

Sustainability report 2020

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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 responsibility to the 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).

RECOGNITION



ACI airport carbon accreditation – level 1: mapping



ACI customers service accreditation: level 1



ACI customers 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 2020 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 Standards.

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

2020 was without doubt the most challenging year for LLA and the wider aviation sector ever. The ongoing disruption caused by quarantine restrictions, changing travel guidance and the closures of borders saw passenger numbers drop by 82%, from 18m in 2019 to around 5.5m in 2020.

The strong commitments we made with our Responsible Business Strategy (RBS) have meant that we were ready to deal with many of the challenges we face from COVID. Although this has impacted our work in some areas, our key priorities have been keeping colleagues and passengers safe, supporting our team and community, and laying the foundations to build back better and greener than ever.

Keeping passengers and colleagues safe

From the very start of the pandemic, the team has worked around the clock to implement all Government guidance and industry best practice. With more cleaning, Perspex screens and hand sanitiser stations, and a myriad of other COVID secure processes, our prompt and comprehensive response to COVID saw us become the first UK Airport to receive the internationally recognised Health Accreditation from Airports Council International (ACI).

Committed to our people

While the drop in passenger numbers has had a dramatic impact on our business and forced us to make significant cost savings, as CEO, I have done everything I can to limit redundancies and to support our team. Making use of the Government's flexible furlough scheme, all operational colleagues have rotated through a combination of work and furlough, ensuring all benefited from support from colleagues and ongoing training.

I have also been very conscious that our people faced new risks, pressures and anxieties related to COVID, and so regular communication and a focus on wellbeing have been vital. Alongside new virtual employee engagement tools, we've been using regular newsletters, emails, videos and virtual town hall meetings to share information and address colleagues concerns and questions directly, while managers have been tasked with ensuring team welfare is given even more focus.

Despite the fact that we have worked further apart this year, the #OneTeam spirit I have seen across the airport has in many ways brought us closer as a team.

Committed to our community

COVID has also dealt a significant toll on our community this year, and it was important we maintained our contributions to our Community Trust Fund, making £150,000 available to support community projects. This includes £50,000 to a regional Post COVID Stability Fund which aims to help those worst affected by the pandemic.

We were able to play a more direct role too, providing essential passenger services to repatriate UK and foreign nationals to their home country during the height of the pandemic. As flights ground to a halt, we opened the runway to medical and military flights, General Aviation, and our cargo operation to ensure the delivery of vital supplies including PPE and medical equipment. We also transformed one of our car parks into a COVID testing site, and set up a new colleagues volunteering scheme, LLA Heroes, to help deliver positive impact for those who need it most. More than 70 members of colleagues volunteered, helping more than a dozen local charities across the year as well as helping to run the testing centre. Their hard work and community spirit was recognised with a British Chambers Business Hero Award.

Building back better

Despite its challenges, 2020 has presented an opportunity for us to lay the foundations for a better future. We have recruited some key new roles to expand our sustainability management, including a new Head of Sustainability, and an Energy and Environment manager. We also recruited a new HR Director, who has already had a huge impact on key RBS themes including diversity and wellbeing.

With fewer passengers in the terminal, we've also been able to implement a range of energy efficiency projects which will save more than 250MWh of electricity every year. The team has also enhanced processes across many of our RBS strategic areas such as: creating new strategies for wellbeing and health and safety; implementing a new waste contract with a local supplier which will not only increase recycling rates but also bring jobs to the region; and conducting an exceptional virtual

public consultation on noise that was short-listed in the 2021 CIPR Excellence Awards.

The improvements we've made through the RBS have translated into better customer experience, and I'm proud that were named among the UK's top airports in 2020 by Conde Nast Traveller, as well as being shortlisted in the UKCXA Customer Service Awards 2020.

We have worked hard this year to further integrate responsible business practices into our core strategy, and have established a number of new targets, which include:

- Achieving Net Zero Carbon by 2040
- Working with partners to generate renewable energy on-site
- Establish a centre of excellence, with partnerships with world-leading universities and technology partners to tackle sustainability challenges

The extraordinary work of the team this year and the plans we have for the future fill me with hope and I look forward to welcoming more passengers, partners and colleagues back into the airport as international travel gets easier.

Alberto Martin CEO, London Luton Airport



ABOUT LONDON LUTON AIRPORT

INTRODUCTION

London Luton Airport (LLA) is one of the UK's busiest airports. Despite COVID-19, we carried 5.5 million passengers in 2020. Our airline partners include easyJet, Wizz Air and Ryan Air and over this year they have continued to fly, serving 140 destinations across 29 different countries.

The airport is owned by Luton Council through London Luton Airport Limited (LLAL) 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:

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 and good road access, along with excellent coach, bus and taxi services.

We operate short and long-stay car parks on site and a kiss-and-fly facility directly, and work with other transport providers to make the airport accessible to everyone.

Our operations: Terminal, security, cargo, maintenance, fire-fighting and administration

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

Third-party operations: concessions, airline ground operations and ground crew

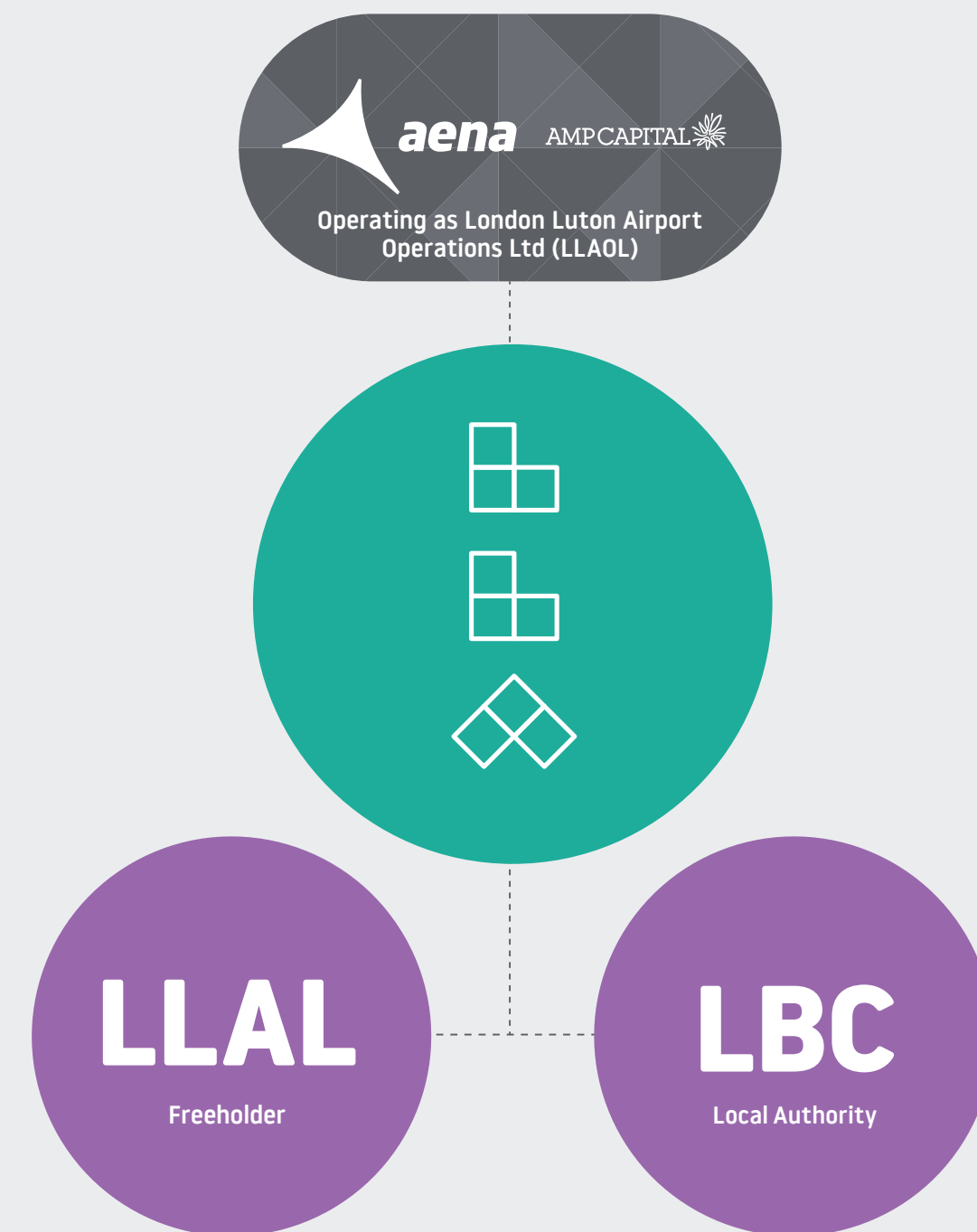
Third-parties are responsible for a large number of activities at London Luton Airport. Terminal shops and restaurants are all run by concessionaires, and our airline partners also have significant operations to manage and maintain aircraft. Baggage handling is also managed by third parties. We don't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

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, **London Luton Airport Limited (LLAL)**, is owned by **Luton Council (LBC)**. We work in collaboration with our partners LLAL and LBC and are able to 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 LBC's sustainability objectives. Further, as a business owned by the world's leading airport operator and a global investor, we take our broader corporate responsibilities seriously. From how we treat our staff and business partners, reduce our environmental footprint, to how we improve the customer experience, we are always striving to deliver our corporate and societal objectives. As a responsible business partner, we work hard to align these interests of our varied stakeholders to ensure sustainable outcomes.



OUR SUSTAINABILITY VISION

Our **Responsible Business Strategy** sets out our ambition to be a good neighbour and employer, minimise our environmental impacts, and have a positive impact for our community.

A YEAR IN REVIEW

COVID-19 has had a significant impact on London Luton Airport. Whilst our quick response and proactive management of COVID risks meant the airport continued to operate throughout the year, passenger numbers dropped by 70%, from 18m in 2019 to 5.5m in 2020.

5.5m passengers

(2019: 18m passengers)



**70% lower
than 2019**

**63,593 aircraft
movements**

(2019: 141,481)



**55% lower
than 2019**

**32,693 tonnes
of cargo**

(2019: 36,906)



**14% lower
than 2019**

140 destinations

(2019: 141)



**1% lower
than 2019**

COVID-19 IMPACTS AND RESPONSES

2020 was dominated by COVID and our main priority was to keep staff and passengers safe. We also needed to adjust to new ways of working and play our part to support our community through this challenging time.

Keeping everyone safe

The restrictions put in place to tackle the global pandemic dramatically reduced travel, and passenger numbers flying through the airport dropped by 70% in 2020. The airport has remained open across the entire year and we implemented a suite of measures to keep passengers and staff safe. We increased the cleaning schedules, installed Perspex screens and hand gel stations, and introduced new COVID-secure processes. Our prompt action saw us achieve the Airports Council International Health Accreditation, the first UK airport to do so.

Responding to challenging business environment

Travel restrictions had a dramatic impact on our business, and we had to make cost savings. We have done everything possible to limit redundancies and to support the team, deploying a flexible furlough scheme which rotated furloughed staff which meant everyone was able to receive support and ongoing training.

COVID has introduced new risks, pressures and anxieties for our team, and we have been made a concerted effort to increase communication and focus on staff wellbeing. We introduced new virtual staff engagement tools, and the senior management increased our communication with the teams. We used newsletters, emails, videos and virtual town hall meetings to keep staff

informed and respond to staff concerns and questions directly. Team members also received regular 1-2-1 calls with managers, providing an opportunity to talk about any concerns about work, health or home-life.

Playing our part in the community

COVID has had a huge impact in our community, and we were committed to helping our community through this challenging time.

We continued to help charities and community projects through our Community Trust Fund, making £150,000 available during the year. We also contributed a further £50,000 to the Post COVID Stability Fund which aims to help those worst affected by the pandemic.

As well as supporting local projects, we were able to help directly, supporting the repatriation of UK and foreign nationals. We also supported medical, cargo and military flights, and took delivery of vital supplies including PPE and medical equipment. We turned our mid-stay car park into a COVID testing site, and established a new staff volunteering scheme, LLA Heroes, to help deliver positive impact for those who need it most. More than 70 colleagues volunteered, helping more than a dozen local charities as well as helping to run the testing centre.

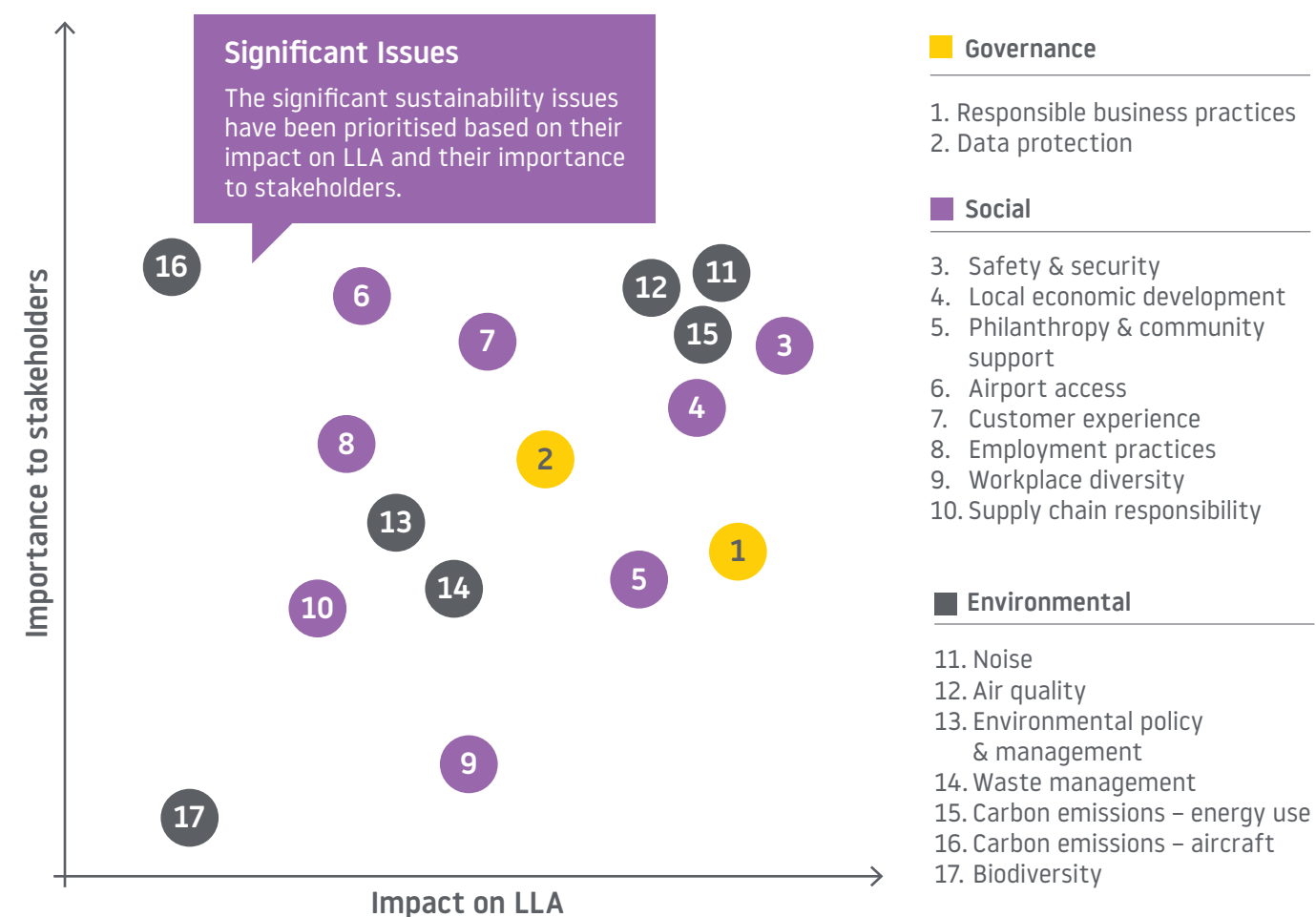


OUR PRIORITY ISSUES

Our **Responsible Business Strategy** is focussed on the most important environment, social and governance (ESG) issues for the airport.

We defined these priority areas by completing a materiality assessment, following the approach set out in the AA 1000 standard. We believe these areas represent themes which are important to our operations, local people, our staff, and stakeholders.

This involved conducting an in-depth analysis of our current ESG management and potential for improvement, collating extensive input from our network of local stakeholders. We also engaged in consultation with our partners and departments across the business, ensuring that our strategy would be one which worked 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 LLA and their importance to stakeholders.



STRATEGY FOCUS

Our Responsible Business Strategy concentrates on six key areas:



Ensure Environmental Responsibility and Efficiency

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Supporting our Community

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A Safe and Secure Airport

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Grow with our People

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Deliver Great Customer Experience

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Sustainable Supply Chain

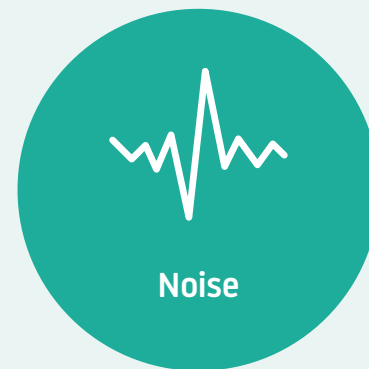
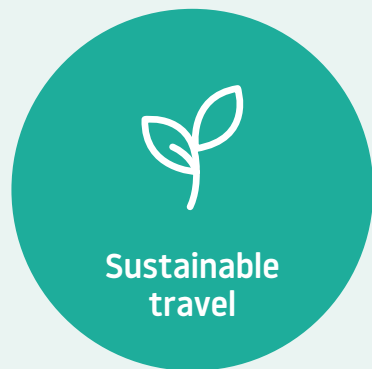
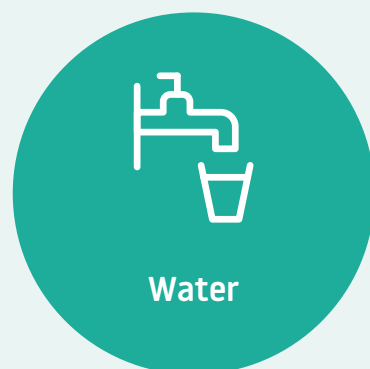
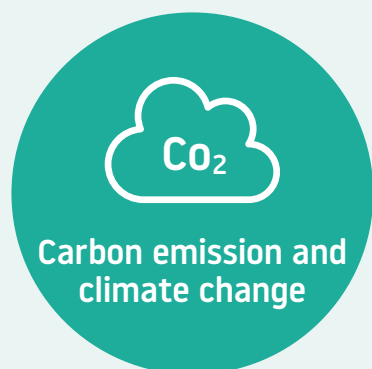
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Our work in each area is supported by a robust governance structure which provides the leadership and resources to manage all material responsible business issues at LLA effectively.

We have identified actions and targets for each of the six focus areas, covering all our key environmental, social, and governance issues.

1 ENSURE ENVIRONMENTAL RESPONSIBILITY AND EFFICIENCY

Our aim is to minimise the environmental impacts from the airport. We have set a range of targets that address the key issues for us, including carbon emissions, noise, waste, and air quality.



During 2020 we have seen major changes to our operations due to COVID, taking steps to minimise our impact during this period and to invest in improvement in environmental management.

Expanded energy and environment team and introduced new environmental governance processes: Recognising the importance of good environmental management for the airport, we recruited a new energy and environment manager and created a new climate resilience manager role during the year. We have also enhanced governance of environmental issues this year, with a new board environmental scorecard and a greater focus on strategic issues and emerging government environmental policy in the board updates. We achieved recertification for our ISO 50001 Energy Management System in early 2021 and started the process to integrate the ISO 14001 and ISO 50001 management systems.

Electricity use down 29% and investment in energy efficiency projects: Our energy use was significantly lower this year than last, with electricity use down 29% in total. This was driven by reduced activity on site and by a concerted effort from our team to switch off any unneeded equipment and adjusting settings and controls. With lockdown affecting the summer period most, our electricity use was down by a third and gas down by 10%.

With fewer passengers in the terminal, we were able to take the opportunity to implement a number of energy efficiency projects. We upgraded escalators and continued our upgrade programme of air handling units and lighting which will deliver energy savings of more than 250 MWh a year.

Waste volumes down and new waste contractor appointed to improve recycling rates: Due to COVID our waste volumes were down in 2020 and recycling rates are also down. This is due to the fact that the concessions have been closed, reducing the proportion of recyclable materials in our waste as well as an increase in non-recyclable waste such as PPE and cleaning waste.

During 2020 we retendered a new waste contractor and appointed Cawleys, a Luton-based firm. They are able to provide secondary offsite waste sorting which will help to increase recycling rates in future, and are helping to implement better recycling facilities including coffee cup recycling. We're pleased to be able to partner with a local supplier, in line with our commitment to increase local spend and contribute to the local economy.

Airspace modernisation community engagement process shortlisted for award: We are making progress with airspace modernisation. We ran a virtual consultation exhibition for proposed changes to our arrivals routes, which has delivered a record level of engagement and has been shortlisted for the integrated campaign category at the Chartered Institute of Public Relations Excellence Awards 2021.

Reduction in use of public transport due to COVID but preparing for the DART light rail to open: During 2020, passenger numbers reduced by 70% and the proportion traveling on public transport also decreased. We have, however, been preparing for the opening of the DART light rail system which will help us to increase the accessibility of the airport by public transport.

ENERGY, CARBON EMISSIONS AND CLIMATE CHANGE

Climate change is one of the most pressing challenges we face as a society and a defining issue of our times. Awareness of the need to protect our environment has never been higher and the requirement for aviation to decarbonise quicker, never clearer. 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 to reduce their greenhouse gas emissions. In 2020 we set a target to be net zero carbon by 2040 which is supported by our targets to source all electricity from renewable sources and to generate at least a quarter of our electricity demand from on-site renewables. We will also reduce our energy demand per passenger to ensure we minimise our impact. In addition, we will further assess climate change risks for the airport and incorporate these into our business resilience plans.

ENERGY

ENERGY MANAGEMENT APPROACH

Energy use on site is a major focus for the Responsible Business Strategy.

Electricity is our largest energy source and is used 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 high 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 the onsite 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 system and buildings, to staff training and ongoing maintenance activities.

We welcomed a new energy and environment manager, Jude Hughes, to the airport in October 2020.

During 2020 we achieve recertification for our energy management system, transitioning to the 2018 version of the standard. The latest version of the standard includes a more strategic approach and a greater focus on the management of energy-related risks and opportunities.

JUDE HUGHES JOINS THE LLA SUSTAINABILITY TEAM

In 2020, we recruited a new energy and environment manager to join our sustainability team.

Jude Hughes is responsible for managing our energy performance and overseeing the ISO 50001 management system.

Jude will bring her significant experience of delivering carbon and energy reductions to the team, and will be instrumental in helping us meet our target to achieve net zero carbon by 2040.



“I’m excited to have joined the team at such an important point in the airport’s sustainability journey. I’m looking forward to working with colleagues across the business to deliver on our low carbon promises.”

Jude Hughes
Energy and Environment Manager

ENERGY PERFORMANCE

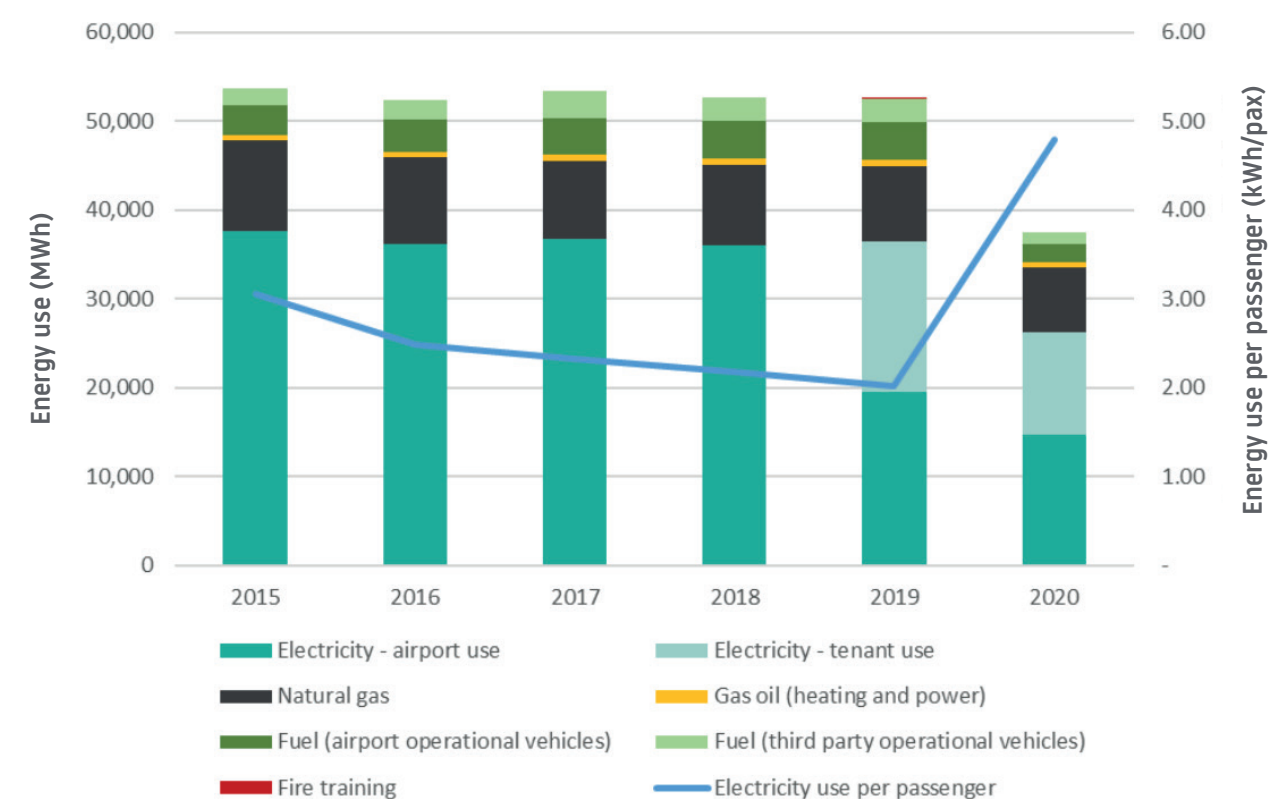
Over the past 5 years, our total energy use has remained relatively constant whilst our passenger numbers have increased from around 12m in 2016 to 18m in 2019. Our energy use per passenger has been steadily reducing since 2016, reflecting the ongoing investment in energy efficiency at the airport.

In response to COVID-19 travel restrictions in place in 2020, passenger numbers at the airport reduced significantly to 5.5m and our total energy

use dropped by 29% to 37.5MWh. Our electricity use reduced by more than one third, but as lockdown predominantly affected the summer period, our gas use only reduced by 10%. Our electricity use per passenger also increased sharply with fewer passengers travelling, from 2.20kWh per pax in 2019 to 4.8 in 2020.

		2015	2016	2017	2018	2019	2020
Electricity - airport use	(MWh)	37,568	36,186	36,727	35,975	19,488	14,661
Electricity - tenant use	(MWh)	-	-	-	-	16,920	11,609
Natural gas	(MWh)	10,324	9,794	8,748	9,110	8,495	7,337
Gas oil (heating and power)	(MWh)	556	605	764	769	693	474
Fuel (airport vehicles)	(MWh)	3,292	3,590	4,098	4,265	4,317	2,038
Fuel (third party vehicles)	(MWh)	1,926	2,227	3,014	2,622	2,643	1,385
Fire training	(MWh)	-	-	-	-	69	17
Total	(MWh)	53,666	52,402	53,351	52,742	52,555	37,503

Energy use and efficiency



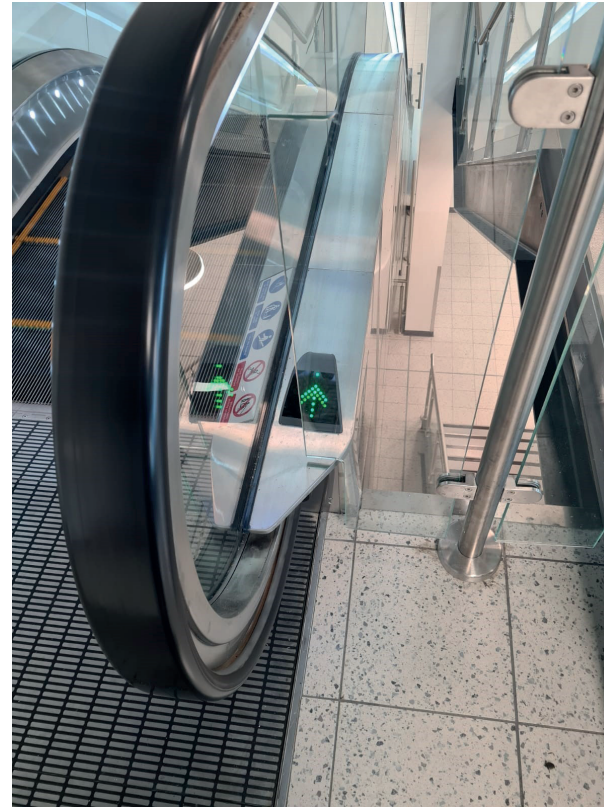
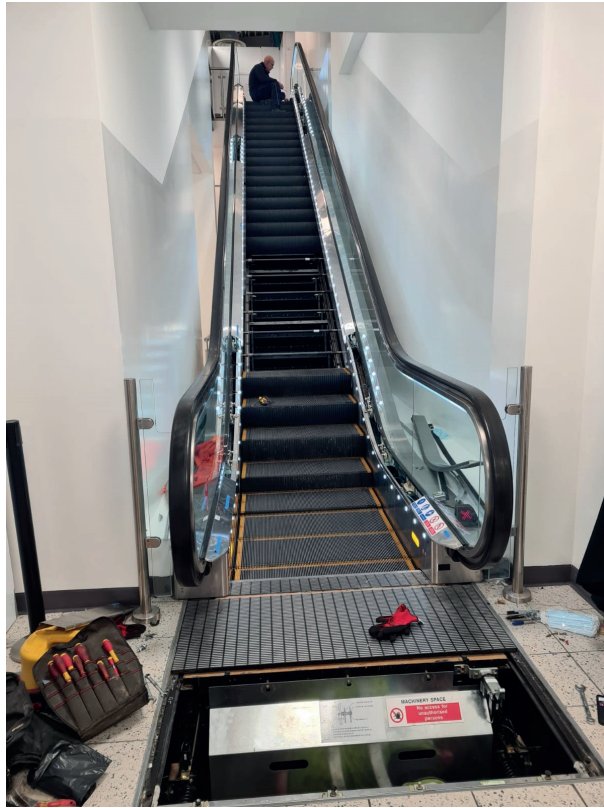
PROGRESS IN 2020

Our focus for energy management this year has been maximising the energy efficiency of our operations as we adapted to COVID-19 restrictions and taking the opportunity to invest in energy efficiency projects.

Following the implementation of travel restrictions in March 2020, the team reviewed our energy controls. As the airport remained open throughout the year, we mothballed areas that were not needed and reviewed all major energy-using systems and equipment, switching off unneeded equipment and changing settings to minimise energy use.

Commercial challenges from reduced passenger numbers has delayed our progress of prospective onsite renewable projects, but during the year we implemented a new energy supply contract which will allow us to purchase 100% of renewable energy from 2021. This will provide Renewable Energy Guarantee of Origin (REGO) certified electricity from sources such as solar, wind and hydro.

We also took advantage of the lower passenger numbers to implement a number of energy efficiency upgrades.



PIER B ESCALATOR IMPROVEMENT PROJECT

We upgraded the escalators in the terminal building, installing more efficient motors and automatic start/stop functionality. The improvements will save 100,000 kWh of electricity every year, equivalent to 27 average UK households.

Three escalators in the terminal have been upgraded with inverter drives, which are significantly more efficient than the existing direct drive electric motors. The team also installed new controls and cabling to allow the escalators to automatically stop when they are not needed by passengers and added new indicators to show whether the escalators are available to use or out of service.

Delivering carbon savings of 23 tonnes of CO₂e a year, the new inverter drives are also easier to maintain, and along with stop/start capability, this will extend the life of the escalators and reduce maintenance costs.

“Energy management is a priority issue for the Technical Services Team. With fewer passengers in the terminal this year, we have taken the opportunity to deliver some exciting energy efficiency projects.”

Mark Graves
Head of Technical Services



UPGRADING LIGHTING SYSTEMS AND AIR HANDLING UNITS

During 2020 we continued our LED lighting upgrade programme and upgraded ventilation system, which will deliver 58 tonnes of carbon savings each year.

We continued our site-wide lighting replacement project in 2020, upgrading emergency lighting in the baggage dock and undercroft. The existing 110W fittings were replaced with 40W LED versions, providing equivalent or improved lighting levels in these high-traffic zones. Approximately 150 fittings have been replaced reducing overall electricity consumption by 36% in these areas.

We also replaced the belt driven motors in the air handling units with direct drive systems and installed over-door curtain heaters to reduce the hot air being lost from the building in cold

weather. These upgrades are expected to save 250 MWh a year, which is equivalent to the energy used in 70 average UK households.

“Focusing on energy efficiency projects has allowed us to reduce energy use on site by 250,000 kWh, saving more than 90 tonnes of carbon. This is the equivalent of removing 45 cars from the road.”

Ian Green
Maintenance Operations Manager

Co₂ CARBON EMISSIONS

CARBON MANAGEMENT APPROACH

The airport's carbon footprint is one of the most important themes in the RBS. 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.

The airport's direct emissions account for only 3% of our total emissions, with the majority of remaining emissions coming equally from aircraft landing and take-off (LTO) and passenger surface access. As such, our carbon reduction strategy focusses on reducing our own emissions and working with airlines, strategic partners (including Luton Council, LLAL and transport companies), as well as passengers to work towards net zero carbon.

In 2019 we achieved level 1 of the ACI airport carbon accreditation (mapping) and are working towards level 3 (optimisation). During 2020 we have been developing our Carbon Management and Stakeholder Engagement Plans. Our internal programme will focus on energy efficiency, on-site renewable energy capacity and purchasing renewable energy. The stakeholder strategy also includes clear actions to engage with key partners to reduce our scope 3 emissions.

CARBON PERFORMANCE

We have calculated our carbon emissions in line with the ACI carbon reporting guidance for scope 1 and 2 emissions since 2015 and included scope 3 emissions. In 2019 we achieved a 7% reduction from 2018, predominantly through greater use of public transport by staff and passengers, and better data on aircraft movement. We have been working with airlines to improve the quality of our aircraft emissions data, allowing us to collect airport and aircraft specific data rather than having to rely on industry averages. Our emissions dropped significantly in 2020 driven by the 70% reduction in air travel due to the pandemic.

The ACI framework excludes supply chain and construction emissions, and we are exploring how best to include wider scope 3 emissions sources in future emissions reporting.

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

EMISSIONS - LOCATION BASED

		2015	2016	2017	2018	2019	2020
Scope 1	(t CO₂e)	2,885	2,917	2,899	3,189	2,966	2,326
Natural gas	(t CO ₂ e)	1,904	1,802	1,611	1,650	1,562	1,349
Fuel (airport vehicles)	(t CO ₂ e)	804	938	1,048	1,102	1,137	536
Gas oil (heating and power)	(t CO ₂ e)	177	177	240	225	203	129
Refrigerants	(t CO ₂ e)	-	-	-	212	55	309
Fire training	(t CO ₂ e)	-	-	-	-	8	2
Scope 2	(t CO₂e)	17,364	14,910	12,912	10,184	4,981	3,418
Electricity - airport use	(t CO ₂ e)	17,364	14,910	12,912	10,184	4,981	3,418
Scope 3	(t CO₂e)	-	-	-	292,511	278,268	109,094
Aircraft movements	(t CO ₂ e)	-	-	-	137,603	136,145	60,669
Passenger surface access	(t CO ₂ e)	-	-	-	152,286	131,923	41,859
Electricity - tenant use	(t CO ₂ e)	-	-	-	-	4,325	2,706
Staff commuting	(t CO ₂ e)	-	-	-	1,428	1,010	436
Electricity T&D losses	(t CO ₂ e)	-	-	-	868	790	527
Fuel (third party vehicles)	(t CO ₂ e)	-	-	-	-	3,179	1,592
Aircraft engine tests	(t CO ₂ e)	-	-	-	-	608	266
Water	(t CO ₂ e)	-	-	-	133	136	54
Business travel	(t CO ₂ e)	-	-	-	145	103	39
Waste	(t CO ₂ e)	-	-	-	48	50	945
Total	(t CO₂e)	-	17,827	15,811	305,885	286,215	114,838

Note 1: from 2019, tennant electrcity moved to scope 3

Note 2: from 2020 waste emissions include emissions from production of raw materials



EMISSIONS - MARKET BASED

		2015	2016	2017	2018	2019	2020
Scope 1	(t CO ₂ e)	2,885	2,917	2,899	3,189	2,965	2,326
Natural gas	(t CO ₂ e)	1,904	1,802	1,611	1,650	1,562	1,349
Fuel (airport vehicles)	(t CO ₂ e)	804	938	1,048	1,102	1,137	536
Gas oil (heating and power)	(t CO ₂ e)	177	177	240	225	203	129
Refrigerants	(t CO ₂ e)	-	-	-	212	55	309
Fire training	(t CO ₂ e)	-	-	-	-	-	2
Scope 2	(t CO ₂ e)	17,364	14,910	12,912	13,690	6,772	5,059
Electricity - airport use	(t CO ₂ e)	17,364	14,910	12,912	13,690	6,772	5,059
Scope 3	(t CO ₂ e)	-	-	-	292,511	275,012	92,967
Aircraft movements	(t CO ₂ e)	-	-	-	137,603	131,333	43,219
Passenger surface access	(t CO ₂ e)	-	-	-	152,286	131,923	41,859
Electricity - tenant use	(t CO ₂ e)	-	-	-	-	5,880	4,034
Staff commuting	(t CO ₂ e)	-	-	-	1,428	1,010	436
Electricity T&D losses	(t CO ₂ e)	-	-	-	868	790	527
Fuel (third party vehicles)	(t CO ₂ e)	-	-	-	-	3,179	1,592
Aircraft engine tests	(t CO ₂ e)	-	-	-	-	608	266
Water	(t CO ₂ e)	-	-	-	133	136	945
Business travel	(t CO ₂ e)	-	-	-	145	103	54
Waste	(t CO ₂ e)	-	-	-	48	50	39
Total	(t CO ₂ e)	20,249	17,827	15,811	309,390	284,749	100,352

Note 1: from 2019, tennant electrcity moved to scope 3
Note 2: from 2020 waste emissions include emissions from production of raw materials
Note 3: EasyJet offsetting their carbon emissions from November 2019

CLIMATE CHANGE

Climate change is one of the most pressing challenges we face as a society and a defining issue of our times. In 2020 we created a new role within our sustainability team: climate resilience manager, and Liga Apsite was appointed.

KEY RISKS AND OPPORTUNITIES

A review of key climate related physical risks and opportunities commenced in 2020, in line with the DEFRA guidance.

The review identified a range of physical and transition risks and opportunities. Transition risks include the impact of potential carbon taxes, regulations and consumer preferences on the demand for air travel if sustainable aviation fuels are not implemented quickly enough. The review also identified potential noise impacts from aircraft needing more thrust and longer distances to take off in higher temperatures, as the air is less dense.

Physical risks also include the impact from more intense and frequent extreme weather, which may impact the airport’s operations as well as utilities and our supply chain.

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

PLAN FOR THE COMING YEAR

Our main focus in 2022 will be building on the climate change adaptation work and furthering our understanding of climate change risks by carrying out further climate change assessments in line with the Task-Force on Climate Related Financial disclosures framework.



Through the RBS, we will 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, concessionaires 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 recycling at least 70% of our waste by 2022, to achieve the carbon trust zero to landfill certification, and ensure that less than 5% of non-hazardous construction waste goes to landfill.

We operate a segregated waste stream across the airport, with specialist waste contractors in place to ensure that waste is managed in line with legislation. Over the last four years, 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 in 2019. This has helped to increase our recycling rate to between 60% and 65%

but we have however struggled to achieve our target recycling rate of 70%. During 2020, only 49% of waste was recycled. This reduction is primarily due to the closure of shops and restaurants which typically would generate recyclable waste, and the more widespread use of single-use PPE and cleaning materials.

To help address this during 2020, we appointed a new waste contractor who are well placed to help us improve our recycling rate. They are able to provide additional off-site waste sorting and segregation, and we are working with them to develop a waste improvement plan which will include projects such as recycling of coffee cups.

WASTE PERFORMANCE

The total waste generated at the airport reduced by 65% in 2020, whilst the recycling rate reduced to 49%. Since 2016, waste per passenger has remained reasonably constant, around 0.140kg per pax.

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

NEW WASTE CONTRACTOR APPOINTED

In 2020 we ran a tender process to appoint a new waste contractor to help us improve our recycling performance.

We appointed Luton-based firm Cawleys, one of the few privately owned businesses running its own Materials Recycling Facility (MRF). This will allow additional off-site waste sorting, helping us to improve our recycling rate.

Based close to the airport, Cawleys will manage all hazardous and non-hazardous waste for the airport whilst minimising the carbon footprint from collections.

“Taking care of the environment and the local community are two key pillars of our Responsible Business

Strategy, so it’s great to be working with a local company on such an important contract. In 2019, we spent more than £46 million with local suppliers, accounting for 30 per cent of all supply chain spend, and it’s vital we continue to support the local and regional economy wherever we can.”

David Vazquez
Head of Sustainability



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 USE

Water is mostly used on site for terminal facilities including toilets, cooking and drinking, with some water being 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 on site. Using data from our growing number of water meters across the airport, we have identified high use areas and 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 potential opportunities to replace the use of potable water with non-potable water, such as for vehicle cleaning or toilet flushing. This has been delayed due to resource constraints due to COVID-19.



ISO 14001 Environmental management system

We have robust processes in place to manage environment impacts, risks and opportunities through our ISO 14001 certified environmental management system (EMS).

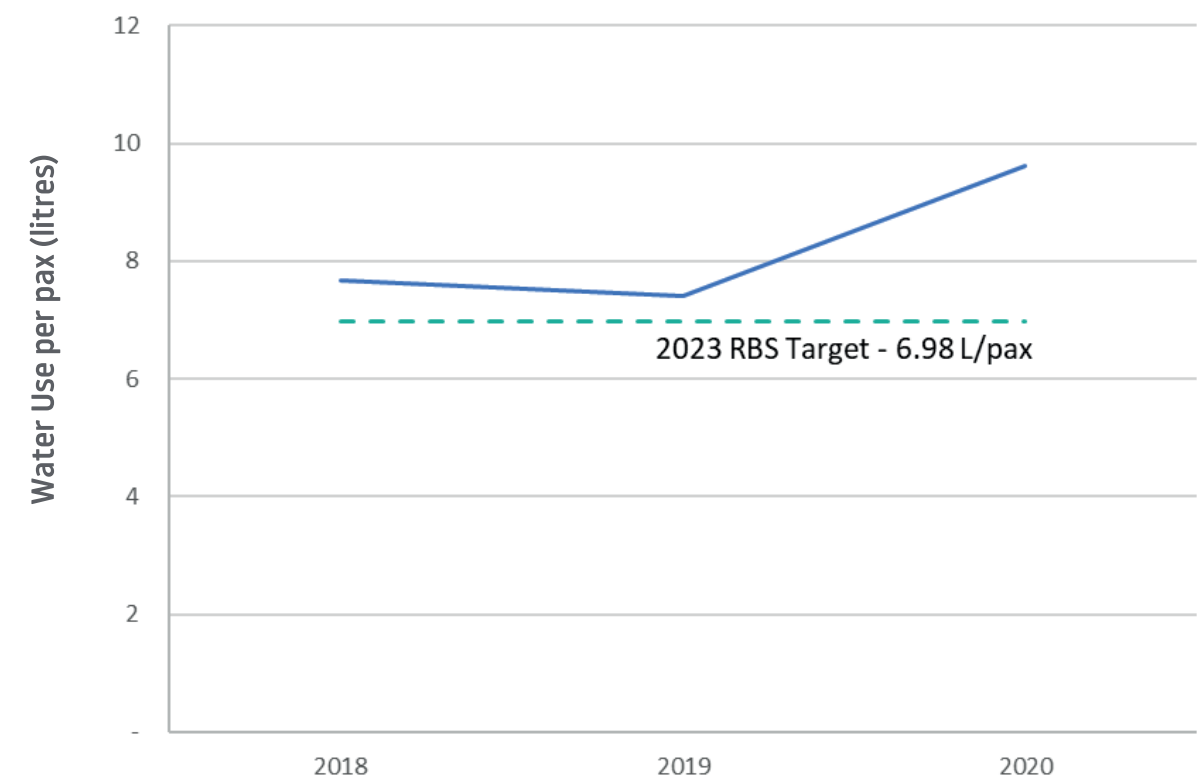
We have an environmental policy and clear processes and controls for each of our major areas of environmental impact and to ensure we comply with all applicable legislation and compliance obligations.

PROGRESS IN 2020

Having achieved a 3% reduction per passenger in 2019 from 2018, water use per passenger was significantly affected by the reduced passenger numbers. It increased by 30% to 9.63 litres per passenger in 2020, although total water use reduced by 60% this year.

KPI	2018	2019	2020
Water use (litres)	126,792,000	133,334,000	52,693,000
Water use per pax (litres/pax)	7.67	7.41	9.63

Water Use per pax (litres)



WATER QUALITY

Runoff from an airport can have a significant impact on water quality if the glycol used for de-icing aircraft is allowed to enter water courses. As a result, we employ a suite of technologies and processes to minimise our use of glycol and prevent run-off. We also monitor the water quality to allow us to respond quickly if the need arose.

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 2 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 7 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 in the event of a spill or contaminated discharge.

As part of our ISO 14001 environmental management system, we also monitor and manage spills. There were 55 spills in total in 2020. 3 of these were classified as major (scoring 6 out of 9 on the risk assessment) with the rest being minor or negligible.

In 2020 there were no instances where discharges exceeded permitted limits.

GLYCOL USE AND RECOVERY

KPI	2020
Type 1 De-icing fluid sprayed (litres)	81,616
Type 2 De-icing fluid sprayed (litres)	7,380
Type 4 De-icing fluid sprayed (litres)	15,947
De-icing fluid collected (litres)	15,000 (at 17% glycol)
% of airframes de-iced in designated capture area	Not measured in 2020

AIR QUALITY

Air quality has always been an important area for us and has been monitored in and around LLA since 2003. Through the RBS, we will develop a new air quality strategy which will build on our previous work in this area and address the changes from the growth in passenger numbers and aircraft movements

OUR 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 apron are likely to have higher levels of air pollution.

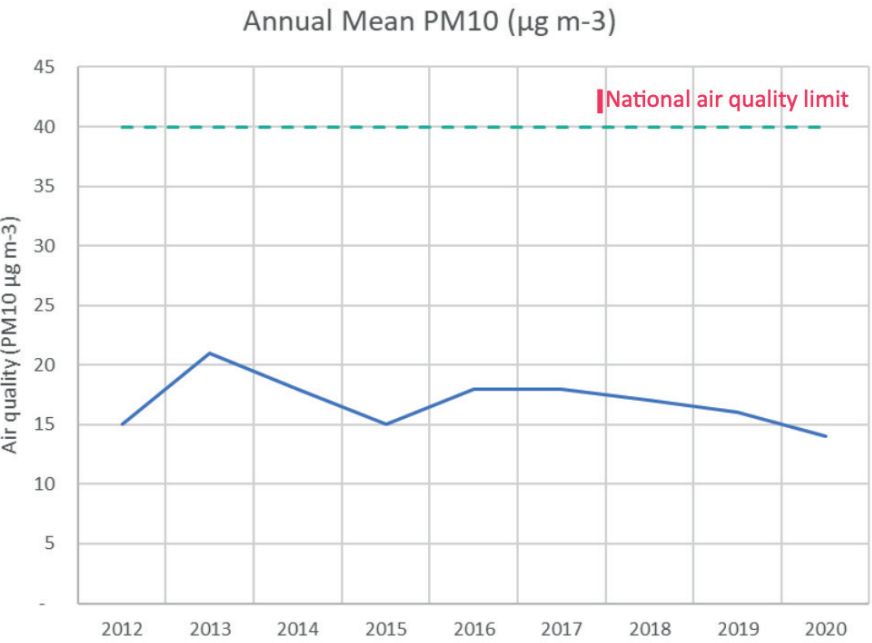
We have a range of policies in place to minimise emissions. At high-impact locations such as the coach terminal and the under-croft, we have no-idling policies with penalty charges for non-compliance.

We also seek to use low emissions vehicles for our own operations, and those of third parties, and bus and coach companies.

We monitor air quality at 19 sites across the airport using diffusion tubes. Monitoring locations are classified in 4 groups: access roads, runway and flightpath, airfield, car parks and drop-off zones.

During 2020, NO2 levels were lower than any of the last 8 years. The average reduction in NO2 concentrations observed between 2019 and 2020 for the runway and flight path and access road locations are 35% and 36% lower respectively. The airfield (42%) and “carpark and drop off zone” (46%) locations were even lower, measuring 42% and 46% below last year’s levels.

You can read more in the Annual Monitoring Report, which includes a detailed section on air quality.



Air quality remains well below the annual mean national air quality objectives.



Responsible growth of course means proactively managing all of our environmental impacts. Noise can have a significant impact on the quality of life of those living under flight paths and this needs to be responsibly managed. We work with airline partners to phase out noisier aircraft and to 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

Noise is an impact we work hard to reduce, with 5 dedicated targets in the RBS. Our Flight Operations Team launched our 4-year Noise Strategy in 2019, with 5 priority areas for how we manage noise:

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

Key links

Noise Action Plan

www.london-luton.co.uk/corporate/community/noise/noiseaction-plan

Annual Noise Monitoring Reports

<https://www.london-luton.co.uk/corporate/community/noise/annual-monitoring-report>

Improved operational procedures

We monitor adherence to noise procedures through our Aircraft Noise and Track System. This system captures aircraft flight information 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 to subsequently 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 considered to be 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 day-time 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. With CDA less fuel is burnt, less emissions are produced but most importantly it reduces the noise by avoiding the use of engine thrust required for level flight. Our target for CDA compliance increased to 92% in 2020.

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 5 and 7 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 at high level, and the use of precision satellite navigation and electronic surveillance systems to redesign terminal routes and improve safety. LLA is 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.

Quieter aircraft

We operate a quota count system during the night. We do not allow aircraft with a quota count of 2 or more to operate at night, and we have a quota count limit which sets a noise budget which cannot be exceeded. This limit will reduce from 3,500 to 2,800 by 2028.

In 2020, the airport used 1,650 of its 3,500 night quota.

Operational restrictions

There is a rolling limit to the number of aircraft movements permitted during the night and early morning. Night time aircraft movements are limited between 23:30 – 06:00 to 9,650 in any 12 month period, and the limit for early morning movements is 7,000. In 2020, there were 4,250 night movements and 2,525 early morning movements. Many of the cargo aircraft movements were deliveries of PPE and COVID 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 being Chapter 4 or better by 2022. There were no Chapter 3 aircraft movements from London Luton in 2020 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 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 Borough Council to restrict any inappropriate development within noise sensitive areas.

We had set a target to submit a strategy to reduce noise contours in line with the noise action plan. We completed a consultation with Luton Council during 2020 and submitted the noise action strategy with the planning application to increase the passenger cap to 19m passenger.

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, airports users and other stakeholder groups. We also hold public surgeries and would typically distribute Inform, a bi-monthly newsletter from the Flight Operations team, although we did not do so during 2020 due to resource limitations due to COVID. We were only able to complete 1 public surgery this year due to COVID restrictions and associated resource constraints, rather than the 6 we had initially planned.

We had planned to complete a noise survey in 2020, but 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 2022 at a time when passenger numbers are likely to have increased.

NOISE PERFORMANCE

In 2020, there were 63,593 aircraft movements (2019: 141,481). There were 11 track violations (2019: 54) and 4,489 noise complaints (2019: 12,735).

		2020	2019
Total aircraft movements	↓	63,593	141,481
Day movements (07:00 – 23:00)	↓	55,929	124,306
Night movements (23:00 – 07:00)	↓	7,664	17,175
Early morning movements (06:00 – 07:00)	↓	2,525	5,968

Track violation	↓	11	53
Departure noise violations (day)	↑	2	0
Departure noise violations (night)	-	0	0

24hr Continuous Decent Approach (% achieved)	↓	88%	91%
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Noise complaints	↓	4,489	12,735
Complainants	↓	395	664
Number of new complainants	↓	165	357

As part of our noise action plan, we introduced more stringent departure noise limits 80dB (A) and 79dB (A) during the year. The 2 noise infringements during the year were due to the more stringent limits (2019: 0).

The proportion of arrivals achieving a continuous decent reduced from 91% in 2019 to 88%. A major contributing factor was more direct routing by air traffic control as there was less air traffic. The increase in direct routing also changed the direction that aircraft approached the airport. Typically aircraft approach the airport from the north, but with less air traffic for Heathrow and Gatwick, aircraft also approached the airport from the south. This is a common factor in the noise complaints received during the year, as well as the fact that more people were aware of aircraft noise as they were working from home, were on furlough or had been made redundant.

CASE STUDY: DIGITAL ENGAGEMENT

London Luton Airport and NATS shortlisted for innovative public consultation on airspace modernisation.

A key focus this year has been on a proposed arrivals airspace change, which is expected to assure the safety of the airspace and reduce arrival delay. Following the Civil Aviation Authority's airspace change guidance CAP1616, we submitted a successful stage 3b application in August 2020.

Typically, we would have then completed a series of in-person meetings and presentations, but due to COVID-19 restrictions we instead created a digital community engagement portal to share key information with the public and to seek responses and input.

The digital consultation period ran from October 2020 until Feb 2021 and featured videos, documents, as well as live and recorded presentations in an interactive virtual reality environment. The virtual exhibition achieved significantly higher levels of engagement than we have previously achieved in person. The virtual exhibition had more than 11,000 unique visitors, 17m people reached via media and we received 2,440 consultation responses which is a record for an airspace consultation.

People told us that they found the digital approach more accessible and user-friendly, and it allowed them to complete research in their own time. Our approach has been short-listed for the integrated campaign category in the Chartered Institute of Public Relations Excellence Awards 2021.



OUR FOCUS FOR 2021

Our noise programme in 2021 will focus on changes to departure processes, implementing a new aircraft database and submitting an airspace change AD6 to create a new arrivals holding stack.

DEPARTURE PROCEDURE ASSESSMENT

We are going to analyse two new potential departure processes to reduce noise impact. The options will affect where noise impacts occur. The first option is a steeper take off, which will increase noise nearer the airport, but is expected to reduce noise levels further away. The second is a gentle climb which requires less thrust, creating less noise but over a larger distance.

We will establish new noise monitoring sites and run a test over July and August 2021, taking data during June as a baseline. Operators will be exempt from noise and track fines during the trial period.

PROJECT LITHIUM: NEW AIRCRAFT DATABASE

A new aircraft database will be published by the end of October 2021, which will allow us to monitor aircraft noise Chapters more easily and compile more accurate noise data.

AD6: NEW ARRIVALS AIRSPACE CHANGE

LLA and Stansted current share a single holding pattern for arrivals, which can cause delays at both airports at busy times. We are co-sponsoring an airspace change with National Air Traffic Controllers (NATS) for a new holding pattern North of the airfield that will improve resilience and safety, and reduce delays.

We have completed a public consultation on two options and will submit our final designs to the CAA for approval in June 2021. If approved, the changes may come into effect from February 2022.

SUSTAINABLE TRAVEL

Journeys start the moment our passengers leave their home or office, and so we are working hard to help make 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 use of rail with the introduction of express rail services and the Direct Air-Rail Transit (DART) linking the station 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 as a result is a critical part of our carbon reduction strategy. We have set three key targets within the RBS which are implemented through the Airport Surface Access Strategy (ASAS), which has two key aims:

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

In the long-term we are particularly focused on encouraging passengers to travel to the airport by rail, bus and coach. The expanded coach and bus bays and the DART (Direct Air-Rail Transit), when it opens in 2022, will significantly help in this aim. There are also preferential rates for up to 30 minutes parking for electric vehicles, and there are 5 Tesla and 5 type 2 tethered charging points on the 2nd floor in Terminal Car Park 1.

COVID-19 related travel restrictions have however reduced the total number of journeys made by passengers and staff by around 90%, and there has been an understandable shift away from public transport towards single occupancy private cars. During 2020, National Express and Arriva suspended bus services to the airport as demand was low. Consequently, it has not been possible to meet targets for the year.

Due to lower passenger numbers, the CAA have not collected data on passenger surface access, and we have paused sending our travel surveys until the number of journeys will provide worthwhile and reliable insights.

We also run an airport-wide Sustainable Travel Forum, which is open to our partners and other on-site businesses. In 2020 we held two meetings of the Forum in June and December as virtual conferences, welcoming partners such as APCOA, Arriva, National Express, Enterprise, ABG, LLACC, Addison Lee, Stagecoach, Luton Council, St Albans Council, North Herts Council, Go-Ahead Thameslink, London Luton Airport Ltd (LLAL), Hertz, Europcar and representatives from the Department for Transport. The agenda included useful discussions on how transport providers aim to achieve carbon neutrality and their approach to managing climate related risks, such as extreme weather.

2021 FOCUS AREAS

New half-hourly rail service to start in May 2021

East Midlands Railway is to introduce a new half hourly non-stop service between London St Pancras and Luton Airport Parkway.

The new service will be introduced as part of the May 2021 timetable change and is the first significant step towards a separately-branded 'Luton Airport Express' service. The service will operate using electric trains and run every 30 minutes between 06:00 and 22:00 daily, with additional late night and early morning services to serve departures from the airport.

The new service means passengers will be able to reach the airport in around 30 minutes from central London, making the airport one of the most accessible from the capital. The timetable change also sees the introduction of a half-hourly service from Corby and other stations in the East Midlands, allowing passengers to travel from these towns to the airport in under an hour.

Developing EV car parking strategy

With Electric Vehicles (EVs) becoming more commonplace, we will establish a clear strategy for EV charging through to 2040. This will help meet the changing needs of passengers, but also support the transition for buses, taxis, staff cars and operational vehicles.



SPILLS

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

OUR APPROACH TO MANAGING SPILLS

Spills of oils, fuels or chemicals can occur anywhere on 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. Spills kits are located in key locations across the airport, and staff are provided with training on how to respond to spills safely.

All spills are categorised based on the volume as well as the environmental and operational impacts. Records are maintained.

There were 55 spills in total in 2020. 3 of these were classified as major (scoring 6 out of 9 on the risk assessment) with the rest being minor or negligible.

SINGLE-USE PLASTICS

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 TO SINGLE USE PLASTICS

We aim to eliminate single use plastic where we can from the airport, 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 2020, and the COVID secure practices often using single-use items to avoid potential sources of contamination, we have not completed a further audit in 2020.

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



PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	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	ON TRACK Level 1 was achieved in December 2019 and on track to achieve level 2 Reduction by the end of 2022
1.2	Carbon accreditation	Develop a Carbon Management Strategy with ambitious emission reduction target by the end of 2020	BEHIND TARGET Targets already set on 2040 Net Zero and 2026 carbon neutrality. Carbon Reduction Strategy to be published by the end of 2022.
1.3	Energy	Source 100% of electricity from renewable sources by end of 2021	ON TRACK We will purchase 100% of electricity from renewable sources for 2021 onwards, using REGOs or green tariff electricity in the first instance"
1.4	Energy	At least 25% of the energy we use to come from on-site renewables by end of 2026	ON TRACK A programme to investigate the feasibility for ground and roof mounted solar will commence in 2021
1.5	Energy	Reduce operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023	PAUSED COVID reduced passenger numbers and increased the electricity use per passenger to 4.8kWh/pax in 2020
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	PAUSED COVID reduced passenger numbers and increased the water use per passenger to 9.63l/pax in 2020
1.7	Water	Identify and quantify operations that currently use potable water but could be served by non-potable water by end of 2021	PAUSED This project has been delayed due to resource constraints related to COVID. Contract will be retendered in 2022 and take into account this requirement.
1.8	Waste	Recycle at least 70% of non-hazardous operational waste (excluding aircraft waste) by end of 2022	BEHIND TARGET COVID impacted operations on site meaning that recycling rate reduced to 49%
1.9	Waste	Reduce operational waste (excluding aircraft waste) to 0.12 kg per passenger by end of 2023	BEHIND TARGET COVID reduced passenger numbers and increased waste generated per passenger to 0.159kg/pax
1.10	Waste	Achieve the Carbon Trust Standard for Zero Waste to Landfill accreditation by end of 2020	PAUSED Accreditation delayed due to COVID, 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	PAUSED No qualifying projects in 2020 due to constructions activities being put on hold as a result of COVID
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	ON TRACK Work on Strategy delayed due to COVID but due to start by the end of 2021

Target	Theme	Objective	Progress update
1.13	Noise	No Chapter 3 aircraft operating at the airport by 2020	ACHIEVED No chapter 3 aircraft operated from the airport in 2020
1.14	Noise	100% Chapter 4 aircraft or better by 2022	ON TRACK We are implementing a new airport operations database (AODB) known as project lithium which will help us to monitor and report more accurately
1.15	Noise	Assess if Slightly Steeper Approaches can be adopted and implement recommendations by 2023	ON TRACK Initial investigation with operators will begin in 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 With aircraft movements down significantly due to COVID, conducting a survey would not provide a representative view of noise impacts in the community. Therefore the survey will take place by end of 2022 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	ACHIEVED A plan was submitted in 2020, but superseded by the planning application to increase the passenger cap to 19m submitted in 2019
1.18	Sustainable travel	Reduce single occupancy vehicle travel to the airport for customers and employees (employees: 2022 – 64%; customers: 2022 – 47%)	PAUSED Reporting data not available during 2020 due to COVID
1.19	Sustainable travel	Greater than 28% of employees and 33% of customers travelling to and from the airport using sustainable modes of transport by 2022 ³	PAUSED Reporting data not available during 2020 due to COVID
1.2	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)	PAUSED Travel surveys paused due to move to working from home for many team members and resource restrictions due to COVID
1.21	Sustainable travel	Establish a plan for low-carbon airside and landside vehicles by mid-2021	PAUSED Work on developing a low-carbon strategy has been delayed due to resource restrictions as a result of COVID
1.22	Spills	Reduce the number of fuel spills with a severity rating of 'Major' to less than 5 per year by 2025, and zero spills with a severity rating 'Hazardous' or 'Catastrophic'	ON TRACK There were 3 spills classified as Major in 2020 and 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 This metric was not measured in 2020 due to resource constraints due to COVID
1.24	Single-use plastic	All new concession contracts to include a requirement for zero single use plastics	PAUSED Project paused due to significant proportion of the concessions being closed during 2020 due to COVID. This will be picked up with concessionaires reopening during 2021
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	ON TRACK Climate change adaptation report in progress due to be completed in 2021. Carbon Reduction Strategy to be published by the end of 2022

² Qualifying project will have a value of more than £300k excluding VAT
³ Sustainable travel modes include bus and coach, rail, walking, cycling, and electric vehicles

2 SUPPORTING OUR COMMUNITY

Our community programme is focussed on three key themes: health and wellbeing, skills and tackling poverty. We work with our community to create opportunities for young people, support good causes and community wellbeing projects, and help residents access airport support through our noise surgeries and noise reduction initiatives.



Charitable giving



Staff volunteering



Skills and training for our community



Community wellbeing and noise impact

OUR APPROACH

A key part of our Responsible Business Strategy is supporting positive change in our community. London Luton Airport is the only major UK airport which is 100% publicly owned, which means the fee we pay as the Operator goes directly back to the local authority and into the community.

We recognise that our biggest impacts on our communities are on health and wellbeing, and how we can contribute to economic prosperity. We therefore have 7 targets in the RBS which relate to these areas:

- We work to promote healthy lives by supporting Macmillan Cancer Support's local activities; through our employee-matched funding scheme which raises money for health and wellbeing charities important to our employees; and a dedicated fund for local initiatives that promote community cohesion, a proven lever for improving wellbeing.
- We facilitate skills for tomorrow through targeted skills development of young people via our Schools Programme that promotes career opportunities, as well as providing opportunities for them to start meaningful careers in the aviation sector via the Prince's Trust Get into Airports scheme.

OUR COMMUNITY ENGAGEMENT STRATEGY

Promoting a healthy life, today

We aim to:

- Promote community health and wellbeing through our work with our charity partner and our matched funding scheme for employees.
- Promote quality of life by focussing our community trust resources on those under the flight paths, support improved noise management, and invest in local community enrichment initiatives and volunteering activities of our employees.

Facilitating skills for tomorrow

We will support skills development for young people in our community and provide opportunities to start meaningful careers in aviation. Through our community engagement strategy, we will:

- Develop a London Luton Airport Schools Programme to support two critical skills for a successful career: communication skills and problem-solving skills.
- Create and promote opportunities for meaningful careers in aviation.
- For those who join us, support their first steps in the aviation sector with an entry-level LLA Skills Induction Programme.

Alleviate poverty

We will take action to alleviate the impact of poverty in our community. We will support individuals to find employment through skills initiatives and providing opportunities to get into work, helping people to reach their full potential.

We aim to help make the communities we live in more resilient and work together to ensure no one has to live in poverty.

More staff volunteered in 2020 than ever before

This year, more of our team have volunteered than ever, with more than 15% of staff supporting the COVID-19 local vaccination centres.

We contributed £200,000 to community projects

We continued to contribute to the Community Trust Fund in 2020, giving £150,000 to support community health and skills initiatives and tackling poverty in our community.

We also provided a further £50,000 to the Post COVID Stability Fund that aims to help those worst affected by the pandemic.

We raised £180,000 over the 3-year charity partnership with Macmillan, which finished this in 2020.

The LLA team have raised more than £180,000 over the 3 years to support the vital work Macmillan do. Our support has funded over 400 Macmillan Grants in our community and helped local families meet the costs that can arise from cancer and its treatment.

East Anglia Air Ambulance and Luton Food Bank selected as new charity partners

2021 will mark the start of a new 3-year partnership and after a wide ranging search, we selected two new charity partners: East Anglia Air Ambulance and Luton Food Bank.

Community skills and training projects postponed due to COVID

We've not been able to run the project we'd intended to in 2020 as COVID restrictions have prevented the in-person training and work experience. We look forward to restart these projects when it's safe and practical to do so.

STAFF VOLUNTEERING

We recognise that we can also have a positive impact in our community by providing practical support, and we have introduced a staff volunteering programme. We aim to increase the proportion of staff volunteering over the course of this strategy.

OUR VOLUNTEERING APPROACH

We aim to get increasing numbers of staff involved in our volunteering programme. We exceeded our target of 5% in 2019, and in 2020, our aim was for at least 10% of staff to take up to one day paid leave to volunteer for good causes.

The team have previously supported a wide range of events but there was some uncertainty about how best for staff to volunteer at the start of

the lockdown period in March. Our team rose to challenge and staff have volunteered at the local vaccination centre. More than 60 members of staff volunteered during 2020 and at the time of writing, we have already exceeded our target of 15% of staff to volunteered in 2021. We also supported Luton Foodbank across the year, donating more than 100,000 items that were not compliant with Government hand luggage restrictions.



CHARITABLE GIVING

We provide direct financial support through our Community Trust Fund, which offers grants of £250 to £10,000 to community projects that benefit people across our region. We also have a long-standing charity partnership scheme, and we have worked with our charity partner Macmillan to fundraise and help deliver projects that directly benefit our local community. We also amplify the philanthropic efforts of our staff by offering a match funding scheme.

Since we set up our charity partnership in 2008, we have raised more than £600,000 for charity partners, thanks to the fundraising efforts of our team and passengers.

During 2020 we contributed £150,000 to our Community Trust Fund. The fund, which is administered by the Bedford and Luton Community Foundation distributes grants to charities, non-profits and community groups that contribute to the three priorities in our charity strategy:

- **Healthy today (mental/physical health and wellbeing)**
- **Skilled tomorrow (Upskilling young people)**
- **Alleviating poverty (supporting people to support themselves)**

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

This year, we also provided a further £50,000 to the post-COVID Stability Fund which aims to help those people in the Central Bedfordshire and Luton area who have been worst affected by COVID-19. The fund's priorities are to support projects that tackle mental health, poverty and inequality.

LLA HEROES

“I’m so proud of the LLA team. In a year where we each had so much to cope with in our personal and professional lives, more than 120 of our colleagues signed up to become LLA superheroes, supporting the vaccination centre, homeless shelters and more than 40 good causes across our region.”

Neil Thompson
Director of Operations

In addition, we raised more than £100,000 for our charity partner Macmillan in the final year of our 3-year partnership. The charity quiz night we ran in March 2020 turned out to be the last in-person event of the year due to COVID, but the team have continued to run virtual events and fundraisers throughout the year including the return of the “brave the shave” challenge.



We raised more than £2,300 for Macmillan through the Brave the Shave event. Pictured are Aiden, Riann and Misty Oosthuizen and Kim Hurst.

The LLA team have raised more than £180,000 over the 3 years to support the vital work Macmillan do. Our support has funded over 400 Macmillan Grants in our community and helped local families meet the costs that can arise from cancer and its treatment. We are exceptionally proud of the success that the partnership has brought for both organisations.

2021 will mark the start of a new 3-year partnership and after a wide-ranging search, we selected two new charity partners: East Anglia Air Ambulance and Luton Food Bank.



Based in Norwich and Cambridge, East Anglian Air Ambulance operate across the east of England, providing urgent medical care through two H145 helicopters and four rapid response vehicles.

As well as fundraising support, we will 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 be a huge help to their life-saving operations in Bedfordshire and beyond over the next three years. During 2020, EAAA was tasked to help someone in need of critical care in Bedfordshire 122 times.



Luton Foodbank aims provides emergency food and support to help people to overcome the problems that brought them to the bank.

Relying on donations of food and staffed by a team of volunteers, Luton Foodbank works closely with front line agencies like Luton Advice Network, Age Concern, children's centres and mental health charities to provide access to healthy food for those in need.

We started our relationship with Luton Foodbank in 2019, where we provided food and confiscated items from airport security. We look forward to growing our support over the coming years.

“Supporting our local community is an incredibly important part of airport life. Our adopted charities are a perfect fit with our focus on creating a ‘healthy today and a skilled tomorrow’. We have some really exciting fund-raising ideas planned for the new partnership and are really passionate about making a difference.”

Alberto Martin
CEO

COMMUNITY SKILLS AND TRAINING

We work with local schools to provide career training, with a focus on communication and problem solving. We also aim to arrange at least two schools tours each year and support young people to start a career in aviation through schemes such as our ‘Get Into Airports’ programme, run in partnership with the Prince’s Trust.

The airport is in a great position to support skills and training in our community. As a major employer with a wide range of professions and trade, we are keen to work with local schools and pupils to share skills and knowledge that will help young people start their careers successfully.

We are also keen to showcase the exciting opportunities to work within aviation and engineering, and provide a pathway into working with us through the ‘Get into Airports’ programme.

Due to the restrictions in place due to COVID, we were not able to run school visits or training sessions in person.

OUR APPROACH TO SKILLS AND TRAINING

Although we were not able to run the programme in 2020, our approach is to work with local schools via our partner Develop. We would typically visit schools to run our Connect programme which develops the student’s communication and problem-solving skills, and invite pupils to visit the airport site. We aim to make 10 school visits each year, and will reintroduce the programme when COVID-19 restrictions allow.

GET INTO AIRPORTS

Since 2011 we have run the ‘Get into Airports’ programme in partnership with The Prince’s Trust and The Launch Group. Although 27 young people aged 18 to 30 completed the programme in 2019, we were not able to run the programme this year. Since 2011, over 178 individuals have completed the programme, of which 81% have gone into full-time employment. Placements have included Harrods Aviation, World Duty Free, The Restaurant Group (TRG), Aelia and Signature.



COMMUNITY WELLBEING AND NOISE MANAGEMENT

We will improve wellbeing in our community. Our community team will also attend our community noise surgeries to ensure local residents are able to access all the support we have in place to address noise impacts.

OUR APPROACH TO COMMUNITY WELLBEING AND NOISE MANAGEMENT

During 2020 we continued to support Luton Foodbank. We donated more than 100,000 items collected from security as well as donations from staff and passengers.

Working in partnership with our noise team, our community team hold public surgeries to share information and answer questions about noise. We were only able to complete 1 public surgery this year due to COVID restrictions and associated resource constraints, rather than the 6 we had initially planned.



PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Progress update
2.1	Charitable giving	Maintain LLA's contribution to the Community Trust Fund at £150,000 per annum	ACHIEVED We contributed £150,000 to the Community Trust Fund and a further £50,000 to the post covid stability fund
2.2	Charitable giving	Promote the airport's employee matched-funding scheme and achieve 20 requests for match funding per year	ACHIEVED 20 match funding requests were made during 2020
2.3	Charitable giving	Dedicate £30k per year to support selected local and regional initiatives that support community spirit and cohesion	ACHIEVED £30k was provided to local initiatives across the year
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 The school programme was paused in 2020 due to COVID restrictions
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	ACHIEVED More than 10% of staff took PTO during 2020
2.6	Community wellbeing	Implement a programme that supports wellbeing and increases the standard of living in our community	PAUSED Initiative paused due to COVID."
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	PAUSED We completed a community noise surgery in January 2020, but subsequent noise surgeries were paused due to COVID restrictions

3 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.



Airside Safety



Health and Safety



Information Security



Enhanced security training

AIRSIDE SAFETY

The reduction in air traffic this year offered an opportunity for us to focus on airside safety. In particular, we have had greater access to complete habitat management and line painting on the taxiways and apron.

HEALTH AND SAFETY

We were the first airport in the UK to achieve the ACI airport health accreditation, reflecting our robust approach to managing COVID risks for staff and passengers.

INFORMATION SECURITY

With many members of staff working from home during the year, our efforts have focussed on ensuring our data and systems remain secure.

AIRPORT SECURITY

We have continued to provide training for airport security officers, running necessary in-person and classroom teaching with reduced numbers and PPE.

The safety of our passengers, staff, and data is our highest priority. We have robust processes in place to ensure we achieve the highest standards of security and have established a series of targets that build on our excellent record.



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

OUR APPROACH TO AIRSIDE SAFETY

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, it is how we do things, 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 provider, aircraft engineering and aircraft manufacturers. The initial purpose of the Safety Stack was to improve the safety culture through 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 otherwise too challenging for a single organisation to manage effectively on its own. This a first globally and has brought around beneficial changes for the Stack Partnership such as the harmonisation of a raft of underwing ground handling procedures which is in 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, as safety risks typically affect a number of organisations or individuals in the Stack. This approach also brings together experience, knowledge and expertise not readily available when partners work in isolation.

This focus on collaboration has accelerated our improvements in safety performance significantly.

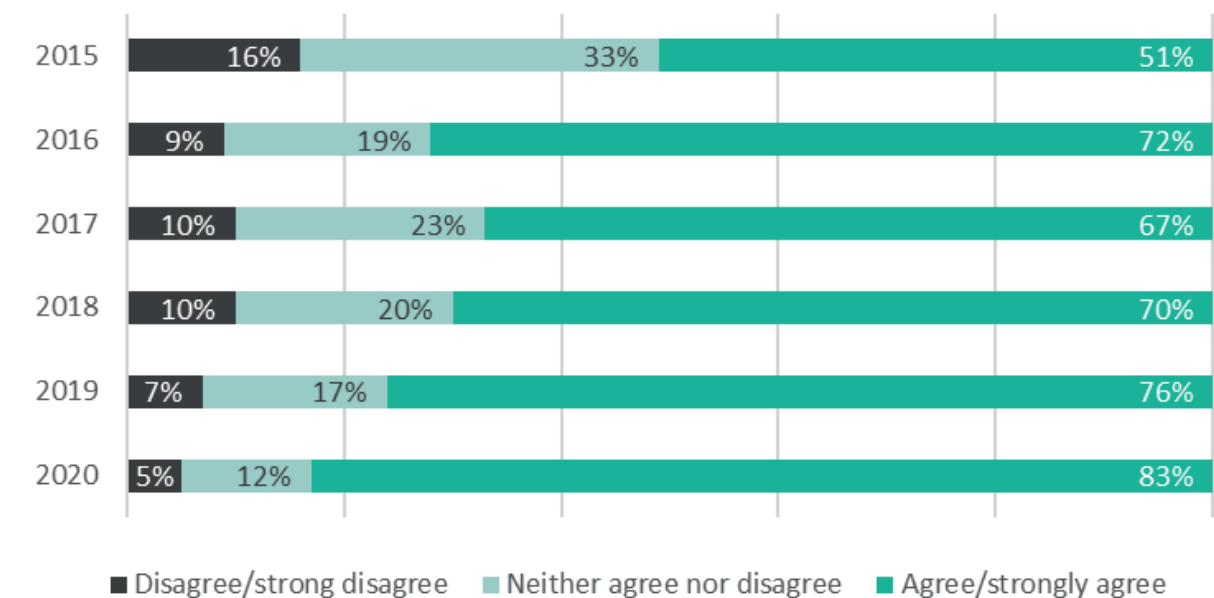
The Stack uses an engagement approach where responsibility, accountability and learning are the central themes supported by a Just Culture.

The success of this approach 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 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.

The chart below shows the progress made even in one of our most challenging periods, 2019 and 2020. 2016 is an outlier as it was August that year whilst working toward what was to become the LTN Safety Stack we developed and introduced a scheme we call Points of Engagement (PoE Scheme). This scheme came about out of the realisation that traditional methods of communication, particularly safety communication, failed to reach its target audience. The decision was made to support traditional communication methods with speaking directly with the target audience, the front line, whether that's the pilot or the aircraft cleaner the message we wanted to convey was to be brought directly to them. It was not realised at the time what a profound effect PoE would have in building trust, a trust that has been cemented through the workings of the Stack.

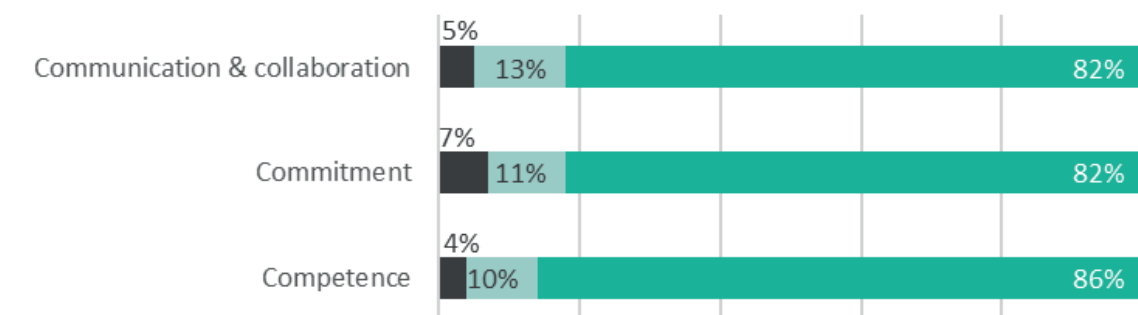
Airside user safety survey scores - 2015-2020



The summary data below gives a breakdown of 2020 results by theme against 2019 and our starting point, 2015. When we compare progress from 2015 the results further support the break from the traditional methods of safety management practiced pre-Safety Stack:

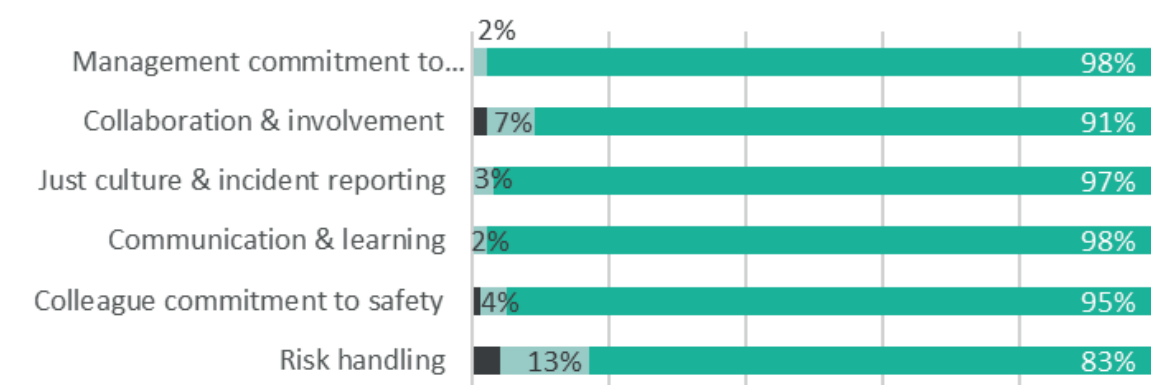
- **Communication & Collaboration:** up 14% on 2019 and 71% on our first survey in 2015.
- **Commitment:** up 9% on 2019 and 44% on 2015.
- **Competence:** up 7.5% on 2019 and 115% on 2015.
- **Consistency:** up 9% on 2019 and 60% on 2015.

2020 airside users safety survey - consolidated theme scores



The survey covers questions ranging from management commitment to safety to procedures and training. The scores for each question increased, most by nearly 20%. Management commitment to safety and communication and learning both received a score of 98%.

2020 airside users safety survey - sub-theme scores



CASE STUDY: SAFETY IN ACTION

During the year, we completed 7,292 Points of Engagement (2019: 12,104). The reduction from 2019 figures is due to fewer staff being on site.

We still rely on data collection and analysis to understand and manage our safety risks and that is unlikely to ever change how we approach the outputs from the safety management system has changed and has delivered equally impressive results. A good example would be Near Miss reports: a high proportion of which related to incorrect parking of vehicles and equipment. Despite having clearly defined parking bays these only ever partially resolved the situation, the real breakthrough came about when working collaboratively with the equipment and vehicle users to understand their specific needs. Not only did we achieve an 85% decrease between 2016 and end of 2019, our busiest year on record, but how we set up the equipment has allowed the ground handlers to achieve the most efficient aircraft door opening times within industry. One service provider at LTN holds the record for door opening times across 159 out stations their airline customer operates from and in the process earned £250k in additional income in 2019 against their agreed SLA.

Another significant achievement was the eradication of flatbed baggage trucks. Not only were these extremely costly to run, but they were also involved in a high proportion of airside incidents and almost all vehicle/ aircraft damage and fall from height events. Working through the stack with the ground handlers, the pooled equipment provider and other key stakeholders the airport invested circa £700k on the inbound baggage facility allowing it to be accessed by electric baggage tugs (EBTs) and trailers that were used in the outbound baggage process. The ground handler saved a significant amount of money, incidents involving flatbed baggage trucks were eradicated, EBTs and trailers were added to the equipment pool improving environmental performance and the infrastructure was improved.

Another key metric is reported vs. unreported incidents as it informs on how much trust individuals have in our Just Culture and partnership approach in that they will be treated fairly when things go wrong. The Safety Stack produced a Just Culture Framework with all partners agreeing that the principles contained within would be upheld in their own Just Culture Policies or to the adoption of the framework policy in the absence of having a policy in place. Today at LTN 96% of all incidents are reported, the aim is to achieve 99% or better, we recognise and accept that for various reasons not everyone will report no matter how secure the environment and seek to address this by other means such as exposure to Broken

Windows Theory and interventions by empowered trained stack partners as is the intention of the Safety Leaders Programme.

Other key milestones through the Stack Partnership have been the Safety Leaders Programme where we induct anyone with leadership responsibilities, training them on how to identify and intervene in behaviours, if left unchallenged, might lead to a safety event. The programme is open to everyone however the primary focus, for very good reason, is on the leadership. There has been the harmonisation of a raft of underwing ground handling procedures led by the airlines that has led to the production of specific LTN GOMs inserted into a Ground Operations Manual. The GOMs are a collective undertaking and standardise procedures such as aircraft marshalling, aircraft chocking and coning, pre arrival and post departure inspection etc. This standardisation simplifies training and significantly reduces the risk of error in protecting the airframe and persons operating around the airframe.

A more recent development is the formation of the Safety Managers Alliance. Through the Stack Partnership, the Alliance brings safety managers together for the shared purpose of reducing safety occurrences, collaborating on investigation, agreeing learning outcomes and the development of a unified approach on safety promotion so that messaging to the target audience is consistent and supported at all levels across the partnership. It is also intended that we agree and work collaboratively on safety targets and offer greater support to the Safety Leaders. The Alliance meets monthly whereas the Safety Stack meets quarterly.

The approach being developed through the Stack Partnership focusses more on what works well and recognises and celebrates good practice. The focus is on recording when things go right, most management systems contain only the data that shows what went wrong, in a month we have almost as many Safety Recognition Events as we do safety occurrences for an entire year. This becomes significant when reviewing an individual's overall safety performance in the event of a safety incident. Knowing how an individual typically performs allows for a clearer assessment of risk and or the identification of changes in behaviour that might be out of character.

The overall approach at LLA and through the Safety Stack is performance based, it is not enough to say 'they knew the procedure' it is more important to know that we understand and do what we say and that out cultural story is centred on 'how things get done around here'.

PROGRESS IN 2020

Our safety record during 2020 has been excellent and we made improvement in most of the airside safety metrics we monitor. Despite the downturn in traffic, LLA experienced a parallel drop in safety occurrences and airside activity. One of the primary reasons for this is our established collaborative approach and the overwhelming evidence of its effectiveness. The Stack Partners quickly established a twice weekly 'Start-up' meeting that has since become a weekly collaboration meeting and continues to be well attended.

Whilst air traffic volumes have been lower this year, there have been opportunities to focus on airside safety. In particular, we have had greater access to complete habitat management and line painting on the taxiways and apron and managed to complete our runway re-designation on time and under budget.

Habitat management plays a key role in wildlife strike hazard reduction by limiting food, water and shelter on the airfield.

The wildlife control team works closely with Natural England, local landowners, Luton Borough Council, farmers and game keepers. We also use a range of methods to deter birds, including vehicle mounted systems that use bird distress calls and pyrotechnics to disrupt flight lines and discourage birds from overflying or habituating the airfield, protecting both wildlife and aircraft. LLA operates a long grass policy

which is aimed at deterring large birds that pose greater risk of causing damage to the airframe or engines if ingested. The drawback is that long grass entices smaller species, most commonly Meadow Pipit, Skylark and Redwing. These pose lower risk to aircraft but are more susceptible to vortex strike. In 2020 from the red and amber list of birds of conservation concern we recorded vortex strikes on 1 bird from the red list, 7 from the amber list with a further 10 confirmed strikes from the amber list. The increase in vortex strikes is mainly due to a very successful breeding season of the smaller uncontrollable species such as Meadow Pipit. Whilst airlines have reported an increase in wildlife strikes of up to 65% across their networks, LLA have recorded a 50% decrease in controllable species strikes in what has been a challenging year.

As the airport has remained open across the entire year, we have used a flexible approach to the furlough scheme, rotating staff on and off furlough to ensure all staff have continued to train and maintain important professional competences.

SAFETY METRICS

Event type	2019 Total	2020 Total
Holding Point Busts	22	6
Incorrect Taxi Routing	70	48
Controllable Species Bird Strikes	6	3
Collisions	136	60
Spillages	94	55
Failure to give way to aircraft	53	14
FOD Aircraft waste	486	49
Failure to comply with regulations	154	43
Failure to comply with Ground Operations Managers	51	69
Incorrect parking	586	168
Points of Engagement	12,104	7,292



Through the RBS, we will expand our award-winning health and safety programme which is based on the ‘Safety Differently’ principles. Our aim is to review and improve our operations to proactively avoid issues, rather than waiting for something to go wrong. We apply this approach for the health and safety of our staff, customers, and on-site suppliers to embed a culture of exceptional safety and risk management across the whole airport.

OUR HEALTH AND SAFETY APPROACH

At London Luton Airport, we operate an award-winning health and safety management system based on the ‘Safety differently’ approach. Certified to ISO 45001:2018, our health and safety management system aims to review and improve our operations to proactively avoid issues, rather than waiting for something to go wrong before taking action.

Our approach is set out in our health and safety policy and in our newly updated health and safety strategy, which addresses the key physical and mental health risks and impacts for staff, contractors, partners and passengers.

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.

PROGRESS IN 2020

Our main priority in 2020 has been responding to COVID and we implemented wide-ranging changes to keep staff and passengers safe. We were the first UK airport to achieve the ACI Airport Health Accreditation.

We also launched two new strategies this year, for health and safety, and wellbeing, and achieved recertification for our ISO 45001:2018 health and safety management system.



London Luton Airport was the first airport in the UK to achieve the ACI Airport health accreditation.

COVID response

Our main focus has been responding to COVID and providing a safe environment for staff and passengers. We completed risks assessments for all airport operations and introduced new management practices to reduce the risk of transmission. Where possible our team moved to working from home, but 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. We increased cleaning and removed high touchpoint areas such as customer satisfaction terminals. We installed Perspex screens at check in desks, security and customer service desks, and introduced testing and extended welfare provision for staff.

You can read more about our response to COVID on pages 10.

New health and safety strategy

In January 2020, we launched a new health and safety strategy with four key strategic themes:

- LLA family
- Learning from experience
- Risk management
- Proactive monitoring

The strategy, which is based on the ‘safety differently’ principles, aims to create a proactive safety culture at the airport and achieve safety excellence.

Across 2020 we worked to embed the new strategy into the way we work and engaged key stakeholders and third parties to adopt the approach. As well as investigating safety events, we complete appreciative enquiries that look to proactively identify risks and opportunities to improve. We document these lessons learned and seek to embed them in the way we work. We share them with colleagues through the LLA hub and Safety Stack for third parties.



FOCUSSED ON BETTER:
HOW APPRECIATIVE ENQUIRIES
TURNED WASTE INTO COMMUNITY
SUPPORT

We know that conducting appreciative enquiries delivers more than health and safety improvements. In 2019, Security team leader Yanii Van Der Logghe saw the thousands of items confiscated at security being thrown away and knew we could do better. We partnered with Luton Foodbank and donated more than 100,000 items in the first year of the scheme.

In March 2020, we ran training sessions for staff from across the airport on how to conduct appreciative enquiries. Building on Yanii’s great example, we hope that our extended focus on proactive improvement will help to deliver a more sustainable and safer airport for everyone.



Wellbeing strategy

We launched our wellbeing working group in 2020, and over the course of the year, the team developed the airport’s wellbeing strategy. The strategy aims to promote the health and wellbeing of all our team, with 6 key areas of focus:

- 1. Financial
- 2. Community
- 3. Belonging
- 4. Physical
- 5. Emotional
- 6. Growth

During the year, we started to implement a number of wellbeing initiatives to support the strategy.

- We instigated wellbeing time outs, a 1-hour session for staff to hear from guest speakers on key wellbeing topics. During the year, we ran sessions on mental health, resilience, diversity awareness, laugh yoga, stress management, and mindfulness.
- We launched a wellbeing guide and mental health training for line managers

You can read more about our wellbeing strategy on page 70.

Safety training

During 2020 we conducted a wide range of health and safety training. We launched our skills session programme early in the year, the HSE ‘team’ developed content and hosted sessions to raise awareness of health and safety issues for staff. We also completed training on COVID secure practices, construction health and safety (CDM), hazardous materials (COSHH) and hazard awareness.

In September our senior management team completed training on safety differently with Sidney Dekker and Robert de Boer, who pioneered the approach. The principles of this session have been embedded in our Senior Management Engagement objectives.

SENIOR MANAGEMENT TRAINING ON SAFETY DIFFERENTLY

In September 2020, our senior management team completed a training session with Sidney Dekker and Robert de Boer, who pioneered the safety differently approach.



Performance data

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

	Target	2020 performance
Share learning from level 2 (medium to high risk) events	90%	90%
Senior managers completing Safety Differently Training during the year	100%	100%
Attendance at our risk governance meeting	75%	89%

In addition, we also monitor safety events. The number of staff, contractor and passenger safety incidents decreased significantly in 2020, predominantly due to a significant reduction in the number of people at the airport.

Operational safety accidents decreased by 64% and passenger safety accidents by 75%. We also monitor the Moving Average Frequency Rate (MAFR) which measures the number of safety accidents per passenger. The passenger MAFR (passenger safety accidents per PAX) reduced by 15% but the total MAFR (total safety accidents per PAX) increased by 18%, driven by the lower passenger numbers.

Over the course of 2020 there were no fatalities. There were a total of 6 recordable injuries and we identified 860 near misses for staff. In addition, there was 1 lost time injury for contractors.

There were no fatalities or recordable injuries for passengers during the year.

	Staff	Contractors	Passengers
Fatalities	-	-	-
Lost time incidents	8	1	-
Recordable injuries	6	1	-
Near miss incidents	860	-	-
Hours worked	1,012,488	23,240	-
Lost time injury rate (number per million hours worked)	7.9	43.03	-
Total recordable injury rate (number per million hours worked)	5.93	43.03	-

PLAN FOR 2021:

- We have set 4 new objectives for 2021:
1. 4 ‘Safety Engagments’ per year per Senior Manager
 2. 80% of departmental and functional risk reviews meeting take place, 75% attendance
 3. 90% of Level 2 lessons learned shared
 4. 80% of Departmental Continuous Improvement assessment actions closed within agreed timescales



INFORMATION SECURITY

We manage a lot of personal and sensitive information and we 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 resilience of our networks against cyber and physical risks in line with the Network and Information Systems (NIS) Regulations.

OUR APPROACH TO INFORMATION SECURITY

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 securities policies in place and have appointed a data protection officer. 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 VPNs and access controls.

Staff are required to complete annual training on information security, using our e-learning platform.

PROGRESS IN 2020

We have been working to ensure all personal data and sensitive information remains protected following the move to extensive remote working this year, ensuring our processes for information security and system access continue to align with good practice in Internal Control for Financial Reporting (ICFR).

Our progress to achieve ISO 27001 certification has however been paused due to resource constraints linked to COVID.

We have also been working closely with other UK airports and the CAA to agree an alternative timeline to implement the requirements of the NIS directive. The requirement was for all airports with more the 10m passengers a year to implement the requirements by the end of 2020, but given the significant reduction in passenger numbers, and airport resources across the country, the deadline has been pushed back to April 2021.

We are working with external consultants to carry out an audit which includes both the airport and NATs within the scope. We are on track to complete audit by end of July 2021 and will then be subject to ongoing annual audits from the CAA.

There have been no data breaches or complaints related to personal data breaches during the year.

PLAN FOR 2021

As part of Project Lithium, we will be updating a range of operational systems and databases, including the airport operational database and billing system. This will improve operational & business management processes, and replace legacy systems carrying cyber-security vulnerabilities. We are also exploring opportunities to update our digital strategy to increase automation, security and efficiency.

OUR SECURITY DEPARTMENT

We will expand our security training so that it exceeds the requirements from the Civil Aviation Authority (CAA) and delivers an excellent customer experience as well as continuing professional development and leadership training for our security teams.

OUR APPROACH TO PROFESSIONAL DEVELOPMENT IN SECURITY

As the largest team in the airport, our Security department is dedicated to making the service for customers passing through security as straightforward as possible. Our department has a programme of enhanced security training above the minimum standard set by the Civil Aviation Authority (CAA), including customer experience and leadership.

PROGRESS IN 2020

With the airport open through the year, the security team have adapted their approach to meet the changing circumstances during 2020.

When travel restrictions were imposed in March, we implemented a flexible furlough scheme for security staff. We operated a core group, with a peripheral team that was flexed to match the changing requirements

for security screening for staff and passengers across the year.

We have continued to conduct training across the year, including classroom and in person training with reduced numbers and PPE. We were conscious that working through the pandemic increase the risk of officers being exposed to COVID as well as have an impact on their mental health.

The team has also monitored core competences and both physical and mental health closely, using increased in-person and CCTV performance audits. We implemented new Perspex screens and introduced COVID secure practices drawing on guidance from the Department for Transport.

Team leaders ran open discussions with the team, and conducted 1 on 1 calls for all staff during the year to ensure the team felt connected and engaged during this difficult time.



PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	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	BEHIND TARGET Staff career development pathways have not yet been established for security staff
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	ACHIEVED 90% achieved
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	PAUSED These were paused in Q2 and Q3 due to COVID. For Q1 & Q4, 48% was achieved with the majority of our Senior Manager still working from home in Q4
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	ACHIEVED Training completed in 2020
3.5	Health and safety	Senior Managers will be required to attend 75% of risk governance meetings throughout the year	ON TRACK 89% achieved during 2020.
3.6	Health and safety	We will conduct pre-emptive assessments (appreciative investigations) on each department every quarter to identify opportunities to improve	PAUSED Target paused due to COVID restrictions
3.7	Health and safety	We will conduct quarterly continuous improvement safety tours for each of our key on-site suppliers	PAUSED Target paused due to COVID restrictions
3.8	Information security	Achieve certification to ISO 27001 (information security management system) by the end of 2021	PAUSED Implementation of ISO 27001 system behind target due to resource constraints due to COVID
3.9	Information security	Fully compliant with the NIS Directive by the end of 2020	PAUSED Due to COVID impacts across the sector, the deadline for this target has been extended until April 2021. We are on target for the revised deadline.

4 GROW WITH OUR PEOPLE

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

The RBS 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 are also keen that we listen to our people and will expand our initiatives to engage with our teams.



FACILITATING TALENT

The development of our new facilitating talent strategy has been paused until the publication of our new corporate strategy.

DIVERSITY AND INCLUSION

The development of our new diversity and inclusion strategy has been paused until the publication of our new corporate strategy.

WELLBEING

We developed a new wellbeing strategy, which aims to provide practical help and guidance on the wellbeing issues which matter most to our team.

FAIR PAY

We pay all employees a living wage, and review pay annually to ensure the Real Living Wage is paid to those employees on the lowest pay bands.

INTERNAL ENGAGEMENT

We have implemented a wide range of new virtual engagement tools, with our senior management team in particular preparing more frequent and accessible communications. We have introduced new tools to engage staff and understand what issues they feel are most important, and incorporate those priority issues for staff into communications.

We have taken the opportunity to get to know our teams more, with colleagues sharing insights

into how they have dealt with the challenges and changes from COVID.

In relation to our size, we operate with a small team. As of the 18th December 2020, we employed 710 people (FTE 614) and the Security department remains the biggest department with around 400 members of staff. As part of a cost saving programme driven by COVID, our team has reduced in size by around 108, with 20 others taking a sabbatical of between 6 and 12 months.

Within the team we have a wide range of specialist technical and professional skills to keep the airport operating effectively and safely, from mechanical engineers to marketing executives.

It is critical for us to attract and retain the best people and grow their skills as we develop as a business. It is also critical that we recruit the best people, regardless of their background and that we address the barriers that prevent talented people for getting into careers within aviation.



FACILITATING TALENT

Aviation offers rich career opportunities and through our RBS, we aim to attract the best talent and support our staff to develop meaningful and fulfilling careers. This means developing new strategies for entry level talent and developing existing talent, as well as contributing to Luton Council's training academy. We will also expand our apprenticeship programme.

OUR APPROACH TO FACILITATING TALENT

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

We operate schemes such as the 'Get into Airports' programme and school partnerships to showcase the exciting opportunities to work in aviation and help build a talent pipeline within the region.

Our HR team oversee 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.

PROGRESS IN 2020

During this year, our entry level talent programmes have been curtailed due to COVID. We typically run 2 'get into airports' programmes with the Prince's Trust each year, and aim to run 10 career and job events for schools, focussing on more deprived wards. Neither was possible due to COVID related restrictions.

We had 1 apprentice during 2020 who will continue with the airport in 2021.

All personal development reviews were paused in 2020, with our team diverted their focus to wellbeing employee engagement whilst much of the team worked from home or were on furlough.

The development of the facilitating talent strategy has been paused, awaiting the publication of the new Corporate Strategy.

STAFF BENEFITS

Staff are entitled to a suite of enhanced 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 is 6 weeks at 90% pay then 12 weeks at 50%, Paternity is 1 week full pay then 2nd as statutory)**
- **Financial services: Flexible savings offers, including pensions, ISAs and mortgage pay down, Life assurance**
- **Health and wellbeing: Occupational health, Private medical insurance, available to spouses and children as well, virtual GP service, on site gym and classes, cycle to work scheme**
- **Assistance helpline: 24/7 employee assistance anonymous helpline**
- **Discounts: Retail discounts, including terminal shopping, duty free and Clubroom lounges**



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 APPROACH TO DIVERSITY AND INCLUSION

We recognise workplace diversity is a strength, and we aim to have HR Policies in place that set out commitments to encourage diversity and prevent discrimination of any kind.

DIVERSITY

At the 31st December 2020, there were 5 women serving on our Board of 15 (33 percent female representation). 11% of our executive management are female and 29% of our senior management. In total, 38% of our team are female.

Level of organisation	Female		Male		Other or no gender reported		Total
Board	5	33%	10	67%	-	-	15
Executive management	1	11%	8	89%	-	-	9
Senior management	5	29%	12	71%	-	-	17
Total employees	260	38%	420	62%	-	-	680

Diversity is a challenge in many parts of the aviation sector and remains an area we need to improve in, in particular the representation of women who work at the airport and obtaining better data on the diversity of our workforce.

There are some teams where a high proportion are male. 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. Other departments have a high proportion of female employees. This includes the sustainability, finance, procurement and HR departments which have more than 75% of 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**

There are also 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.

Quartiles		
	Female	Male
Lower	49.7%	50.3%
Lower middle	43.9%	56.1%
Upper middle	37.6%	63.3%
Upper	15.6%	84.4%

	Female	Male
Mean hourly rate of pay	£13.10	£16.91
Mean GPG in hourly pay	-22.60%	Women’s hourly rate is lower than men’s
Median GPG in hourly pay	-25.60%	Women’s hourly rate is lower than men’s

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, but the gap extends up the pay scale with considerably more men in the upper quartile than women (84.4% men).

The mean hourly rate of pay for women is £13.10 and £16.91 for men, a gender pay gap of -22.6% for mean hourly pay and -25.6% for median hourly pay. We last reported our gender pay in 2018. Since then, both the mean and median hourly pay gaps have decreased from -28.6% and -27.0% respectively.

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.

PROGRESS IN 2020

We are in the process of developing a new diversity and inclusion strategy which has been paused due to resource constraints during the pandemic. We will finalise and publish our strategy in 2021.



Making LLA a great place to work means stepping up our efforts on staff wellbeing. We will develop a comprehensive wellbeing strategy and ensure that at least 15% of staff have received mental health first aid training.

OUR APPROACH TO WELLBEING

Looking after the wellbeing of our team is a priority to all of us, and in 2020 we developed a new wellbeing strategy.

We conducted a detailed review to identify the key wellbeing challenges for our team. This included conducting staff surveys and feedback sessions with our Co:Lab group and staff wellbeing breakfasts (which we ran until COVID restrictions were introduced in March 2020).

The review identified five key wellbeing risks that we should address in the new strategy:

- 1. Stress
- 2. Finances
- 3. Sleep
- 4. Menopause
- 5. Inclusion

The strategy includes support and 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, with collaboration with occupation health and BUPA.



Fair pay is integral to making LLA a great place to work. We will look into achieving Living Wage accreditation as part of our fair pay review.

APPROACH TO FAIR PAY

We pay the living wage to all staff and assessment are completed annually to ensure the Real Living Wage is paid to those employees at lowest end of pay scale. We haven’t gained Living Wage Accreditation as we cannot guarantee that all our supply chain partners follow suit currently.



INTERNAL ENGAGEMENT

In the last few years, we have made great efforts to increase the level and quality of internal engagement with staff. We will expand our internal engagement efforts through the RBS to ensure that staff feel informed and engaged.

Our approach to internal engagement

Internal engagement is a vital part of our people approach, and we have deployed a range of tools to keep connected with staff across the airport.

We have an internal engagement strategy (called 'ICE') which is designed around the diverse types of roles we have across the airport. Whilst many of the team regularly access email or the intranet through a work computer, those working in front line roles such as in security, maintenance or customer service often prefer face to face communications.

Our engagement needs to reach all of our employees and so the strategy includes various communication platforms, such as:

- **A monthly newsletter and regular video updates from our CEO**
- **Yammer – an internal social media platform for staff to communicate with each other**
- **A face-to-face internal group called Co:Lab. This is a forum where volunteers from across the business meet to represent their colleagues and discuss issues of importance and meet people from different departments. This has been particularly successful.**

We run an annual employee survey which explores important issues including the effectiveness of communications, team meetings, and leadership. In 2019 we established a pulse survey to measure levels of engagement, communications and support with the aim of running this in 2020.

Progress in 2020

With many of our team working from home during the year, and a large number on permanent or flexible furlough, internal engagement has been an essential tool in 2020.

Weekly newsletters kept the team informed and connected

Alberto Martin, our CEO, sent weekly newsletters to all staff to keep them up to date with the changes in the business and what we needed to work on. Alberto also produced short, informal videos, speaking directly to the camera. Through a new scheme, 'ask the Leadership team', staff were able to ask questions anonymously and Alberto would address the key questions through short videos.

We also introduced weekly, family-style newsletters which focussed on sharing stories from members of staff. We have included features on individuals, showcasing their role at the airport and some insight into their life and how they have been coping with the challenges and changes brought on by the pandemic.

Central repository for guidance and information

With so much change happening over the year, we created a COVID-hub which everyone with an LLA account could access. We posted FAQs, communications, videos, guidance and links to external resources for themes that may be useful for staff including mental health, financial management and domestic violence.

We've since expanded the COVID-hub to the LLA-hub, linking a wider range of resources such as information on staff benefits, HR policies and opportunities to volunteer.

Manager 1 to 1s

With staff working remotely or being placed on furlough, team leaders and managers have taken the time to speak with each member of their team on a regular basis to check in.

Virtual all hands meetings

We introduced new virtual all-hands meetings, where members of the senior management team provide an update to staff. The short segments were then cascaded to all members of staff.

Co:lab

The LLA Co:Lab is a network of communications champions from across the business, who share information out to the business, and collate questions and concerns from colleagues to be answered and addressed.

Having proven to be a great success in 2019, we paused the initiative for 6 months in 2020 due to resource constraints during 2020. The Co:Lab scheme will be restarted in 2021.

Pulse surveys

We ran 5 pulse surveys across the year through our internal social media tool, Yammer. The engagement level was lower than previously achieved due to the furlough scheme.

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	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	PAUSED The facilitating talent strategy has been paused due to COVID
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 The programme was not run in 2020 due to COVID
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 The programme was not run in 2020 due to COVID
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	PAUSED The development new diversity and inclusion strategy has been paused due to COVID
4.5	Wellbeing	Develop a wellbeing strategy by the end of 2020	ACHIEVED The wellbeing strategy has been developed but has not yet been formally published."
4.6	Wellbeing	15% of staff to receive mental health first aid training by 2020	BEHIND TARGET Currently 75 members of staff have received mental health first aid training, around 10% of our employees
4.7	Fair pay	Undertake a cost-benefit analysis of achieving Living Wage accreditation status and present for decision by the end of 2020	ACHIEVED We completed the review during 2020. We pay a Living Wage to all LLAOL staff, but we cannot achieve Living Wage Accreditation at this point as we cannot guarantee that all suppliers currently meet the requirements
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	PAUSED The annual engagement survey was not completed in 2020 due to resource constraints due to COVID
4.9	Internal engagement	At least 60% of staff to feel they have a voice on what goes on at the airport in 2020	PAUSED The annual engagement survey was not completed in 2020 due to resource constraints due to COVID
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	PAUSED The annual engagement survey was not completed in 2020 due to resource constraints due to COVID
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	ACHIEVED Members of the senior management team have communicated regularly across 2020

5 DELIVER GREAT CUSTOMER EXPERIENCE

Our objective is to make travelling through LLA an exceptional and positive experience for everyone. We will establish a customer experience charter, extend our training programme, and achieve certification to the ACI's customer experience programme.

Delivering a great customer experience for everyone who travels through LLA is a vital part of our RBS. Having invested £160m in expanding our terminal and upgrading infrastructure at the airport, creating an outstanding customer experience is a key priority.



OUR CUSTOMER SERVICE RECOGNISED WITH ACCREDITATION AND AWARDS

We have been named among the UK's top airports by Conde Nast Traveller, as well as being shortlisted in the UK Customer Experience Awards 2020. In 2020, we achieved Level 1 of the ACI customer experience accreditation and the majority of passengers using the airport rate it outstanding or good according to industry regulator CAA (Civil Aviation Authority).

LLA IS THE FIRST UK AIRPORT TO ACHIEVE THE ACI'S HEALTH ACCREDITATION

Our main priority during the pandemic was ensuring our passenger felt safe when travelling through the airport. We were the first airport in the UK to achieve the ACI Health Accreditation, reflecting our rapid implementation of COVID secure measures.

WE UPGRADED ACCESSIBILITY PROCESSES AND INFRASTRUCTURE IN 2020

Over the year we reviewed and upgraded our customer service processes and installing new hearing loops and upgrading toilet facilities. We have also been making preparations to ensure our support passengers with reduced mobility when the new DART light rail system comes on line in 2022.

CUSTOMER EXPERIENCE

Through our customer experience charter, we will ensure that we deliver outstanding customer experience across the whole airport. We will monitor customer satisfaction closely and set targets to increase our customer experience scores.

OUR APPROACH TO CUSTOMER SERVICE

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 to identify where a customer's needs help and are able to put customers at ease, especially when they are tired, in a rush or panicked.

Great customer experience is everyone's responsibility, and we deliver customer service training to all front-line staff including security and cleaning teams. Through our internal engagement forum, Co:Lab, we have established an effective dialogue to coordinate activities and departments better in order to better serve our customers.

We are developing a customer charter which will enshrine our good practices and we monitor customer experience at key areas in the airport through surveys, audits and satisfaction-rating terminals.



We achieved level 1 of the ACI Customer Experience Accreditation in January 2020.

OUR PROGRESS IN 2020

Delivering a COVID secure airport

Our main priority during the pandemic was ensuring our passenger felt safe when travelling through the airport. We were the first airport in the UK to achieve the ACI Health Accreditation, reflecting our rapid implementation of COVID secure measures.

From March 2020 we implemented enhanced cleaning schedules, passenger temperature testing, and policies on face coverings and social distancing. We installed Perspex screens in areas where staff and passengers speak face to face and introduced new cleaning equipment, such as the new tray cleaning machine for security and robotic fogging machines. We also removed high-volume touch points which included our customer-satisfaction terminals. Customer feedback showed more than 90% satisfaction scores on COVID management.

LONDON LUTON AIRPORT NAMED AMONG TOP UK AIRPORTS FOR CUSTOMER SERVICE



London Luton Airport has been named among the UK's top airports by Conde Nast Traveller, as well as being shortlisted in the UKCXA Customer Service Awards 2020. The two awards come as the majority of passengers using the airport rate it outstanding or good according to industry regulator CAA (Civil Aviation Authority).

The Conde Nast Traveller Readers' Choice Awards are one of the longest-running and most prestigious awards in the travel industry. They cover all aspects of travel and recognise the world's best hotels, resorts, countries, cities, islands, spas, airlines, airports and cruises and provide a snapshot of where and how people travel. LLA was ranked second in the UK this year, an improvement on last year's ranking of fourth. The top 5 airports are as follows:

1. London Heathrow
2. London Luton
3. London Gatwick
4. London Stansted
5. Manchester

LLA's customer service improvements were also recognised at this year's UKCXA Customer Service Awards, with the airport shortlisted for the "Customers at the Heart of Everything" award, for its customer service strategy.

All of this builds on recent CAA annual passenger survey which shows that 89 per cent of passengers rated their experience as 'excellent' or 'good' in 2019.

"I am incredibly proud of the team for providing such great customer service, and I'm delighted they've been recognised for this. This has been a challenging year for the aviation industry, and these awards prove that our colleagues continue to put customer service first, even under difficult circumstances."

Alberto Martin, CEO

REVIEWING AND UPDATING PROCEDURES

Over the course of the year, we used the opportunities from lower passenger numbers to review and update our customer experience procedures. We have also adopted the airside operations software tool Opscom to provide enhanced record keeping and improvement management, and have improved our communication systems with staff, contractors and third parties.

Our aim is to build back better, and we have used this year to establish a strong foundation to deliver better customers experience as passengers return in greater numbers.

MONITORING CUSTOMER EXPERIENCE

During the first quarter of the year, we monitored customer satisfaction through feedback terminals and ASQ surveys. We achieved 76% customer satisfaction scores, and scored 3.59/72% in the 398 ASQ surveys completed (2019: 74%).

In early March, we adapted our approach in response to COVID. Having removed our customer-satisfaction terminals, we introduced new ways to get customer feedback. Upgraded WiFi was implemented across the terminal this year, and we added a short satisfaction survey on the landing page. The Passenger Services Team also started to capture Net Promoter Score data, asking customers how likely they were to recommend us on a score of 0 to 10. Possible overall scores range from -100 (very negative) to +100 (very positive), with any score over 0 being good and over 20 being favourable. Since we start collecting data in March, we have achieved a score of +29.

We plan to restart our ASQ assessment in Q3 of 2021 and reintroduce feedback terminals when safe to do so.

CUSTOMER EXPERIENCE TRAINING

Customer experience training was paused in 2020 in response to staff and operational changes due to COVID.



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

OUR MANAGEMENT APPROACH FOR ACCESSIBILITY FOR ALL

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, and 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 representatives from a wide range of airport user groups and our PRM service provider. This includes the Alzheimer's Society, Hertfordshire Age UK, Action on Hearing Loss, SIA, Colostomy UK, Autism Bedfordshire, The Disability Resource Centre, JDRF, and Guide Dogs for the Blind. The group is independently chaired by Andrew Wright and the group has met three times since it was established in November 2019, with meetings in 2020 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 2020

Upgrading accessibility infrastructure

We installed more than 125 new hearing loops across our customers service points early in the year as well as new alarms in disabled toilets. The new alarms improve our team's ability to respond to an incident.

Appointed a new PRM provider

In September 2020, our existing PRM provider informed us that they wished to end the contract early. We retendered the service, with our procurement team doing an excellent job to deliver the new contract from a standing start in 6 months. We are pleased to welcome Wilson James Ltd on board. They will deliver enhanced PRM performance data for the airport and an expanded training syllabus for the team.

PRM preparations with DART

With DART, the new light rail connection between the airport and Luton Airport Parkway station, due to open in 2022, we have been making preparations to ensure our PRM support runs seamlessly for passengers travelling to or from the airport by train. We worked closely with the station team and rail operators to make sure all processes are ready for the start of the DART service.

CAA ratings paused for 2020

We are pleased that we maintained a rating of 'good' in the 2019/20 CAA accessibility report, achieving an 11% increase in our customer satisfaction score.

Due to restrictions to the audit programme in 2020 due to COVID, it has not been possible for airports to be assessed against all the criteria under CAP1228. As a result, the CAA will not be publishing a report on airport accessibility for 2020/21 but we will continue to capture the data, which we will publish.



Our team play a vital role in making sure travelling through LLA is easy and enjoyable. We will provide all customer-facing staff with training on customer experience and hidden disabilities.

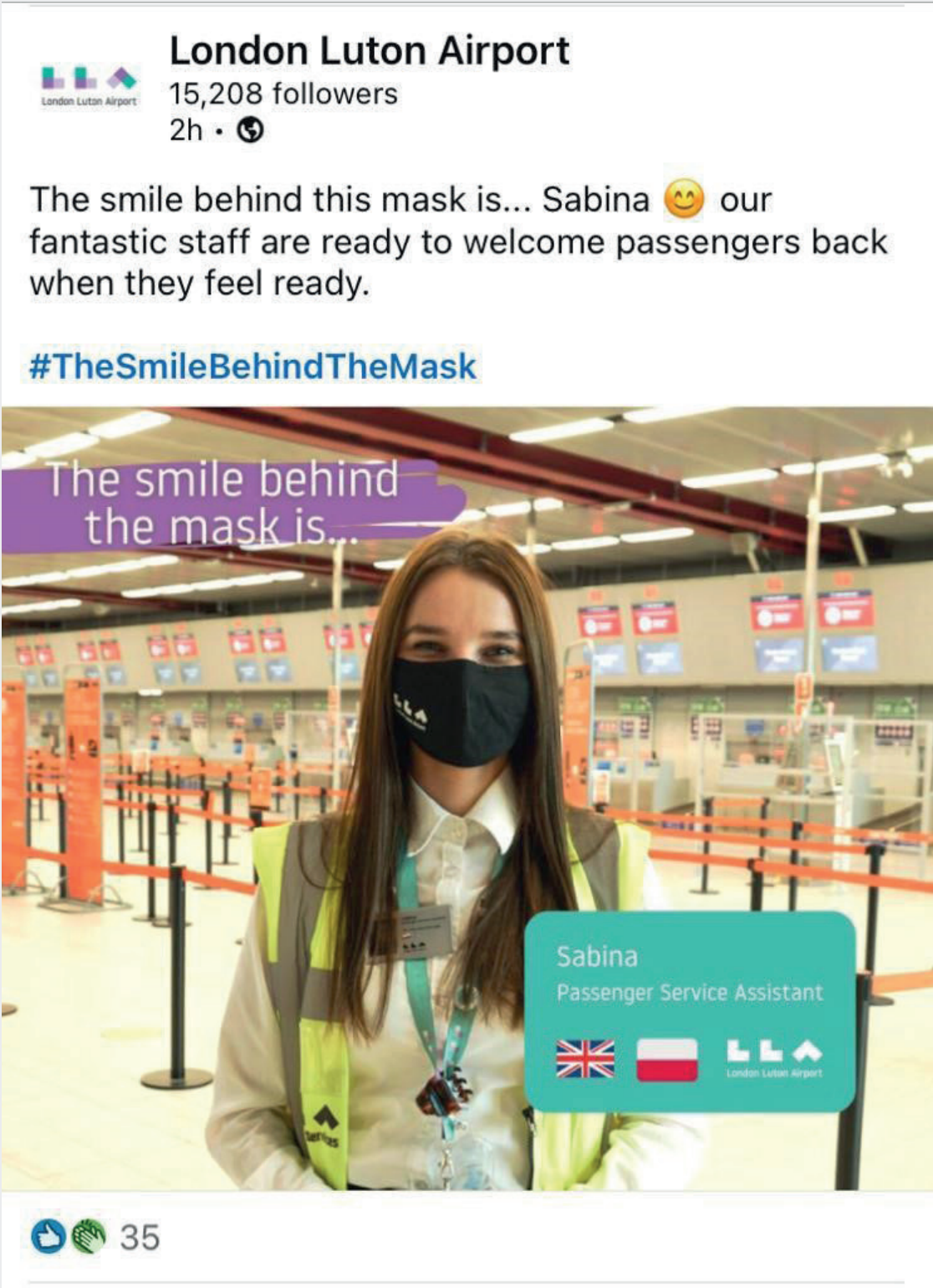
OUR APPROACH TO HIDDEN DISABILITIES

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. We have set targets to provide training for all front-line staff on hidden disabilities, aiming to have all front line staff trained by the end of 2020.

SMILE BEHIND THE MASK

With our Passengers Services team wearing face masks due to COVID, we introduced a new initiative to ensure we keep a friendly connection with all our passengers.

Through the “Smile behind the mask” initiative, we introduced a staff badge with a photo of their face on as well as the languages they speak, so passengers can more easily relate with the team members whose faces are now covered. We like to think that it provides that more human, personal touch that we all miss in COVID times.



PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Progress update
5.1	Customer experience training	100% of customer-facing LLA employees undergo training in customer experience by the end of 2020	PAUSED The training programmes were paused during 2020 due to COVID restrictions
5.2	Customer experience charter	Customer experience charter in place by mid-2021	ON TRACK The customer experience charter will be developed in parallel to the new corporate strategy
5.3	Customer experience	Achieve customer satisfaction score of 80% by the end of 2021 and 82% by the end of 2022	ON TRACK We achieved 72% in Q1 of 2020 and are on track to achieve improvement to our score in the coming years
5.4	Training	Provide training to all LLA front line staff on hidden disabilities by the end of 2020	PAUSED Training on hidden disabilities was paused due to resource restrictions during 2020
5.5	Accessibility	Achieve the highest rating of 'very good' in the CAA's Persons of Restricted Mobility (PRM) categorisation by the end of 2021	ON TRACK We retained a rating of 'good' in 2019/20 and achieved an 11% increase in our customer satisfaction score
5.6	Accessibility	Establish our Accessibility Focus Group by the end of 2020	ACHIEVED Our Accessibility Focus Group has met 3 times since it was established in 2019
5.7	Accessibility	Gain certification to ACI's customer experience accreditation programme by the end of 2020	PAUSED We achieved Level 1 of the ACI Customer Experience Accreditation in January 2020. Progression to level 2 has been paused due to COVID restrictions

6 SUSTAINABLE SUPPLY CHAIN

We aim to extend our good environmental and social management across our supply chain. We will establish a code of conduct and incorporate sustainability criteria into contracts. We will also provide capacity development opportunities for suppliers and encourage local spending, as well as establishing climate change resilience plans.

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.



Supplier code of conduct



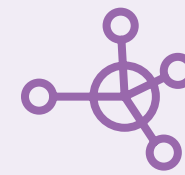
Capacity building



Local spend



Climate change resilience



SUPPLIER CODE OF CONDUCT

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

OUR APPROACH

We have a supplier code of conduct which applies to all major tenders and projects, such as construction projects and site operations. All tenders include general requirements relating to environmental management, social practices and impact, and governance, and 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 monitor the sustainability performance of key suppliers to ensure they continue to meet the agreed standards.

PROGRESS IN 2020

In response to COVID, the main 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.

CAPACITY BUILDING

We are keen to share our experience and knowledge with our supply chain, which includes SMEs and local businesses. We will develop a supplier toolkit to help supply chain partners improve their own sustainability performance and we will run capacity building events.

OUR APPROACH TO SUPPLIER CAPACITY BUILDING

We are keen to work with existing and prospective suppliers to develop capabilities that will create greater value to us and their businesses. Our supply chain includes a large number of small and local businesses, and we run programmes to help them win more work, develop new capabilities, and embed the 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.

PROGRESS IN 2020

Due to the resource restrictions in place due to COVID, we have not completed any capacity development sessions during the year. In 2019, we completed 4 events for SMEs on how to respond to tenders and on our sustainability supply chain criteria.

LEVERAGING OUR SUPPLY CHAIN TO DELIVER SOCIAL VALUE

We aim to create a positive impact in our community. During the tender process, we ask suppliers to demonstrate how their proposal might offer social, economic or environmental benefits to the community and take into account social provisions over and above the provision of the service.

This could include (but is not limited to) creating jobs, improving skills, increasing local volunteering opportunities or improving environmental conditions in and around London Luton Airport.

LOCAL SPEND

We are committed to using our influence to grow the local economy and want at least 25% of our total supply chain spend to go to companies within a 20-mile radius of the airport. To achieve this, we will work to maximise the opportunities for local organisations to work with the airport, including running training and capacity building events to overcome any barriers that might prevent local businesses from tendering.

OUR LOCAL SUPPLY APPROACH

Our approach to supporting local spend includes running capacity building events to help SMEs and local businesses to understand our tender process, and to recognise the value that local suppliers can bring through creating new jobs and reducing environmental impacts.

PROGRESS IN 2020

Our spend with suppliers based within 20 miles of the airport increased to 35% in 2020 (2019: 30%), above the 25% target we set. The reduction in spend over the year has played an important role in this increase.

In 2020, 35% of our supply chain spend was with suppliers within 20 miles of the airport.



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 risk for our strategic suppliers and develop a climate change resilience plan.

OUR SUPPLY CHAIN CLIMATE 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 action to mitigate the risks.

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

PROGRESS IN 2020

As part of our work with the sustainability team and London Business School on the new supply chain charter, we completed a high-level analysis of climate change risks in our supply chain. We aim to commence a more detailed review in 2021.

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Progress update
6.1	Code of conduct	Create supply chain sustainability code of conduct and standards by the end of 2020	ACHIEVED We have implemented a supply chain code of conduct
6.2	Sustainability in contracts	75% of supplier contracts by spend to include sustainability objectives by December 2020	ACHIEVED All contracts with a value over £25k include sustainability objectives
6.3	Supplier capacity building	Sustainable supply chain toolkit for suppliers in place by December 2022	ON TRACK We conducted a review of supply chain climate related risks and impacts in 2020
6.4	Supplier capacity building	Undertake capacity building events for suppliers each year: 6 in 2020, 8 in 2022	PAUSED The supplier capacity events programme was paused in 2020 due to resource restrictions due to COVID
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	ON TRACK In 2020, 35% of spend was with suppliers within 20 miles of the airport
6.6	Climate change risk	Identify strategic suppliers and assess the climate change risks for these suppliers by the end of 2021	ON TRACK We conducted a review of climate change impacts in the supply chain during 2020 and will be publishing a supply chain charter by 2022
6.7	Climate change risk	Develop a supplier climate change resilience plan by 2023	ON TRACK Work due to start in 2021

SUSTAINABILITY GOVERNANCE

As a relatively small organisation (headcount under 1,000) we need to be flexible, clever with our resources, and attract skilled people to help us deliver our responsibilities. Therefore, our Responsible Business Strategy is governed, owned by and embedded within the business. Each department has ownership responsibilities of key activities, supported by a central sustainability team.

ACCOUNTABILITY

The RBS has a clear set of priorities, with improvements 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.
- The RBS Steering Committee was set up to oversee progress and a dedicated Head of Sustainability has been appointed to ensure sufficient resources are allocated. The Steering Committee is composed of our principle managers, management board members, and head of each key department (Strategic Affairs, Operations, Finance, Marketing, Communications, HR, IT, Procurement, Environment, H&S, Noise & Community).
- We have a central sustainability team, which works very closely with Community, Environment, and Energy team members.

RBS GOVERNANCE/ TEAM AND COMMITTEES

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

- A key part of the governance structure is an annual review, which reviews 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.

POLICIES

A set of guiding policies and related strategies have and 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 & Inclusion Strategy, refreshed in 2020
6. Health & 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

KEEPING OUR 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 the changes in our annual Responsible Business report and explain the changes.

CONTACT

Please send your enquiries to:
Sustainability@ltn.aero or Community@ltn.aero



DAVID VAZQUEZ JOINS THE LLA SUSTAINABILITY TEAM

In 2020, David joined the LLA family as the new Head of Sustainability. Although new to aviation, David comes from a transport background, and brings with him over a decade of sustainability experience.

David is responsible for developing, delivering and leading on the airport's Responsible Business Strategy, ensuring we can adapt to future challenges and making sure we become a better business and neighbour, by meeting all of our environmental and community obligations.

NET ZERO
2040

“The newly created green team is working extremely hard to build strong foundations from which we can take off to become Champions in Sustainable Aviation and achieve critical targets such as Net Zero by 2040”

David Vazquez
Head of Sustainability

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GRI Standard	Reported	Page number
GRI 102: General disclosures		
Organisational profile		
102-1 Name of the organisation	Y	4
102-2 Activities, brands, products, and services	Y	7
102-3 Location of headquarters	Y	91
102-4 Location of operations	Y	91
102-5 Ownership and legal form	Y	7
102-6 Markets served	Y	7
102-7 Scale of the organisation	Y	9
102-8 Information on employees and other workers	Y	65-72
102-9 Supply chain	Y	81-84
102-10 Significant changes to the organisation and its supply chain	Y	5-6, 10
102-11 Precautionary Principle or approach	N	-
102-12 External initiatives	Y	3
102-13 Membership of associations	N	-
Strategy		
102-14 Statement from senior decision-maker	Y	5
102-15 Key impacts, risks, and opportunities	Y	11
Ethics and integrity		
102-16 Values, principles, standards, and norms of behaviour	Y	85-86
102-17 Mechanisms for advice and concerns about ethics	N	-
Governance		
102-18 Governance structure	Y	85
102-19 Delegating authority	Y	85
102-20 Executive-level responsibility for economic, environmental, and social topics	Y	85
102-21 Consulting stakeholders on economic, environmental, and social topics	Y	11, 33-36, 53-56, 85
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	85
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	11, 85
102-30 Effectiveness of risk management processes	N	-
102-31 Review of economic, environmental, and social topics	Y	85
102-32 Highest governance body's role in sustainability reporting	Y	85
102-33 Communicating critical concerns	N	-
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	-

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GRI Standard	Reported	Page number
Stakeholder engagement		
102-40 List of stakeholder groups	Y	7-8
102-41 Collective bargaining agreements	N	-
102-42 Identifying and selecting stakeholders	N	-
102-43 Approach to stakeholder engagement	Y	7
102-44 Key topics and concerns raised	Y	-
Reporting practices		
102-45 Entities included in the consolidated financial statements	Y	4, 7-8
102-46 Defining report content and topic boundaries	Y	4
102-47 List of material topics	Y	11
102-48 Restatements of information	N	-
102-49 Changes in reporting	Y	-
102-50 Reporting period	Y	4
102-51 Date of most recent report	Y	2019
102-52 Reporting cycle	Y	4
102-53 Contact point for questions regarding the report	Y	86
102-54 Claims of reporting in accordance with the GRI Standards	Y	4
102-55 GRI content index	Y	87-90
102-56 External assurance	N	-
GRI 103: Management approach		
103-1 Explanation of the material topic and its Boundary	Y	4, 11
103-2 The management approach and its components	Y	12
103-3 Evaluation of the management approach	Y	85
GRI 205: 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 organization	Y	15-20
302-2 Energy consumption outside of the organization	Y	17
302-3 Energy intensity	Y	17
302-4 Reduction of energy consumption	Y	15-20
302-5 Reductions in energy requirements of products and services	Y	15-20
GRI 305: Emissions		
305-1 Direct (Scope 1) GHG emissions	Y	21-24
305-2 Energy indirect (Scope 2) GHG emissions	Y	21-24
305-3 Other indirect (Scope 3) GHG emissions	Y	21-24
305-4 GHG emissions intensity	Y	21-24
305-5 Reduction of GHG emissions	Y	21-24
305-6 Emissions of ozone-depleting substances (ODS)	Y	21-24
305-7 Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	Y	30

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GRI Standard	Reported	Page number
GRI 306: Waste		
306-1 Waste generation and significant waste-related impacts	Y	25-26
306-2 Management of significant waste-related impacts	Y	25-26
306-3 Waste generated	Y	25-26
306-4 Waste diverted from disposal	Y	25-26
306-5 Waste directed to disposal	Y	25-26
GRI 308: Supplier environmental assessment		
308-1 New suppliers that were screened using environmental criteria	N	-
308-2 Negative environmental impacts in the supply chain and actions taken	N	-
GRI 401: Employment		
401-1 New employee hires and employee turnover	P	66
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Y	67
401-3 Parental leave	Y	67
GRI 402: Labour/management relations		
402-1 Minimum notice periods regarding operational changes	N	-
GRI 403: Occupational health and safety		
403-1 Occupational health and safety management system	Y	53-61
403-2 Hazard identification, risk assessment, and incident investigation	Y	53-61
403-3 Occupational health services	Y	53-61
403-4 Worker participation, consultation, and communication on occupational health and safety	Y	53-61
403-5 Worker training on occupational health and safety	Y	53-61
403-6 Promotion of worker health	Y	53-61
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Y	53-61
403-8 Workers covered by an occupational health and safety management system	Y	53-61
403-9 Work-related injuries	Y	61
403-10 Work-related ill health	Y	61
GRI 404: 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	Y	-
404-3 Percentage of employees receiving regular performance and career development reviews	Y	67
GRI 405: Diversity and equal opportunity		
405-1 Diversity of governance bodies and employees	Y	68
405-2 Ratio of basic salary and remuneration of women to men	Y	69
GRI 406: Non-discrimination		
406-1 Incidents of discrimination and corrective actions taken	N	-
GRI 407: 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	-

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GRI Standard	Reported	Page number
GRI 408: Child labour		
408-1 Operations and suppliers at significant risk for incidents of child labour	N	-
GRI 409: Forced or compulsory labour		
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	N	-
GRI 412: 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	-
GRI 414: 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	-
GRI 418: Customer privacy		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Y	62

Further information

For more information please contact us on:
sustainability@ltn.aero or community@ltn.aero

Visit our website on:
<https://www.london-luton.co.uk/corporate/community>

Or write to us at:

**Sustainability Team
Percival House
134 Percival Way
Luton, Bedfordshire
LU2 9NU**

LLA key stakeholder strategies include:

AENA sustainability approach:
<http://www.aena.es/en/corporate/responsiblebusiness-model.html>

AMP Capital sustainability approach:
<https://www.ampcapital.com/europe/en/->

**London Luton Airport Limited sustainable growth plan 2020-2050
and 2019 Sustainability plan:**
<https://www.llal.org.uk/FUTURELuToN.html>

London Luton Airport Limited CSR plan:
<https://www.llal.org.uk/LLALCorporateSocialResponsibility.html>

Sustainable Aviation UK:
<https://www.sustainableaviation.co.uk/>

CAA 5 year strategic plan:
<https://www.caa.co.uk/Our-work/Corporatereports/Strategic-Plan/Our-five-year-strategic-plan/media/articles/2019/october/AMP-Capital-launches-ambitious-real-estate-sustainability-strategy>

