



Champions  
of Sustainable  
Aviation

# RESPONSIBLE BUSINESS STRATEGY

2024–2027



# Contents

|  |           |
|--|-----------|
| <b>Introduction</b>                                | <b>2</b>  |
| <b>Our strategy at a glance</b>                    | <b>4</b>  |
| <b>A warm welcome</b>                              | <b>6</b>  |
| <b>Our Responsible Business Strategy</b>           | <b>10</b> |
| LLA – A progressive London airport                 | 10        |
| Our unique ownership model                         | 11        |
| We’ve come a long way...                           | 12        |
| Laying the foundations for a sustainable future    | 13        |
| Our 2023 environmental sustainability achievements | 14        |
| Introducing our new Responsible Business Strategy  | 16        |
| Our vision for the future                          | 17        |
| Our ambition and guiding principles                | 18        |
| Our strategy highlights                            | 19        |
| Our strategic approach                             | 20        |
| Empowering transformation                          | 21        |
| Accelerating decarbonisation                       | 22        |
| Net Zero Roadmap                                   | 23        |
| Beyond decarbonisation                             | 24        |
| <b>Making strategy happen</b>                      | <b>26</b> |
| Unveiling our key strategic themes                 | 27        |
| <b>Our team</b>                                    | <b>28</b> |
| Our commitment to our team                         | 28        |
| Our objectives and commitments in action           | 29        |
| <b>Our community</b>                               | <b>30</b> |
| Our commitment to our community                    | 30        |
| Our objectives and commitments in action           | 31        |
| The future of our community                        | 32        |
| <b>Our infrastructure</b>                          | <b>34</b> |
| Our commitment to infrastructure                   | 34        |
| Our objectives and commitments in action           | 35        |
| The future of operations                           | 36        |
| The future of transport                            | 38        |
| <b>Our partners</b>                                | <b>40</b> |
| Our commitment to our partners                     | 40        |
| Our objectives and commitments in action           | 41        |
| The future of aviation                             | 42        |
| <b>Our commitments in action</b>                   | <b>44</b> |
| <b>Governance</b>                                  | <b>46</b> |
| Overview   | 46        |
| Our governance framework                           | 47        |



# Our Responsible Business Strategy

At London Luton Airport Operations Limited (LLA), we play a vital role in connecting people to places around the world. In 2023, 16.2 million passengers were proudly carried to and from London Luton Airport.

As operator of one of the UK’s busiest airports, we’re committed to working toward shaping a sustainable future and reducing the environmental impact of our operations on our people, our community, the economy and of course, our environment. We acknowledge that there are negative environmental impacts from the airports operations, we as a business are striving to reduce those impacts through the development of this ambitious and forward looking strategy.

Thanks to our Responsible Business Strategy, we’re well on our way to achieving our goals. This updated strategy reflects our ongoing commitment to creating a more sustainable airport. We’ll introduce new targets and objectives, and reflect on our evolving priorities and the latest industry standards. By taking ambitious action to reduce our environmental impact, foster economic growth and support our community, we can create a better world for generations to come.

CAUTIONARY STATEMENT This document 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 or actions to differ materially from those expressed or implied by these statements. London Luton Airport Operations Limited (LLA) takes no obligation to implement or update any forward-looking statements contained in this Report, whether as a result of new information, future events or otherwise.




# Our accreditations to date





2023 - LEVEL 4  
Airport Carbon Accreditation (ACA)  
– Transformation



G R E S B  
INFRASTRUCTURE  
sector leader 2023







## Our ambition

# Champions of sustainable aviation



## Our strategic themes

### Our airport

#### 1. Our teams

Making LLA a great place to work, learn, and build a fulfilling career.

### Our responsibility

#### 2. Our community

Supporting our neighbours and community in impactful ways.

#### 3. Our infrastructure

Providing the infrastructure, and supporting the transitions necessary for LLA to move to net zero.

#### 4. Our partners

Collaborating with our partners to design the future of our sector and supporting the innovation and implementation of future flight technology.

## Ambition in Action



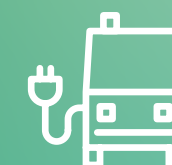
Working to find ways to support the uptake of Sustainable Aviation Fuels.



Supply 25% of direct electricity at the airport through on or near-site renewable energy sources by 2026.



The Future of Our Community Programme.



Work towards our aim to achieve 100% low-carbon in our own vehicles by 2030.

## Foundations for success



### Collaboration

As a community airport, collaboration is key. We strive to be a good neighbour, an ethical employer, and a supportive partner.



### Transparency

The difference we make is simple, clear, and visible. We believe in transparent practices and processes that are backed up by evidence.



### Innovation

We encourage innovation by working with our partners to develop sustainable solutions for an ambitious future of flight.



# A warm welcome from our CEO

LLA’s updated Responsible Business Strategy is designed to provide an understanding of the ways in which we look to work responsibly and sustainably for the benefit of our passengers, communities, stakeholders, and the environment.

Building on the success of our original Responsible Business Strategy in 2020, this updated version sets out the ambition and commitments that we will focus on over the next three years as part of our sustainability journey to 2040.

This journey is already underway and, over the last three years, we have achieved several important milestones. Most recently, becoming only the third major UK airport to achieve Level 4 of the Airport Carbon Accreditation (ACA) scheme, and for the second year running, being named GRESB Infrastructure Sector Leader, coming top globally and maintaining our perfect score of 100.

Other key developments include 27% of flights at LLA made with Next Generation aircraft in 2023, with all Wizz Air aircraft based at the airport now being Airbus A321XLR. These quieter, more fuel-efficient Airbus A321XLRs will deliver a 20% reduction in fuel consumption and half the amount of nitrogen oxide emissions compared to the previous models.

The introduction of next generation aircraft is just one of the measures introduced as part of our noise action plan. LLA has some of the most stringent noise control measures of any UK airport, and we are already making great progress in tackling how we can most effectively monitor, manage and reduce the impacts of aircraft noise on our neighbouring communities.

Another way in which we are reducing our impact on local residents, is our work with Luton Rising to drive more sustainable travel to and from the airport. The launch of the airport DART replaced the existing shuttle bus service and seamlessly connects the airport terminal and the mainline railway at Luton Airport Parkway station, where there are direct services to more than 60 stations. Additionally, the new Luton Airport Express service delivers a faster, simpler end-to-end experience for passengers travelling to London Luton Airport by rail, with the journey from London St Pancras to the airport terminal taking as little as 32 minutes.

We are also moving towards sourcing 100% renewable electricity to power our operations and contributing £150,000 to local causes via our Community Trust Fund during 2023. As part of our Greener Future Fund, we have made £100,000 available for local environmental projects. We have also raised £140,000 for our charity partners since we’ve been working with them.

As Luton’s community airport, we take seriously our responsibility towards achieving the Council’s vision for a healthy, fair and sustainable town where everyone can thrive, and no one has to live in poverty. That’s why we invested in delivering capacity-building events to give local businesses the skills and tools to successfully compete for more of our supply chain spend. In 2022, 53% of our total supply chain spend was allocated to suppliers within twenty miles of the airport.

Our plans for responsible, sustainable growth are interwoven with the wellbeing of the local economy. As well as investing in the local supply chain, we continue to focus on creating exciting employment opportunities for local people. With 62% of our employees now living within a LU postcode, our recruitment initiatives are paying dividends. Building on this success and connecting with local people is a priority and our teams regularly attend careers fairs at local schools, colleges and universities. We will also continue to work closely with Luton Borough Council and key partners including Job Centre Plus and the Department for Work and Pensions to highlight the diverse career path opportunities available at LLA.

We recognise, however, that there is always more that can be done. Whilst the benefits of aviation are clear, the sector faces numerous challenges that it must overcome if it wants to maintain its licence to operate and grow. The need for people to travel for work, rest and play is something we strive to preserve. We’re focused on delivering impactful change, by playing a leading and collaborative role in the aviation sector’s move towards sustainability.

We are excited to be on this journey, working alongside our partners, our stakeholders and our local communities to fulfil our ambition to become champions of sustainable aviation.



**Alberto Martin**

Chief Executive Officer,  
London Luton Airport

A warm welcome







# Luton Rising Managing Director

London Luton Airport (the Airport) has a vital role to play in the delivery of the bold and ambitious vision for Luton in 2040: a healthy, fair, and sustainable town where people can thrive, and no-one has to live in poverty.

Luton Rising is proud that London Luton Airport (the Airport), our largest asset, is firmly established as the UK’s most socially impactful airport. The scale of our community investment programme is unmatched by any other UK airport and benefits the lives of local people across Luton and its neighbouring communities.

Over the last 20 years, Luton Rising has contributed over £480m to frontline services in the town, providing valuable funding to support the incredible voluntary, community and charitable organisations who carry out vital work to improve the lives of those in our local communities who most need our help.

This investment is just part of our unique social impact approach. Alongside the airport operator, Luton Rising also shares ambitious commitments to establish London Luton Airport as one of the greenest airports.

Sustainability is at the heart of our responsible growth plans for the airport. Luton Rising’s proposed Green Controlled Growth initiative is a groundbreaking, environmentally focused approach to managing responsible long-term growth and details the binding, independently-measured limits we have set for the airport’s environmental impacts.

We believe Green Controlled Growth is one of the most far-reaching commitments to the sustainable operation of an airport ever to be introduced in the UK.

It is this approach that underpins our exciting plans for LLA’s continued sustainable growth – all of which will drive economic growth, new employment opportunities and more direct community support to the town and wider region.



**Nick Platts**  
Managing Director, Luton Rising



# London Luton Airport – a progressive London airport

London Luton Airport is one of the UK’s busiest airports and plays a vital role in connecting people and places across the world.

London Luton Airport (the Airport) is the UK’s fifth-biggest airport in terms of both total passengers and aircraft movements, with an extensive route network serving more than 160 destinations across Europe, Africa and Asia. In 2023, the airport carried 16.2 million passengers, up from 13.1 million in 2022. Passenger numbers continue to recover post-covid with the expectation to reach 18 million in the near future.

LLA is wholly-owned by Luton Council (LC) through its subsidiary company, 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 Infrabridge, a global investment manager.

As the operator, we work in collaboration with our partners at Luton Rising and Luton Council and engage closely with members of our community, local residents and regional policymakers.

At LLA, we are committed to delivering an exceptional travel experience for all of our guests while also driving sustainability and responsibility across our operations.

Taking effective action on sustainability has never been more important and LLA is committed to playing a core collaborative role within the aviation industry. We have set our target to work towards achieving net zero emissions, from our own operations, by 2040 and working with our partners to encourage a reduction in their emissions.

## Our unique ownership model

LLA has a unique ownership model, being wholly-owned by the local authority, but operated by a private operator under a concession arrangement. This public-private model enables us to drive the adoption of global best practices in airport operations, while focusing on the benefits for the local community.



# We’ve come a long way...

After the release of our first Responsible Business Strategy (RBS) in 2020, we embarked on a journey to establish a sustainable framework for LLA. This included:

**Establishing a dedicated sustainability team.**  
Our newly-formed team is focused on cultivating a sustainable mindset within LLA, ensuring that sustainability is embedded into our operations and culture. This remains a top priority for us today.

**Committing to ambitious and purposeful action.**  
We are committed to not only growing responsibly but also ethically, in a way that aligns with Luton’s values and makes our community proud.

**Achieving notable milestones despite challenges.**  
In the face of the unprecedented challenges posed by COVID-19, our newly-formed team helped us to achieve milestones of which we’re incredibly proud.

**Adapting and learning continuously.**  
We embrace an iterative approach, continually learning from and with our community and partners – which is why we are now launching an updated Responsible Business Strategy.

We’ve made significant strides and want to keep the momentum going, leveraging our successes and learning from experience. We aim to sustain a positive impact and continually update our approach and goals in line with changes to industry and technology.

# Laying the foundations for a sustainable future

Pre-2020 highlights

First charity partnership.

£50k

donated to establish the Community Trust Fund.

Non-perishable food from security screening processes donated to Luton Food Bank.

Achieved ISO 14001 (environment) certification and OHSAS 18001 (H&S) certification.

First airport in the UK to be accredited with 45001 certification (OH&S).

£150k

Funding to Community Trust Fund trebled to £150k.

Night-time movement and QC limits introduced.

Airport’s first jobs’ fair and first schools’ programme.

Achieved ISO 50001 (energy) certification.

Noise Action Plan approved by Defra 2019.

Sustainable Aviation membership started.

Regular Public Noise Surgery programme started.

Green Apple Award for Environmental Best Practice for the construction of Taxiway Bravo.

Community Engagement Strategy creation.



## Our 2023 environmental sustainability achievements



**Largest operation of next-generation aircraft in Europe in summer 2023, reducing emissions by up to 20% per flight compared to previous generation aircraft.**



Achieving GRESB global sector leader position for a second year running for sustainability, performance and governance.

Introducing the use of low-carbon fuel across our airport operations fleet, including our on-site buses. HVO reduces lifecycle carbon emissions by up to

**90%**



Exploring the delivery of our on-site solar farm to the south of our runway, it is aimed at delivering around 25% of our electricity requirements by 2026.



Launch of a new electrified Express rail service and Luton DART, a brand new fully automated and electrically powered shuttle that combined, deliver a faster, more frequent and sustainable service to and from LLA.



**Airport Carbon Accreditation Level 4 achieved, only the third major UK airport to have reached this level.**



Commencing the role of the electric vehicle transition in line with our net zero roadmap and increasing operator EV usage, with over 42% of Hackney taxis now electric.

**74%**

Reaching an average 74% recycling rate across our concessionaire waste through engagement with our concession operators and their employees.



Developing a new air quality strategy that highlights and demonstrates the actions to be taken on non-carbon emissions and their impacts.

## ... and the positive impact driven across our community.



**Over 50% of our supply chain is local to the airport in line with our new sustainable supply chain charter, launched in 2023.**



**15,500+**

individuals benefiting from Community Trust Fund grants in 2023 across 33 community groups.

Through our partnership with Bedfordshire and Luton Community Foundation (BLCF) we have invested:

**£185K**

to local organisations and groups for projects that help create a healthy today, skilled tomorrow, and alleviate poverty across Luton and neighbouring towns.



we planted 1000 trees and took part in the annual Keep Luton Tidy Campaign that runs alongside the National Great British Spring Clean, collecting 60 bags of rubbish.

**The successful launch of our new Greener Future Fund.**

As part of our Community Trust Fund, this new fund is aimed at supporting local community groups to deliver projects within 5 miles of the airport.

**£89K**

to local organisations and community groups within five miles of LLA to improve biodiversity and promote carbon reduction through education programmes and initiatives.



We're a Real Living Wage employer contributing to Luton 2040's goal to tackle poverty.



350+ hours volunteered by LLA employees in 2023.



Invested £30,000 in sponsorship to five local organisations.



Redistributing over 1.5 tonnes of unreclaimed tools from security points to local projects and causes with an estimated retail value of over £10,000.

**£140K**

Raised for our charity partners, East Anglian Air Ambulance and Luton Food Bank since 2020.



Launch of new Enterprise Advisors Scheme with LLA colleagues partnering with local schools to provide education and insight on the aviation industry.



# Introducing our new Responsible Business Strategy

Our sustainability ambition  
**Champions of Sustainable Aviation**

Our approach to sustainability is based on the principles of collaboration, transparency and innovation.

We're introducing new ways of working and development, including:

### 1. Our teams

Making LLA a great place to work, learn and build a fulfilling career.

### 2. Our community

Supporting our neighbours and community in impactful ways.

### 3. Our infrastructure

Providing the infrastructure, and supporting the transitions necessary, to move to net zero emissions from our own emissions.

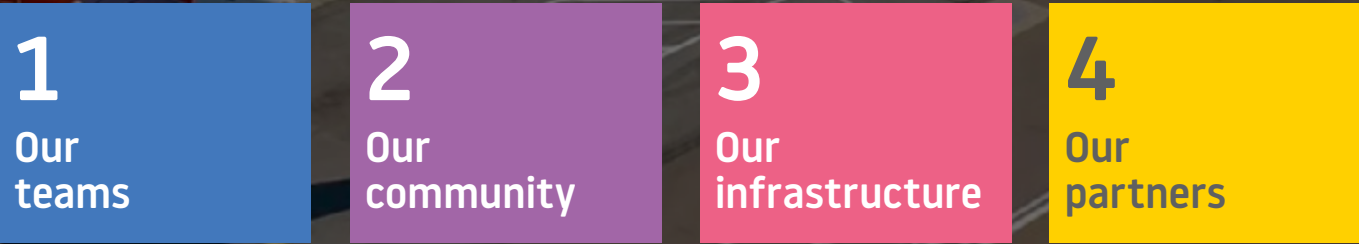
### 4. Our partners

Collaborating with our partners to design the future of our sector and supporting the innovation and implementation of future flight technology.

Our plan of action includes:

- Creating enhanced methods of working through collaboration that consolidates our current LLA and partner engagement forums, focusing on various aspects of sustainability.
  - Amplifying our commitment within our local community through investment in a lifelong 'Future of the Community' programme. Encompassing outreach, support and future skills investment from primary school level to retirement.
- Reducing our airport emissions through accelerated energy efficiency, on and near-site solar generation and our transition to low and zero-carbon vehicles.
  - Supporting and working with our airlines to encourage the deployment of the newest, most efficient aircraft and working to support the uptake of Sustainable Aviation Fuel (SAF).

# Our vision for the future



Robust governance mechanisms hold the organisation and teams across LLA accountable for the delivery of the RBS.



Our ambition and guiding principles

# Champions of sustainable aviation

Our guiding principles

Collaboration

As a community airport, collaboration is key when striving to be a good neighbour, an ethical employer and a supportive partner.

Transparency

The difference we make is simple, clear, and visible. We believe in transparent practices and processes that are backed up by evidence.

Innovation

We encourage innovation by working with our partners to develop sustainable solutions for an ambitious future of flight.



# Our strategy highlights

The collaborative approach followed in the development of this strategy has led to the definition of 31 ambitions\* that we will be working towards in cooperation with our partners. Here, we highlight some of our priority commitments in action.

**Building the foundations to reduce environmental impact**

Supply 25% of electricity at the airport through on or near-site renewable energy sources by 2026.

**Working with partners to drive sustainable aviation**

Work with airlines to encourage the uptake of Sustainable Aviation Fuel (SAF) used at the airport.

**Driving and supporting low and zero-carbon on the ground**

Work towards our aim to achieve 100% low-carbon emissions in our own vehicles by 2030 through the use of low-carbon fuels and the transition to electric vehicles.

**Investing and giving back to our community**

The Future of Our Community programme is aimed at providing Lutonians with a structured pathway for young people and students to start their career in aviation.

\*(see pages 48 and 49)

# Our strategic approach

By actively involving relevant stakeholders, we have gained valuable insights into their perspectives and expectations which has influenced this sustainability strategy assessment.



**Internal Interviews**  
We interviewed 30+ internal stakeholders from various departments. In these interviews, we gained insights into current sustainability practices, challenges, and opportunities. These interviews allowed us to identify areas where we could improve our sustainability performance and ensure our sustainability initiatives are aligned with the perspectives of our teams.

**Workshops**  
We hosted five workshops bringing together representatives from different stakeholder groups, including airlines, passengers, community members, and government agencies. These workshops provided a platform for open dialogue and facilitated the exchange of ideas and perspectives on sustainability issues. Participants were encouraged to share their concerns, ideas, and expectations for LLA’s sustainability performance.

**Corporate social responsibility**  
We conducted four corporate social responsibility interviews with experts in the field that allowed us to gain insights into emerging sustainability trends and best practices. These interviews provided us with a broader understanding of the challenges and opportunities facing the industry, and helped us identify areas where we could differentiate ourselves in our sustainability efforts.

**Passengers**  
We conducted several passenger interviews that allowed us to gauge the public’s understanding of, and attitudes towards, sustainability issues. These interviews revealed passengers do have concerns about the environmental impact of aviation and are looking for ways to travel more sustainably. We used this feedback to develop initiatives that address passenger concerns and promote sustainable travel practices.

**Community**  
We conducted six community interviews, engaging with local residents and stakeholders to understand their concerns about the airport’s impact on the surrounding environment and community. These interviews helped us identify areas where we could improve our environmental performance and build stronger relationships with our community.

**Shareholders**  
We also engaged with shareholder representatives on an ongoing basis to discuss sustainability priorities and concerns, tapping into their expertise and perspectives to develop a robust Responsible Business Strategy, underpinned by our commitment to long-term value creation for all our stakeholders.

# Empowering transformation

We’re fostering collaborative change through wide, varied and continuous engagement, enabling us to better understand and address sustainability challenges in both the aviation sector and local communities.

**Collaboration**

We drive collaboration through sustainability committees, working groups, and stakeholder engagement, bringing together shareholders, staff, community, passengers, partners, and institutions.

**Transparency**

Our annual responsible business performance reports ensure transparency, keeping stakeholders informed. Ongoing conversations and bi-monthly sessions facilitate reflection and alignment on objectives and projects.

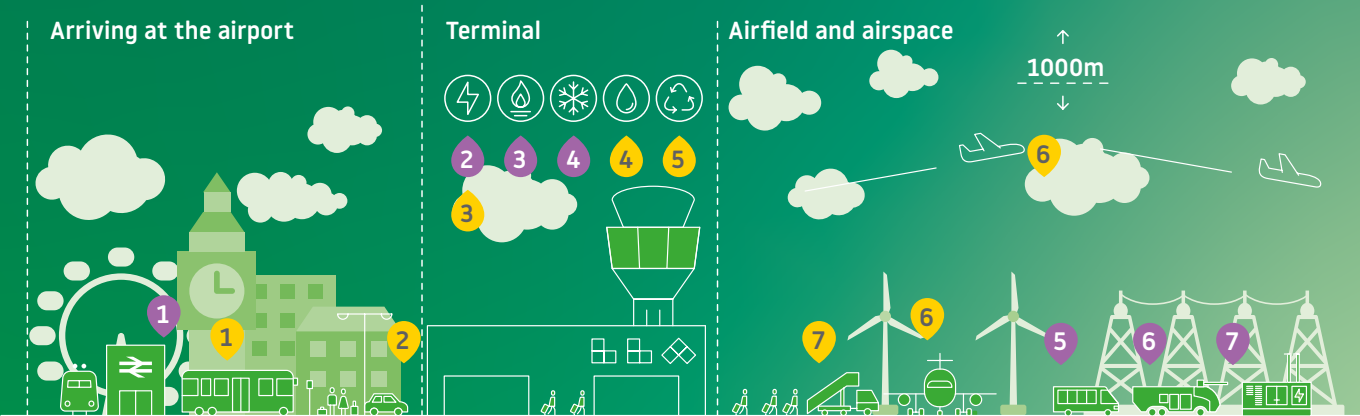
**Innovation**

Partnering with airlines and research institutions, we aim to contribute to shaping a sustainable future for air travel. The hub encourages knowledge sharing, resource pooling, and challenges for best practices, supporting the exploration of new technologies and innovative developments for collective action.





# Accelerating decarbonisation



## Our direct 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 stakeholders' emissions

### Arriving at the airport

- 1 Passenger travel
- 2 Colleague commute

### Terminal

- 3 Electricity use by retail operators
- 4 Water management
- 5 Waste management

### Airfield and airspace

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

# Net Zero roadmap

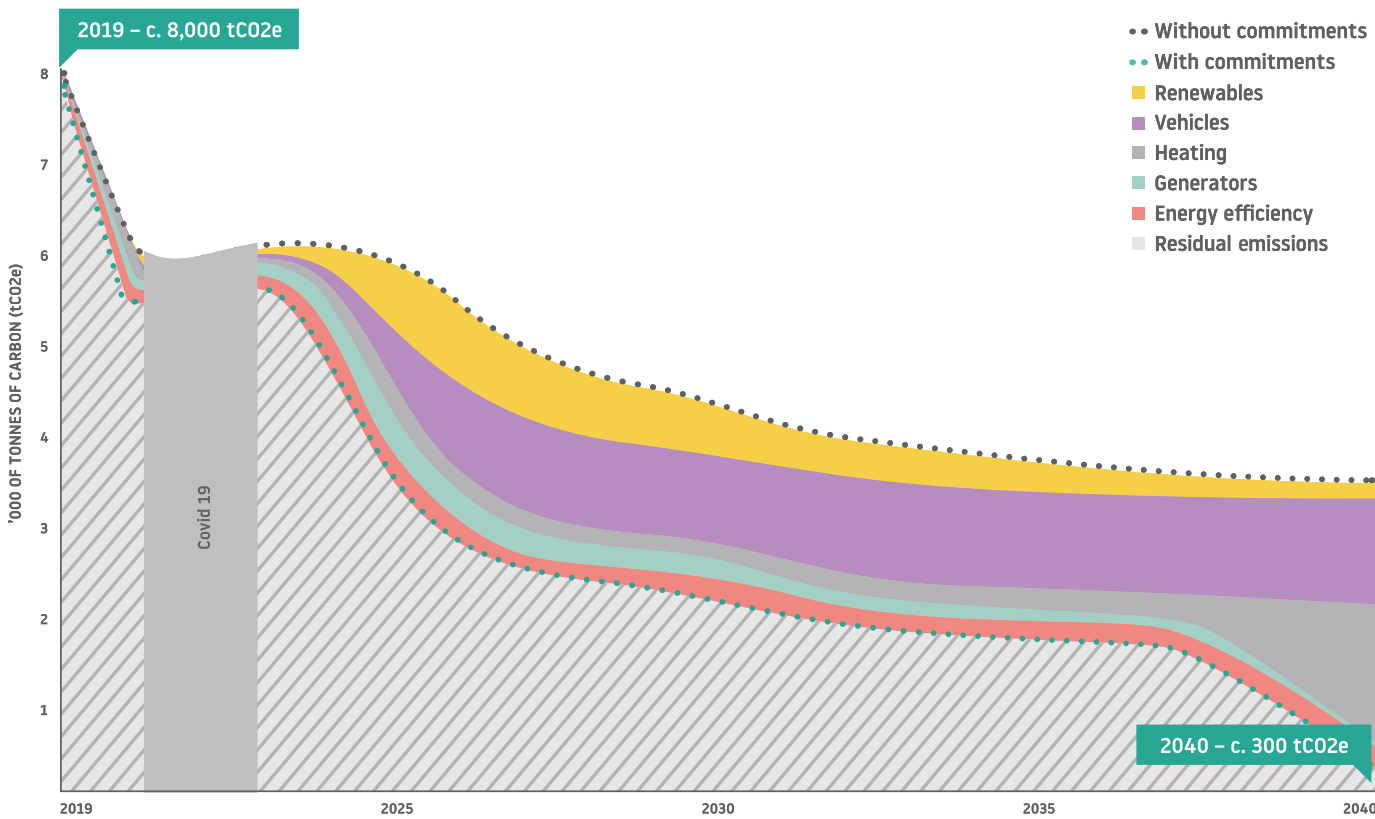


Sustainability is a cornerstone of our vision for London Luton Airport as we look to operate and grow responsibly. We are committed to sustainable aviation and have set an ambition to achieve net zero by 2040 for our airport emissions.

This roadmap outlines the first steps on our net zero journey to reduce emissions from our own operations and enable us to continue to operate a thriving, sustainable airport.

Whilst we have taken the initial steps on our pathway to net zero, we recognise there is still plenty of work to be done. We will continue to work closely with our partners, including Luton Rising, Luton Borough Council, and the airlines, to support and enable the reduction of overall carbon emissions across our airport.

## Our trajectory to net zero



# Beyond decarbonisation: aligning with UK Government policy

The UK Government’s Jet Zero strategy focuses on how we reduce CO<sub>2</sub> emissions from aviation, however, we also recognise that aviation has non-CO<sub>2</sub> climate impacts, that need to be addressed. We’re working to minimise the non-CO<sub>2</sub> effects of aviation in several ways:

**Promoting Sustainable Aviation Fuel**

We will work with airlines to seek to drive up the proportion of Sustainable Aviation Fuel (SAF) used at the airport, in line with the UK Government mandate. SAF is known to have a lower soot content, reducing contrail formation and nitrogen oxide emissions.

**Collaborating with airlines and other stakeholders**

Collaborating with airlines and stakeholders allows us to support the development of new technologies and industry standards. We also leverage the scale and experience of our shareholders to engage with and identify best practice across the domestic and international airport communities.

**Investing in research and development**

We are developing our links with leading academic institutions like Cranfield University to support research and development in areas such as contrail mitigation, cleaner engines, and fuel efficiency improvements to help develop innovative solutions to the non-CO<sub>2</sub> effects of aviation.

**Investing in renewable energy**

We are exploring ways to switch to solar power as this significantly cuts greenhouse gas emissions beyond CO<sub>2</sub>, reflecting our commitment to renewable energy sources.

**Improving our ground operations**

Optimising ground operations, from the boarding process to taxiing, reduces aircraft emissions. Supporting efficient ground-handling equipment and traffic management contributes to emission reduction and minimises non-CO<sub>2</sub> effects.

**Non-CO<sub>2</sub> Impacts**

This is an emerging area and we look to work closely with the government and the wider industry to better understand and mitigate non-CO<sub>2</sub> impacts from aviation.





# Making strategy happen



## Unveiling our key strategic themes

In the next phase of our journey, we'll prioritise delivering impact, aligned with sustainability targets in four key areas, serving the future of our people and the future of flight.

Our strategy focuses on creating an inclusive and diverse work environment in line with Luton's ecosystem and Luton Borough Council's Luton 2040 vision. We support ongoing learning, invest in local talent, and collaborate with the community for positive impact. To help achieve a more sustainable future for our airport operations, we innovate ground processes, work with partners, and encourage a cleaner aviation sector for a more positive societal impact in our communities.

|                      | Our airport   | Our responsibility   |
|----------------------|---|--|
| The future of people | <div><h3>1. Our teams</h3><p>Making LLA a great place to work, learn and build a fulfilling career.</p></div>   | <div><h3>2. Our community</h3><p>Supporting our neighbours and community in impactful ways.</p></div>  |
| The future of flight | <div><h3>3. Our infrastructure</h3><p>Providing the infrastructure, and supporting the transitions necessary, to move to net zero emissions from our own emissions.</p></div> | <div><h3>4. Our partners</h3><p>Collaborating with our partners to design the future of our sector and supporting the innovation and implementation of future flight technology.</p></div> |

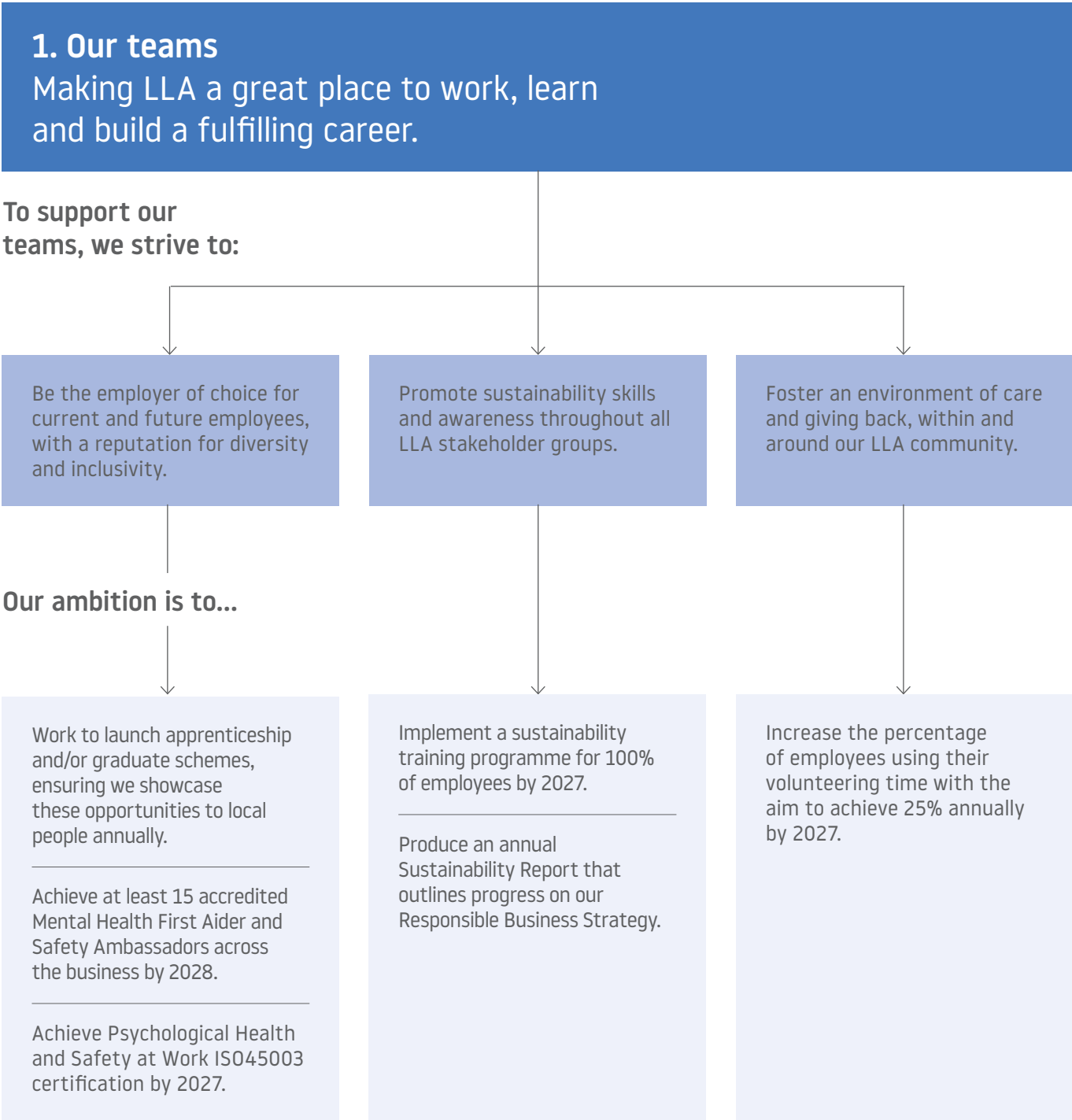
# Our commitment to our teams

LLA strives to be an inclusive, diverse, and safe workplace, understanding and supporting our teams’ motivations and challenges. Our goal is to create an environment that encourages growth, pride, creativity, and innovation. We aim to be a top-class employer, setting standards in our sector and beyond with ethical practices and best-in-class approaches.



This diagram provides a snapshot of how we’ll aim to fulfil LLA’s strategic themes by outlining our key objectives and the commitments we’re making to seek to meet them.

Our strategic theme:





# Our commitment to our community

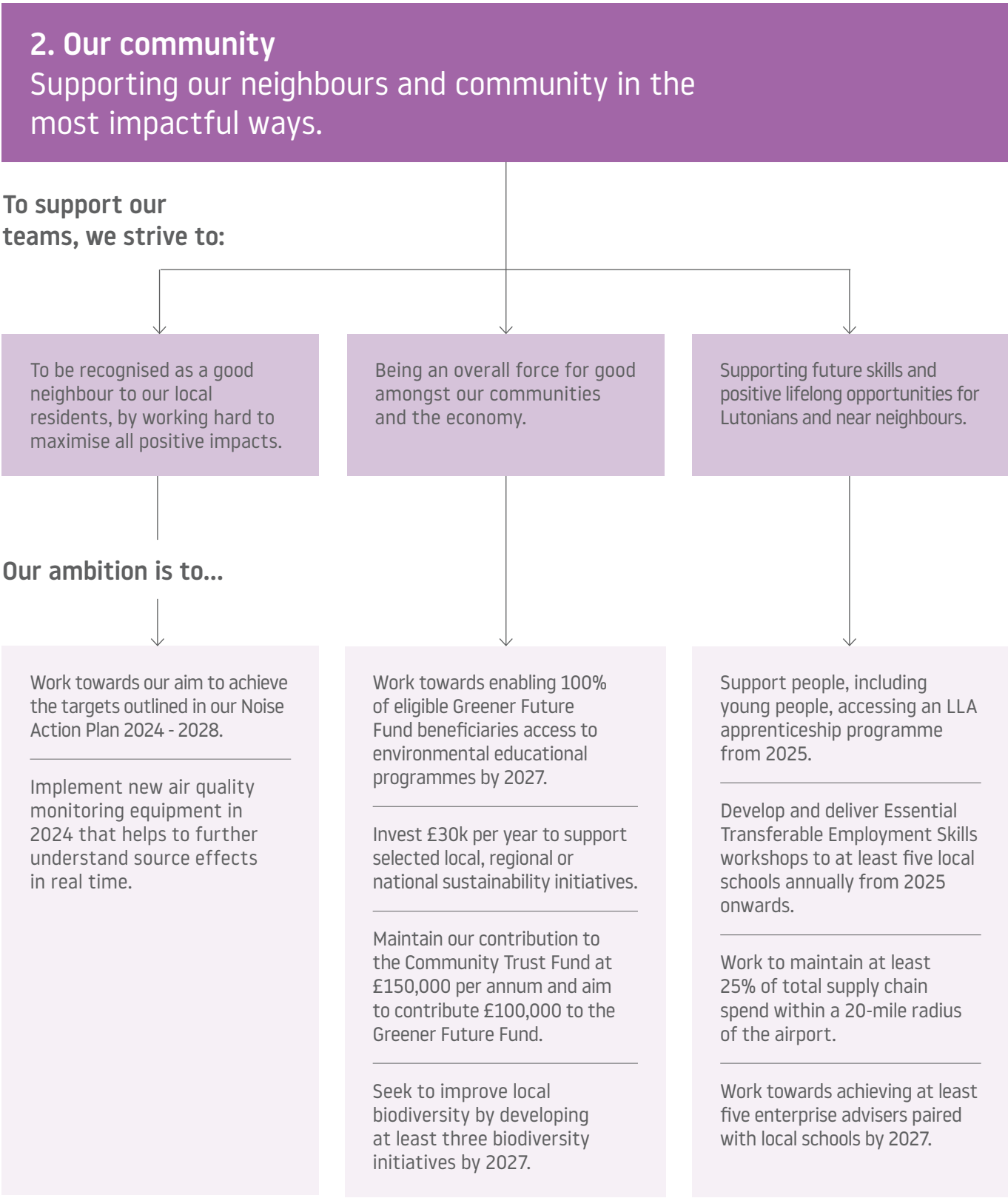
LLA’s unique ownership model means that the wider Luton community benefits from the airport’s success. We also want to see all those within our community thrive. We strive to be a force for good – we are working towards delivering positive impact and social value to those who live in and near the airport and are impacted by our operations, and those that use our services.

By working with local businesses and joining forces with the many local charity and Corporate Social Responsibility organisations that serve the wider community, our aim is simple: to support our communities.



This diagram provides a snapshot of how we’ll aim to fulfil LLA’s strategic themes by outlining our key objectives and the commitments we’re making to seek to meet them.

Our strategic theme:



# The future of our community

As a community airport, we value local support and want to be seen as a good neighbour.

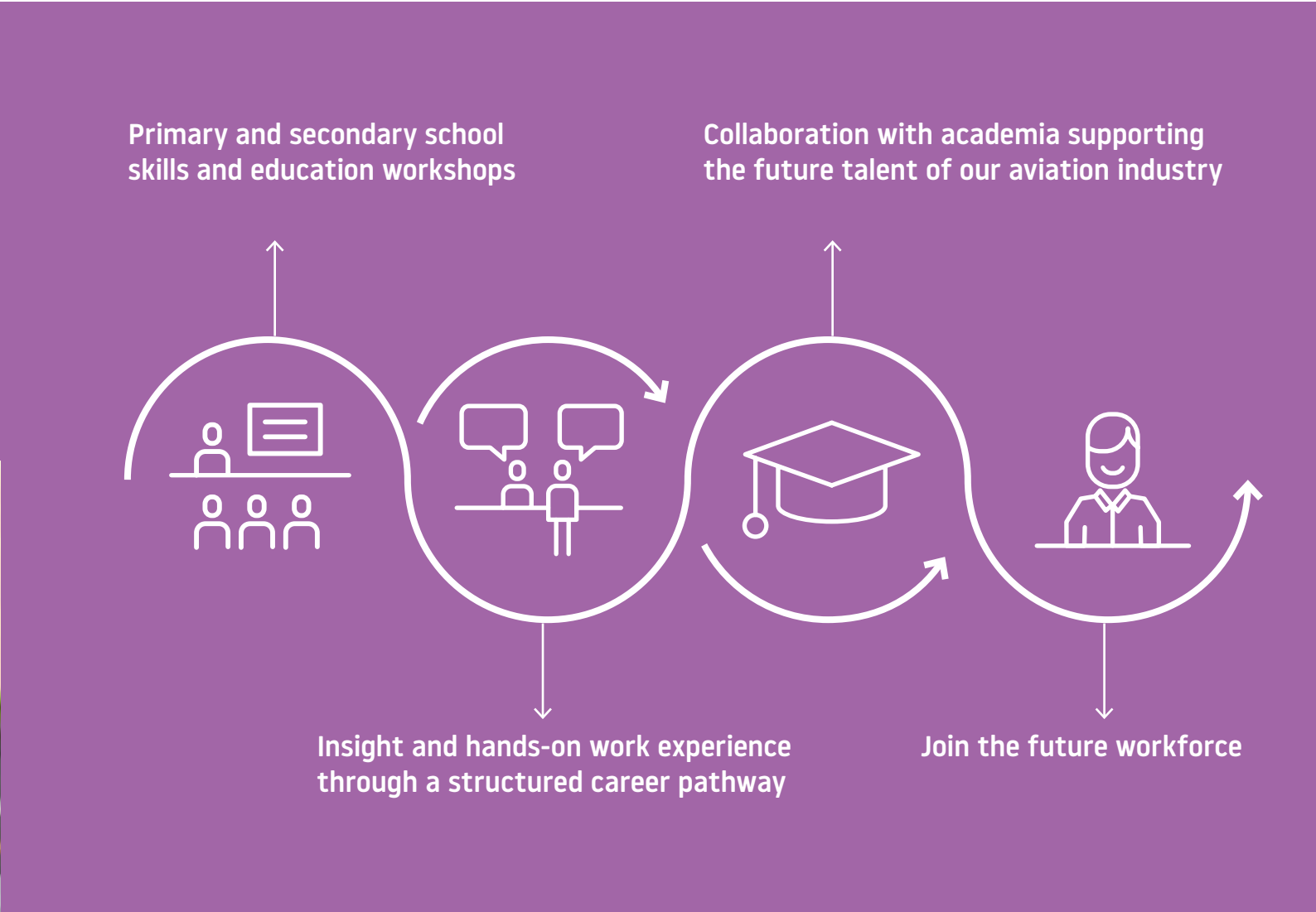
At LLA, we invest in our community’s future by offering skills, training, and development opportunities for career progression, starting from entry-level and beyond.

The future of our community programme aims to provide a structured pathway for young Lutonians, working with schools and partners to implement skills and education interventions from early to secondary education. These programmes offer aviation insights, new skills, and knowledge provision, inspiring talent from within our community for the future.



## Our goals

- Aim to provide young people from our community with the skills and opportunities to kick start their careers in aviation.
- Drive schools and education partnerships to build and deliver strong skills and education programmes that enable direct opportunities with local schools and our Community Trust Beneficiaries.
- Work in partnership with education providers to support future talent, and the transition to jobs that support the green economy.
- Demonstrate the added value that our educational programmes bring to our local community and economy.



## Impact

Our educational programmes are targeting 2,000 individuals over the next 3 years.



# Our commitment to infrastructure

## Moving to net zero

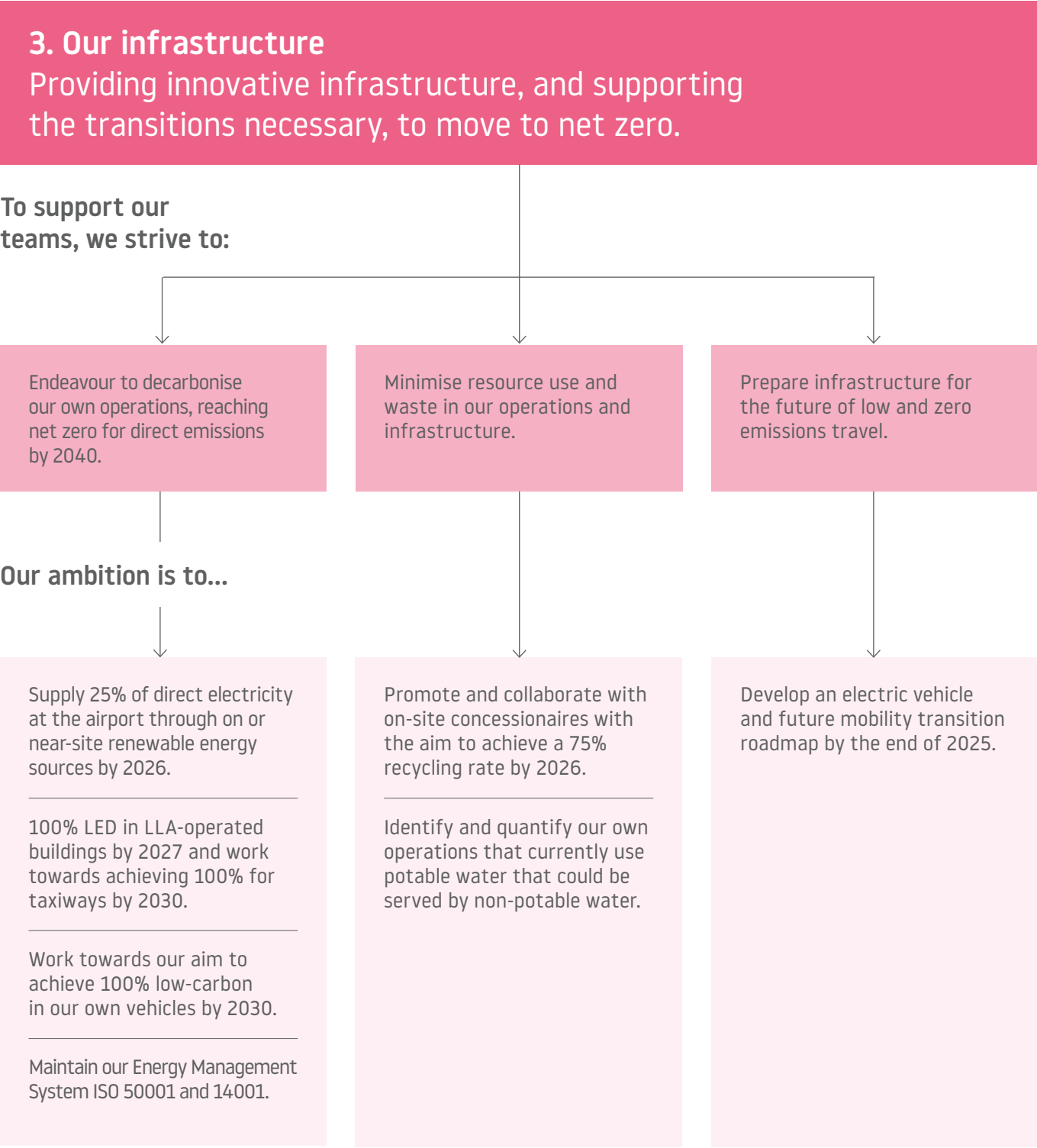
We’re committed to minimising our environmental and societal impact in our daily operations. We do this by supporting renewable energy, sustainable transportation, and overall emission reduction. Leading by example, we focus on high-impact areas to inspire partners and passengers towards net zero, starting with our own infrastructure and journeys.

We’re not only referring to the physical structures and systems of LLA, but also acknowledging the unseen operational and delivery teams who work hard to make the transitions possible at pace and scale.

3

This diagram provides a snapshot of how we’ll aim to fulfil LLA’s strategic themes by outlining our key objectives and the commitments we’re making to seek to meet them.

## Our strategic theme:



# The future of operations

To actively reduce and minimise the carbon impact of LLA operations.

To achieve net zero by 2040, we must focus on decarbonising airport operations and generating on-site renewable energy. This immediate emission reduction is crucial for the growing electrification of our operations. We're actively retrofitting existing infrastructure and developing new projects, including exploring the implementation of a 10MW solar farm.

Our energy transition plans go beyond engagement with shareholders, Luton Rising, and other partners for on-site/off-site solutions. We aim to establish LLA as a renewable energy hub, supporting research, design, and adoption of innovative technologies for our net zero goals.



## Our goals

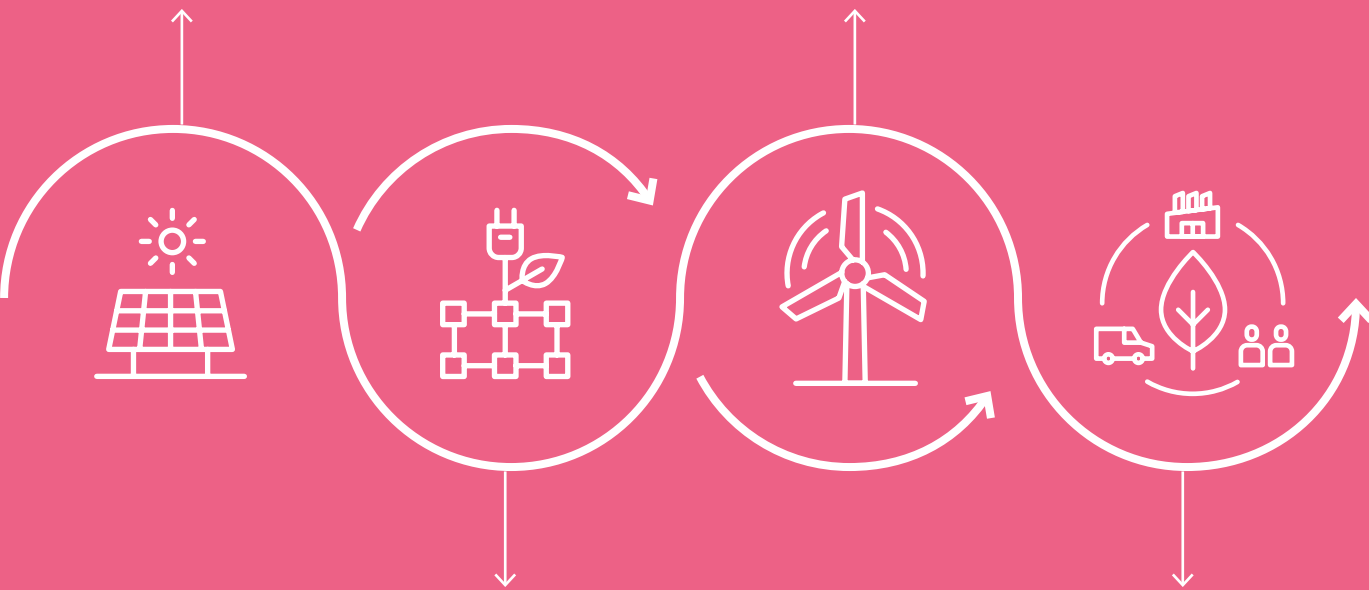
- Striving to install a 10MW solar farm and exploration o other renewable energy sources (such as anaerobic digesters).
- Explore the potential for additional solar energy production at the airport.
- Explore the potential to derive further renewable energy for the airport from nearby locations.

### Initial solutions

Strive to install four kilometres of HV cabling to facilitate initial 10MW solar farm and future solutions.

### Explore new and emerging technologies

- Continue to explore opportunities for on-site renewable generation.
- Utilise new/pioneering technologies to meet net zero goals.



### Develop plans for further on-site, near-site or private wire solutions

Engage with Luton Rising and other third party organisations to increase the generation of renewable energy from off-grid systems.

### Aim to establish the Airport as a renewable energy hub

## Impact

Electricity accounts for circa 60% of LLA's direct airport emissions and so we're targeting a 25% supply of direct electricity at the airport through on or near-site renewable energy by 2026.



# The future of transport

To generate and meet the Airport’s transport needs through EVs.

To achieve decarbonisation, we’re not only introducing renewables at the airport, but also focusing on achieving net zero on the ground. Through the Future of Transport programme, we’re collaborating with partners to introduce electric vehicles (EVs) and charging infrastructure across the site alongside the LLA fleet. We’ve also introduced an EV scheme for staff.

Beyond our own fleet, we’re going to be focused on switching ground handling equipment and encouraging our transport providers to accelerate their transition, such as car hire, buses, coach and taxi providers.



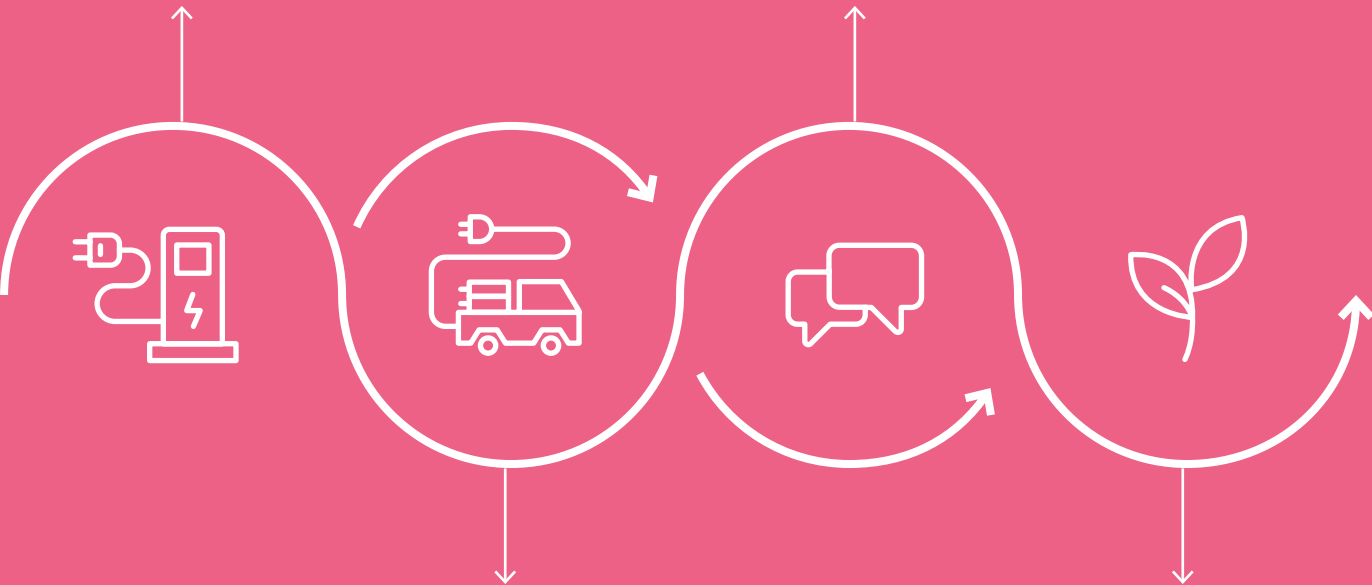
## Our goals

- Encouraging ground transportation partners to decarbonise their vehicle fleets in a planned and coordinated way.
- Investment into EV infrastructure and the introduction of an EV fleet.

### Introduction of LLA fleet

- Seeking to implement EV charging infrastructure
- Transitioning of LLA vehicles to EVs

### Supporting partners in setting up their EVs onsite



**Encouraging operators to transition ground vehicles to EVs**

**Educational campaigns**  
In collaboration with partners, deliver effective communications that educate passengers on the greenest way to travel to and from the airport.

## Impact

LLA’s vehicles account for around 15% of of the Airport’s direct emissions and so we are working to achieve a low carbon fleet by 2030.

# Our commitment to our partners

Collaborating with our partners to design the future of our sector and supporting the innovation and implementation of future flight technology.

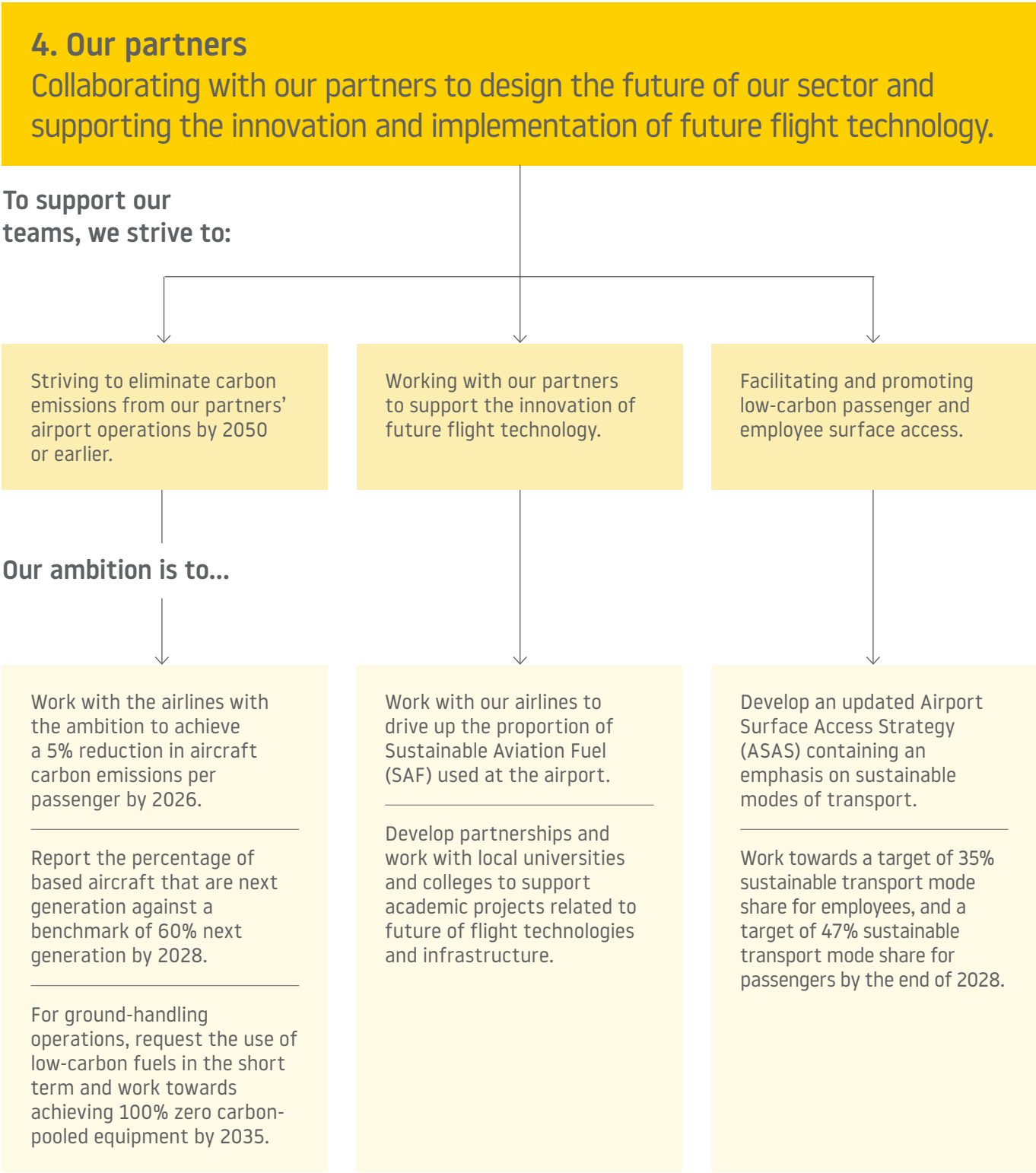
In the dynamic sustainability landscape, a collaborative approach is crucial for LLA to achieve net zero by 2040. By leading the co-operation with business partners, resource sharing, and access to data we can encourage, inspire and educate our supply chain to act sustainably and trial new ideas for a more sustainable aviation ecosystem.

When we talk about our partners, we’re referring to all those who work with us in running our operations, both on the ground and in the air – like our airlines, supply chains, concessions, tenants and operators. We also consider any research and development groups, such as universities and technology and research institutes, to be our partners.



This diagram provides a snapshot of how we’ll aim to fulfil LLA’s strategic themes by outlining our key objectives and the commitments we’re making to seek to meet them.

Our strategic theme:





# The future of aviation

Working with the airlines operating at the Airport to encourage the uptake of the proportion of Sustainable Aviation Fuel (SAF) used at the airport.

We are focused on shaping a sustainable future for air travel. Partnering with airlines and research institutions, we encourage knowledge sharing, resource pooling, challenges for best practices, and exploration of new technologies and innovative developments for collective action. Sustainable Aviation Fuel (SAF) is crucial, reducing aircraft carbon emissions by up to 70%.

LLA wishes to support aircraft operators in utilising SAF and is committed to working with them to enable this to happen. The adoption of Sustainable Aviation Fuel is pivotal in tackling growing emissions whilst hydrogen and electric aircraft technologies continue to develop, and our aim is to collaborate with partners to expedite the usage of SAF across commercial aviation.

We want our neighbours and passengers to know that we do not accept the status quo of business operations. Instead, we are committed to striving to ensure that the future of aviation is a less polluting one. This will include working with fuel suppliers and supporting accelerated SAF adoption across the airlines operating at the Airport. We will also collaborate with external organisations and academic institutions to explore innovative and new technological developments in SAF.

## Our goals

- Working with the airlines operating at the Airport to encourage the uptake of the proportion of Sustainable Aviation Fuel (SAF) used at the airport.
- From 2025 onwards, we will look beyond SAF and how we can support alternative zero emissions flight technology as it becomes fully developed including electric and hydrogen.

### Collaboration

Work closely with airlines operating at the Airport to enable SAF use at LLA.

### Governance

Ensure the SAF programme is backed up by a robust reporting mechanism and governance structure.



### Certification

Seek to establish a baseline of SAF certification acceptance.

### Beyond

Exploration beyond SAF of alternative, innovative solutions (like, hydrogen) to support zero emissions flights.

## Impact

Airline emissions make up for the majority of the airport’s total emissions and so we’re encouraging the use of Sustainable Aviation Fuel which reduces lifecycle CO<sub>2</sub> emissions by up to 70%.

# Our commitments in action

| Strategic theme                            | Overview  | Our ambitions  | Our commitments   |
|--|---|--|---|
| <div>1</div> <div>Our teams</div>          | Making LLA a great place to work, learn and build a fulfilling career.  | <div>1</div> Be the employer of choice for current and future employees, with a reputation for diversity and inclusivity. <div>2</div> Promote sustainability skills and awareness throughout all LLA stakeholder groups. <div>3</div> Foster an environment of care and giving back, within and around our LLA community.     | <ul style="list-style-type: none"><li>• Achieve at least 15 accredited Mental Health First Aider and Safety Ambassadors across the business by 2028.</li><li>• Achieve Psychological Health and Safety at Work ISO 45003 certification by 2027.</li><li>• Implement a sustainability training programme for 100% of employees by 2027.</li><li>• Increase the percentage of employees using their volunteer time with the aim of achieving 25% annually by 2027.</li><li>• Work to launch apprenticeship and/or graduate schemes, ensuring we showcase these opportunities to local people annually.</li><li>• Produce an annual sustainability report that outlines progress on our Responsible Business Strategy.</li><li>• Ensure the Responsible Business Strategy is updated every three years.</li></ul>  |
| <div>2</div> <div>Our community</div>      | Supporting our neighbours and community in the most impactful ways.   | <div>4</div> To be recognised as a good neighbour to our local residents, by working hard to increase all positive impacts. <div>5</div> Being an overall force for good amongst our communities and the economy. <div>6</div> Supporting future skills and positive lifelong opportunities for Lutonians and near neighbours. | <ul style="list-style-type: none"><li>• Implement new air quality monitoring equipment in 2024 that helps to further understand source effects in real time.</li><li>• Work towards our aim of achieving the targets outlined in our Noise Action Plan 2024 - 2028.</li><li>• Seek to improve local biodiversity by developing at least three biodiversity initiatives by 2027.</li><li>• Work towards enabling 100% of eligible Greener Future Fund beneficiaries access to environmental education programme by 2027.</li><li>• Maintain our contribution to the Community Trust Fund at £150,000 per annum and aim to contribute £100,000 to the Greener Future Fund.</li><li>• Invest £30k per year to support selected local, regional or national sustainability initiatives.</li><li>• Develop and deliver Essential Transferable Employment Skills workshops to at least five local schools annually from 2025 onwards.</li><li>• Work towards achieving at least five enterprise advisers paired with local schools by 2027.</li><li>• Work to maintain at least 25% of total supply chain spend within a 20-mile radius of the airport.</li></ul> |
| <div>3</div> <div>Our infrastructure</div> | Providing the infrastructure, and supporting the transitions necessary, to move to net zero for LLA's operations.                                 | <div>7</div> Decarbonise our own operations reaching net zero for direct emissions by 2040. <div>8</div> Reduces resource use and waste in our operations and infrastructure. <div>9</div> Prepare infrastructure at the airport for the future of low and zero emissions travel.  | <ul style="list-style-type: none"><li>• 100% LED in LLA-operated buildings by 2027 and work towards achieving 100% for taxiways by 2030.</li><li>• Work towards our aim to achieve 100% low-carbon in our own vehicles by 2030.</li><li>• Promote and collaborate with on-site concessionaires with the aim of achieving a 75% recycling rate by 2026.</li><li>• Supply 25% of direct electricity at the airport through on or near-site renewable energy sources by 2026.</li><li>• Maintain our Energy Management System ISO 50001 and 14001 Environmental Management System Accreditation.</li><li>• Identify and quantify our own operations that currently use potable water that could be served by non-potable water.</li><li>• Develop an electric vehicle and future mobility transition roadmap by the end 2025.</li></ul>  |
| <div>4</div> <div>Our partners</div>       | Collaborating with our partners to design the future of our sector, and supporting the innovation and implementation of future flight technology. | <div>10</div> Eliminate carbon emissions from our partners' airport operations by 2050 or earlier. <div>11</div> Working with our partners to support the innovation of future flight technology. <div>12</div> Facilitating and promoting low-carbon passenger and employee surface access.                                   | <ul style="list-style-type: none"><li>• Report the percentage of based aircraft that are next generation against a benchmark of 60% next generation by 2028.</li><li>• Work with airlines operating at the airport to drive up the proportion of Sustainable Aviation Fuel (SAF) used at the airport.</li><li>• Work with the airlines with the ambition to achieve a 5% reduction in aircraft carbon emissions per passenger by 2026.</li><li>• Request the use of low-carbon fuels in the short term and work towards achieving 100% zero carbon-pooled equipment by 2035.</li><li>• Develop an updated Airport Surface Access Strategy (ASAS) containing an emphasis on promoting sustainable modes of transport.</li><li>• Work towards a target of 35% sustainable transport mode share for employees and a target of 47% sustainable transport mode share for passengers by the end of 2028.</li><li>• Develop partnerships and work with local universities and colleges to support academic projects related to future of flight technologies and infrastructure.</li></ul>   |



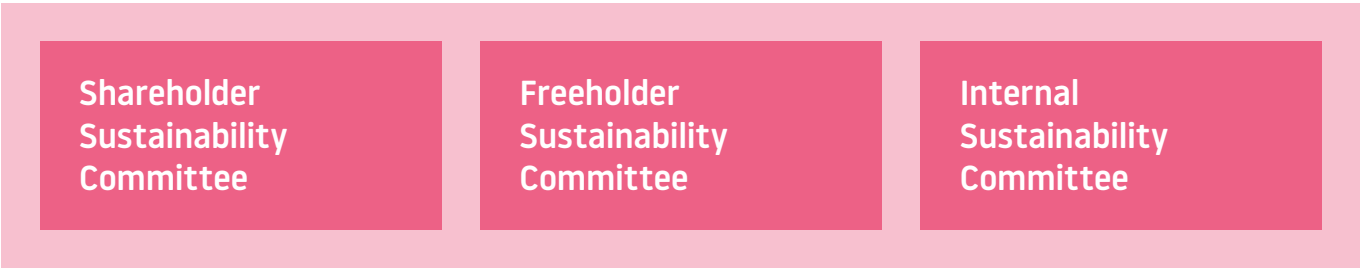
# Governance

**Our sustainability committees**

In 2021, we established the Sustainability Committee (SusCo) to review and advise the Board appropriately on the practices and performance of the group in relation to sustainability. The SusCo meets quarterly and is chaired by Amparo Brea, Chief Green Officer at Aena, London Luton Airport Operations Limited’s (LLA) major shareholder. It comprises representatives from LLA (CEO, CFO, Director of Corporate Affairs, Operations Director, General Counsel and Head of Sustainability) and from shareholders Aena and InfraBridge.

Additionally, we have a committee that meets quarterly and includes members of Luton Borough Council and Luton Rising.

**Sustainability committees**



**Stakeholders**



# Our governance framework

Our governance structure is designed to oversee our approach to responsible business:

The ultimate owners are our CEO and Management Board.

A key part of governance is our annual review, which looks at the progress of the strategy and identifies opportunities for improvement.

We include a section on responsible business performance in our annual reports to keep our stakeholders informed.

We publish a dedicated, annual sustainability report, reporting on progress against our targets and drawing on key metrics from the Global Reporting Initiative (GRI) and sector supplement guidance.

**Our governance policies**  
Our Responsible Business Strategy implementation plan includes the development of a series of guiding policies and corresponding strategies, which are owned and implemented by LLA.









