Sustainability Policy

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Heathrow

Purpose

The policy aims to ensure Heathrow will deliver its People and Planet beacon and support its license to operate and grow. It supports our commitment to ensuring that Heathrow's sustainability strategy, 'Connecting People and Planet', is delivered. It also outlines how responsibility and accountability should be embedded across all levels of the business.

Scope

This policy applies to the management and operation of Heathrow Airport Holdings Limited and its subsidiary companies ("Heathrow" or the "Heathrow Group"). This includes all those who work for and on behalf of Heathrow (including directors and colleagues on permanent, temporary or fixed-term contracts of employment ("Colleagues"), and also all paid or voluntary agents, contractors, subcontractors or contingent workers where appropriate whilst they are undertaking activities for Heathrow and at Heathrow Airport (the "Third Parties").

Policy

People and Planet is one of Heathrow's six strategic beacons and sustainability is also fundamental to delivery of the other five. It is crucial to how we operate the airport and work to build a better, more successful and more sustainable business and an extraordinary place to work. Our values, including "Doing the Right Thing", underpin everything we do and guide our decision making every day. Our current sustainability strategy, 'Connecting People and Planet' was updated in December 2024. It details the environmental, social and governance goals and targets Heathrow will work towards by 2030 and is structured in three sections:

1. **Net zero aviation –** to work towards our vision of sustainable aviation at Heathrow and across our industry.
2. **Being a better neighbour –** to improve the quality of life of our colleagues and our neighbours, help our people fulfil their potential and work together to make a positive impact in our community.
3. **Responsible business foundations –** to show how Heathrow addresses a range of key issues including environmental compliance, safety, security and ethics through its strategies and policies.

Heathrow will deliver this policy by:

Setting strategy and delivering targets

- Ensuring that objectives, goals and targets are set to address Heathrow's material sustainability issues and continually improve performance. (These are detailed in Connecting People and Planet and issue-specific strategies such as the Net Zero Plan, Noise Action Plan, Surface Access Strategy, Nature Positive Plan, Resource and Waste Strategy, Climate Adaptation Strategy, Air Quality Action Plan, and Giving Back Programme).
- Engaging with our stakeholders to identify our material sustainability issues and regularly reviewing our strategy to ensure these issues remain the focus. Where there are trade-offs between different environmental and / or community impacts, seeking to strike a fair balance in identifying and delivering an appropriate and sustainable solution.
- Measuring and reviewing progress against our objectives, goals and targets, and communicate our performance transparently, including publication of an annual sustainability report and other associated documents.

- Ensuring necessary information and resources are made available to achieve objectives and targets.

Embedding responsibility and accountability for sustainability

- Supporting Heathrow colleagues to understand the business case for sustainability, and how they can include sustainability in business decisions and interactions.
- Delivering our objectives, strategies, goals and targets by ensuring accountability and responsibility is embedded in all key areas of the business.

Engaging with partners and stakeholders

- Communicating to and engaging with our stakeholders throughout the development and delivery of our objectives, goals and targets.
- Collaborating with partners to lead, drive and create the conditions for change to improve the performance of Heathrow.
- Leading and creating the conditions for our partners to improve their performance where we do not directly control Heathrow's impacts.
- Working with our airport partners to ensure that the airport plays its role in respecting environmental limits and adapting to the effects of a changing climate.
- Working constructively to influence the development of appropriate government policies.

Doing business responsibly and efficiently

- Conforming to legal, Government policy and other requirements related to our sustainability, environmental and energy impacts.
- Implementing best practice sustainable procurement practices across Heathrow.
- In the context of infrastructure development, seeking to make the best use of our existing facilities and design, and constructing and operating new facilities in support of our sustainability goals.
- Designing and building our facilities to give passengers the best airport service in the world, whilst creating a zero carbon, sustainable hub airport.
- Procuring energy efficient products and services and designing assets considering energy performance improvement.

Reviewing and improving our management systems to continually improve performance

- Implementing the requirements of the Wildlife Trusts Biodiversity Benchmark Award including complying with legislation relevant to biodiversity, managing our landholdings to protect and enhance biodiversity (whilst safeguarding the aerodrome), and eliminating unjustified pesticide use on our biodiversity sites.
- Monitoring the use of energy and resources, managing their consumption efficiently and effectively.

Accountabilities and Responsibilities

Sustainability is embedded into our culture and through our governance structures. Key aspects include:

All Colleagues and Third Parties: Everyone working at Heathrow is supported to understand their role in delivering sustainable growth and to build this policy into daily decision making.

People and Planet Committee: The People and Planet Committee exercises delegated authority granted by the Executive Committee to make recommendations or take formal decisions on People and Planet topics.

The Executive Committee: Our Chief Executive Officer and the Executive Committee share a commitment to deliver against the strategic priorities set out in Connecting People and Planet. The Chief Communications and Sustainability Officer is accountable for ensuring Heathrow has a Sustainability Policy and that it is reviewed annually and updated as necessary.

The Sustainability and Operational Risk Committee (SORC): The SORC is a dedicated sub-committee of the Board which discusses sustainability issues quarterly. Its responsibilities include oversight of sustainability strategy, review of sustainability policies, performance, risk management and reporting.

The Board: The Board is ultimately accountable for ensuring that Heathrow has sufficient resources to deliver its sustainability commitments. It considers reports from the SORC and approved recommendations to improve performance or ensure compliance.

Consequences of the Policy

Non-compliance with this policy could result in Heathrow failing to deliver the goals and targets set out in Heathrow's Connecting People and Planet strategy. This could undermine Heathrow's license to operate and grow, result in financial loss and cause damage to Heathrow's reputation.