scope 3 carbon emissions. We have already seen exciting progress. In 2019, 10% of aircraft operating from LLA were the Airbus 320 NEO or Boeing 737 MAX. This latest generation of

aircraft have more efficient engines, sharklets and aerodynamics, which reduce emissions by over 15% compared to the previous generation of aircraft. We project the proportion NEO/MAX aircraft operating from LLA will increase to 50% by 2028.

We report our carbon emissions from electricity use using both the location-based method (which uses the national average emissions factor for grid electricity) and the market-based approach (which uses the emissions factor from our electricity provider).

PROGRESS IN 2021

This year we achieved our level 3 certification from the Airport Carbon Accreditation Scheme, for ‘Optimisation’. We aim to achieve Net Zero Carbon by 2040 and are working towards achieving ACA level 4 for ‘Carbon Neutrality’ by 2026 at the latest.

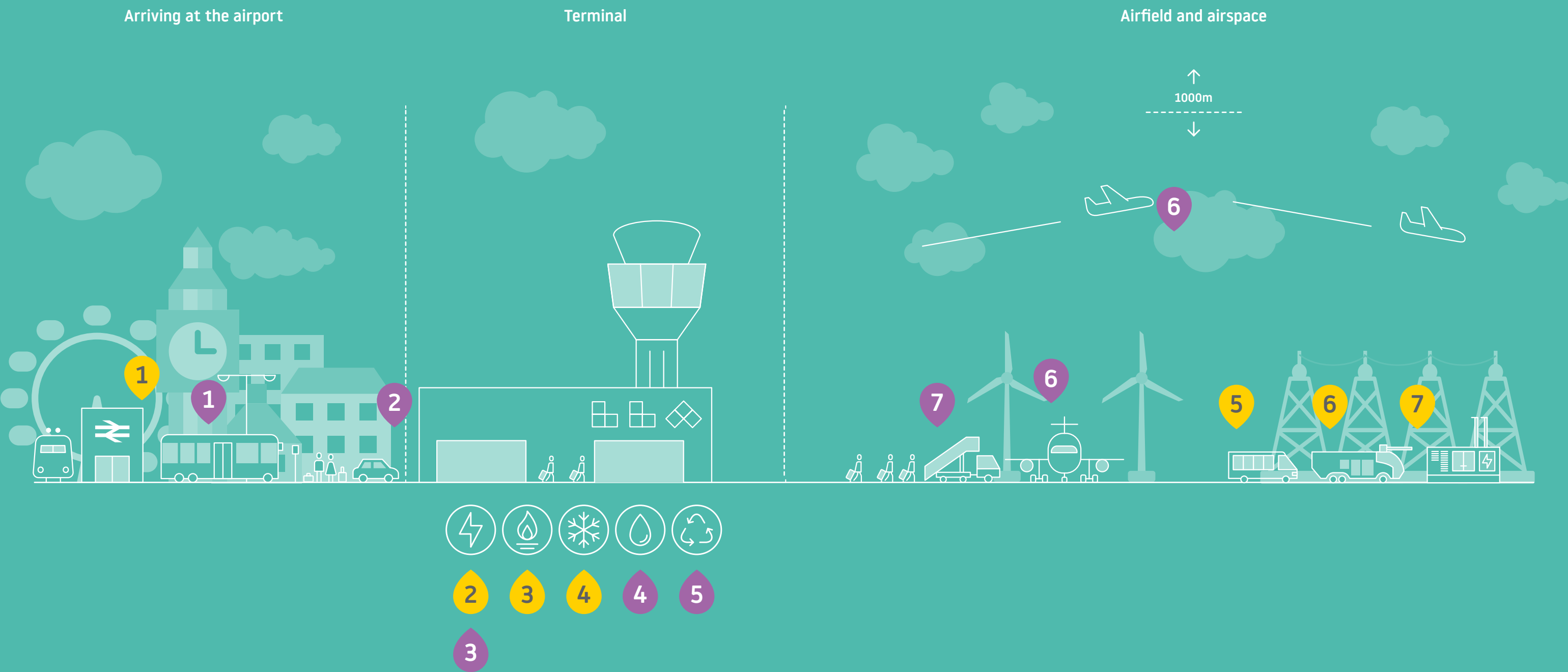
LOCATION-BASED

	2015	2016	2017	2018	2019	2020	2021
Scope 1 (tCO ₂ e)	2,885	2,917	2,899	3,189	2,965	2,325	2,321
Airport de-icer (tCO ₂ e)	-	-	-	-	-	-	22
Natural gas (tCO ₂ e)	1,904	1,802	1,611	1,650	1,562	1,349	1,492
Fuel (airport vehicles) (tCO ₂ e)	804	938	1,048	1,102	1,137	536	447
Gas oil (heating and power) (tCO ₂ e)	177	177	240	225	203	129	192
Refrigerants (tCO ₂ e)	-	-	-	212	55	309	162
Fire training (tCO ₂ e)	-	-	-	-	8	2	6
Scope 2 (tCO ₂ e)	17,364	14,910	12,912	10,184	4,981	3,418	3,538
Electricity - airport use (tCO ₂ e)	17,364	14,910	12,912	10,184	4,981	3,418	3,538
Scope 3 (tCO ₂ e)	-	-	-	292,511	278,269	109,093	93,845
Aircraft movements (tCO ₂ e)	-	-	-	137,603	136,145	60,669	56,625
Passenger surface access (tCO ₂ e)	-	-	-	152,286	131,923	41,859	29,857
Electricity - tenant use (tCO ₂ e)	-	-	-	-	4,325	2,706	2,211
Electricity - WTT (tCO ₂ e)	-	-	-	-	-	-	1,630
Staff commuting (tCO ₂ e)	-	-	-	1,428	1,010	436	525
Electricity T&D losses (tCO ₂ e)	-	-	-	868	790	527	509
Fuel (third party vehicles) (tCO ₂ e)	-	-	-	-	3,179	1,592	1,505
Third party de-icer (tCO ₂ e)	-	-	-	-	-	-	101
Aircraft engine tests (tCO ₂ e)	-	-	-	-	608	266	85
Water (tCO ₂ e)	-	-	-	133	136	54	19
Business travel (tCO ₂ e)	-	-	-	145	103	39	4
Waste (tCO ₂ e)	-	-	-	48	50	945	774
Total (tCO ₂ e)	20,249	17,827	15,811	305,884	286,215	114,836	99,704

MARKET-BASED

	2015	2016	2017	2018	2019	2020	2021
Scope 1 (tCO ₂ e)	2,885	2,917	2,899	3,189	2,965	2,325	2,321
Airport de-icer (tCO ₂ e)	-	-	-	-	-	-	22
Natural gas (tCO ₂ e)	1,904	1,802	1,611	1,650	1,562	1,349	1,492
Fuel (airport vehicles) (tCO ₂ e)	804	938	1,048	1,102	1,137	536	447
Gas oil (heating and power) (tCO ₂ e)	177	177	240	225	203	129	192
Refrigerants (tCO ₂ e)	-	-	-	212	55	309	162
Fire training (tCO ₂ e)	-	-	-	-	8	2	6
Scope 2 (tCO ₂ e)	17,364	14,910	12,912	13,690	6,772	5,059	1,332
Electricity - airport use (tCO ₂ e)	17,364	14,910	12,912	13,960	6,772	5,059	1,332
Scope 3 (t CO ₂ e)	-	-	-	292,511	275,012	92,971	82,082
Aircraft movements (tCO ₂ e)	-	-	-	137,603	131,333	43,219	43,782
Passenger surface access (tCO ₂ e)	-	-	-	152,286	131,923	41,859	29,857
Electricity - tenant use (tCO ₂ e)	-	-	-	-	5,880	4,034	3,291
Electricity WTT (tCO ₂ e)	-	-	-	-	-	-	1,630
Staff commuting (tCO ₂ e)	-	-	-	1,428	1,010	436	525
Electricity T&D losses (tCO ₂ e)	-	-	-	868	790	527	509
Fuel (third party vehicles) (tCO ₂ e)	-	-	-	-	3,179	1,592	1,505
Third party de-icer (tCO ₂ e)	-	-	-	-	-	-	101
Aircraft engine tests (tCO ₂ e)	-	-	-	-	608	266	85
Water (tCO ₂ e)	-	-	-	133	136	945	19
Business travel (tCO ₂ e)	-	-	-	145	103	54	4
Waste (tCO ₂ e)	-	-	-	48	50	39	774
Total (tCO ₂ e)	20,249	17,827	15,811	309,390	284,749	100,355	85,735

Our emissions



OUR AIRPORT EMISSIONS

Arriving at the airport

- 1 Colleague business travel

Terminal

- 2 Electricity use
- 3 Gas use for heating
- 4 Refrigerant losses

Airfield

- 5 Fuel use in vehicles
- 6 Firefighting activities
- 7 Fuel use for power

OUR PARTNERS' EMISSIONS

Arriving at the airport

- 1 Passenger travel
- 2 Colleague commute

Terminal

- 3 Electricity use by tenants
- 4 Water management
- 5 Waste management

Airfield and airspace

- 6 Aircraft landing and take-off
- 7 Ground support equipment

Case study

ACA CARBON EMISSIONS LEVEL 3 ‘OPTIMISATION’ CERTIFICATION ACHIEVED

The Airport Carbon Accreditation programme provides a unique common framework for carbon management at airports and has delivered measurable results. It covers the operational activities that contribute most to carbon emissions. It has six levels and supports airports through a process of continual improvement. The six levels are:

In 2019, we achieved level 1 ‘Mapping’. This year, within just 18 months of joining the scheme, we achieved level 3 ‘Optimisation’ certification by widening the scope of our carbon footprint minimisation to include third party emissions and by engaging third parties at and around the airport.

We are currently working towards level 4 ‘Carbon Neutrality’, which we aim to reach by 2026 at the latest.

[Learn more about the ACA Carbon Accreditation scheme](#)

+ MAPPING

Footprint measurement

+ REDUCTION

Carbon management towards a reduced carbon footprint

+ OPTIMISATION

Third party engagement in carbon footprint reduction

+ NEUTRALITY

Carbon neutrality for direct emissions by offsetting

+ TRANSFORMATION

Transforming airport operations and those of its business partners to achieve absolute emissions reductions

+ TRANSITION

Compensation for residual emissions with reliable offsets



FOCUS IN 2022

- Working towards carbon neutrality
- Developing a detailed Net Zero roadmap in 2022



ENERGY MANAGEMENT APPROACH

On-site energy use is a major focus for our Responsible Business Strategy.

Electricity is our largest energy source. We use it for lighting, ventilation and powering equipment across the airport. We use natural gas for space heating, and diesel and fuel oil are predominantly used for operational vehicles and back-up power generation.

Our highest energy use areas include airfield ground lighting, the heating and cooling systems, and our water pump systems. We operate and manage a high-voltage network on-site and provide energy for our airline partners and on-site concessions, which include shops, restaurants and private lounges.

We manage energy use carefully through our energy management system (EnMS), which is certified to ISO 50001. We achieved certification in 2014 and have an energy policy and a suite of processes and controls to help us drive energy efficiency, from procurement of equipment and designing systems and buildings, to staff training and ongoing maintenance activities.



“I’m responsible for managing our energy and environmental data and ensuring the wider business complies with its environmental management systems and legal obligations, from air quality to water use.”

— Kelvin Chum, Environment Executive

ENERGY PERFORMANCE

- In 2021, our electricity consumption was 27,080 MWh (including airport and tenant use).
 - During 2021, we achieved recertification for our ISO 50001 energy management system.
 - From April 2021, 100% of electricity purchased was from renewable sources.
 - In 2021, we noticed a slight increase in the energy use per passenger, from 4.80 to 5.91 kWh/passenger. This is due to the reduction in passenger numbers, and the gradual return to normal operations following the pandemic. We are committed to implementing further energy reduction measures.
- This year our investments focused on:
- Replacing fluorescent lighting with LEDs, bringing the total to 85% LED lighting across the airport.
 - Reviewing our site meter tree, which is our network of electrical sub-meters across the airport. By carrying out on-site investigations and repairs to these meters, we have improved the quality of energy data we capture, allowing us to closely monitor energy usage in real-time. This programme of replacement will continue into 2022.
 - Replacing an old chiller in the new terminal building with equipment that uses 25% less energy.
 - Reviewing the air handling systems in the check-in area to identify inefficiencies in temperature control. We installed heating coils to better regulate temperatures.
 - Improving lighting in staff security search area, replacing around 100 lamps and upgrading controls, which achieved a 60% energy saving in that area.
 - Creating a suite of electrical standards that specify which product ranges to use when an area is upgraded. By using LLA standardised products, we can hold a minimum level of equipment stock, which creates financial and waste efficiencies.
 - Upgrading facility mechanical systems in the arrivals areas of the terminal to save energy.
- In 2022, we are planning further investments in solar panel installation, electric vehicle infrastructure, new energy meters and energy efficient air handling units.

Once operations have normalised to capture data in a comparable way, we are planning a site-wide energy audit in 2022 to identify further energy reduction/efficiency measures. From this we will develop our capital budget to further reduce our energy consumption. We will also invest in renewable energy generation, having set an initial target of 25% on-site generation by 2026.



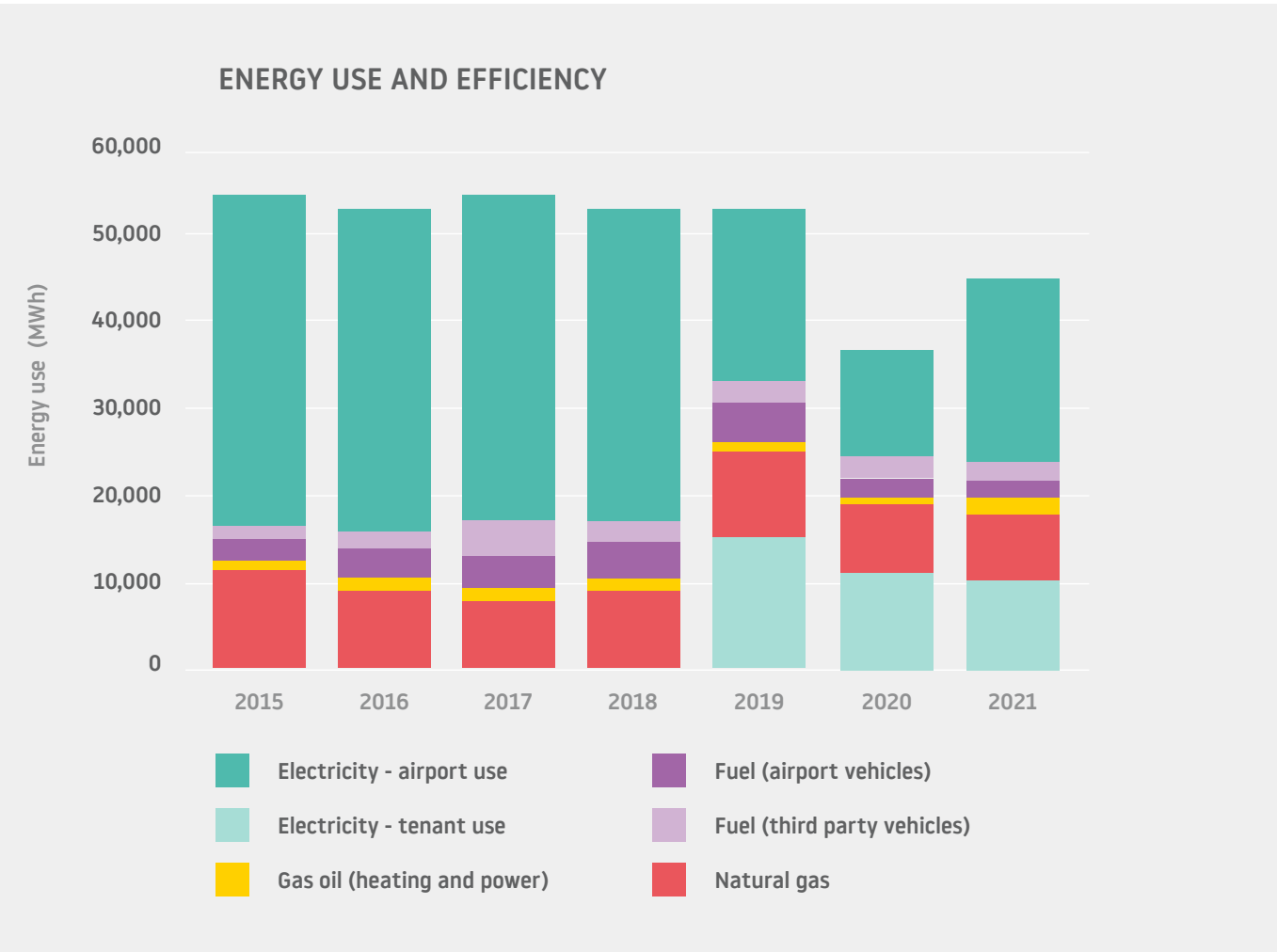
Aena (our majority shareholder) has previously demonstrated its commitment to reducing energy reliance on national grids across its airports. We plan to use Aena’s experience of using on-site generation at their other airport sites, such as the installation of 100% on-site generation at Cesar Manrique-Lanzarote Airport and Tenerife Sur Airport, generating a total of 1.85 MW of power that was used on-site.



“I’m the Climate Resilience Manager and my role is to prepare the airport for the impacts of climate change. This year, we completed a review of the physical risks for the airport.”

— Liga Apsite, Climate Resilience Manager

Energy use (MWh)	2015	2016	2017	2018	2019	2020	2021
Electricity - airport use	37,568	36,186	36,727	35,975	19,488	14,661	16,665
Electricity - tenant use	-	-	-	-	16,920	11,609	10,415
Natural gas	10,324	9,794	8,748	9,110	8,495	7,337	8,147
Heating and power (gas oil)	556	605	764	769	693	474	742
Heating and power (biofuel)	-	-	-	-	-	-	552
Fuel (airport vehicles)	3,292	3,590	4,098	4,265	4,317	2,038	1,803
Fire training	-	-	-	-	69	17	28
Total	51,740	50,175	50,337	50,119	49,982	36,136	38,352



Note: In 2019 we started reporting the energy used by tenants separately, having previously reported total site usage.

There was a slight increase in the energy used last year from 36,136 MWh in 2020 to 38,352 MWh in 2021. This reflects the increase in operations following COVID-19 towards the end of the year. This was accompanied by an increase in the amount of energy used per passenger (pax) to 5.91 kWh/pax in 2021, from 4.80 kWh/pax in 2020.

There was also an increase in the energy used for heating and power due to the installation of new water quality equipment in the airport. The new equipment uses biofuel as opposed to gas oil, meaning whilst energy use has increased, the carbon emissions for heating and power did not grow substantially, because biofuel is not as carbon intensive as gas oil.

As detailed in the Carbon Emissions section of this report, despite the increase in energy use per passenger, we saw carbon emissions drop to their lowest level since we began accounting for Scope 3 emissions. This drop is mainly due to fewer aircraft movements and lower numbers of passengers travelling to the airport because of COVID-19.

We will continue to work to decrease our energy consumption and therefore our carbon emissions.



“As COVID-19 continued to limit passenger numbers in 2021, we adapted our operations to run equipment more efficiently and save energy. This included turning off equipment and changing controls in underutilised areas.

We continued this work by instigating a site-wide energy audit to reassess our existing equipment and processes and to further investigate ways to improve energy management across the airport. This will result in refurbishment of inefficient equipment, implementation of best practice and replacement with new technology.”

— Jude Hughes, Energy and Environment Manager

Case studies

UPGRADING MECHANICAL EQUIPMENT FOR GREAT PASSENGER COMFORT AND ENERGY SAVINGS

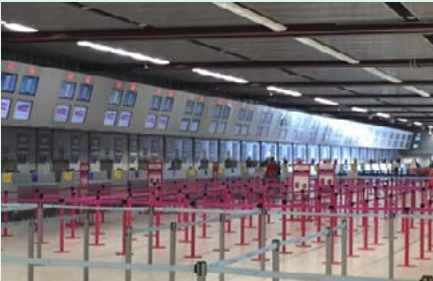
The arrivals area is the oldest part of the terminal. Originally built in 1985, it has been significantly redeveloped to become a dedicated arrivals facility that processes 9 million arriving passengers per year. Whilst the building has been refurbished and extended over the last few years, a lot of legacy equipment is still in use. This includes heating, cooling and hot water systems, as well as baggage collection facilities, offices, toilets and rest areas.

Although these systems still meet the requirements of our passengers and staff, they are inefficient, and an upgrade promises significant energy savings.

In 2022, we will conduct a feasibility study to upgrade the facility mechanical systems and develop a concept design. We are planning to tender for the project in 2023, with a planned implementation during 2024/2025. The design will focus on installing new technology and energy efficient systems, including a centralised hot water system, which will reduce electrical loading by 63kW per hour over the entire system.

Top image: Check-in mezzanine floor offices

Bottom image: Baggage dock offices



LOCALISED HEATING SOLUTIONS IMPROVE EFFICIENCY FOR TERMINAL AIR HANDLING SYSTEM

Providing fresh air at the right temperature to all parts of the airport uses a significant amount of energy. Because the airport has expanded over time, some parts of the system are inefficient or struggle to keep areas at the right temperature.

A prime example is the ventilation system serving the baggage dock offices and check-in mezzanine offices. Although served by the main terminal plant, these have different heating and cooling requirements given their location.

In response, we implemented a local heating coil to improve temperature control within key operational offices. This reduces energy consumption and eliminates the need to run the main terminal chiller plant during the cooler parts of the year. This change will provide energy savings of 60kW per hour and reduces wear and tear on the terminal main chiller plant.

Image: New reheat coil installed within the baggage dock office heating ductwork



FOCUS IN 2022

- Project design and feasibility study to upgrade the facility mechanical systems of the arrivals area



Climate change

CLIMATE CHANGE MANAGEMENT APPROACH

The climate crisis is one of the greatest threats facing our business and wider society. In 2020, we created a dedicated Climate Resilience Manager role, which is now filled by Liga. In 2021, we developed a climate change resilience plan that started to outline the risks posed by climate change to our business.

Carbon emissions in the aviation industry have risen sharply in recent decades. The onset of the COVID-19 pandemic saw emissions drop by a third globally. However, as the global economy recovers, passenger numbers and cargo volumes will once again rise and it's vital that these increased numbers are not accompanied by an unsustainable increase in carbon emissions. The International Energy Agency

has recognised that actions from leading airlines and airports will be vital for catalysing the transition to a sustainable aviation industry, through new technological solutions, improved operational practices and fuel choices, and for encouraging behavioural change in passengers. We will play an important role in supporting new low carbon technologies and practices.

PROGRESS IN 2021

Climate change will have a significant impact on the airport, from both physical changes (such as increased average temperatures and extreme weather events) and transition risks (which include changes in policy, technology or consumer behaviours).

During 2021, we analysed our exposure to climate-related risks and opportunities in line with DEFRA guidance and have developed a climate change resilience plan.

One of the most important physical risks we identified is the potential

impact from more intense and frequent extreme weather. These can disrupt our operations, as well as utilities and our supply chain. The review also identified potential noise impacts as higher temperatures make the air less dense, meaning aircraft need more thrust and longer distances to take off.

Transition risks include the impact of additional operating costs from carbon taxes or additional regulation, and the transition to alternative fuels or electricity for aviation. We could also see changing consumer

preferences on the demand for air travel if sustainable aviation fuels are not implemented quickly enough.

The review also identified a suite of opportunities. These include lower energy costs from efficiency initiatives and competitive advantage from investing in sustainable aviation infrastructure, micro-grids and on-site renewable energy.

In 2021, we published an interim carbon reduction plan, which will be expanded into a detailed Net Zero strategy by the end of 2022.

Case study

LONDON LUTON AIRPORT AT COP26

Head of Sustainability, David Vazquez represented London Luton Airport at COP26 in Glasgow. He attended the events and discussions on Transport Day, meeting with peers from airlines, airports and policy makers to share good practice and ensure we play our part in delivering a low carbon future for aviation.

During COP26, we also ran an event on site at the airport to showcase our actions to improve our sustainability performance. The sustainability team partnered with the airport's new waste supplier, Cawleys, to run a pop-up desk in the airport. Cawleys are based in Luton and started working with us this year. They manage our waste and are particularly focused on increasing recycling at the airport.



"I was really impressed with the discussions on the Transport Day, which highlighted the need for collaboration and innovation. Topics included low carbon aircraft, sustainable aviation fuels and carbon offsetting. It is important to continue the conversations leading up to the ICAO Assembly in 2022, which will give further clarity to the direction and ambition for the industry going forward."

— David Vazquez, Head of Sustainability

Case study

CLIMATE CHANGE RESILIENCE

Climate change is likely to disrupt infrastructure and essential services. Alongside our efforts to reduce carbon emissions, we need to assess the climate resilience of airport services, assets and infrastructure.

A changing climate presents both risks and opportunities for the airport, and we have established a robust process to embed climate change into our risk governance processes.

The greatest transition risk for the airport and our partners over the next 30 years is likely to be linked to changes in UK legislation to deliver Net Zero by 2050. This commitment will also require technological developments within the aviation sector, which presents both risks and opportunities to the airport.

In 2021, we explored the physical and transitional risks in line with DEFRA guidance in a Climate Change Adaptation Report. This follows our previous assessment in 2011 and concluded:

- Adaptation will require investment in upgraded physical infrastructure and further scenario analysis in line with the Task Force on Climate-Related Financial Disclosures (TCFD).
- Mitigation will require development of a Net Zero roadmap, which we have committed to develop in 2022.

Our focus areas to address physical risks include expanding the project planning process to better account for climate change risks and impacts, upgrading the drainage infrastructure, conducting detailed modelling of buildings and continued research to understand potential risk and impacts in more detail.

We will seek to manage these transition risks by undertaking further assessment, engaging with policy and decision-makers, and investing in low carbon technologies.

The next steps are to implement these key projects, integrate climate considerations into businesses plans, policies and budgets, and continue to incorporate climate considerations into our business planning processes. It is critical that climate change resilience is integrated with our existing policies, procedures and monitoring processes. We must define specific actions and develop KPIs to support this process.

Further work to align with TCFD will include undertaking a scenario analysis and a financial materiality assessment of risks and developing a roadmap on how to achieve this.

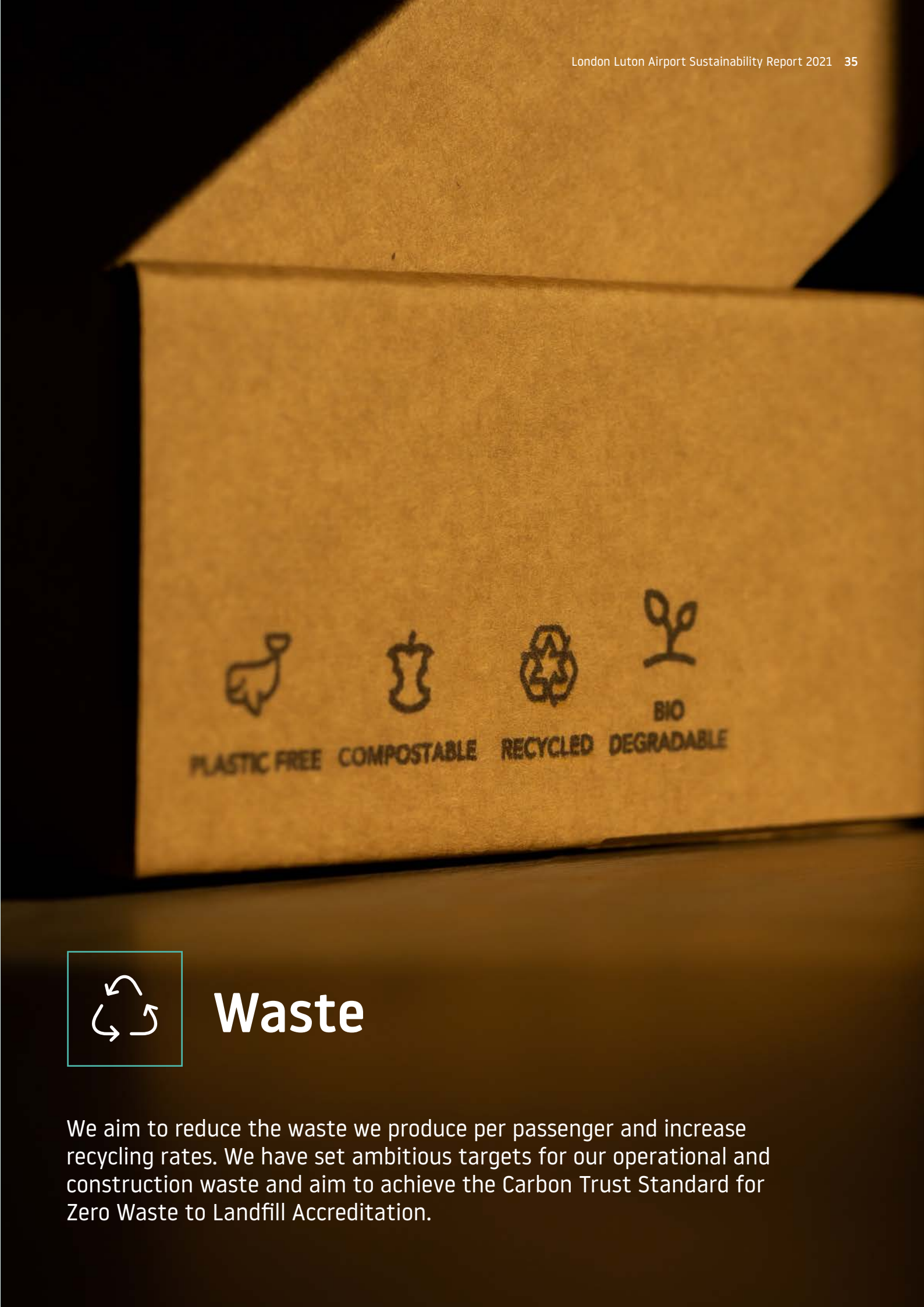
FOCUS IN 2022

- Work to align our climate resilience planning with TCFD guidance
- Continue to explore climate change related risks for the business
- Develop specific actions and KPIs as part of our climate resilience plan and integrate these with existing policies, procedures and monitoring processes



Waste

We aim to reduce the waste we produce per passenger and increase recycling rates. We have set ambitious targets for our operational and construction waste and aim to achieve the Carbon Trust Standard for Zero Waste to Landfill Accreditation.



OUR WASTE MANAGEMENT APPROACH

We manage all waste on-site, except airline waste. This includes waste from the terminal, concessions including shops and restaurants, airside operations, maintenance and construction, and our administrative operations.

We have set targets to reduce the waste produced per passenger to less than 0.12kgs, to recycle at least 70% of our waste by 2022, to achieve

the Carbon Trust Standard for Zero Waste to Landfill certification, and to ensure that less than 5% of non-hazardous construction waste goes to landfill. We operate segregated waste streams across the airport with specialist waste contractors in place to ensure waste is managed in line with legislation. In 2021, we appointed a new waste contractor, Cawleys, to help us improve our recycling rate.

Since 2016, we have increasingly engaged with teams and partners across the airport to implement better waste segregation and management practices, with a particular focus on single-use plastic.

WASTE PERFORMANCE

We have maintained a recycling rate of over 60% most years since 2017 (2020 being the exception), but have not yet achieved our target recycling rate of 70%. COVID-19 limited progress in the last two years, with the closure of shops and restaurants that would typically generate recyclable waste, and the use of single-use PPE and cleaning materials. However, having recognised we needed to do more to exceed our recycling target, we took action this year.

PROGRESS IN 2021

In 2021, we ran a tender for a new waste contractor and appointed Luton-based firm Cawleys on a "zero to landfill" contract. With their off-site waste sorting and segregation facility, they have the infrastructure to help us make a significant step change in recycling, and we are working with them to develop a waste improvement plan. We have also instigated on-site sorting of waste prior to removal by increasing the number of waste operatives. We also launched a new project to recycle more coffee cups and coffee grounds.

Our objective of achieving accreditation to the Carbon Trust Standard for Zero Waste to Landfill has, however, been delayed due to COVID-19.

We have set an objective to reduce operational waste (excluding aircraft waste) to 0.12kg per passenger by the end of 2023. We currently recycle 0.131kg per passenger.

We met our non-hazardous construction and demolition waste target. We recycled 47,032 tonnes of construction waste in 2021, and sent 54 tonnes to landfill.

Year	2016	2017	2018	2019	2020	2021
Recycled waste (tonnes)	690	1,459	1,430	1,493	426	370
Non-recycled waste (tonnes)	1,292	868	809	999	446	229
Total waste (tonnes)	1,982	2,327	2,239	2,492	872	599
Recycling rate	35%	63%	64%	60%	49%	62%
Waste per passenger (kg)	0.136	0.147	0.135	0.138	0.159	0.131



Water

We aim to reduce our water use per passenger and explore where we can use non-potable water across the airport.

OUR WATER MANAGEMENT APPROACH

Water is mostly used on-site for terminal facilities including toilets, cooking and drinking. Some water is used for landscaping and by the fire station. We have set a target to reduce the water used per passenger to 6.98 litres by 2023.

We work in partnership with Veolia to manage our water use. Using data from our growing number of water meters across the airport, we have identified opportunities to fix leaks and reduce water use. During the construction of the new terminal building, we installed low-flow taps and water saving dual-flushes, and we include water management

initiatives as part of our ISO 14001 environmental management system.

We had planned to identify and analyse opportunities to replace potable water with non-potable water, such as for vehicle cleaning or toilet flushing. This has been delayed due to COVID-19-related resource constraints.

We are currently re-tendering the water supply and infrastructure contract and will seek to improve our water conservation, develop water saving initiatives and identify opportunities to use non-potable water with any new contract.

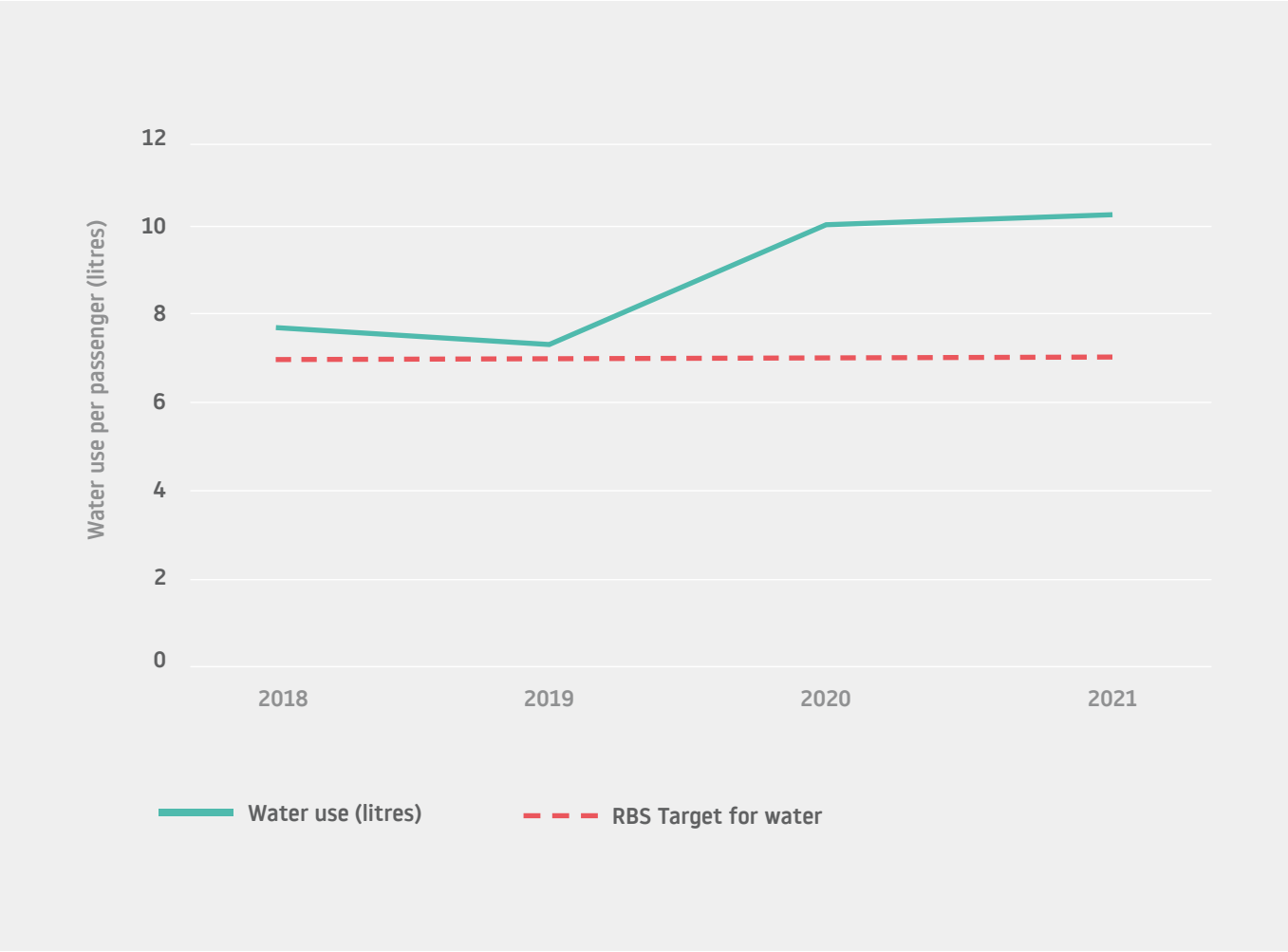
PROGRESS IN 2021

In 2021, whilst our total water use reduced, our water use per passenger has increased to 10.32 litres per passenger because fewer people travelled through the airport due to COVID-19 restrictions. This puts us behind our target to reduce total water use to less than 6.98 litres per passenger by the end of 2023.

WATER PERFORMANCE

2021's lower water use was because of the decrease in passengers from 2020 to 2021.

Year	2018	2019	2020	2021
Water use (litres)	126,792,000	133,334,000	52,693,000	48,200,000
Water use per pax (litres/pax)	7.67	7.41	9.63	10.32
2023 RBS target	6.98	6.98	6.98	6.98



FOCUS IN 2022

- Resume project to identify and quantify operations that currently use potable water

 Air quality

Air quality has always been an important issue for us and has been monitored in and around the airport since 2003. We are taking action to improve our air quality through our dedicated air quality strategy.

AIR QUALITY MANAGEMENT APPROACH

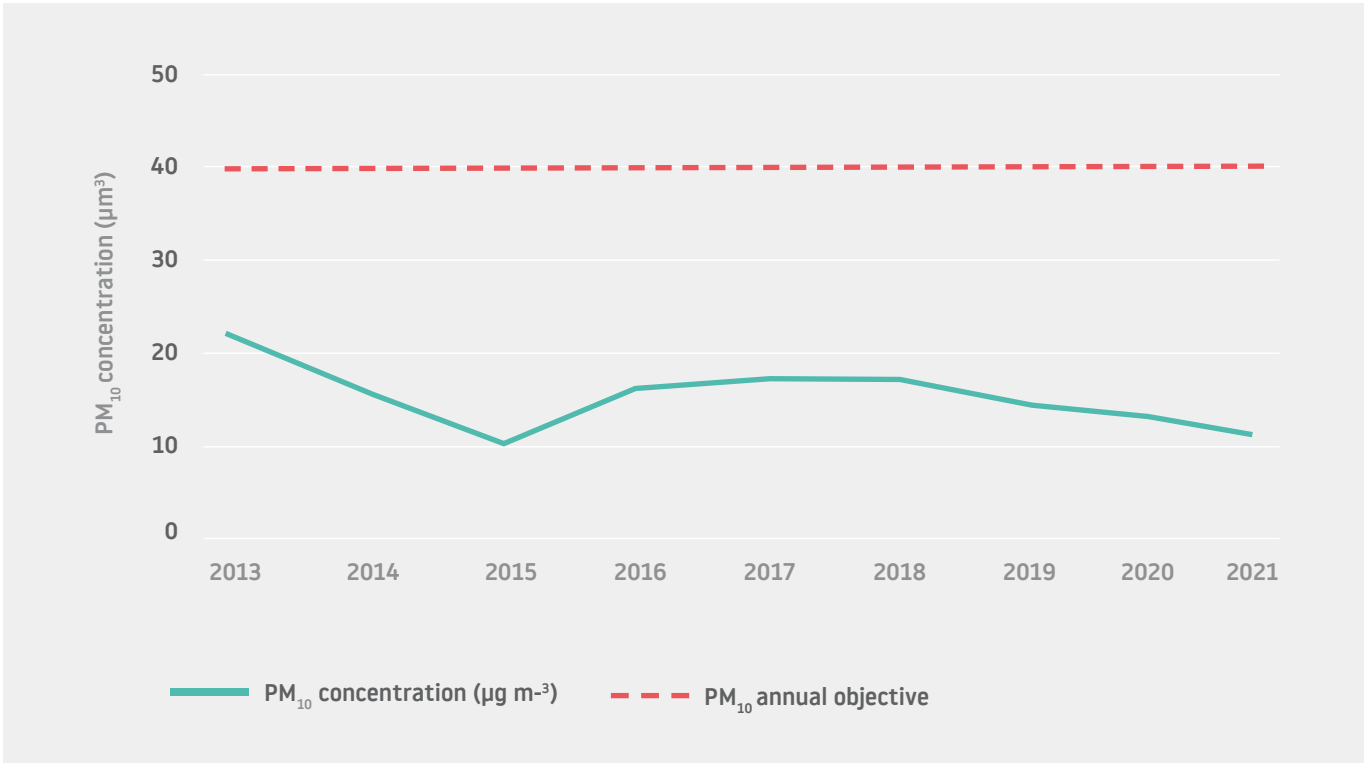
Emissions from road vehicles and aircraft have a negative impact on air quality. These include particulates and nitrogen oxides in particular. Across the airport, site areas with heavy vehicle traffic such as the coach terminal, access roads and runway apron, are likely to have higher levels of air pollution. We have a range of policies in place to minimise emissions. For example, we have no-idling policies for high-impact locations, with penalty charges for non-compliance. We also seek to use low emission vehicles for our own operations, as well as those of third parties, and bus and coach companies.

We use diffusion tubes to monitor air quality at 19 locations across the airport. Monitoring locations are classified in four groups: access roads, runway and flightpath, airfield, car park and drop-off zones. Since 2003, there has been automatic continuous monitoring of particulate matter (PM₁₀) using an EU reference equivalent monitor. In addition, indicative monitoring of nitrogen dioxide (NO₂) was performed at 19 sites in 2021, using diffusive samplers.

AIR QUALITY PERFORMANCE

During 2021, PM₁₀ particulate levels reduced 14%, from 14 µg m⁻³ (2020) to 12 µg m⁻³ (2021). The annual mean decrease in NO₂ concentrations when compared to 2019 was 39%, on average. These results show that the NO₂ concentrations in 2021 are similar to those in 2020 and, as expected, much lower than before the pandemic.

The small changes between 2020 and 2021 suggest that the COVID-19 lockdown restrictions were the biggest factor influencing the observed PM₁₀ and NO₂ concentrations. In its Air Quality Strategy (AQS), the UK Government sets an annual mean limit for PM₁₀ of 40 µg m⁻³, which we did not exceed in 2021.



PROGRESS IN 2021

In 2021, we set the goal of modelling air quality and developing an air quality management strategy by the end of 2022. The strategy will include an outline of initiatives to improve air quality.

PARTICULATES

The annual mean PM₁₀ was well within the UK Government limit.

NO₂

Our annual mean NO₂ ranged from 7.4 to 25.6 µg m⁻³. None of the diffusion tube sites are in areas where the public may be regularly exposed, so the comparison against the UK annual mean AQS objective of 40 µg m⁻³ is not applicable. However, we did not exceed this threshold in 2021. Continued lockdown measures contributed to the lower concentrations of NO₂ observed in 2021, compared to pre-pandemic levels.

FOCUS IN 2022

- Modelling air quality at the airport
- Developing an air quality management strategy



Responsible growth requires proactive management of all our environmental impacts. Noise can impact the quality of life for people and wildlife living under flight paths. We work with airline partners to phase out noisier aircraft and explore operational changes to reduce noise. We also engage with our community on ways to improve our noise management and noise complaints practices, as well as making the strongest possible representations to government for the need to modernise the UK's airspace.

OUR NOISE MANAGEMENT APPROACH

We work hard to reduce the impact of the airport's noise, with dedicated targets in our Responsible Business Strategy. Our Flight Operations Team launched our five-year Noise Strategy in 2019, with five priority areas:

1. Improving operational procedures
2. Quieter aircraft
3. Operational restrictions
4. Land use planning and mitigation
5. Working with the local community and industry partners

IMPROVED OPERATIONAL PROCEDURES

We monitor adherence to noise procedures through our Aircraft Noise and Track System. This captures flight information for aircraft operating within a 25-mile radius of the airport and generally up to an altitude of 12,000ft. The public can access this system from our website. The system receives data from our fixed and portable noise monitoring terminals, located within the neighbouring communities. This enables us to:

- Identify noise infringements and impose penalties where relevant.
- Monitor track-keeping and work with operators to improve performance.
- Monitor noise in all our local communities.
- Investigate complaints of disturbance and enquiries.

We have a suite of noise management initiatives in place, including:

OFF-TRACK VIOLATION SCHEME

To limit noise impact for our communities, departing aircraft are required to follow specific paths called Noise Preferential Routes (NPRs). Aircraft flying outside of this corridor are off-track and may be subject to a penalty, which is paid into the airport's Community Trust Fund.

NOISE VIOLATION SCHEME AND LANDING CHARGES

We have set daytime and night-time noise limits for departing aircraft. In 2020, we reduced these limits to 80dB(A) during the day and 79dB(A) at night. Any aircraft exceeding these limits will be fined, with all fines going to the Community Trust Fund. To avoid noise at night, which is often perceived as louder and more disruptive, we charge a higher landing fee for night arrivals.

CONTINUOUS DESCENT APPROACH

All operators are encouraged to use a Continuous Descent Approach (CDA). This technique means an aircraft stays higher for longer and descends at a continuous rate to the runway threshold, therefore reducing periods of prolonged level flight at lower altitudes. CDA requires less fuel, produces fewer emissions and reduces noise by avoiding the use of engine thrust. We increased our target for CDA compliance to 92% in 2020 and reached 89% in 2021.

DELAYED LANDING GEAR

When an aircraft's landing gear is deployed, the air disturbance it creates causes noise and extra drag. Delaying landing gear deployment reduces aircraft noise by up to 50% for communities between five and seven nautical miles from the runway.

AIRSPACE MODERNISATION

The UK's airspace modernisation strategy will allow greater control and precision for aircraft routing, allowing aircraft to fly optimised routes, and the use of precision satellite navigation and electronic surveillance systems to redesign terminal routes and improve safety. LLA is using this opportunity to explore options for aircraft to reach higher altitudes sooner on departure and remain higher for longer on arrival. This will create significant environmental benefits.



QUIETER AIRCRAFT

We operate a noise quota count system during the night, with each aircraft allocated a score based on how much noise they produce. We do not allow aircraft with a quota count of two or more to operate at night. Our quota count limit sets a noise budget that cannot be exceeded. In 2021, the airport used 1,276 of its 3,500 night quota. This limit will reduce from 3,500 to 2,800 by 2028.

OPERATIONAL RESTRICTIONS

There is a rolling limit to the number of aircraft movements permitted during the night and early morning. Night-time aircraft movements (between 23:30 and 06:00) are limited to 9,650 in any 12-month period. The limit for early morning movements is 7,000. In 2021, there were 6,913 night movements and 2,423 early morning movements. Many of the cargo aircraft movements were deliveries

of PPE and COVID-19 tests for the NHS. We have set targets to phase out louder aircraft from the airport, with no Chapter 3 aircraft to operate after 2020 and 100% of aircraft to be Chapter 4 or better by 2022. There were no Chapter 3 aircraft movements from London Luton in 2021 and we are on track to achieve our 2022 target for 100% of aircraft being Chapter 4 or better.

LAND-USE PLANNING AND MITIGATION

Together with an independent noise analyst and our London Luton Airport Consultative Committee (LLACC) Noise Insulation Sub-Committee, we offer noise insulation to eligible properties. Our Annual Noise Contours (which map areas of noise exposure on the ground) determine the eligible properties each year. The scheme covers both residential and non-residential properties in Bedfordshire and Hertfordshire.

Depending on any existing insulation in the property, double glazing, secondary glazing and ventilation units can be provided. Rooms eligible for insulation include living rooms, dining rooms, kitchen-diners and bedrooms. We have developed a strategy to reduce the area exposed to noise, and work closely with Luton Council to restrict any inappropriate development within noise sensitive areas.

We submitted our strategy to reduce noise contours in line with our noise action plan to Luton Council in 2020. This formed part of the planning application to increase our passenger cap to 19 million. For clarity, this is not linked to the plans in the Development Consent Order (DCO) to expand capacity at the airport to 32m passenger per year.

WORKING WITH THE LOCAL COMMUNITY AND INDUSTRY PARTNERS

We investigate, monitor and respond to all concerns related to aircraft activity. Information on how to contact us can be found on our website and complaints can be submitted via telephone, email or our online flight tracking system (TraVis).

We also meet with a Consultative Committee, which provides a formal mechanism for the airport to engage with members of the community. The committee meets on a quarterly basis and includes representatives from the local authority, community groups, airport users and other stakeholder groups.

In 2021, due to COVID-19 restrictions, we held one in-person surgery and one online. We had planned to complete a noise survey in 2021, but the decrease in aircraft movements would not create a representative view of noise impacts. We will complete the survey before the end of 2023 once passenger numbers have increased.

NOISE PERFORMANCE AND COMPLAINTS

Aircraft movements have slightly reduced since 2020. There were six noise violations in 2021 (2020: 2), with airlines paying fines totalling £31,000. The increase came from a single private aircraft which had not previously operated from Luton. We worked with the owner to reduce the noise to prevent further violations.

In 2021, the number of new noise complainants reduced in line with the reduction in aircraft movements. However, there was a significant increase in the total number of

noise complaints received (2020: 4,489 complaints, 2021: 12,432 complaints). This increase was due to an organised complaints campaign, which generated an additional 8,000 complaints during the year. In response, the Flight Operations team worked with representatives from local noise action groups, Luton and District Association for the Control of Aircraft Noise (LADACAN) and St Albans Quieter Skies (STAQS), to hold a dedicated webinar for a group of residents who had been making a

significant number of complaints. We set up the dedicated webinar to discuss the complaint procedures and provide information from STAQS and LADACAN about how they work with the LLACC committee.

Beyond that, we acknowledge that the airspace change is a common reason for additional complaints. There were no breaches in noise contours in 2021.



“I oversee all aspects of flight operations at the airport. My team is responsible for managing the impacts of aircraft on people, particularly noise, and the work we've been doing to modernise the airspace for the airport.”

— Nicole Prior, Head of Flight Operations

	2020	2021	
Total aircraft movements	63,593	61,560	↓
Day movements (07:00 – 23:00)	55,929	54,647	↓
Night movements (23:00 – 07:00)	7,664	6,913	↓
Early morning movements (06:00 – 07:00)	2,525	2,423	↓

Track violation	11	23	↑
Departure noise violations (day)	2	6	↑
Departure noise violations (night)	0	0	-

24hr Continuous Decent Approach (% achieved)	88%	89%	↑
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Noise complaints	4,489	12,432	↑
Complainants	395	289	↓
Number of new complainants	165	123	↓

PROGRESS IN 2021

After a pause due to the pandemic, we were able to restart the noise insulation scheme with two contractors and an increased budget. We also resumed public noise surgeries and at least two are scheduled for 2022. This will be by appointment only, rather than drop in. [More information, as well as a booking form, can be found here.](#)

We received arrival airspace change approval in November 2021 for a new holding pattern and arrival flightpaths after a consultation process throughout 2021. We will start to implement this from February 2022.

We conducted a review of whether "Slightly Steeper Approaches" would be possible to reduce noise impacts. We prepared a change proposal for the operators and air travel controllers NATS to review, which was discussed at the Flight Operations Committee meeting. Feedback was collated and evaluated, and it was concluded that at this point the approach is not viable for LLA.

We had planned to run a trial in 2021 to evaluate the effectiveness of the Noise Abatement Departure Procedures (NADP) used at London Luton Airport. This trial is now

planned to take place in August 2022 for at least two months, working with five airlines. It will review NADP and work with airlines to identify and implement improvements. As well as monitoring the impact of the various procedures on noise, we will also monitor NOx emissions and fuel usage to understand if changing the NADP creates a significant impact on air quality.

Case studies

VIRTUAL PUBLIC NOISE CONSULTATION

We usually hold public noise surgeries as part of airspace consultations. However, because of COVID-19, we held a virtual consultation for our arrivals airspace change consultation from October 2020 to February 2021. This online consultation was the first of its kind in the UK and included a virtual exhibition, videos and postcode checker.

In response to the consultation, we submitted new flight plans and received arrival airspace change approval in November 2021. Together, the new procedures improve the safety of the airspace, reduce delays and the need for holding (reducing carbon emissions and noise), and noise is dispersed over a larger area.

Luton will be the first airport to conduct a low-level airspace change following the Civil Aviation Authority’s (CAA) process. We will begin the implementation in February 2022.

AIRSPACE MODERNISATION: REDUCING NOISE DURING TAKE-OFF AND LANDING

The Civil Aviation Authority (CAA) is undertaking a national airspace change programme, as part of their Airspace Modernisation Strategy.

We are using this opportunity to look at options of aircraft reaching higher altitudes sooner on departure and remaining higher for longer on arrival, enabling significant environmental benefits such as reducing noise and carbon emissions.

More information can be found [here](#).

SLIGHTLY STEEPER APPROACH ASSESSMENT

In our ongoing efforts to reduce aircraft noise, we explored whether we would be able to adopt Slightly Steeper Approaches at the airport.

Typically, aircraft approach at an angle of 3.0°. Adopting a steeper approach of 3.2° reduces noise because:

- Aircraft fly higher for longer, reducing the area affected by engine noise.
- Steeper descents require less engine power, further reducing engine noise.

We completed a detailed study and engaged with airlines and NATS to seek their feedback on the feasibility of Slightly Steeper Approaches.

Unfortunately, two limitations at London Luton Airport currently prevent us adopting Slightly Steeper Approaches. Firstly, we have a shorter runway than other international airports, which means aircraft would need to use reverse thrust to slow down more quickly, increasing ground noise. Secondly, we have more frequent low visibility conditions due the microclimate at our location.

We will continue to explore ways to reduce noise impacts as part of our Responsible Business Strategy and Noise Action Plan.

The full feasibility study is available [here](#).

FOCUS IN 2022

- Resume in-person noise surgeries
- Arrivals airspace change, which was implemented in February 2022, will be studied for 12 months to review its implementation
- Trial of Noise Abatement Departure Procedures



Sustainable travel

Journeys start the moment our passengers leave their home or office, so we are working hard to help make their journeys more sustainable. We have set targets to reduce single car use and increase access to the airport via sustainable travel options, such as the new express rail services and the Direct Air-Rail Transit (DART) linking Luton Airport Parkway and terminal. We are also exploring how we can transition to more sustainable vehicles within our own operations.

OUR SUSTAINABLE TRAVEL APPROACH

Passenger surface access contributes around 50% of our total carbon footprint, and tackling this is therefore a critical part of our carbon reduction strategy. We have set three key targets within our Responsible Business Strategy. These will be implemented through our Airport Surface Access Strategy (ASAS), which has three key aims:

1. To promote sustainable surface transport options (e.g. reducing employee single occupancy vehicle use, promoting our car sharing scheme, reviewing our own fleet).

2. To reduce the impact of surface access to the airport on our local community (e.g. working with local authorities to shift customers to more sustainable transport options, increasing the number of bus bays, improving proximity of coach and bus services, and installing digital totems and signage improvements).
3. Encouraging passengers to travel with more sustainable transport options to the airport (e.g. by rail, bus and coach).

COVID-19 related travel restrictions reduced the total number of journeys

made by passengers and staff by around 90% during 2021, and there has been an understandable shift from public transport towards single occupancy private cars. During 2020 and 2021, National Express and Arriva suspended some services to the airport as demand reduced. Consequently, it has not been possible to meet our sustainable travel targets.

Due to lower passenger numbers, we only received limited data on travel mode from the CAA, and we have paused sending out travel surveys until the number of journeys will provide worthwhile and reliable insights.

Passenger mode	2012	2013	2014	2015	2016	2017	2018	2019	2020*	2021**
Drop off (%)	27	28	25	27	28	43	45	45	56	57
Car park (%)	23	23	28	27	23	20	17	16	31	16
Rail (%)	17	16	14	16	16	17	17	21	6	17
Bus/coach (%)	16	16	15	15	16	16	16	17	3	8

* Q1 results only, unweighted and with heavy COVID impact ** CAA Snapback Survey 2021 - unweighted

Staff mode	2010	2012	2014	2016	2018	2020	2021
Drive alone (%)	66	66	62	68	59	78	75
Car share (%)	12	8	11	7	8	1	1
Taxi (%)	1	1	0	1	1	2	1
Motorcycle (%)	1	1	1	1	1	5	1
Rail (%)	5	5	10	7	8	2	6
Bus/coach (%)	7	9	8	9	16	3	10
Cycle (%)	2	2	2	2	2	3	2
Walk (%)	5	6	7	5	5	6	3

Our staff travel survey revealed that 22% of staff travel to work on foot, by public transport or by bicycle.

We run an airport-wide Sustainable Travel Forum, which is open to our partners and other on-site businesses. In 2021, we held two virtual meetings of the Airport Transport Forum in June and December, welcoming a wide range of partners. We discussed how transport providers can achieve

PROGRESS IN 2021

A new non-stop express train service run by East Midlands Railway has been introduced between London St Pancras and Luton Airport Parkway. The service will operate uses electric trains every 30 minutes between 06:00 and 22:00 daily, with additional late night and early morning services to serve airport departures. The service



carbon neutrality and their approach to managing climate related risks, such as extreme weather.

Our pooling contract which allows airline partners to share equipment is going to be renewed in 2024, at which point we will be looking to include more pooled ground support equipment (e.g. aircraft steps) and to install electric/low carbon alternatives.

is the first significant step towards achieving a stand-alone Airport Express service.

Some of our travel operators have invested in more efficient vehicles to reduce the carbon and air quality impact from their fleets. For example, Arriva have invested heavily in new fleets for its service from LLA, moving to Euro-6 buses.

“I look after the Airport Surface Access Strategy. I work with airlines and partners across the airport to improve sustainable travel to and from the airport.”

— Graham Sweedy, Operations Manager, Surface Access

With Electric Vehicles (EVs) becoming more common, we will establish a clear strategy for EV charging through to 2040. This will help meet the changing needs of passengers, as well as buses, taxis, staff cars and operational vehicles. We are planning to update our Airport Surface Access Strategy in 2022.

Our new EV parking tariff gives preferential rates for up to 30 minutes parking for electric vehicles, plus five Tesla and ten type 2 tethered charging points on the 2nd floor in Terminal Car Park 1.

Case studies

LONDON LUTON AIRPORT OPENS NEW TAXI RANK FOR LOCAL DRIVERS, SUPPORTING EVS

In 2021, we signed a new partnership with a greener local Hackney Carriage service. Fifteen percent of the vehicles serving the airport are Electric Vehicles (EVs).

The taxi rank for this new partnership is initially located in the passenger drop-off zone. During 2022, it will move to a new dedicated area immediately outside the terminal. We believe this will drive healthy competition and therefore increase the availability of more sustainable vehicles at the airport.



DART: SUSTAINABLE TRAVEL TO THE AIRPORT

As part of our sustainability commitments and Responsible Business Strategy, we want to shift a significant amount of passenger traffic from road to rail.

Poor access between the airport and Luton Airport Parkway station has historically been a major barrier to increasing the number of passengers travelling by train. The new Direct Air-Rail Transit (DART), opening in 2022, will really help to lower that barrier.

Delivered by Luton Rising, DART is a huge step forward in sustainable airport access and a leading example of how sustainability should be embedded into major projects.

The way the Luton DART was built reflects our own community values.

For example, the Construction Skills Training Hub gave 720 local people the skills to enter the construction industry. One hundred percent of sub-contractors signed the project’s Social Value Charter. There was also a mandate for VFK, the lead contractor, to procure materials and labour locally. All of the following came from within 20 miles of Luton:

- 80% of materials spend (excluding steel and aggregate)
- 90% of plant and equipment
- over 80% of the unskilled project workforce
- 100% of unskilled new recruits
- 100% of sub-contract and materials tenders including a local supplier

- VFK’s approach also supports our commitment to using and training a local workforce. The company has:
- Taken on 30 apprentices throughout the life of the project
 - Provided work experience opportunities for 25 people in education and 15 people outside education, training or employment
 - Created 78 new jobs for local people
 - Attended at least 30 students’ careers information, advice and guidance events
 - Provided training and qualification for more than 250 of the sub-contractor workforce.

FOCUS IN 2022

- Promote sustainable surface transport options
- Update our Airport Surface Access Strategy
- Continue to focus on providing the infrastructure that supports Net Zero travel
- Engage with concessionaires on sustainability objectives



Spills

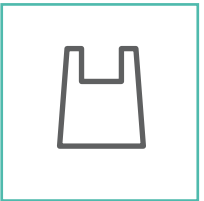
We aim to further reduce the number and severity of spills that occur at the airport (e.g. oil/fuel).

OUR APPROACH

Spills of oils, fuels or chemicals can occur anywhere at the airport. If not properly managed, spills can contaminate water courses and land. We have risk assessments and procedures to reduce the risk of a spill from occurring, and robust

processes to respond to spills effectively. There are spill kits in key locations across the airport, and staff are trained on how to safely respond to spills. All spills are categorised and recorded based on volume, and environmental and operational impact.

There were 46 spills in 2021 (versus 55 in 2020). Three of these were classified as major (scoring six out of nine on the risk assessment); the rest were minor or negligible.



Single-use plastic

We will work with all our on-site partners to reduce single-use plastics, and we will include a requirement in all new contracts to avoid their use.

OUR APPROACH

We aim to eliminate single-use plastic from the airport wherever possible and have set a target to include a requirement in all new concession agreements. We reviewed the prevalence of single-use plastic in 2019 and found that many food outlets had already moved

to replacing plastic cutlery with compostable alternatives. With food outlets closed for much of 2021, and the COVID-19 secure practices often using single-use items to avoid potential sources of contamination, we have not completed a further audit this year.

We expect several new concession agreements to be signed as travel restrictions are lifted, which will provide a good opportunity to refocus our collective efforts on reducing single-use plastics at the airport.



Light pollution

The exterior lighting of the airport is subject to current regulations on operational safety which we comply with.



De-icing

We will minimise the environmental impact from the use of de-icing fluid by adopting techniques and technologies that use fluid efficiently and allow us to capture and collect used fluid.

OUR APPROACH

Run-off from an airport can impact water quality if the glycol used for de-icing aircraft enters water courses. We employ technologies and processes to minimise our use of glycol and prevent run-off. We also monitor water quality at discharge points so we can respond quickly if necessary.

To reduce the amount of glycol used, we use a forced air/blend temperature technique, working closely with contractor IDS and airline partners easyJet and Wizz Air.

During 2020, we purchased two new ground de-icers and use GPS tracking and a more efficient, finer mist to further reduce the glycol required.

We also have a dedicated de-icing pad adjacent to Taxiway Foxtrot that was built as part of our redevelopment project, increasing our dedicated de-icing areas to seven positions. We believe that following the opening of Taxiway Foxtrot in 2019, we have the largest remote de-icing capacity of any UK airport. The proximity of Taxiway

Foxtrot to the runway allows aircraft to taxi directly to the runway, meaning less glycol is needed whilst maintaining the required safety margin.

In 2020, we installed two new water quality monitors which provide continuous data, allowing us to act promptly if necessary. As part of our ISO 14001 environmental management system, we also monitor and manage spills. In 2021, there were no instances where discharges exceeded permitted limits.

KPI	2021
Type 1 De-icing fluid sprayed (litres)	89,247
Type 2 De-icing fluid sprayed (litres)	18,154
Type 4 De-icing fluid sprayed (litres)	9,050
De-icing fluid collected (litres)	Data not yet available
% of airframes de-iced in designated capture area	Target paused



“I’m responsible for managing all airside operations, which includes the safe operations of aircraft on the ground, ground equipment, and habitat management. I lead the airport’s safety stack initiative, a safety partnership with all organisations that work on the aerodrome.”

— Liam Bolger, Head of Airside Operations

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
1.1	Carbon accreditation	Achieve the ‘Mapping’ level of certification within the Airport Carbon Accreditation Scheme by end of 2020 and the ‘Reduction’ level of certification by end of 2022.	Completed	COMPLETED
				Level 3 status complete (Optimisation).
1.2	Carbon accreditation	Develop a Carbon Management Strategy with ambitious emission reduction target by the end of 2020.	Behind Target	BEHIND TARGET
				Committed to achieving neutrality by 2026 or sooner and Net Zero by 2040. We have developed an outline carbon reduction plan with a detailed Net Zero roadmap being developed in 2022.
1.3	Energy	Source 100% of electricity from renewable sources by end of 2021.	Completed	COMPLETED
				Completed April 2021.
1.4	Energy	At least 25% of the energy we use to come from on-site renewables by end of 2026.	In progress	IN PROGRESS
				Enabling work was commenced in 2021.
1.5	Energy	Reduce operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023.	In progress	IN PROGRESS
				5.8 kWh/pax achieved in 2021 due to continued significant reduction in pax numbers. Site-wide energy audit planned for 2022 to identify further energy reduction/efficiency measures.
1.6	Water	Reduce total water consumption to less than 6.98 litres/pax by end of 2023, representing a 10% reduction from the 2018 baseline.	Behind Target	BEHIND TARGET
				10.32 litres per passenger in 2021 (significant reduction in passenger numbers).
1.7	Water	Identify and quantify operations that currently use potable water but could be served by non-potable water by end of 2021.	Behind Target	BEHIND TARGET
				No further update.
1.8	Waste	Recycle at least 70% of non-hazardous operational waste (excluding aircraft waste) by end of 2022.	Behind Target	BEHIND TARGET
				Currently 62%.

Target	Theme	Objective	Status	Progress update
1.9	Waste	Reduce operational waste (excluding aircraft waste) to 0.12 kg per passenger by end of 2023.	In progress	IN PROGRESS
				0.131kg per passenger currently, heading in the right direction for next year.
1.10	Waste	Achieve the Carbon Trust Standard for Zero Waste to Landfill accreditation by end of 2020.	Paused	PAUSED
				Accreditation delayed due to COVID-19, however the new waste supplier contract, which commenced in 2021 includes a requirement for zero operational waste being sent directly to landfill.
1.11	Waste	Less than 5% of non-hazardous construction & demolition waste by weight from qualifying projects to be sent to landfill by 2021 ² .	Completed	COMPLETED
				54 tonnes to landfill while 47,032 tonnes recycled.
1.12	Air quality	Develop an air quality strategy which includes measures to limit the airport’s contribution to air pollution by end of 2022.	In progress	IN PROGRESS
				Currently working on the air quality management strategy, to be completed by end of 2022.
1.13	Noise	No Chapter 3 aircraft operating at the airport by 2020.	In progress	IN PROGRESS
				No Chapter 2 aircraft or marginally compliant Chapter 3 aircraft operated in 2021. Although some aircraft were Chapter 3, all aircraft were Chapter 3 or quieter.
1.14	Noise	100% Chapter 4 aircraft or better by 2022.	In progress	IN PROGRESS
				We are implementing a new airport operations database (AODB) known as project lithium which will help us to monitor and report more accurately.

Target	Theme	Objective	Status	Progress update
1.15	Noise	Assess if Slightly Steeper Approaches can be adopted and implement recommendations by 2023.	Completed	COMPLETED
				Slightly Steeper Approaches study was conducted with operators, it is unlikely we can implement this at LLA. Report was published early 2022.
1.16	Noise	Carry out a survey of local communities to seek feedback on our approach to noise management and our complaints service by end of 2020 and define improvement targets.	Paused	PAUSED
				We have paused the stakeholder survey as we felt that with aircraft movements down significantly on the previous year, a survey would not provide a representative view of noise impacts in the community. We will instead complete the survey before the end of 2023 at a time when passenger numbers have increased.
1.17	Noise	By 2020, develop a strategy to define methods to reduce the area of the noise contours by 2028 for the daytime and the night-time.	Completed	COMPLETED
				A draft was submitted to LBC early 2021, but was withdrawn as the 19mppa variation was in process and the new permission will require a noise contour reduction strategy to be submitted within 12 months which will also push the target date to 2031. This is based on the current planning conditions though, and not those of the DCO Consent.
1.18	Sustainable travel	Reduce single occupancy vehicle travel to the airport for customers and employees (employees: 2022 – 64%; customers: 2022 – 47%).	Behind Target	BEHIND TARGET
				In 2021, due to Covid-19 75% of employees and 57% of customers travelled to the airport via single-occupancy vehicle.
1.19	Sustainable travel	More than 28% of employees and 36% of customers travelling to and from the airport using sustainable modes of transport by 2022 ³ .	In progress	IN PROGRESS
				28% of employees and 36% of customers travelled to and from the airport using sustainable modes of transport in 2022.
1.20	Sustainable travel	Promote and monitor sustainable travel at the airport. Secure 12% participation in the staff travel survey by 2020 and increase the number of organisations attending the airport travel forum (2022: 12).	Completed	COMPLETED
				Based on LLA staff, we secured a response rate of 24%, exceeding the 12% target.

Target	Theme	Objective	Status	Progress update
1.21	Sustainable travel	Establish a plan for low-carbon airside and landside vehicles by mid-2021.	In progress	IN PROGRESS
				A number of initiatives are on-going, including decarbonisation of taxi fleets; and an airside and landside vehicle review being run by the sustainability team. Upcoming tenders will include operator low-carbon initiatives.
1.22	Spills	Reduce the number of fuel spills with a severity rating of 'Major' to less than five per year by 2025, and zero spills with a severity rating 'Hazardous' or 'Catastrophic'.	In progress	ON TARGET
				Three major spills in 2021, none rated hazardous or catastrophic.
1.23	De-icing	More than 95% of all airframes will be de-iced in areas designed for capture and collection of de-icing fluid by March 2024.	Paused	PAUSED
				This metric was put on hold due to reduced air travel from COVID-travel restrictions. This will be progressively picked up when air travel resumes.
1.24	Single-use plastic	All new concession contracts to include a requirement for zero single-use plastics.	Completed	COMPLETED
				The single-use plastics clause has been added to the new concession agreement for use in all future tenders at the airport.
1.25	Climate change risk	Identify climate change risks and develop a resilience plan and integrate it into business risk assessment process by the end of 2022.	Completed	COMPLETED
				Climate change adaptation report completed.

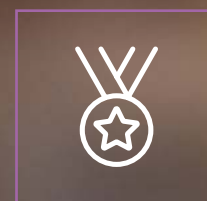
Supporting our community

Our community programme is focused on three key themes: healthy today, skilled tomorrow and alleviating poverty. We work within our communities to create positive impact, supporting charity partnerships and community groups through initiatives and campaigns that help to make a difference locally.

IN THIS SECTION:



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Community wellbeing and noise management



PAGE 61
Community skills



PAGE 63
Staff volunteering



PAGE 64
Charitable giving

We contributed over £200,000 to community projects

We continued to contribute to our Community Trust Fund in 2021, giving £213,345 to support our three key focus areas: healthy today, skilled tomorrow and alleviating poverty. The fund awarded 27 grants, benefitting approximately 10,000 people.

£20,000 raised for East Anglian Air Ambulance and Luton Foodbank

We raised £19,272 for our two charity partners, Luton Foodbank and East Anglian Air Ambulance, from a golf day and passenger donations. Some 218 crates of food and hygiene items, worth £4,360, were also donated to the food bank, helping more than 2,000 local families. These were collected by our security team, who removed the items from passengers unable to take the items airside.



Exceptional staff volunteering efforts

Because of the pandemic, our centrally organised volunteering programme could not run as normal. However, many of our colleagues chose to volunteer independently, going above and beyond to support community initiatives. Many staff volunteered at the local vaccination centre and at Luton Foodbank.

Sponsorship of community awards

We sponsored two awards this year: Community Interest and Love Luton. The awards recognise those in our community who have dedicated volunteering time to support charities and local services.

“I am delighted to be part of a talented team that makes a positive impact amongst our employees and local communities. I am responsible for the airport's community initiatives, working with staff and airport partners. This includes volunteering, charitable giving and partnerships that support employment, skills and good health in our community.”

— Louise Hanlon, Community and CSR manager

Expanding the team

The pandemic highlighted the huge importance of supporting people in our local communities. In recognition of this, we expanded the community team and recruited two new members of staff. Louise Hanlon is the new Community and CSR Manager and Joshua Keating joined as Community and CSR Executive.

The new team will focus on employee engagement, charity partnerships, volunteering and community impact through our supply chain. It will also develop a centre of excellence to help people choose careers in aviation.

The team is a central point of contact for anyone to connect with our sustainability agenda. It also works to create ambassadors for sustainability within various business functions.

Our community support approach

A key part of our Responsible Business Strategy is supporting positive change in our community. Our community initiatives all fall within three themes:

1. Healthy today
2. Skilled tomorrow
3. Alleviating poverty

In 2022, we will add a fourth theme, Environment. We support these themes through:

- Employee engagement:
 - Providing volunteering and fundraising initiatives that enable employees to give back.
 - Match employees funds raised through LLA match funding scheme of £50 per year.
- Grant giving to local causes via our Community Trust Fund.
- Creating partnerships, particularly with charities, Luton Borough Council, Luton Rising, schools and universities, and training providers.

We have seven targets in the Responsible Business Strategy, which can all be found in the table at the end of this section.

1. Healthy today



Community wellbeing and noise management

We will improve wellbeing in our community through hosting quarterly noise surgeries. This will ensure local residents are able to access all the support we have in place to address noise impacts.

OUR COMMUNITY WELLBEING AND NOISE MANAGEMENT APPROACH

Working in partnership with our sustainability team, our noise and track team hold public surgeries to share information and answer questions about aircraft noise. We were only able to complete one public surgery and an online webinar this year due to COVID-19 restrictions and associated resource constraints, rather than the six we had initially planned. The surgeries will start again in May 2022.

Wellbeing became an even more important focus for us during 2021 because of the mental and physical health impacts of the pandemic. Our wellbeing team collaborated with community partners to run a calendar of events throughout the year.

Find out more about how we supported our staff's wellbeing during the pandemic on page 84 in the Grow with our people section.

FOCUS IN 2022

- Develop an environmental quarterly grant funding stream with our trust fund
- Invest all noise and track fine funding into the environmental grant process

2. Skilled tomorrow



Community skills

We work with local schools to provide career training, with a focus on communication and problem solving. Through our Connect programme, we equip young people with the soft skills to make a smooth transition from education to the workplace. We support people to start a career in aviation through schemes such as our Get into Airports programme, run in partnership with the Prince's Trust.



OUR COMMUNITY SKILLS APPROACH

The airport is in a great position to support skills and training in the community. As a major employer with a wide range of professions and trades, we are keen to work with local schools to share skills and knowledge that will help young people start their careers successfully. We showcase exciting opportunities to work within aviation and engineering, and provide a pathway into working with us through our Get into Airports programme for 18-to-30-year olds. In 2021, we held a recruitment fair and invited the Prince's Trust as a charity partner that helps young people into employment.

Due to COVID-19 restrictions, we were not able to run school visits or training sessions in person during most of 2021.

Typically, we visit schools to run our Connect programme, which develops students' communication and problem-solving skills. We also invite pupils to visit the airport site and collaborate with other organisations to offer more schools airport visits, both providing employees an opportunity to share their experience and students with insight into the world of work.

Our aim is to provide 10 school visits every year, but COVID-19 restricted this in 2021. The Connect programme will restart in 2022 with a broader focus on STEM and women in aviation to create greater social impact.

COMMUNITY SKILLS PERFORMANCE

We had to pause our work on community skills for much of the year, but the programme was restarted in November 2021. Despite the restrictions, we are on track to give 300 students insight into the world of work.

Both our Prince's Trust and Connect programmes will restart in 2022 and we're on track to meet our target.

Case study

A CAREER IN AVIATION

We partner with the Prince's Trust to provide work placements for young people starting their careers. James Lynam and Ben Merritt both first came to work at the airport through the Prince's Trust scheme, and Louise Hanlon, our Community and CSR manager met them to learn more about their experience.

Louise: What do you do at the airport?

James: I am a Cargo and Airside Services Officer, which I have only been in a few months now.

Ben: I'm an Operations Safety Officer (OSO) in training.

Louise: When and how did you start working at Luton Airport?

James: I started work at London Luton Cargo all the way back in 2013 after taking part in the Prince's Trust programme.

Ben: I was part of the Prince's Trust programme in 2011, and ended up joining the LLA cargo team in 2012. In 2015, I happily accepted a full-time contract as a cargo handler. My new role as an OSO in training is in airfield operations.

Louise: What is it like working in the air ops team?

James: Everyone is friendly and works to get the job done. Being part of the air ops team gives anyone who wants to progress the tools to make that happen.

Louise: How have you developed new skills and knowledge?

Ben: I've developed my skills and knowledge over the years, and that's accelerated now that I'm on the airside of things. Before I only worked in cargo and that's all I knew, but now I'm getting a bigger picture of the whole airport.

Louise: Who or what has had the biggest influence on you at the airport?

James: There have been a few people within the cargo team who really helped me progress and get me where I am today. I can't thank them enough. The big influence for me was having a team around me that I could call family – ready to help when I needed it.

Louise: What advice would you give to someone wanting to get into aviation?

Ben: Just come in with a can do and hardworking attitude, and you really can go far and progress as far as you feel comfortable.

James: Make sure it is something that interests you and you want to know about. It's a great place to work, so if aviation excites you, come and see what we do.



FOCUS IN 2022

Restart existing programmes to create an even greater impact, in particular:

- Prince's Trust programme, with participants guaranteed an interview for a security role
- Connect programme, introducing new schools with an inclusive focus on STEM and women in aviation



Staff
volunteering

Our volunteering policy allows employees to volunteer two days per year with paid time off. Over the next two years we will create new programmes to increase employee volunteering uptake, ensuring we give back even more to our communities.

OUR VOLUNTEERING APPROACH

We aim to increase the number of staff involved in our volunteering programme, LLA Heroes. We are currently nominating community champions and senior sponsors to promote the scheme. We exceeded our volunteering targets of 5% in 2019, and 10% in 2020. In 2021, our aim was for at least 15% of staff to take up to one day paid leave to volunteer for good causes. However, because of the pandemic we had to pause our formal programme and did not achieve this goal.

Despite this, there were remarkable efforts this year from individual members of staff who chose to volunteer independently. More than 100 volunteers helped with the vaccine rollout at local vaccination centres. There was an exceptional effort from many volunteers around Christmas, supporting additional customer service needs and other ad-hoc pandemic-related necessities.

Senior Airport Chaplain organised performances from local schools and choir groups who sang in the airport during the Christmas period. Tricia Harris from the operations team, along with 30 volunteers, organised and ran the LLA annual Charity Golf day. Together, our staff raised almost £20,000 in 2021 for our charity partners, East Anglian Air Ambulance and Luton Foodbank.

FOCUS IN 2022

- Providing greater choice and opportunities that are inclusive for all LLA employees to transfer skills, knowledge and expertise through volunteering in our local communities



PEOPLE STORY

Terrie is a long-term employee, who after 33 years is still voluntarily supporting many of our community and fundraising efforts. Her formal role is to manage the Billing Team and ensure we invoice our customers correctly and promptly. Beyond that, Terrie has been involved in voluntary work since she started her career, raising money for our charities by cycling from London to Brighton, joining a painting event at the Disability Centre in Dunstable and supporting collections for our charity partners at the airport.

“Volunteers are always welcome, with new volunteers come new ideas, and we are always looking for those. If you just want to help, there is always something you can get involved in, including encouraging others to do the same. It's fun and you may make some life-long friends like I have done.”

— Terrie George,
Accounts Receivable Supervisor

3. Alleviating poverty



Charitable giving

We provide direct financial support through our Community Trust Fund, which offers grants of £250 to £10,000 to projects that benefit communities across our region. We also have a long-standing charity partnership scheme, to fundraise and help deliver projects that directly benefit our local community. In 2021, our charity partners were Luton Foodbank and the East Anglian Air Ambulance. We amplify the philanthropic efforts of our staff by offering a match funding scheme.

OUR CHARITABLE GIVING APPROACH

Community Trust Fund

During 2021, we contributed £213,345 to our Community Trust Fund which will benefit roughly 10,000 people across the geographical areas served by the fund. Around £150,000 of this contribution was from 2021, with the remainder carried over from unallocated funding in 2020.

The fund is administered by the Bedford and Luton Community Foundation. In 2021, it distributed 27 grants to charities, non-profits and community groups that contribute to the three priorities in our charity strategy:

- Healthy today - mental and physical health and wellbeing
- Skilled tomorrow - upskilling young people
- Alleviating poverty - supporting people to support themselves

Grants are available to projects that benefit people living in Luton, Central Bedfordshire, North Herts, Stevenage, St Albans District, Dacorum or Aylesbury Vale District.

Our charity partners

In 2020, employees voted to choose two charity partners to support for the next three years - Luton Foodbank and East Anglian Air Ambulance. Altogether our colleagues raised £19,272 for the two charities. This helped Luton Foodbank donate more than 500 emergency food parcels to hundreds of families in and around Luton. We also donated 218 crates of hygiene products, food and drink to the food bank. These were collected by our security team from passengers who weren't permitted to take the items airside.

CUSTOMER DONATIONS

Even during the pandemic and despite airport closures we still received £5,000 in donations from customers donating foreign currency at dedicated donation points. We raised an additional £3,600 through donations made when booking parking.

INDIVIDUAL FUNDRAISING EFFORTS

Our colleagues Emma Russell and Michelle Frow both completed the London Marathon this year and raised an amazing £1,900 for Dementia UK and £5,390 for Macmillan Cancer Research.

Case study

SUPPORTING EAST ANGLIAN AIR AMBULANCE

Based in Norwich and Cambridge, East Anglian Air Ambulance operates across the east of England, providing urgent medical care through two H145 helicopters and four rapid response vehicles. As well as fundraising support, we provide East Anglian Air Ambulance with free refuelling and waived landing fees as and when one of their helicopters needs to land at the airport. This will continue to help life-saving operations in Bedfordshire and beyond over the next two years. During 2021, EAAA was tasked to help someone in need of critical care in Bedfordshire 130 times.

“Harrods Aviation is proud to be supporting the services provided by the East Anglian Air Ambulance. We see a critical need for the local area to have swift access to the Air Ambulance, and for the Air Ambulance operator to know they have a place they could contact, at short notice, to arrange landing, aircraft handling and fuelling services.”

— Will Holroyd, Harrods Aviation



“The real value is not in what we contribute in cash, but that we ensure the air ambulance teams can pit stop in LLA saving valuable time. Before we offered to do this, time would have been otherwise lost having to return to their home base to refuel - and that's why we did it.”

— Liam Bolger, Head of Airside Operations

CHARITABLE GIVING PERFORMANCE/IMPACT

We maintained our contribution to the Community Trust Fund at £150,000 per annum, but unfortunately could not meet our match funding and local initiative goals this year because of the pandemic. Given that it was difficult to invest in community causes in 2020, we carried over unspent funds of around £63k, which we put towards good causes in 2021.

Due to COVID-19, we could not donate to local and regional initiatives that support community spirit and cohesion this year.



“BLCF have been delighted to partner with LLAOL since 2013. The fund of £150,000 a year continues to be oversubscribed by up to 200% showing the demand and needs of our communities is also growing.”

— Karen Perkins, CEO Bedfordshire and Luton Community Foundation



“Without volunteer support the charity would really struggle in pulling together the daily food parcels. Just with our team’s five extra pairs of hands and a couple of volunteer hours, we helped to parcel up food for the next day’s distribution to families in need.”

— Louise Hanlon, Community and CSR Manager

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
2.1	Charitable giving	Maintain LLA’s contribution to the Community Trust Fund at £150,000 per annum.	Completed	COMPLETED
				We maintained our £150k contribution to BLCF and also ensured that the £63,345 carried over from 2020 was spent through our grant giving process.
2.2	Charitable giving	Promote the airport’s employee matched-funding scheme and achieve 20 requests for match funding per year.	Paused	PAUSED
				Three match fundings for a total of £150. Due to the pandemic this scheme wasn’t promoted therefore resulting in not making this target.
2.3	Charitable giving	Dedicate £30k per year to support selected local and regional initiatives that support community spirit and cohesion.	Paused	PAUSED
				Due to the COVID-19 pandemic, no investments were made from this fund to local community groups etc.
2.4	Skills and training	Instigate a training and skills development programme for ten local schools per year. Arrange at least two on-site tours for local schools per year.	Paused	PAUSED
				Due to the COVID-19 pandemic, no schools took part in this. However, our programme is being reignited in 2022 with a broader focus on STEM and social impact.
2.5	Volunteering	Increase the proportion of staff taking at least one day of paid time off (PTO) per year for volunteering in the local community meeting the following annual targets: 10% in 2020, 15% in 2021, 20% in 2022, 25% in 2023.	Paused	PAUSED
				Target paused in 2021 due to COVID-19 restrictions, although some volunteering did take place.
2.6	Community wellbeing	Implement a programme that supports wellbeing and increases the standard of living in our community.	Paused	PAUSED
				Due to COVID-19, no programme was started.
2.7	Community wellbeing	The community support team to attend at least four community noise surgeries a year to showcase the additional support available to members of the community.	Completed	COMPLETED
				Virtual noise surgeries were put on, no physical ones.

FOCUS IN 2022

- Increase donations to our employee matched-funding scheme
- Support more selected local and regional initiatives

Safe and secure airport

We have set targets to enhance our management of safety and security at the airport. Our programme maintains airside safety and will enhance the skills in our security team, expand our health and safety programme, and increase the protection of our IT networks from physical and cyber network risks.

IN THIS SECTION:



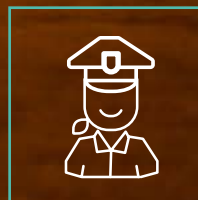
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Airside safety

Successful audit on operational safety by the Civil Aviation Authority (CAA).

Health and safety

At the end of 2021, we became a member of the Royal Society of the Prevention of Accidents (RoSPA). In 2022, we will use this to benchmark against industry peers and ensure wider recognition of LLA's commitment to the health, safety and wellbeing of all who work or interact with the organisation.

Information security

We are currently working towards compliance with the Network and Information Systems (NIS) Information Security Standard. We carried out a site-wide audit and submitted the subsequent audit reports to the CAA for evaluation and comments. Our target is to achieve certification by the end of 2022.

Airport security

We delivered training in disruptive passengers and conflict resolution to more than 60 members of staff, in partnership with Bedfordshire Police.



Airside safety



We maintain high standards of safety for our airside operations, working closely with all our partners to take responsibility for safe and efficient aircraft handling.

OUR AIRSIDE SAFETY APPROACH

We operate a comprehensive safety management system to ensure aircraft operate safely at London Luton Airport. For our team and all our airside partners, safety is a core part of our culture and we collaborate closely to identify and manage potential risks.

In January 2017, we formed the LTN Safety Stack, a first of its kind initiative that brought together all the primary aviation actors. This includes staff from the airport, airlines, ground service providers, air navigation service providers, aircraft engineers and aircraft manufacturers. The initial purpose of the Safety Stack was to improve our safety culture by sharing best practice. The Stack went beyond this and today it is the primary conduit for collaboration across the Stack Partnership, addressing a host of issues that would be too challenging for a single organisation to manage effectively. This is a global first and has led to beneficial changes, such as the harmonisation of underwing

ground handling procedures – itself a global first. Our purpose as an airport authority is to establish and maintain an environment that is safe for use by aircraft. This requires the cooperation and active participation of all our aviation stakeholders, including the regulators. We work collaboratively on risk management and safety promotion initiatives, because safety risks typically affect several organisations or individuals in the Stack. This approach also brings together experience, knowledge and expertise not readily available when partners work in isolation.

This collaboration has significantly improved our safety performance. The Stack uses an engagement approach where responsibility, accountability and learning are the central themes supported by a Just Culture, where people are treated fairly. This approach's success is evidenced in the annual safety survey, which is based around four themes developed by the London School of Economics:

COMMUNICATION AND COLLABORATION:

The information flow of safety related information, notices, incidents or hazard identification; the desire and means for staff to be involved in and work together towards the safety improvement of the airfield.

COMMITMENT:

Personal commitment to safety practices as well as the airport management's commitment to resolving issues and providing a safe place to work.

COMPETENCE:

The perceived level of knowledge that Air Ops staff have in relation to their duties.

CONSISTENCY:

The fair and equitable application of rules and regulations; how people are treated when things go wrong.

PROGRESS IN 2021

SUCCESSFUL CAA AUDIT ON OPERATIONAL SAFETY

Successful audit on operational safety by the Civil Aviation Authority (CAA).

INVESTED IN THE TEAM

In 2021, we improved our team structures:

- We moved Cargo under the Air Operations umbrella. Previously, it was a standalone team, sitting within Commercial. This move created greater team resilience and cost efficiencies through better deployment of staff.
- Expanding the remit of the Air Operations team created better opportunities for team members, and improved pay by upskilling those absorbed into the new structure.

CONTROLLABLE SPECIES

We take active measures to limit the risk of aircraft striking birds, because of the risk to aircraft and life this poses. This includes maintaining grass, hedgerows and trees to reduce breeding and roosting spaces, as well as deploying active and passive bird deterrents to keep birds away from the runway.

The wildlife and habitat management control teams had a successful 2021, maintaining a very low number of strikes. Strikes with controllable species increased slightly to four (2020: three) and there were nine strikes with uncontrollable species (2020: 15). Of those strikes, two were from the red list of birds of conservation concern, and four were from the amber list.

POINTS OF ENGAGEMENT

A key part of our Safety Stack approach is our Points of Engagement (PoE) scheme, where the Air Operations team engage directly with individual members of London Luton Airport or Safety Stack Partner staff.

We put this scheme in place when we realised traditional communication methods, particularly for safety, were failing to reach their target audience. We decided to support traditional communication methods when speaking directly with the target audience. When communicating with the front line, whether that’s a pilot or an aircraft cleaner, we took the message directly to them. This has had a profound effect in building trust and effective engagement.

The number of Points of Engagement completed in 2021 was lower than in 2020, because some of our team and those working for other Safety Stack partners were furloughed, and operational requirements were prioritised.



PEOPLE STORY

Richard McCord has been appointed Chief Financial Officer of London Luton Airport. Richard joins us from Centrica Plc where he has held several senior finance roles over the past 12 years. Richard brings with him a wealth of finance experience and joins LLA as the airport begins to look to restore passenger numbers to pre-COVID-19 levels and deliver on its future growth ambitions.

“2022 will be a pivotal year for Luton Airport and UK aviation. Although the industry faces many challenges, I recognise the airport has a bright future and I am looking forward to working with my new colleagues at the airport to secure the future success of the business.”

— Richard McCord, CFO

Event Type	2019 Total	2020 Total	2021 Total
Holding point busts	22	6	10
Incorrect taxi routing	70	48	30
Controllable species bird strikes	6	3	4
Collisions	136	60	27
Spillages	94	55	46
Failure to give way to aircraft	53	14	13
FOD Aircraft waste	486	49	62
Failure to comply with regulations	154	43	30
Failure to comply with Ground Operations Managers	51	69	47
Incorrect parking	586	168	119
Points of Engagement	12,104	7,292	6,533

In 2022, our primary focus will be to overcome the challenges associated with industry wide recovery, in particular attracting people back into ground services. The lack of job security and uncertainty over recovery saw many in aviation seek opportunities elsewhere. Those who have left the industry have shown little willingness to return.

We have introduced a new Safety Stack initiative, the Safety Manager and Leadership Alliance, to attract prospective candidates into ground services, particularly ramp services.

This alliance will provide mentorship and better integrate frontline leaders into the broader leadership team. Our aim is to foster a culture that is more attractive both to current teams and new employees. Through the Safety Leaders initiative, we have included training on how to manage certain situations, in particular managing conflict – both internal and external to the team.

FOCUS IN 2022

- Attracting people back to work in ground services, through the Safety Manager and Leadership Alliance



Health, safety and wellbeing

Through the Responsible Business Strategy (RBS), we will expand our health and safety programme. We want the best safety culture possible – one where our colleagues feel empowered to always do the right thing, to take accountability for their own and others' safety, and to collaborate with and share information with others to maintain a safe environment.

OUR HEALTH, SAFETY AND WELLBEING APPROACH

At London Luton Airport, we operate a health and safety management system certified to ISO 45001:2018. We use this system to proactively review and improve our operations. This is set out in our health and safety policy.

We are also reviewing our health, safety and wellbeing strategy to ensure it incorporates the changes to the policy and renewed focus post COVID-19. We have a comprehensive suite of controls in place to mitigate health and safety risks across our operations, and we provide training to staff and contractors to ensure they have the right skills and knowledge to work safely. Performance is monitored monthly.

PROGRESS IN 2021

During 2021, our priority was to respond appropriately to COVID-19 and deliver the objectives within our existing health and safety strategy. COVID-19 continued to be one of the airport's main risks. Large-scale absence of trained staff could lead to operational difficulties, and we had to take any prevention possible to avoid this scenario and continue to follow all government and CAA advice.

Our senior team has continued to take an active role in safety management, with all members from senior management completing safety tours across the airport. Considering the reduced resource due to COVID-19, 96% of managers completed four tours – our target was 100%. The challenges posed by COVID-19 further honed our approach to health and safety and stressed the individual responsibility that every member of staff holds. At the end of 2021, we completed the surveillance audit with BSI for our ISO 45001 certification with no non-conformities, demonstrating the continued effectiveness of our management system.

Our health and safety policy has been aligned to our new corporate strategy values to ensure that we talk the same language across the whole business.

At the end of 2021, we became a member of the Royal Society of the Prevention of Accidents (RoSPA). In 2022, we will use this as an opportunity to benchmark against industry peers and ensure wider recognition of our commitment to the health, safety and wellbeing of all who work or interact with the organisation.

A key part of safety management is conducting appreciative reviews, in which we proactively assess a process or function to identify opportunities to improve risk management. Following an appreciative investigation on the baggage claim areas in the terminal, we have seen a reduction in incidents in that area.

Case study

HEALTH AND SAFETY POLICY UPDATE

We've updated our health and safety policy so that it aligns with the values stated in our new corporate strategy. This ensures that we speak the same language across the whole business and have better conversations as a result.

We have set clear commitments that are aligned to our five values: ambitious, trusted, friendly, professional and inclusive.

Ambitious

- Deliver a proactive and positive approach to all safety management, ensuring all operations are safe
- Actively encourage the sharing of best practice and innovation
- Meet and seek to exceed our compliance obligations and other requirements to which we subscribe

Trusted

- Maintain an open and transparent reporting culture
- Assign clear roles and responsibilities throughout the organisation for health and safety
- Operate a just culture of safety across the business
- Understand and control our significant health and safety hazards and risks and eliminate them wherever possible

Friendly

- Ensure that our workforce has the right tools and training to work safely and feels free to raise any concerns
- Consult and work in partnership with all our people, trade unions, third parties, and their representatives to learn and optimise safety

Professional

- Continue to proactively respond to the pandemic and maintain a safe, secure, and welcoming environment for everyone at London Luton Airport
- Provide a framework to define clear objectives and expectations to any party who wishes to operate at the airport

Inclusive

- Ensure the health and safety of all is considered in everything we do
- Embed safety in our design approach and at the heart of our decision making
- Develop and deliver effective business continuity and emergency planning arrangements

COVID-19 RESPONSE

Responding to COVID-19 and providing a safe environment for staff and passengers has been our top priority. We completed risk assessments for all airport operations and introduced new management practices to reduce the risk of transmission. As the airport remained open throughout the pandemic, we also introduced new processes and infrastructure to keep our staff and passengers safe at the airport.

KEEPING CUSTOMERS SAFE

- Increased cleaning and removed high touchpoint areas such as customer satisfaction terminals.
- Installed Perspex screens at check in desks, security and customer service desks.
- Sanitiser stations installed throughout.
- COVID-19 safe passenger announcements in the terminal.
- COVID-19 signage installed i.e., keep a safe distance, wear face covering, wash your hands.
- Conducted regular risk assessments to keep our customers as safe as possible.

KEEPING STAFF SAFE

- Introduced testing and extended welfare provision for staff.
- Introduced a hybrid working policy to allow working from home where possible.
- Took precautions to make office as COVID-19 safe as possible.
- Took a personalised approach to PPE so people could choose the type of face covering best suited to their needs.
- Adapted work processes where possible to mitigate the risk of infection, such as increasing distances between staff, staggered arrivals/handovers etc.

KEEPING STAFF IN TOUCH

- Introduced a welfare catch up where all managers contacted a member of the team.
- Moved to computer-based training to keep X-ray training current.
- Adapted training spaces to stay COVID-19 secure.
- Offered all staff wellbeing time-out sessions on resilience, mindfulness and financial wellbeing.

PERFORMANCE

We are on track with most of our RBS targets. However, due to the impact of COVID-19 on resource, we had to prioritise other work. As a result, some of these targets have not been achieved or are now not relevant.

We maintained our ISO 45001 accreditation and became a member of the Royal Society of the Prevention of Accidents (RoSPA). We also updated our staff health and safety induction and our reporting practice.

We have a suite of safety metrics that are focussed on taking proactive action and embedding safety further into our culture.

HIGHLIGHTS

SUPPORTING WELLBEING THROUGH MENTAL HEALTH SUPPORT FOR OUR STAFF

With more staff working from home and social distancing rules in place throughout 2021, mental health was an important focus for us. We expanded our mental wellbeing service for staff, which included running virtual “1-hour time-outs”. These gave people the chance to talk about mental health topics, and conversations included money matters, loans, the power of laughter, working shifts and eating for energy. All managers also kept in touch with their team, doing our best to keep everyone connected.

HEALTH AND SAFETY TRAINING

Given resource constraints due to COVID-19, our priority this year was to ensure that all mandatory health and safety training was delivered. In addition, we also facilitated first aid at work, mental health first aid, and Better Conversation training

WELLBEING STRATEGY

We are developing a comprehensive wellbeing strategy that is due to be launched in 2022. For more information, see our Grow with our people section (page 84).

SAFETY METRICS

	Target	2021 Performance
Share learning from level 2 events	90%	90%
Senior managers completing Safety Differently Training	Cancelled	
Attendance at our risk governance meeting	75%	100%

In 2021, safety incidents were low, having reduced in tandem with passenger numbers. Compared to the previous year, the number of passenger incidents decreased by 54%, employee incidents decreased by 51% and third party employee incidents decreased by 13%.

We monitor the Moving Average Frequency Rate (MAFR) to measure the number of safety incidents per passenger. The passenger MAFR (passenger safety incidents per 1,000,000 passengers) decreased by 42% in 2021 and the total incidents MAFR (total safety incidents per 1,000,000) decreased by 32%.

In 2021, there were no fatalities or recordable passenger injuries. There were three recordable employee injuries and four recordable third party injuries. There were also nine lost time injuries for employees.

Seventy-one near misses were reported and 1,240 hazard observations were made.



Emma attended an event on behalf of LLA at the House of Lords during Mental Health Awareness Week. Gympass and the Rt Honorable Lord Boateng co-hosted an event to discuss loneliness in the workplace.

“We are committed to providing a safe environment for our colleagues, our families, our friends and our guests. We want the best safety culture possible – one where our colleagues feel empowered to always do the right thing, to take accountability for their own and others’ safety, to collaborate with their colleagues and share information with others to maintain a safe environment. In other words, a culture where everyone feels empowered to Keep Our Airport Safe: The LLA Way.”

— Emma Meenan, Health, Safety & Environmental Coach

FOCUS IN 2022

The focus in 2022 will be recovery from COVID-19 while ensuring the safety of staff, third parties and visitors.

- We’re launching a new HR Menopause policy, providing menopause awareness for staff and managers, and a manager’s toolkit
- We’re making the NEBOSH Health and Safety at Work Training schedule available to line managers and those with health and safety responsibilities
- We’re training line managers to effectively manage their team’s stress and mental wellbeing to enable a successful, inclusive and supportive management strategy
- We’re developing a wellbeing programme



Information security and digitalisation

At LLA, we manage a lot of personal and sensitive information and are committed to making sure it's kept safe. We will achieve certification for our information security practices to the ISO 27001 standard, and continue to strengthen the resilience of our networks against cyber and physical risks in line with the Network and Information Systems (NIS) Regulations.

OUR INFORMATION SECURITY AND DIGITALISATION APPROACH

We operate robust procedures to keep sensitive information safe and protect our network against cyber and physical risks. We have clear data protection and information security policies in place and have appointed a data protection officer in compliance with the General Data Protection Regulations (GDPR). We minimise the volume of sensitive information we hold and limit access to sensitive or restricted information and systems. We operate a secure network, and all company devices and systems are secured with Virtual Private Networks (VPNs) and access controls. Staff are required to complete annual training on information security, using our e-learning platform. We are also collaborating with Aena, our major shareholder, on cyber security.

OUR IT RISK MANAGEMENT RESPONSE INCLUDES:

- Constant monitoring of critical IT systems and networks, with alerts to the IT Operations Team.
- 24/7 IT call out process is in place.
- Backups are taken daily. Restore testing weekly.
- Cyber security and system patching updates are automated where appropriate.
- Network security testing carried out at least twice per annum by independent party. Vulnerabilities found are mitigated and/or resolved.
- Data and infrastructure replicated to a disaster recovery site. Disaster recovery testing of critical systems is performed annually.
- Regular reviews of the IT risk register.
- Backup power supplies are in place for critical locations.
- IT will implement formalised incident management plans and carry out incident exercises, due to complete by end of 2022.

No data breaches or personal data losses were reported during the year.

To continue maintaining our existing functionality while achieving our enhanced security goals, we will be expanding the cyber security team in 2022.



"I lead the airport's information security programme. I work with colleagues across the business to keep our network and data secure."

— Kamal Patel, Head of IT

PROGRESS IN 2021

ISO 27001 STANDARD UPDATE

We are recruiting a new information security lead to implement the ISO 27001. We aim to achieve certification in 2023.

PROJECT LITHIUM: BILLING AND FLIGHT DATA SYSTEM

After a six-month pause due to COVID-19, in June 2021 we recommenced Project Lithium, our IT system upgrade for billing data and the flight management system. This has improved access to data while reducing our equipment and energy demand.

E-WASTE

We are aware of the impacts of electronic waste. We have a partnership with IT equipment recycling specialist Icx to reuse and recycle our legacy IT equipment, which also provides income to the airport's charity partnerships.

DIGITAL TRAINING

In response to the pandemic, we rolled out a suite of digital skills training to support staff working from home. We provided equipment and training on platforms like Microsoft Teams. We are also running a campaign offering staff online refresher training courses, including in cyber-security.

WORKING TOWARDS THE INFORMATION SECURITY STANDARD NIS

We have been working closely with other UK airports and the Civil Aviation Authority (CAA) to implement the requirements of the NIS Regulations. The requirement is for all airports to implement these standards. In 2021, we carried out a site audit with the CAA to identify recommended actions to ensure compliance. We have been working on these and aim to complete this process in line with the timelines agreed with the regulator.

Through this work we have also laid the groundwork for achieving ISO 27001 certification, which would provide further recognition of the security of our IT systems.

FOCUS IN 2022

- Recruiting new members of the cyber security and compliance team
- Progress agreed improvements towards NIS Regulations compliance
- Hire new ISO 27001 lead and make progress towards certification
- Implement formalised incident management plans and carry out incident exercises



Airport security



OUR SECURITY DEPARTMENT

We will expand our security training beyond the requirements of the Civil Aviation Authority (CAA) and deliver an excellent customer experience as well as creating clear progression plans for professional development and leadership training for our security teams.

OUR SECURITY TRAINING APPROACH

As the largest team in the airport, training is a priority for the security department. We have developed a programme of enhanced security training above the minimum standard set by the CAA, including customer experience and leadership. We are in the process of creating a new professional development programme for Enhanced Safety and Security Operations which will provide a structured professional development framework for security staff to progress. This will be launched in 2022.

COVID-19 RESPONSE

During the pandemic, security services were vital to keeping the airport and our operations going.

As a frontline team, we prioritised the safety of our staff and passengers. We completed risk assessments for all team members, and redeployed vulnerable staff away from customer-facing roles.

We were also very conscious of the physical and mental toll that working during the pandemic posed. We redoubled our efforts on team engagement, making sure managers kept good lines of communication open with staff who were on-site and on furlough. We continued to conduct training through the year, having adapted our training spaces and procedures to be COVID-19 secure.

PROGRESS IN 2021

During 2021, we conducted extensive security training including customer skills, and identifying threats and hostile reconnaissance. We also partnered with Bedfordshire Police to provide our security teams with training on managing disruptive passengers and conflict resolution.

We are finalising our new professional progression approach, which we will roll out in 2022. It provides a structured training framework consisting of seven modules and resulting in formal security qualifications recognised by the CAA.



“I’m responsible for security across the entire airport. Within the RBS, my main responsibilities are to ensure that my team, the largest within the airport, is given exceptional training and professional development, and play our role in supporting the airport’s accessibility and customer experience objectives.”

— Chris Jones, Head of Security

FOCUS IN 2022

- Expanding security training

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
3.1	Enhanced security training	Create a career development programme for airport security above the minimum requirements stipulated by the CAA, including customer experience and leadership.	In progress	IN PROGRESS
				In 2021 all SDM/STM/SLL levels received conflict management training. Will be delivering enhanced training in 2022.
3.2	Health and safety	Across 2020, share the learning from at least 90% of health and safety investigations to embed lessons learned and prevent repeat events.	Completed	COMPLETED
				90% of shared learning was published across 2021 with documentation shared across the health and safety hub.
3.3	Health and safety	Senior managers will complete four safety tours a year and we will align this with a recognition scheme embedded in our risk governance process to reinforce best practice and behaviours.	Completed	COMPLETED
				A target of 100 leadership engagements was set for 2021 with 107 completed in total.
3.4	Health and safety	In 2020, all members of our senior management team will complete training on 'Safety Differently' to support our vision and culture journey.	Paused	CANCELLED
				With the greater focus in 2021 on COVID-19 and maintaining business as usual with reduced passenger numbers the "Safety Differently" work was paused. With a new culture for 2022 looking at "Making Safety Personal" aligned with our Corporate Strategy Values being delivered, this better supports our wellbeing focus and becoming more people centric.
3.5	Health and safety	Senior managers will be required to attend 75% of risk governance meetings throughout the year.	Completed	COMPLETED
				We achieved 100% attendance in 2021.

Target	Theme	Objective	Status	Progress update
3.6	Health and safety	We will conduct pre-emptive assessments (appreciative investigations) on each department every quarter to identify opportunities to improve.	Completed	COMPLETED
				Appreciative investigation continues to be a driver in the business, looking at patterns from hazards to prompt further investigation, work has been done on baggage handling belts to reduce the issue of blockages and breakdowns.
3.7	Health and safety	We will conduct quarterly continuous improvement safety tours for each of our key on-site suppliers.	In progress	IN PROGRESS
				Given the minimisation of visits during 2021 this was paused. However a virtual visit was organised by Cawleys to their waste recycling facility.
3.8	Information security	Achieve certification to ISO 27001 (information security management system) by the end of 2021.	Behind target	BEHIND TARGET
				Focus is on achieving NIS Directive targets (below) before focusing on ISO 27001.
3.9	Information security	Fully compliant with the NIS Directive by the end of 2020.	Behind target	BEHIND TARGET
				Working to have this completed by end of 2022.

Grow with our people

Our objective is to support careers in airports and aviation. We work with our community to help people take their first steps into the sector and we implement programmes that will help our people to gain skills, knowledge and experience to further their careers and our combined capabilities.

The Responsible Business Strategy includes a clear commitment to making LLA a great place to work. This means taking action to facilitate talent within our community and our team, and support diversity, inclusion and fair pay. We listen to our people and actively engage with our teams.

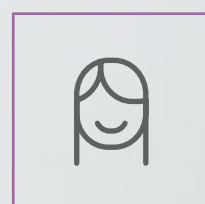
We support a flexible working approach, which contributes to the wellbeing of our staff.

2021 posed exceptional challenges for our business and our employees. After having to deal with uncertainty and redundancies, we are working hard to create a supportive working environment and to improve levels of wellbeing.

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Facilitating talent

We rolled out a new corporate strategy in 2021 with talent development as a core priority.

Recruitment fair

In November 2021, we ran a job fair in collaboration with Luton Council, which was supported by more than 20 local companies. Over 600 people attended the event, at which 1,000 job roles were advertised.

Diversity and inclusion

We have restructured our HR team and hired our first Culture and Engagement Manager to focus on employee experience. We also have a Reward Manager and a People Services Manager to ensure the best support for our staff development and equal opportunities.

Wellbeing

We adopted flexible working and developed a new hybrid working policy for office-based staff.

Internal engagement

The pandemic highlighted the importance of strong internal engagement. Whilst it posed some challenges for our employee engagement, we have developed new ways to engage with staff that will strengthen our internal culture over the long-term.



“My team and I run the RBS Grow with our people initiatives, collaborating with teams across the airport to improve diversity, enhance staff training and development, and ensure staff are paid fairly, engaged and looked after.”

— Alex Bradshaw, Head of People Operations



Facilitating talent

Aviation offers rich career opportunities and through our Responsible Business Strategy, we aim to attract the best talent and support our staff to develop meaningful and fulfilling careers. This means developing new strategies for attracting entry level talent and developing existing talent.

OUR FACILITATING TALENT APPROACH

To ensure our ongoing success, we need to attract great talent and provide opportunities for our team to learn and develop.

Together with our Community and CSR team we support school partnerships and initiatives like the Get Into Airports programme run by the Prince's Trust. This showcases exciting opportunities in aviation and helps to build a talent pipeline within the region.

Our HR team oversees a training and development structure, with each department managing technical training plans for their teams. We conduct personal development reviews annually to provide all team members with an opportunity to get feedback on their performance and to establish clear development goals.

We are keen to do more in this area and are developing a facilitating talent strategy, which will extend our talent pipeline initiatives and our professional development structures.

Because we want to appreciate people's work and offer exceptional career opportunities, we are implementing a wider recognition programme to extend the recognition scheme trial implemented during the pandemic.



PROGRESS IN 2021

2021 was a challenging year for all our staff. We paused recruitment and many people were on furlough. To keep the airport operating, our team has worked exceptionally hard, taking on additional responsibility and demonstrating a remarkable level of ingenuity and resilience. Many members of the team on furlough also took on volunteering roles, supporting the local vaccination centres and other good causes across our community. We’ve made every effort possible to protect jobs. However, given the scale of change, a small number of redundancies had to be made.

In October, we were able to start hiring again. In our new partnership with Luton Council, we made a commitment to local recruitment, which stipulates that 90% of all jobs must be advertised in LU postcodes before other locations. Whilst COVID-19 has limited progress in some areas, we were pleased to hold a job fair in November. Run in partnership with Luton Council and 20 other businesses, we welcomed 600 people to the event. More than 1,000 roles were advertised. We currently employ 412 people from the local area with a total salary paid to those employees of £11m.

Both our apprenticeship scheme and the Get into Airports programme was placed on hold in 2021 due to COVID-19. However, we have continued to run staff training during the year, including on our code of conduct and absence management. Departments continued to complete technical training to maintain operational compliance. We plan to develop a new HR system that will enhance our management of training and development opportunities. We have also set new targets for performance management, personal development reviews (PDRs) and talent management which will be rolled out through 2022.

EMPLOYEE BENEFITS

Staff are entitled to a suite of benefits, which include:

- **Pay:** Profit share scheme (rules and eligibility apply), long service awards (which includes a lump sum payment and additional annual leave), company sick pay.
- **Parental leave:** Enhanced maternity and paternity leave. Maternity leave is six weeks at 90% pay then a further 12 weeks at 50%; paternity leave is one week full pay then second as statutory.
- **Financial services:** Flexible savings offers, including pensions, ISAs, mortgage pay down and life assurance.
- **Health and wellbeing:** Occupational health, private medical insurance (Bupa) for all our staff. During COVID-19 we extended free health session from 10 to 20, and made them available to spouses and children. We also provided access to a virtual GP service, an on-site gym and classes, the cycle to work scheme and medical cash plans.
- **Assistance helpline:** 24/7 employee assistance anonymous helpline.
- **Discounts:** Retail discounts, including terminal shopping, duty free and a travel card discount on public transport.

POLICIES

We have a comprehensive suite of HR policies in place:

- Special Leave
- Study Leave & Sponsorship
- Training & Development
- Business Ethics
- Equal Ops, Inclusion & Dignity

- Counter Terrorism Check
- Occupational Health
- Performance Management
- Social Media
- Whistleblowing
- Carers in the Workplace
- Code of Conduct
- Disciplinary
- Grievance
- Sickness & Absence
- Maternity
- Paternity

FOCUS IN 2022

- Develop a facilitating talent strategy
- New apprentices
- Increase career and job events



Diversity and inclusion

We will take positive action to improve diversity and inclusion within aviation, with a central focus on supporting more women into aviation. This will take the form of a new diversity and inclusion strategy, with supporting actions and targets.

OUR DIVERSITY AND INCLUSION APPROACH

We recognise workplace diversity is a strength, and our policies set out our commitments to encourage diversity and prevent discrimination of any kind. We are in the process of developing a diversity and inclusion strategy which is going to be published in 2022. Our new corporate strategy includes core diversity commitments and lays the groundwork for our new diversity and inclusion strategy.

DIVERSITY PERFORMANCE

At the end of 2021, there were three women serving on our Board of 15 (18% female representation). Women make up 11% of our executive management and 29% of our senior management. In total, 38% of our team is female.

DIVERSITY PERFORMANCE

Level of organisation	Female		Male		Other or no gender reported		Total
Board	3	18%	14	82%	-	-	17
Executive management	1	11%	8	89%	-	-	9
Senior management	5	29%	12	71%	-	-	17
Total employees	240	38%	388	62%	-	-	628

QUARTILES

	Female	Male
Lower	49.7%	55.8%
Lower middle	40.3%	59.7%
Upper middle	26%	74%
Upper	22.1%	77.9%

	Female	Male
Mean hourly rate of pay	£15.93	£19.95
Mean GPG in hourly pay	-20.15%	
Median GPG in hourly pay	-26.09%	

We need to improve diversity across the aviation sector. In particular, we must increase the number of women who work at the airport. We are aiming to obtain better data on the diversity of our workforce including ethnicity, disability and gender.

GENDER DIVERSITY

Some teams have a high proportion of men. The cargo, TSD, fire service, baggage control and IT teams have more than 90% men. Commercial and airside operations have more than 80%. Gender diversity in our largest team, the security department, is around 50:50. This is also the case for our terminal team, legal team and marketing team. Some departments have

a high proportion of female employees, including sustainability, finance, procurement and HR, which all have more than 75% women in their teams.

We signed the Women in Aviation and Aerospace Charter in 2019, which commits the airport to:

- Supporting the progression of women into senior roles through the development of a talent pipeline for mid-tier roles.

- Setting a strategy and targets to improve diversity.
- Reporting progress on targets externally.

The Charter also includes commitments to assign responsibility for diversity to a member of the executive team and aligning senior management pay to the delivery of diversity and inclusion targets.

GENDER PAY GAP

Our gender pay gap analysis shows that there is no significant difference in pay between men and women in the lower quartile. However, the pay gap extends up the pay scale with considerably more men in the upper quartile than women (77.9% men). This reflects an improvement compared to 2020 (84.4% men).

The mean hourly rate of pay is £15.93 for women and £19.95 for men, a gender pay gap of -20.15% for mean hourly pay and -26.09% for median hourly pay. We first reported our gender pay in 2018. Since then, both

the mean and median hourly pay gaps have decreased to -22.8% and -9.89% (from 27.0%) in 2020 respectively.

There is no significant gap in bonus pay – both men and women are at 2.9%.

The gender pay gap reflects the fact that around 70% of roles in the airport are entry level roles, and there are challenges in attracting and retaining women into senior positions within aviation.

We have published the gender pay gap data for 2021. We did not publish our 2020 data because of resource constraints.

ETHNIC DIVERSITY

We do not currently hold comprehensive data on ethnic diversity, but plan to introduce new systems that will capture this.

We are committed to ensuring equal opportunities to people from all backgrounds. During 2021, we have taken efforts to celebrate the broad cross-section of cultures represented in our workforce, with our weekly newsletter evolving to ensure it captures events that are meaningful to all LLA employees.

GENDER PAY GAP DATA 2021

	Female	Male
Paid bonus	2.9%	2.91%
Mean GPG in bonus pay	50.00%	
Median GPG in bonus pay	75.00%	

FOCUS IN 2022

- Launch updated Diversity and Inclusion strategy



Making LLA a great place to work means stepping up our efforts on staff wellbeing. We are developing a comprehensive wellbeing strategy that will be published in 2022 and have set a target to ensure that at least 15% of staff have received mental health first aid training.

OUR WELLBEING APPROACH

Looking after the wellbeing of our team is a priority to all of us. Our existing wellbeing plan was published in 2020 and focuses on stress, finances, sleep, menopause and inclusion. The plan incorporates initiatives that address each key area, including:

- Fortnightly Wellbeing Time Outs (WTOs) where guest speakers provide insight and guidance on our priority wellbeing themes.
- Quarterly roadshows across the airport, focussing on priority wellbeing themes.
- Selected wellbeing apps including Unmind (for mental health and wellbeing) and Nudge (financial guidance, from cradle to grave).
- Annual wellbeing lifestyle check-in days, in collaboration with occupational health and Bupa.
- Better Conversation training roll out.
- Mental health manager training.
- Occupational health conducted welfare calls seven days a week.

We are currently developing a new strategy, taking on board the insights from our response to the pandemic. The new strategy will be published in 2022. We will also redesign our leadership engagement sessions to increase employee engagement.

WELLBEING PERFORMANCE

Staff wellbeing has been a priority for us during the pandemic. During the year, we increased the number of Bupa health sessions available from 10 to 20, ran online meetings focusing on mental health for people

on furlough, and included mental health themes in the weekly updates from our CEO. More than 15% of our staff received mental health first aid training (MHFA). One hundred staff have

completed MHFA and Better Conversations training with the Healthy Work Company. This makes workplace communication more effective, and creates better support for everyone’s wellbeing.

Case study

WELLBEING TIME OUTS

In 2021, we organised fortnightly Wellbeing Time Outs (WTOs) at which guest speakers provided insight and guidance on mental health. Talks included 'Creating work-life boundaries' with Psychology Coach Dr. Aarti, 'Good money habits', a webinar with practical advice on personal financial management, and 'Workstation and health' with a physiotherapist and a mindfulness practitioner.

FOCUS IN 2022

- Launch new wellbeing strategy



Fair pay

Fair pay is integral to making the airport a great place to work. We committed to achieving Living Wage Accreditation as part of our fair pay review.

OUR FAIR PAY APPROACH

We pay the UK Government living wage rate to all staff. This rate is derived from average UK earnings. Given prices can rise faster than wages, we also complete an annual

assessments to ensure we pay the Real Living Wage (which is based on the true cost of living) to employees at the lowest end of pay scale.

During COVID-19, we facilitated the payment of tax relief for those who had to work from home during the pandemic.

FOCUS IN 2022

Achieving Living Wage Accreditation and embedding these principles across our internal processes. This will mean that not only will our staff be paid a real living wage, but direct on-site contractors (who meet the criteria) will also be paid fairly. LLA and its union will engage in annual pay review discussions to ensure a fair deal is maintained over the long-term.



Internal engagement

The pandemic exposed the importance of employee engagement and an effective communication culture. We are working harder than ever to ensure that staff feel informed and engaged.

OUR INTERNAL ENGAGEMENT APPROACH

It's vital that our people feel connected and engaged across our business. We have deployed a range of tools to help with this. Our internal engagement strategy ('ICE') is designed to include a suite of approaches that suit the diverse types of roles we have across the airport. A new role, Culture and Engagement Manager, will start in 2022.

We made sure to engage staff around the roll out of our new corporate strategy to ensure a good understanding of our vision, values and mission. We will conduct our first annual engagement survey in February 2022 and will explore important issues including the effectiveness of communications, team meetings and leadership.

Whilst many of the team access the intranet or engagement-related emails, face to face communication is often more effective for those working in front line roles such as security, maintenance or customer service. We are therefore prioritising this sort of engagement. We employ a range of approaches to ensure we're engaging everyone, including:

- A monthly newsletter and regular video updates from our CEO.
- Yammer – an internal social media platform for staff to communicate with each other.
- Moving into 2022, platforms for employees' ideas and suggestions are being created locally and LLA wide.

- Town halls and all hands meetings senior management led informal sessions to share information and answer questions from staff
- Ask HR - a dedicated email address for staff to ask questions

PROGRESS IN 2021

Internal engagement was an essential tool in 2021, with many of our team working from home and a large number on permanent or flexible furlough.

- **WEEKLY UPDATES:** With the changing COVID-19 restrictions and impact on our business, our weekly updates provided staff with the latest information that may affect their lives and work.
- **TOWN HALLS:** We held our first virtual Town Hall in May 2021, which gave our staff the opportunity to ask question directly to the Executive Leadership Team. The session was well received by our employees.
- **ASK HR:** In 2021, we rolled out a new communication service called

"Ask HR". This is a dedicated email address that allows our people to send queries. HR then manage responses amongst the team to ensure the most appropriate response.

- **CENTRAL REPOSITORY FOR GUIDANCE AND INFORMATION:** With so much change happening over the year, we created a COVID-19-hub which everyone with an airport account could access. We posted FAQs, communications, videos, guidance and links to external resources for themes that may be useful for staff, including support on mental health, financial management and domestic violence. We've since expanded the COVID-19-hub to the LLA-hub, linking a wider range

of resources, such as information on staff benefits, HR policies and volunteer opportunities.

- **MANAGER 1-2-1s:** With staff working remotely or being placed on furlough, team leaders and managers have taken the time to regularly check in with each member of their team.
- **VIRTUAL ALL-HANDS MEETINGS:** We continued our virtual all-hands meetings, where members of the senior management team provide an update to staff. The short segments are then cascaded to all members of staff.

In addition, we sent regular newsletters, created message boards and improved individual unit communication.

FOCUS IN 2022

- **Conduct our first annual colleague survey to generate an employee led data baseline. These results will be analysed and turned into simple, concise and clear action plans across all teams and LLA**

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
4.1	Facilitating talent	Develop a facilitating talent strategy by the end of 2020, including entry-level talent. Support Luton Council with a financial commitment for their training academy. We will put in place measures that will double the number of apprenticeships by 2021.	Behind target	BEHIND TARGET Corporate strategy rolled out in 2021 that forms the drivers behind a talent strategy. Currently embedding the strategy in order to then formulate a talent strategy that incorporates vision, values and mission. Local level talent management has started. No new apprentices were hired, one remains.
4.2	Facilitating talent	In partnership with the Prince's Trust deliver no less than two 'Get into Airports' programmes, each with 15 individuals or more, securing a 75% or higher positive outcome.	Paused	PAUSED Due to the pandemic none of these programmes were able to run.
4.3	Facilitating talent	Promote airport career opportunities. Complete ten career and job events for schools including events at the airport and in schools. Activities promoting career opportunities and employment to be focussed within the more deprived wards.	Paused	PAUSED Due to the pandemic none of these programmes were able to run.
4.4	Diversity and inclusion	Develop a broad Diversity and Inclusion strategy by the end of 2020. This will include supporting Women in Aviation and Aerospace Charter making a commitment to work together to build a more balanced and fair industry for women.	Behind target	MISSED TARGET Strategy is being rewritten to be reissued in 2022, alongside training for all managers. Waited for launch of corporate strategy in order to incorporate the values.
4.5	Wellbeing	Develop a wellbeing strategy by the end of 2020.	In progress	IN PROGRESS With COVID putting a gap in all plans the wellbeing strategy is being renewed and relaunched in 2022. This will better engage and grow with staff through the revamping of the leadership engagement sessions and the appointment of a wellbeing lead in the business.

Target	Theme	Objective	Status	Progress update
4.6	Wellbeing	15% of staff to receive mental health first aid training by 2020	Completed	COMPLETED We have 100 staff who have completed MHFA and Better Conversations training with the Healthy Work Company to support staff and ensure that we all have better conversation in the workplace and support each other's wellbeing. ELT have supported these sessions with a small session being completed as part of the strategy days to ensure better conversations start from the top. This puts us at just over 15% of the staff trained in mental health awareness and support.
4.7	Fair pay	Undertake a cost-benefit analysis of achieving Living Wage accreditation status and present for decision by the end of 2020	Completed	COMPLETED See previous year. Update: LLA has progressed with the Real Living Wage and understands the requirements and scope for accreditation. Procurement has identified the cost implication of becoming accredited, which LLA fully understands. Early 2022 will see HR and Procurement processes established to support RLW and is targeted to become accredited by 31st March 2022.
4.8	Internal engagement	At least 85% of staff to confirm they are 'well informed' or 'very well informed' about our vision, values and strategic pillars in 2020	Behind target	BEHIND TARGET Corporate strategy has been rolled out and starting to embed within LLA, driving our vision, values and mission. Engagement strategy has been created and new role of 'Culture & Engagement Manager' taken on to deliver this into 2022.
4.9	Internal engagement	At least 60% of staff to feel they have a voice on what goes on at the airport in 2020	Behind target	BEHIND TARGET Survey provider procured in November 2021 for three years. First annual survey to launch in February 2022.
4.10	Internal engagement	Raise the visibility and profile of the Executive team with at least 80% of staff knowing the team members by 2020	Behind target	BEHIND TARGET Same as last year.
4.11	Internal engagement	Support and enable managers to become better communicators with at least 60% communicating with their teams 'regularly' or 'very regularly' by 2020	Behind target	BEHIND TARGET Survey provider procured in November 2021 for three years. First annual survey to launch in February 2022.

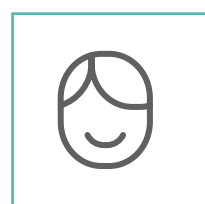
Deliver great customer experience

In 2021, the pandemic challenged our dedication to customer service and our staff went above and beyond to ensure we served our guests to the high standards we expect.

Delivering great hospitality for everyone who travels through LLA is very important to us. At the beginning of 2021, much of our work was halted due to COVID-19. Following the development of the new corporate strategy in 2021, we used this pause to refresh our customer experience strategy and revive several key initiatives.

One of these is the 'LLA Way' which sets the expectations for service for everyone working at LLA, and creates a blueprint for both direct and non-direct employees. We laid strong foundations in 2021 and in 2022 we will implement a host of activities to ensure we consistently deliver great hospitality.

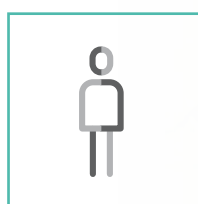
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Maintaining high levels of service despite COVID-19

We were one of the only airports to remain open during the pandemic. Our staff and airline partners needed to rapidly adapt service provision in response to changing restrictions and lower staffing numbers, while giving guests confidence that their health and safety needs were always being met. Despite these obstacles, we received excellent customer feedback during this time.

Continuation of LLA Accessibility Forum

London Luton Airport Accessibility Forum (LLAAF) was established in 2019 to provide expert feedback on how we can improve the accessibility of the airport. Meetings are usually held twice a year and were increased during COVID-19 to four virtual meetings a year.

Expansion of ACI Accreditation

We achieved level 1 of the ACI Customer Experience Accreditation in January 2020. Progression to level 2 was paused due to COVID-19 restrictions but we are planning to achieve this in 2022

New service provider for passengers with reduced mobility (PRM)

Due to the impact of COVID-19, our ‘People with Restricted Mobility’ PRM service provider withdrew from their contract. As a result, we had to appoint a new PRM service provider to maintain the service. The team managed to run a successful tender in a very short timeframe and appointed Wilson James.



Customer experience

Through our Customer Experience Strategy and Service Standard, we ensure that we deliver outstanding customer experience across the whole airport. We monitor customer satisfaction closely and set targets to increase our customer experience scores. Our aim is to build back better and become more resilient from our experience during the pandemic. We used this year to establish a strong foundation to deliver better customer experience as passengers return in greater numbers.

OUR CUSTOMER EXPERIENCE APPROACH

Customer satisfaction is at the centre of our business, and we work hard to ensure that everyone who flies through LLA has a great experience. We have a team of dedicated customer experience colleagues with a unique skillset. Many of the team are multi-lingual and all are able to see a situation from a customer’s perspective. They are vigilant in identifying where a customer needs help and can put customers at ease, especially when they are tired, in a rush or panicked.

During 2021, we defined a clear customer vision and set of service signatures. These service signatures define our expectations of all colleagues working at LLA.

The strategy and service signatures have now been developed into a clear customer experience service standard guide and training programme that helps explain our service aspirations to all colleagues working at LLA. Our Vision, Purpose and Service Signatures are shown below.

Cx Vision	To deliver great guest hospitality - consistently!			
Cx Purpose	To delight our customers by making travel safe, accessible, simple and enjoyable			
Cx Service Signatures	We work collaboratively as one team	We build loyalty by showing we care	We take accountability for the end to end customer journey	We share what we know

Special Assistance



Accessibility for all

We want LLA to be accessible to everyone. We have worked hard to make sure our facilities make travelling through the airport as stress-free and seamless as possible. To ensure we continue to improve, we run an accessibility focus group to get feedback on what is working well and where we need to do better. We have also set a target to achieve the highest rating from the CAA for Persons of Restricted Mobility (PRM).

OUR MANAGEMENT APPROACH

We provide specialist support for Passengers with Reduced Mobility (PRM). Responsibility for the provision of PRM support moves between airlines, the airport and public transport companies over the course of a journey. We work closely with our partners to provide seamless assistance to those who need additional help moving through the airport. We use a third-party company to deliver our PRM support.

We run an accessibility focus group with our PRM service provider and representatives from a wide range of airport user groups. This includes the Alzheimer's Society, Hertfordshire Age UK, Action on Hearing Loss, Security Industry Association (SIA), Colostomy UK, Autism Bedfordshire, the Disability Resource Centre, diabetes charity JDRF, and Guide Dogs for the Blind. The group has met seven times since it was established in November 2019, with meetings in 2021 being run remotely.

Our performance on PRM support is monitored by the CAA based on our performance data and airport assessments against standards set out in CAP1228, the CAA's quality standard for PRM support.

PROGRESS IN 2021

ADAPTING SPECIAL ASSISTANCE DURING COVID-19

During the pandemic we faced new challenges with our Special Assistance service. Usually, airlines inform the airport about the need for special services for customers. We aim to keep unnotified cases as low as possible to ensure that mobility support can be arranged prior to a passenger's arrival. Because of additional challenges airlines and airports faced during the pandemic, unnotified cases went up to 40%. As a response, we started collaborating more closely with the airlines and have since gained more insight into airlines' booking process.

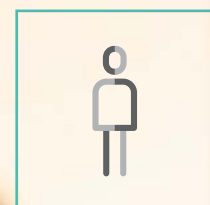
PROGRESS THROUGH THE ACCESSIBILITY FOCUS GROUP

Our accessibility focus group is a highly effective forum and has helped to deliver tangible improvements for service users. Since starting the meetings in November 2019, our forum members' advice has led to the following:

- Improvements to the information provided on the Special Assistance pages on our website, along with advice for correct wording etiquette.
- A 'Retail accessibility review' to improve access at shops and restaurants.
- Adjustments to the vending machines available for PRM use in pier A.
- Better communication with people with disabilities around COVID-19 measures and their specific compliance needs.
- Signage at the bus stop area notifying customers of a contact number to call for assistance.
- Audited accessible toilet facilities to bring each unit to the same standard, as well as creating stoma friendly environments. This project is ongoing, and we have worked on future proofing our accessible toilet design when they are refurbished.
- Relief areas for service animals.
- Installation of 130 hearing loops throughout the terminal building to assist hearing-impaired customers.

FOCUS IN 2022

- Achieve CAA PRM highest rating



Hidden disabilities



Our team plays a vital role in making sure travelling through London Luton Airport is safe, accessible, simple and enjoyable for everyone. We provide all customer-facing staff with training on customer experience and hidden disabilities.

OUR HIDDEN DISABILITIES APPROACH

As part of our programme to ensure that the airport is accessible to all, we have focussed efforts on improving how we support passengers with hidden disabilities.

Disability awareness has been included in both Ground Security Operative (GSO) initial training and annual recurrent training for airport staff. The aim being to ensure that all GSOs are familiar with and confident when dealing with people who face challenges when using transportation, specifically aviation.

In July 2021, a dedicated Disability Awareness module was included in both training courses. The main principles of the training are:

- Define the terms 'Disabled Person' and 'Persons with Reduced Mobility'.
- Identify passenger's special needs during all aspects of the airport experience.
- Know how to apply search methods on persons with physical / hidden disabilities.
- Adaptation to specific needs to allow safe and secure travel for all passengers.
- Demonstrate care, sensitivity and discretion.

PROGRESS IN 2021

We aimed to have all front-line staff trained on hidden disabilities by the end of 2020. Due to the pandemic, we could not progress as planned and are now behind target. However, since the inception of the dedicated module, 94% of GSO staff have been trained.

FOCUS IN 2022

- Provide training to all LLA frontline staff on hidden disabilities

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
5.1	Customer experience training	100% of customer-facing LLA employees undergo training in customer experience by the end of 2020.	In progress	IN PROGRESS
				Was paused due to COVID-19 pandemic. Being developed in Q1 of 2022 to rollout in Q2.
5.2	Customer experience charter	Customer experience charter in place by mid-2021.	In progress	IN PROGRESS
				Same as last year.
5.3	Customer experience	Achieve customer satisfaction score of 80% by the end of 2021 and 82% by the end of 2022.	Completed	COMPLETED
				83% in 2021.
5.4	Training	Provide training to all LLA frontline staff on hidden disabilities by the end of 2020.	Behind target	BEHIND TARGET
				Since the inception of the dedicated module the total number of GSO's that have undertaken the training is as follows: GSO initial: 75 GSO recurrent: 176 Total: 251 (94%).
5.5	Accessibility	Achieve the highest rating of 'very good' in the CAA's Persons of Reduced Mobility (PRM) categorisation by the end of 2021.	Paused	ACCESSIBILITY
				Target paused due to COVID-19. Will resume work in 2022.
5.6	Accessibility	Establish our Accessibility Focus Group by the end of 2020.	Completed	COMPLETED
				London Luton Airport Accessibility Forum (LLAAF) was established in 2019. seven meetings have occurred since the first in November 2019. Meetings are held twice a year although during COVID-19 these were held more frequently.
5.7	Accessibility	Gain certification to ACI's customer experience accreditation programme by the end of 2020.	In progress	IN PROGRESS
				Having gained our Level 1 accreditation in the ACI CX Accreditation Programme in 2020 we were unable to continue with our plans for further accreditation due to the COVID-19 pandemic. Now that our customer transformation programme has been restarted in 2022 we will be applying for Level 2 status this year.

Sustainable supply chain

2021 has been a challenging year for global supply chains. We faced delays and higher material costs which have impacted some of our projects and operations. When passenger volume decreased by 90% from May 2020, the procurement team developed a robust and rapid plan to respond, centred around innovation and collaboration. We delivered a COVID-19 procurement survival and cost saving programme which was recognised with a Chartered Institute of Procurement and Supply (CIPS) Award 2021.

Our influence stretches far beyond our own operations. Our supply chain includes hundreds of businesses who either work with us directly on-site or supply us with goods or services. Working with our supply chain partners will allow us to deliver greater impact.

IN THIS SECTION:

				
PAGE 113 Supplier Code of Conduct	PAGE 115 Supplier capacity building	PAGE 117 Climate change resilience	PAGE 118 Local spend	PAGE 121 Sustainability governance

Our team receiving the Procurement Team of the Year award at the 2021 CIPS Awards.



LLA wins CIPS Award as Procurement Team of the Year

Our procurement team has been recognised as Procurement Team of the Year (Small Organisations) at the Chartered Institute of Procurement and Supply (CIPS) Awards 2021 for how they pivoted to save the business by supporting suppliers and concessionaires and for promoting diversity in the supply chain.

LLA collaborates with LSE's LondonCAP project to review supply chain impacts

In 2021, we worked with a student team from the London School of Economics (LSE) to review our supply chain impacts. This led to recommendations that we have started to implement and will be further reviewed with the sustainability team in 2022.

Support for suppliers during COVID-19

We supported suppliers during this challenging period. We adjusted service level agreements to allow suppliers to make use of the furlough scheme, and offered contract holidays and extended contract lengths to provide greater security and confidence in their future. During this period, we are aware of only one supplier that ceased trading. We'll be working with suppliers on resilience as we scale back up.



Supplier Code of Conduct

Through our Supplier Code of Conduct we engage our supply chain partners to help improve the airport's overall sustainability performance. We include our Code of Conduct in the contracts we award to demonstrate that sustainability is a key part of what we expect from our suppliers.

OUR SUPPLIER CODE OF CONDUCT APPROACH

We aim to extend our environmental and social management across our supply chain. We have a Contractor Code of Practice, a Business Ethics Policy and sustainability is included on our risk register. In addition, we are developing a Supplier Code of Conduct covering all construction and physical works and related tenders.

All tenders include general requirements relating to environmental management, social practices and impact, and governance. Where appropriate, specific sustainability management or performance requirements are included in contracts.

Relevant sustainability targets are included in all contracts with a value over £25,000 and the team monitors the performance of key suppliers to ensure they continue to meet the agreed standards. All our contracts include human rights and slavery clauses. We also provide capacity development opportunities for suppliers and encourage local spending, as well as establishing climate change resilience plans.



“I’m responsible for all purchasing at the airport. I work with airport departments to embed sustainability considerations into the way we source goods and services, and run capacity building events for suppliers to help more local businesses succeed.”

— Terry Gittins, Head of Procurement

PROGRESS IN 2021

PERFORMANCE

When passenger volume decreased in May 2020, the procurement team, having just achieved CIPS accreditation, developed a robust and rapid plan to survive centred around innovation and collaboration. We delivered a procurement survival and cost saving programme that led to rapid savings of £14m whilst improving Corporate Social Responsibility. This effort was not only recognised by our senior management team as a major contribution to the survival of the airport but was also awarded with the CIPS Award 2021.

In response to COVID-19, the focus for the procurement team has been cost reduction. Very few contracts have been awarded during this period. Monitoring of sustainability performance has been reduced during this period due to resource constraints. The resource restrictions and additional challenges of the pandemic also mean we are behind with our Supplier Code of Conduct. Capacity building events could not take place in 2021 but are planned to resume in 2022.

We are aiming to launch the Supplier Code of Conduct by Q4 2022, followed by roll out during 2023. The procurement team also promoted diversity during the period, adding more extensive equalities questions in tenders and promoting diversity within the team.

FOCUS IN 2022

- Expand the promotion of diversity within the supplier selection process
- Launch Supplier Code of Conduct
- Launch Supply Chain Charter



Supplier capacity building

We want to share our experience and knowledge with our supply chain, which includes SMEs and local businesses. We will develop a supplier toolkit in 2022 to help supply chain partners improve their own sustainability performance. We run capacity building events with our supply chain partners and internal procurement training for our staff.

OUR SUPPLIER CAPACITY BUILDING APPROACH

We want to work with existing and prospective suppliers to develop capabilities that will create greater value to us and their businesses. Our supply chain includes many small and local businesses, and we run programmes to help them win more work, develop new capabilities, and embed high standards of sustainability management in the way they operate.

We typically run workshops and training sessions, helping suppliers to understand our expectations and how they can be implemented within their businesses. We worked with LSE to produce a review of supply chain impacts and develop a list of recommendations.

PROGRESS IN 2021

COVID-19 impacted our supply chain and operations. We were not able to progress as planned on our sustainability objectives and targets, but we have applied learning from these new challenges to build a more resilient and sustainable supply chain. Our capacity building training courses could not take place in 2021, but will resume in 2022. We maintained our internal procurement training throughout 2021 and hosted at least 12 procurement training courses during the year.

We maintained our relationships with local suppliers throughout 2021 and are looking to achieve Real Living Wage Accreditation in 2022. In our Invitations to Tender we ask suppliers to provide the gender and ethnicity breakdown of their employees, including within senior leadership, to improve the diversity performance of our suppliers.

Case study

LLA COLLABORATES WITH LSE’S LONDONCAP PROJECT TO REVIEW SUPPLY CHAIN IMPACTS

We collaborated with the London School of Economics’ LondonCAP project to review our supply chain impacts. LondonCAP is a ten-week consulting style project for MBA students at LSE to gain real-life business exposure. The student team ran roundtable discussions and research, reviewed data and conducted interviews and questionnaires with key members of staff.

The review led to recommendations we started to implement in 2021 and will continue to do so in 2022. We added more detail to the environment, and diversity and inclusion sections, moving focus from policy towards performance and planning to deliver improvements. We also included more questions on priority areas including carbon emissions, environmental risk management, real living wage and social value.



Climate change resilience

Climate change will not only affect our business directly, but also poses risks for the airport through our supply chain. We will identify the climate change risks for our strategic suppliers and develop a climate change resilience plan.

OUR CLIMATE CHANGE RESILIENCE APPROACH

The impacts of climate change will not just affect us, but our entire supply chain. We aim to work with suppliers and industry bodies to understand the key risks and impacts from climate change and encourage mitigation.

We typically run workshops and training sessions, helping suppliers to understand our expectations and how they can be implemented within their businesses.

PROGRESS IN 2021

Due to the pandemic, we had to pause our work on the development of our supplier climate change resilience plan. The work will begin again in Q4 of 2022 and we are still aiming for a launch of the plan in 2023.

For more details on our climate change resilience work, see the Ensure environmental responsibility and efficiency section on page 16.

FOCUS IN 2022

- Resume capacity building events
- Develop sustainable supply chain toolkit

FOCUS IN 2022

- Progress on developing a supplier climate change resilience plan



Local spend

We are committed to using our influence to grow the local economy and aim to work with as many companies as possible within a 20-mile radius of the airport. To maintain and expand the great progress we have made in this area, we will maximise the opportunities for local organisations to work with the airport. We will do this by running training and capacity building events to overcome any barriers that might prevent local businesses from tendering.

OUR LOCAL SPEND APPROACH

Our approach to supporting local spend includes running capacity building events to help SMEs and local businesses to understand our tender process. We recognise the value that local suppliers can bring through creating new jobs and reducing environmental impacts. A target update is due in 2023 in alignment with the new sustainability strategy.

PROGRESS IN 2021

Despite the pandemic, we maintained our relationships with local suppliers throughout 2021. Our target was to spend at least 25% of our total supply chain with companies within a 20-mile radius of the airport. We have exceeded this target and currently spend 35%.

FOCUS IN 2022

- Develop target update to be launched in 2023

Case study

LLA WINS CIPS AWARD AS PROCUREMENT TEAM OF THE YEAR

London Luton Airport's (LLA) procurement team has been recognised as Procurement Team of the Year (Small Organisations) at the CIPS Awards 2021. The Chartered Institute of Procurement and Supply (CIPS) Excellence in Procurement Awards are the most prestigious procurement awards in the world and cover all aspects of procurement from value for money, equality, sustainability and ethical procurement.

These awards are an opportunity to showcase and celebrate the best work and teams in the procurement profession. The LLA procurement team won the award in recognition of the rapid changes they made in response to the COVID-19 pandemic and its impact on the airport. The team developed a robust and rapid plan to support the airport centred around innovation and collaboration, reducing spend where possible and directly contributing to the survival of the airport.



“This has been a particularly tough year for aviation. However, the team has continued to work hard and deliver best-in-class procurement, while also supporting our local supply chain as much as possible. This is a testament to that work, and I couldn't be prouder.”

— Terry Gittins, Head of Procurement

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
6.1	Code of Conduct	Create supply chain sustainability Code of Conduct and standards by the end of 2020.	Behind target	BEHIND TARGET
				Working with the sustainability team to create a Code of Conduct by Q3 2022.
6.2	Sustainability in contracts	75% of supplier contracts by spend to include sustainability objectives by December 2020.	Paused	PAUSED
				Due to COVID-19 we significantly reduced the number of new contracts made.
6.3	Supplier capacity building	Sustainable supply chain toolkit for suppliers in place by December 2022.	In progress	IN PROGRESS
				Currently working on a toolkit for suppliers.
6.4	Supplier capacity building	Undertake capacity building events for suppliers each year: six in 2020, eight in 2022.	Paused	PAUSED
				Paused again in 2021 due to COVID-19 - to rollout in 2022.
6.5	Local spend	Maintain at least 25% of total supply chain spend with suppliers based within a 20-mile radius of the airport, and provide support for local organisations to maximise opportunities to work with the airport.	Completed	COMPLETED
				35% was achieved again in 2021.
6.6	Climate change risk	Identify strategic suppliers and assess the climate change risks for these suppliers by the end of 2021.	Completed	COMPLETED
				Worked with LSE to produce a review of supply chain impacts and develop a list of recommendations.
6.7	Climate change risk	Develop a supplier climate change resilience plan by 2023.	Behind target	BEHIND TARGET
				To start in Q4 2022.



As a relatively small organisation with 675 employees, we need to be flexible, clever with our resources, and attract skilled people to help us deliver our responsibilities. To enable this, our Responsible Business Strategy is governed, owned by and embedded within the business. Each department is responsible for key activities and supported by a central sustainability team and overseen by a new board sustainability committee. With our expansion plans for the airport, we acknowledge our growing sustainability responsibilities. We are responding to this by expanding and restructuring our sustainability teams so we can successfully implement our Responsible Business Strategy and 2040 Net Zero strategy.

ACCOUNTABILITY

- The RBS has a clear set of priorities, with objectives and actions to deliver upon. Each set of targets has an implementation plan that the business takes ownership for, and which is supported through a governance and management structure.

 - The ultimate owner is our CEO and Management Board. Our CEO, Alberto Martin, chairs the RBS Steering Committee.
 - A sustainability board committee was established in 2021 and is chaired by Amparo Brea, Chief Innovation, Sustainability and Customer Experience officer at Aena, the airport's major shareholder. The first meeting will take place in January 2022.
- The RBS Steering Committee was set up to oversee progress and a dedicated Head of Sustainability was appointed to ensure sufficient resources are allocated. The Steering Committee is composed of our principal managers, management board members, and heads of each key department (Strategic Affairs, Operations, Finance, Marketing, Communications, HR, IT, Procurement, Environment, Health and safety, Noise and Community).
 - We have a central sustainability team, which works very closely with Community, Environment and Energy team members.
- Meetings with operational teams are held across the year via:

 - Risk and sustainability meetings
 - Executive leadership sessions
 - Senior leadership team meetings
 - All executives have sustainability targets that are linked to our 2040 Net Zero roadmap. Their remuneration is linked to the achievement of these targets.



“London Luton Airport is an important contributor to Aena’s sustainability ambitions for its family of airports. This includes becoming a carbon neutral airport operator by 2026, and achieving Net Zero Carbon by 2040.

To do this we are working with our network of airports to sharply reduce the emissions per passenger associated with Aena’s operations. We are investing nearly €550 million between 2021 - 2030 to decarbonise our operations in line with the Paris Agreement.

Already we have collectively achieved a 100% share of energy supply from renewable energies.

As the chair of LLAOL’s board sustainability committee, I work in close collaboration with LLA to ensure the airport plays a meaningful role in creating a more sustainable aviation industry.”

— Amparo Brea Álvarez, Director of Innovation, Sustainability and Customer Experience, Aena

RBS GOVERNANCE

We have created a governance structure to oversee our approach to responsible business.

- A key part of the governance structure is an annual review, which looks at the progress of the strategy and identifies opportunities for improvement.
- To ensure accountability to our stakeholders, we will include a section on responsible business performance in future annual reports. We will also publish a dedicated responsible business report annually, drawing on key metrics from the Global Reporting Initiative (GRI) and sector supplement guidance.
- We will actively engage and communicate with key stakeholder groups and welcome their input on the design and development of our Responsible Business Strategy.
- To facilitate good governance, we also operate compliance registers to monitor our legal, regulatory and stakeholder-led obligations.

THE GOVERNANCE STRUCTURE IS AS FOLLOWS:

- CEO
- Sustainability board committee
- RBS Steering Committee
- SusCo
- ELT
- SMT
- Risk
- Team meetings

PROGRESS IN 2021

Due to COVID-19 limitations, no RBS committee meetings were held during 2021, but they will resume in 2022. We established a new sustainability board committee, which will meet for the first time in 2022.

POLICIES

A set of guiding policies and related strategies are being developed as part of the Responsible Business Strategy implementation plan. These are owned and delivered by the business:

1. Surface Access Plan, refreshed in 2019
2. Energy Plan, refreshed in 2018
3. Environmental Management Plan, refreshed in 2018
4. Noise Action Plan, updated and launched in 2019
5. Equality, Diversity and Inclusion Strategy, refreshed in 2020
6. Health and Wellbeing Strategy, refreshed in 2020
7. Community Investment Strategy, refreshed in 2019
8. Passenger Satisfaction Strategy, launched in 2019
9. Employee Engagement and Communications Strategy, launched in 2019
10. Hybrid working policy, launched in 2021

KEEPING STRATEGY UP TO DATE

Our Responsible Business Strategy includes a range of short- and long-term targets. To ensure our strategy and targets remain relevant, we will review them each year and update where necessary. If we introduce new targets or amend existing ones, we will report and explain the changes in our annual Responsible Business Report.



“Sustainability is very important to AMP Capital and, in 2021 we worked closely with Alberto Martin, David Vazquez and the sustainability team in LLA to establish a clear plan and embed sustainability into LLA’s corporate strategy.

AMP Capital is a founding member of GRESB, an organisation that assesses the environmental, social and governance (ESG) performance of real assets around the world.

Through GRESB we engage on ESG performance with all of the companies in our portfolio, and we are pleased with the progress on sustainability and disclosure that LLA has made.”

— Patsy Sandys, Head of Global Direct Investments - Infrastructure Equity, AMP Capital

GRESB

Our ESG performance is benchmarked by GRESB, the leading infrastructure sustainability framework. The scorecard covers both management and performance of a comprehensive range of environmental, social and governance issues. GRESB requires us to have a process for identifying ESG risks and managing them.

FINANCE

CONCESSION AGREEMENT
SETTLEMENT NEGOTIATIONS

Under the terms of the Concession Agreement, LLA served notice to Luton Rising of a Special Force Majeure Event (“SFM”) in March 2020, to partially recover losses from the COVID-19 pandemic. A Settlement Agreement was reached with Luton Rising in November 2021. Under the terms of the Settlement Agreement, LLA will benefit from £45m reduction in its concession fee payments to Luton Rising, plus an extension of the Concession Agreement by 16.5 months to 15th August 2032.

In addition to the Settlement Agreement, a Supplemental Agreement which amends certain terms of the Concession Agreement was agreed. The Supplemental Agreement incorporates several additional social responsibility commitments, made as part of a stronger partnership working for the airport’s future. These include delivering the real living wage for all its direct employees in 2021 and being accredited with the Real Living Wage Foundation by the end of 2022. The reintroduction of a dedicated public taxi rank for Hackney Carriage drivers and advertising jobs at the airport alongside Luton Council vacancies, ensuring local jobs are targeted at local people. LLA will also work closely with Luton Rising and Luton Council on ambitious sustainability and Net Zero strategies, directly supporting Luton Council’s 2040 vision for a place to thrive and a carbon neutral town where no-one needs to live in poverty.

PENSION FUND CONTRIBUTION

LLA reached an agreement with the Trustees of the London Luton Airport Pension Scheme on the triennial valuation as of 31 March 2020. The deficit repair profile agreed resulted in a payment by the Company to the pension scheme of £20.6m in 2021 with a further £9.4m to be paid prior to the next valuation.

CHANGE IN CFO

We welcomed our new CFO Richard McCord in March 2021 with the intention to drive forward our recovery post-COVID-19 and focus on implementing the future growth strategy of the airport which will ultimately lead to more jobs and economic benefits to the local community.



“Climate change is one of the key risks for the airport and sustainability is a core pillar of our new corporate strategy. Building on our strong existing risk management practices, this year we’ve taken a major step forward in sustainability and climate risk management. We established a new sustainability board committee, strengthening the link between strategic decision making and operational management, and commissioned a review of climate related risks and opportunities.”

— Mee-Ling Skeffington, General Counsel

GRI INDEX

This Report includes standard disclosures from the Global Reporting Initiative (GRI) Standards. This index sets out the indicators we have and have not included, and those that are not material to LLA, and where we have provided partial information from a particular disclosure.

Key					
Y	Reported	P	Partially reported	N	Not reported

GRI Standard	Reported	Page number
GRI 102: General disclosures		
Organisational profile		
102-1 Name of the organisation	Y	5
102-2 Activities, brands, products, and services	Y	8-9
102-3 Location of headquarters	Y	130
102-4 Location of operations	Y	130
102-5 Ownership and legal form	Y	5, 9
102-6 Markets served	Y	8
102-7 Scale of the organisation	Y	11, 91
102-8 Information on employees and other workers	Y	91
102-9 Supply chain	Y	111-120
102-10 Significant changes to the organisation and its supply chain	Y	11-13, 111-120
102-11 Precautionary Principle or approach	N	-
102-12 External initiatives	Y	4-5, 26, 102, 105
102-13 Membership of associations	Y	13, 77
Strategy		
102-14 Statement from senior decision-maker	Y	6-7
102-15 Key impacts, risks, and opportunities	Y	14
Ethics and integrity		
102-16 Values, principles, standards, and norms of behaviour	Y	121
102-17 Mechanisms for advice and concerns about ethics	N	-

GRI Standard	Reported	Page number
Governance		
102-18 Governance structure	Y	121-124
102-19 Delegating authority	Y	121-124
102-20 Executive-level responsibility for economic, environmental, and social topics	Y	121-122
102-21 Consulting stakeholders on economic, environmental, and social topics	Y	9, 14, 20, 44, 122
102-22 Composition of the highest governance body and its committees	N	-
102-23 Chair of the highest governance body	N	-
102-24 Nominating and selecting the highest governance body	N	-
102-25 Conflicts of interest	N	-
102-26 Role of highest governance body in setting purpose, values, and strategy	Y	122
102-27 Collective knowledge of highest governance body	N	-
102-28 Evaluating the highest governance body's performance	N	-
102-29 Identifying and managing economic, environmental, and social impacts	Y	122-123
102-30 Effectiveness of risk management processes	N	-
102-31 Review of economic, environmental, and social topics	Y	122
102-32 Highest governance body's role in sustainability reporting	Y	121-122
102-33 Communicating critical concerns	Y	121-123
102-34 Nature and total number of critical concerns	N	-
102-35 Remuneration policies	N	-
102-36 Process for determining remuneration	N	-
102-37 Stakeholders' involvement in remuneration	N	-
102-38 Annual total compensation ratio	N	-
102-39 Percentage increase in annual total compensation ratio	N	-
Stakeholder engagement		
102-40 List of stakeholder groups	N	-
102-41 Collective bargaining agreements	N	-
102-42 Identifying and selecting stakeholders	N	-
102-43 Approach to stakeholder engagement	Y	122
102-44 Key topics and concerns raised	Y	14

GRI Standard	Reported	Page number
Reporting practices		
102-45 Entities included in the consolidated financial statements	Y	5
102-46 Defining report content and topic boundaries	Y	5
102-47 List of material topics	Y	14
102-48 Restatements of information	N	-
102-49 Changes in reporting	N	-
102-50 Reporting period	Y	5
102-51 Date of most recent report	Y	5
102-52 Reporting cycle	Y	5
102-53 Contact point for questions regarding the report	Y	130
102-54 Claims of reporting in accordance with the GRI Standards	Y	5
102-55 GRI content index	Y	125-129
102-56 External assurance	N	-
Management approach		
103-1 Explanation of the material topic and its Boundary	Y	14
103-2 The management approach and its components	Y	14
103-3 Evaluation of the management approach	Y	14
Anti-corruption		
205-1 Operations assessed for risks related to corruption	N	-
205-2 Communication and training about anti-corruption policies and procedures	N	-
205-3 Confirmed incidents of corruption and actions taken	N	-
GRI 302: Energy		
302-1 Energy consumption within the organisation	Y	17, 27-31
302-2 Energy consumption outside of the organisation	Y	29
302-3 Energy intensity	Y	30
302-4 Reduction of energy consumption	Y	27-31
302-5 Reductions in energy requirements of products and services	N	-
Emissions		
305-1 Direct (Scope 1) GHG emissions	Y	20-23
305-2 Energy indirect (Scope 2) GHG emissions	Y	20-23

GRI Standard	Reported	Page number
305-3 Other indirect (Scope 3) GHG emissions	Y	20-23
305-4 GHG emissions intensity	Y	21
305-5 Reduction of GHG emissions	Y	20-23
305-6 Emissions of ozone-depleting substances (ODS)	Y	20-23
305-7 Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	Y	20-23
Waste		
306-1 Waste generation and significant waste-related impacts	Y	35-36
306-2 Management of significant waste-related impacts	Y	35-36
306-3 Waste generated	Y	35-36
306-4 Waste diverted from disposal	Y	35-36
306-5 Waste directed to disposal	Y	35-36
Supplier environmental assessment		
308-1 New suppliers that were screened using environmental criteria	P	113-114
308-2 Negative environmental impacts in the supply chain and actions taken	P	110-120
Employment		
401-1 New employee hires and employee turnover	N	-
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Y	89
401-3 Parental leave	Y	89
Labour/management relations		
402-1 Minimum notice periods regarding operational changes	N	-
Occupational health and safety		
403-1 Occupational health and safety management system	Y	74-77
403-2 Hazard identification, risk assessment, and incident investigation	Y	74-77
403-3 Occupational health services	Y	74-77
403-4 Worker participation, consultation, and communication on occupational health and safety	Y	68-77
403-5 Worker training on occupational health and safety	Y	74-77
403-6 Promotion of worker health	Y	74-77
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Y	74-77
403-8 Workers covered by an occupational health and safety management system	Y	74-77
403-9 Work-related injuries	Y	77

GRI Standard	Reported	Page number
403-10 Work-related ill health	Y	77
Training and education		
404-1 Average hours of training per year per employee	N	-
404-2 Programmes for upgrading employee skills and transition assistance programmes	N	-
404-3 Percentage of employees receiving regular performance and career development reviews	N	-
Diversity and equal opportunity		
405-1 Diversity of governance bodies and employees	Y	91
405-2 Ratio of basic salary and remuneration of women to men	Y	92
Non-discrimination		
406-1 Incidents of discrimination and corrective actions taken	N	-
Freedom of association and collective bargaining		
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	N	-
Child labour		
408-1 Operations and suppliers at significant risk for incidents of child labour	N	-
Forced or compulsory labour		
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	N	-
Human rights assessment		
412-1 Operations that have been subject to human rights reviews or impact assessments	N	-
412-2 Employee training on human rights policies or procedures	N	-
412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	N	-
Supplier social assessment		
414-1 New suppliers that were screened using social criteria	N	-
414-2 Negative social impacts in the supply chain and actions taken	N	-
Customer privacy		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Y	78

FURTHER INFORMATION

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