



GROUPE ADP

SHARING NEW HORIZONS

VIGILANCE PLAN 2021



ONE AMBITION

Imagining the sustainable airport of tomorrow



ONE GROUP

Building a global, integrated and responsible group



SHARED DYNAMICS

Innovating, supporting and empowering



OUR GROUP VALUES:

Responsibility and Hospitality.

OUR PURPOSE:

To welcome passengers,
operate and imagine airports in a responsible
way all around the world.

OUR 2022-2025 ROADMAP:

Hospitality, always at the heart of a multimodal
connection hub, designed and operated sustainably
to the benefit of the city and the regions, by a multi-location
group that relies on each of its employees.



Under the law of 27 March 2017, known as the "Potier" Act, on the duty of vigilance of parent and contracting companies with respect to their supply chains, any contracting public limited company whose registered office is located on French territory and which employs more than 5,000 employees¹ (including subsidiaries), as is the case for Groupe ADP, must implement a plan that includes "reasonable due diligence measures such as to identify risks and prevent serious violations of human rights and fundamental freedoms, as well as serious harm to the health and safety of people and the environment" that may be caused by the activities of the Group and/or those of subcontractors and suppliers with whom it has an established business relationship.

In accordance with the provisions of this law, Groupe ADP's vigilance plan is updated annually and included in the Group's Universal Registration Document.

This document, which includes a presentation of the Group and illustrations of sometimes very technical matters, is intended to facilitate understanding, monitoring and communication by the Group of its duty of vigilance, as well as the continuous improvement process to which it subscribes.

¹ 10,000 employees for companies with registered offices abroad.

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GROUPE ADP, THE WORLD'S LEADING AIRPORT GROUP



Groupe ADP designs, develops and operates several airports in Paris (including Paris-Charles de Gaulle, Paris-Orly, Paris-le Bourget) and worldwide.

As of 31 December 2021, all activities and subsidiaries combined, Groupe ADP is active in nearly 125 airports worldwide, including 28 airports under management or concession contracts and located in 17 countries (in Europe, Asia, Africa and South America).

To develop its expertise and presence worldwide, the Group relies on a unique complementarity with its two partners: TAV Airports and GMR Airports.

- ▶ **TAV Airports.** TAV Airports is a Turkish airport group with 14 airports (five of which are in Türkiye) and seven airport services and hospitality companies.
- ▶ **GMR Airports².** This Indian operator has recently joined the Groupe ADP network with eight airports and significant potential for development, especially in India.



The consolidated group, which makes up the scope of the duty of vigilance, is currently present, directly or indirectly, in 31 countries around the world.

THE GROUP'S PURPOSE

"Welcome passengers, operate and imagine airports in a responsible way all around the world". This purpose is in line with the Group's values of "Responsibility and Hospitality". It reflects the objectives that the company has set itself in terms of hospitality, operational excellence, infrastructure design and innovation, the safety of passengers, airlines, airport personnel and local residents, and more broadly, its responsibility with regard to environmental, social and societal issues in Paris and abroad.



1. Austria, 2. Belgium, 3. Bermuda, 4. Chile, 5. China, 6. Croatia, 7. France, 8. Georgia, 9. Germany, 10. Guinea, 11. India, 12. Italy, 13. Jordan, 14. Kazakhstan, 15. Kenya, 16. Latvia, 17. Libya, 18. Madagascar, 19. Mauritius³, 20. Mexico, 21. Netherlands, 22. North Macedonia, 23. Panama, 24. Qatar, 25. Saudi Arabia, 26. Spain, 27. Thailand, 28. Tunisia, 29. Türkiye, 30. United Kingdom, 31. United States of America.

² Outside the consolidated scope of Groupe ADP.

³ Mauritius airport is operated by ATOL in which ADP International formerly held a stake. It was sold on 28 January 2022 following the expiry of the technical support contract on 31 December 2021.

OUR CODE OF CONDUCT

Global and united, around the values of hospitality and responsibility



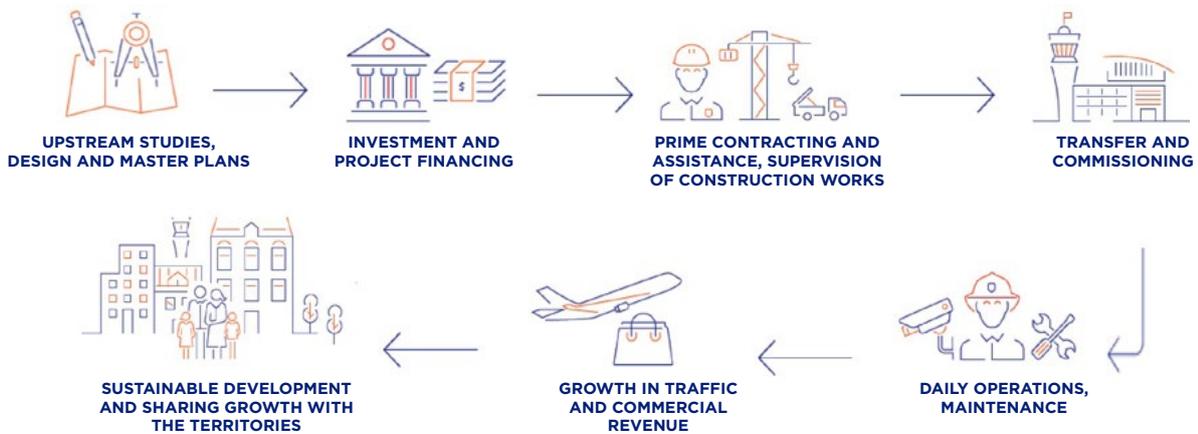
- A united airport community**

Groupe ADP undertakes to make commitments that go beyond its core scope of serving passengers
- A professional community based on responsibility and integrity**

Groupe ADP undertakes to be an attractive employer and to promote ethics, compliance and citizen commitment
- A local community at the heart of our priorities**

Groupe ADP undertakes to work in favour of the communities

A UNIQUE GROUP MODEL

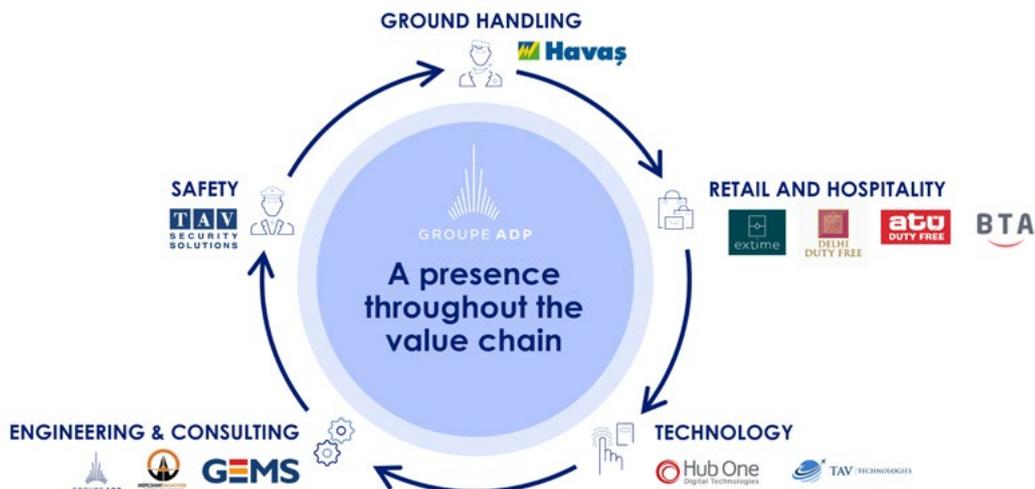


Groupe ADP's international offer is currently based on three main business lines: investment, airport operations, and services in the field of design engineering and innovative solutions.

Groupe ADP is one of the few players in the sector to cover the entire airport value chain.

Groupe ADP's employees work in more than a hundred different business lines, with renowned know-how and expertise in a number of key areas: aeronautical engineering and infrastructure, travel retail, real estate, acquisitions and equity investments in assets worldwide.

Its global expertise and targeted approach by market, country and customer type enable it to provide the best response possible to each of its stakeholders' needs.



GROUPE ADP'S BUSINESS MODEL



"2025 PIONEERS": GROUPE ADP'S 2022-2025 STRATEGIC ROADMAP TO BUILD A SUSTAINABLE AIRPORT MODEL

Air transport has undergone exceptional growth from 100 million passengers per year in 1960 to 4.5 billion passengers in 2019. Today, this industry is at the crossroads of two major world issues:



The Covid-19 pandemic:

The return of traffic to 2019 levels will be gradual, as adapting to a new long-term growth rate is a major challenge and all players will have to adjust their models.



Climate change:

Accelerating action to reduce the environmental impact of air transport is our main challenge; all stakeholders in the aeronautics industry are committed to an ambitious roadmap. Commercial aviation has a justified place in a low-carbon world.

Aeronautics has turned crises into opportunities. Opportunities that push us to reinvent, rather than simply adapt. With Groupe ADP's new 2022-2025 strategic roadmap "2025 Pioneers", published on 17 February 2022, we are building the foundations of a new airport model with a focus on sustainability and performance, in line with societal and environmental expectations.

As part of this long-term vision, the Group wishes to turn its airports into multimodal and energy hubs that are designed and operated in a sustainable manner. It aims to provide world-class hospitality and smooth journeys for its passenger customers and operational and environmental performance for its airline customers. Finally, it is applying a multi-location approach to develop a culture of innovation and responsibility, to benefit the regions in which it operates.

The "2025 Pioneers" strategic roadmap is a first step in this long-term process of transformation. It sets out the priority actions for the 2022-2025 period and proposes 20 objectives for 2025, divided into three strategic priorities:



ONE AMBITION

Imagining the sustainable airport of tomorrow by:

- ◆ Aiming for excellence and the sustainability of operational and construction methods
 - ◆ Innovating in hospitality
 - ◆ Developing the range of multimodal connections

01

2025

PIONEERS

02



ONE GROUP

Building a global, integrated, and responsible Group by:

- ◆ Consolidating the Group's network
- ◆ Mobilising and developing expertise
- ◆ Relying on a strong regional anchoring

03



SHARED DYNAMICS

Innovating, supporting and empowering by:

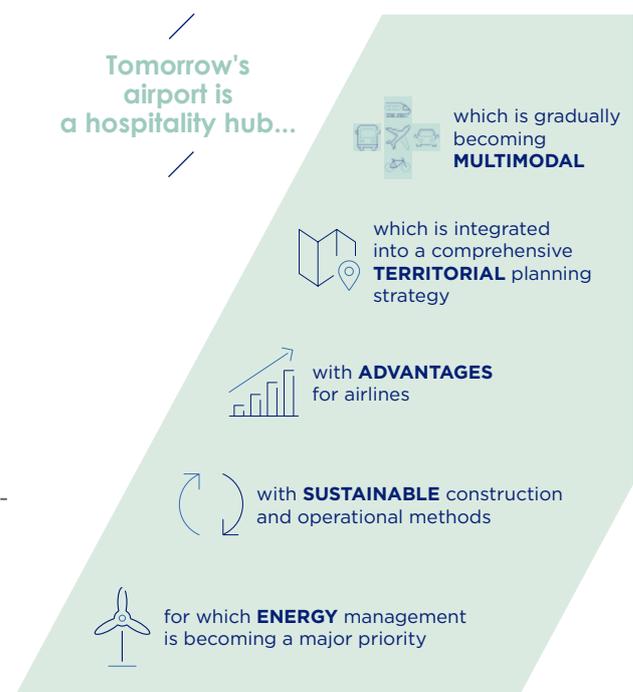
- ◆ Promoting an innovative approach
- ◆ Attracting and retaining talent through a comprehensive HR policy
- ◆ Developing a culture of responsibility

Among the 20 objectives⁴ that Groupe ADP has set for 2025 through this new roadmap, are:

- ◆ [Reduce average taxiing emissions per flight by 10%](#) at Paris-Orly and Paris-Charles de Gaulle
- ◆ Set a carbon budget for the [life cycle of all investment projects](#) of over €5 M for Aéroports de Paris and TAV Airports
- ◆ Use 10% low-carbon energy in the terminals and airside, almost double the amount in 2019, and 40% excluding landing and take-off for airports controlled by Groupe ADP at ACA level ≥ 3 in 2021
- ◆ Open the [new multimodal hub](#) at Paris-Orly, with the commissioning of the Line 14 station in 2024, and enable the commissioning or building of 8 additional public transport lines to connect the Paris airports with neighbouring areas
- ◆ Preserve 25% of land for biodiversity at Paris-Charles de Gaulle and 30% at Paris-Orly and Paris-Le Bourget, and establish a plan for the Group's Airports for Trust Charter signatories to improve their biodiversity index by 2030
- ◆ Support the widespread application of [continuous descent](#) procedures between 2023 and 2025 at Paris-Orly and Paris-Charles de Gaulle
- ◆ Promote the achievement of 80% of purchases to be made in the Paris region, including 20% from SMEs, subject to compliance with public procurement legislation for Aéroports de Paris
- ◆ Carry out 120 trials in societal, environmental and operational innovations by 2025, 30 of which will lead to industrialisation, for Aéroports de Paris, TAV Airports and Hub One
- ◆ Conduct at least one employee shareholding operation by 2025 for Aéroports de Paris
- ◆ Include a CSR element in the compensation of 100% of Aéroports de Paris, TAV Airports and AIG employees
- ◆ Increase the number of [employee citizen commitment](#) days by five, bringing it to 5,000 over the 2022-2025 period for Aéroports de Paris
- ◆ Educate 100% of employees on [good ethical and compliance practices](#)

At the heart of the industrial transformation initiated for 2025 Pioneers is the evolution of airports towards multimodal transport and energy hubs:

- ▶ which will no longer be just a place where people board flights, but a place where they can benefit from increased connectivity, offering travellers a choice between different modes of transport (long and short-distance rail, bus, soft mobility, etc.), and where rail-air connections will account for a growing share in the development of Groupe ADP's airports
- ▶ which will host a diverse range of our energy activities and the roll-out of new clean energies: biomass, green electricity, sustainable aviation fuels, hydrogen
- ▶ which will see existing infrastructures strengthened and the capacities of stations and multimodal hubs extended, using new innovative and environmentally-friendly construction methods;
- ▶ which will be integrated into a comprehensive urban planning process, by playing a key role in communities' considerations of real estate, energy and mobility issues.



⁴ see summary in appendices

CSR POLICY

Groupe ADP has a long-standing policy of combining responsibility with competitiveness. The Group is regularly subject to extra-financial ratings. The culture of corporate social responsibility is fully aligned with our public service values that constitute Aéroports de Paris' DNA⁵.

Aéroports de Paris is also developing its activity in accordance with the 10 principles of the United Nations Global Compact, of which it has been a participant since 2003:

THE 10 PRINCIPLES OF THE UN GLOBAL COMPACT

Human rights

1. Support and respect the protection of internationally proclaimed human rights
2. Make sure that there is no complicity in human rights abuses

Labour

3. Uphold the freedom of association and the effective recognition of the right to collective bargaining
4. Ensure the elimination of all forms of forced and compulsory labour
5. Ensure the effective abolition of child labour
6. Ensure the elimination of discrimination in respect of employment and occupation

Environment

7. Support a precautionary approach to environmental challenges
8. Undertake initiatives to promote greater environmental responsibility
9. Encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

10. Work against corruption in all its forms, including extortion and bribery

Groupe ADP's CSR strategy is formalised in the Group's CSR Charter, signed in 2015 by the Chairman and CEO of Groupe ADP and the CEO of Hub One (a wholly-owned subsidiary), and which incorporates the following performance objectives:

Performance objectives

- ◆ to guarantee exemplary governance
- ◆ to put people at the heart of our strategy
- ◆ to satisfy all our customers
- ◆ to control and minimise its impacts on the environment
- ◆ to adopt an ethical and responsible procurement policy
- ◆ to foster social commitments on a local scale.

The Group is gradually rolling out its CSR policy internationally.

Thus, in January 2021, the "[Airports for Trust](#)"⁶ charter of commitments on environmental and societal priorities was signed by 23 airports in our network (within TAV Airports, AIG, Ravalina (Madagascar), Liège Airport, MZLZ (Zagreb) and Nuevo Pudahuel (Santiago de Chile), out of a total of 28. The aim is to deeply ingrain a common culture on essential CSR aspects, to set shared objectives and to measure progress in a transparent manner.

⁵ "Aéroports de Paris" in this document refers to the parent company of Groupe ADP.

⁶ see Appendix 1.

The "Airports for Trust" Charter is fully in line with the values of Responsibility and Hospitality and the purpose adopted by Groupe ADP in 2020: "To welcome passengers, operate and imagine airports in a responsible way all around the world." As members of the world's largest airport network, these 23 airports consider that their social and environmental responsibility is not only limited to their staff, passengers, customers, suppliers and airport industry players, but also concerns all stakeholders in the countries where the Group operates.

All the airports that have signed this charter share the common ambition of being leaders in terms of environmental protection, by being exemplary in their field of action and by asserting themselves as fully committed players in the ecological transition of air transport. They are introducing additional initiatives to extend their policy to the entire airport value chain, to cooperate with communities and to take action regarding the life cycle of development projects.

"At a time when the air transport industry as a whole is facing one of the greatest challenges in its history with the fight against global warming, it can seize this opportunity to thoroughly reinvent its industrial model, and design and apply more efficient and responsible processes. For Groupe ADP, this means reducing its carbon footprint and strengthening ties with local communities."

Augustin de Romanet
Chairman & CEO of Groupe ADP

Four major ambitions for the planet



Move towards zero environmental impact operations



Actively participate in the aviation sector's environmental transition



Promote the integration of each airport in a local resource system



Reduce the environmental footprint of airport planning and development projects

The signatory airports firmly believe that the balanced and sustainable development of airport activities need to be intertwined with the creation of value for local communities and thus investment in human development at a local level, with a special focus on young people. Improving the airports' territorial anchoring is a factor of innovation and collective performance over the long term.

As a result, the signatory airports have committed to:

- ▶ Actively contribute to improving the living conditions of local populations and reducing noise exposure
- ▶ Build a long-term relationship of trust with the territories and local stakeholders (particularly in terms of training, integration and employment)
- ▶ Reinforce the benefits of airport activity for the local communities
- ▶ Unite the airport community and act together to maximise the positive impact of airport activity.

To assess its CSR performance and the relevance of its strategy, Groupe ADP applies international initiatives and standards.

The 17 Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, used as a framework for analysis, were used to assess the contribution to global sustainability and help resolve the most pressing global issues.

In 2018, the Group identified a contribution to 11 UN SDGs.

- ◆ Quality education (goal 4)
- ◆ Gender equality (goal 5)
- ◆ Clean water and sanitation (goal 6)
- ◆ Affordable and clean energy (goal 7)
- ◆ Decent work and economic growth (goal 8)
- ◆ Industry, innovation and infrastructure (goal 9)
- ◆ Sustainable cities and communities (goal 11)
- ◆ Responsible consumption and production (goal 12)
- ◆ Climate action (goal 13)
- ◆ Peace, justice and strong institutions (goal 15)
- ◆ Partnerships for the goals (goal 17).

A [materiality analysis of our CSR issues](#), carried out at the end of 2017 (to be updated in 2022) thanks to the responses of 2,000 stakeholders (75% employees, 25% external stakeholders: suppliers, customer tenants, airlines, etc.), made it possible to identify and qualify the issues to which the Group must provide solutions, taking into account two criteria: importance for the stakeholders and the Group's performance in relation to these different issues.

	◆ Exemplary airport operator	◆ Well-being of our staff and partners	◆ Environmental protection	◆ Dialogue with regional stakeholders	
VERY IMPORTANT	◆ 3.	Public and airport safety and security			8.9
	◆ 7.	Quality of service and customer care			8.6
	◆ 9.	Accessibility of airport areas			8.2
	◆ 18.	Preservation of natural habitats and air quality			8.1
	◆ 1.	Good governance and business ethics			8.1
	◆ 12.	Workplace health and safety for Groupe ADP employees			8.1
	◆ 17.	Sustainable construction projects and the fight against climate change			8.0
IMPORTANT	◆ 19.	Waste management and the circular economy			7.8
	◆ 13.	Quality of life of our staff members and partner organisations			7.8
	◆ 22.	Value creation shared with our local regions			7.8
	◆ 8.	Welcome and support services for disabled people and those with reduced mobility			7.8
	◆ 20.	Dialogue with stakeholders in our airports' local regions			7.8
	◆ 14.	Attractiveness as an employer and career progression			7.5
	◆ 16.	Gender equality and diversity			7.5
	◆ 4.	Robustness of our operations			7.4
	◆ 2.	Encouraging and supporting innovation			7.4
	◆ 11.	Promoting sustainable procurement and improving health and safety for our service providers			7.2
LESS IMPORTANT	◆ 23.	Measurement of and information regarding noise pollution			7.1
	◆ 15.	More two-way communication and improved relations between Groupe ADP and its employees			7.0
	◆ 21.	Dialogue with the State and its departments			6.7
	◆ 6.	Improving our economic performance and competitiveness			6.6
	◆ 5.	Encouraging airline growth and development			6.4
	◆ 10.	Quality of service for real estate customers			5.9

One of Groupe ADP's priorities is to integrate CSR elements into all its activities at the most strategic level:

- ▶ CSR projects are presented to the Group's governance bodies: the executive committee and the strategic investment committee.
- ▶ In 2019, a Corporate Social Responsibility Committee was created within the Board of Directors to examine the main CSR issues facing the company, as well as the CSR strategy and action plan.
- ▶ The process of designing and implementing CSR programmes is treated as a top priority by our executive management and involves all employees at all levels of the company. In addition, the roll-out of the CSR culture largely relies on a network of CSR officers - from the strategic divisions of Aéroports de Paris and Hub One - as well as awareness raising actions and internal communication (organisation of events on sustainable development, publication of articles in the in-house newsletter, conferences, etc.).

During 2021, a CSR strategy for 2025 was co-constructed with the various Aéroports de Paris entities (in particular, the Audit, Safety and Risk Management, Procurement, Human Resources, Customer, Sustainable Development and Public Affairs Divisions) and the Group's subsidiaries. To be rolled out from 2022 onwards, this new collectively constructed strategy, entitled 2025 Pioneers For Trust, is an opportunity to establish CSR as a lever for supporting the Group's transformation, attracting future employees and engaging existing employees.



The challenge for 2025 Pioneers For Trust is to reconcile competitiveness and responsibility by providing concrete evidence of the Group's CSR commitments in terms of:

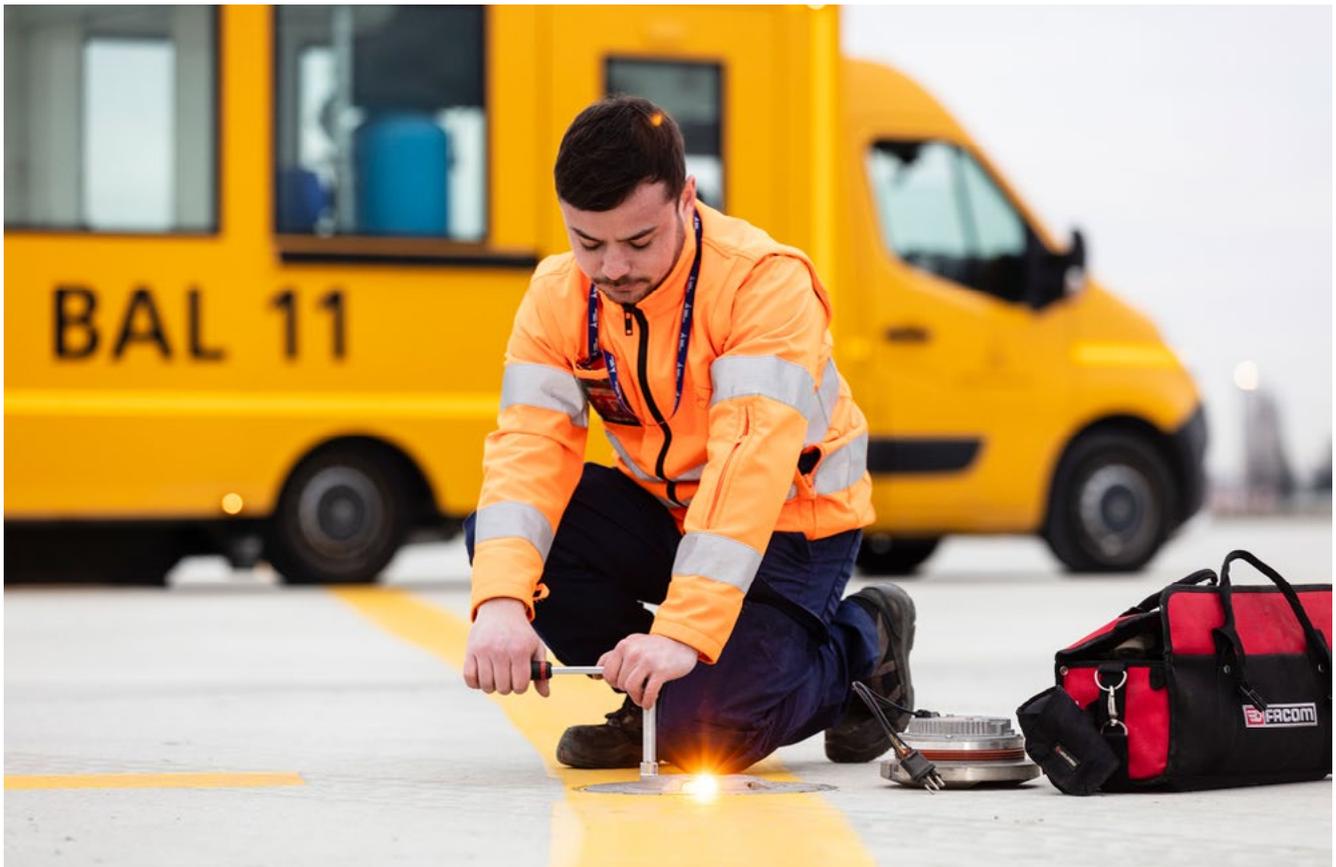
- ▶ Environmental actions, by imagining the sustainable airport of tomorrow
- ▶ Societal actions, by making communities the primary beneficiaries of our activities
- ▶ Social actions, by attracting talent, developing career paths and empowering employees
- ▶ and Governance actions, by managing our business responsibly.

To meet these various challenges, Groupe ADP will develop a CSR culture to be shared by all its employees. This is one way to guarantee the success of the 2025 Pioneers For Trust strategy.

A CSR STRATEGY BASED ON 4 PILLARS



A SUSTAINABLE, COMMITTED AND EXEMPLARY GROUP



© Gwen Le Bras for Groupe ADP

THE VIGILANCE PLAN



The vigilance plan, as provided for by law no. 2017-399 of 27 March 2017, known as the "Potier" Act, on the duty of vigilance of parent and contracting companies, is based on the following pillars:

- ▶ Risk mapping
- ▶ Procedures to regularly assess the situation of subsidiaries, subcontractors or suppliers in relation to the risk mapping
- ▶ Appropriate actions to mitigate risks and prevent serious violations or harm
- ▶ A whistleblowing system and processes for handling reports of the existence or occurrence of risks
- ▶ A system to monitor the measures implemented and assess their effectiveness.



RESPONSIBILITIES

1.1. Governance

Groupe ADP’s governance is structured to take into account the growing social and environmental challenges it faces and to ensure that its duty of vigilance is performed at the highest level.

Internal governance dedicated to the duty of vigilance

In order to strengthen its commitments in this area, Groupe ADP’s Executive Management has decided to set up a governance body dedicated to the Duty of Vigilance.

An officer was thus appointed in September 2021 within the Group’s Ethics and Personal Data Division to coordinate the duty of vigilance and, more specifically, work with the Human Resources Division to structure the Group’s actions and commitments in terms of human rights⁷. A steering committee and theme-based working groups (procurement, environment, human resources) have been set up to make this duty of vigilance part of a systemic approach to continuous improvement. The whole process is supervised by a Steering Committee made up of five members of the Executive Committee, who are responsible for the main areas of the duty of vigilance, and the Head of Ethics and Personal Data.

to take a step back and question our behaviour and practices within the company. Its purpose is also to define, disseminate as widely as possible and reinforce the Group’s Ethics and Compliance culture and the resulting collective ethical responsibility to be honoured in everyone’s professional practices. It is also responsible for informing decision-making by highlighting any ethical questions or issues.

“The ambition of Groupe ADP’s Ethics Committee is to provide more than a simple response to regulatory compliance, to actually analyse the dilemmas that arise when decisions are made.”

G rard Kuster

Former Director of Ethics at Engie and Board member of Transparency International.

“The approach of the Ethics Committee as conceived by Groupe ADP is quite innovative for a company. Few ethics committees have this dual ambition: they can very quickly fall into operational matters without taking the time to ask themselves the most important questions.”

Marc Grassin

Philosopher, Doctor of Medical Ethics, Vice-Chairman of the ADP Ethics Committee

It is not intended to manage issues in an operational manner but to question company practices in relation to this ethical culture.

The Ethics Committee may be called upon by the Chairman and CEO, the Director of Ethics, the Ethics Committee itself (self-referral), the CEO and the Chairman of the Boards of Directors of the Group’s subsidiaries.

Ethics Committee

Created in 2018, the Ethics Committee brings together internal stakeholders as well as external figures. It is a space for reflection and analysis, an opportunity

Group Investment Committee

The Group Investment Committee is a committee within Groupe ADP. Its role is to enable Executive Management to make decisions regarding the need for an investment and to verify that this investment is in the best interests of A roports de Paris. In this context, it has at its disposal the information required to properly understand the projects, as well as an analysis of the major strategic, operational,

⁷ The notion of human rights used in this document also includes fundamental freedoms and personal health and safety.

technical and economic choices that will enable the identification and selection of the most effective options.

The Group's decision-making process with regard to investments is based jointly on:

- ◆ the internal strategy and investments committee (separate from the Board's Strategy and Investments Committee), which reviews and approves investment strategies by business line
- ◆ the Group Investment Committee, which uses certain thresholds or criteria (the golden rules) to validate the tangible, intangible and financial investment and divestment projects undertaken by Groupe ADP.

Board of Directors' CSR Committee

Created in 2019, the CSR Committee is a specialised Board of Directors committee made up of six members with voting rights, appointed from among the directors, including at least three employee representatives. It was created within the Board of Directors to examine the main CSR issues faced by the company (including the duty of vigilance), as well as the related strategy and action plan.

Board of Directors' Strategy and Investments Committee

The Strategy and Investments Committee is a specialised Board of Directors committee made up of six members with voting rights, appointed from among the directors, including two employee representatives. Its tasks include advising the Board of Directors on:

- ◆ the definition and implementation of Groupe ADP's strategic policies
- ◆ the company's strategic guidelines and their effects on activities, employment, business lines and the organisation of work, and on the use of subcontractors, temporary staff, short-term contracts and internships
- ◆ Groupe ADP's guidelines in terms of diversification and growth operations
- ◆ significant investment and development projects, as well as the divestment of holdings.

Board of Directors' Audit and Risk Committee

The Audit and Risk Committee is a body emanating from the Board of Directors which carries out the following tasks (among others):

- ◆ It helps the Board of Directors to monitor the accuracy and reliability of Aéroports de Paris' corporate and consolidated financial statements, the efficiency of internal control and risk management systems, the statutory audit of accounts by official auditors and the independence of the latter, and the relevance of the Group's financial policy
- ◆ It advises the Board of Directors on the reliability and quality of information issued to it. It carries out its activities under the responsibility of the latter and has no decision-making powers of its own
- ◆ It validates the updated risk mapping for Groupe ADP as well as that of Aéroports de Paris and its subsidiaries, after prior approval by the Executive Committee
- ◆ It ensures the continual improvement of the risk management and internal control system
- ◆ It verifies the expertise, independence and objectivity of outside experts whom it may appoint.

This committee does not have any executive officer members; it is composed of four members with voting rights, appointed from among the directors, including a representative of the State, an employee representative and other directors (preferably independent). Committee members must have the necessary financial and accounting skills. The Chairperson is an independent lead director.

The committee meets at least four times a year, and as often as necessary, at the request of its Chairperson, who sets the agenda, or at the request of the Chairman and Chief Executive Officer or the statutory auditors.

1.2. Ethics programme and whistleblowing system

The Ethics and Personal Data Division defines and coordinates the Group's Ethics and Compliance action plan (including personal data protection) with the Legal Affairs & Insurance Division.

In addition to the Ethics and Compliance risk included in the Group's mapping, a specific Corruption risk mapping is carried out every two years to identify potential scenarios and define preventive action plans (last mapping conducted in 2020).



The Ethics and Compliance action plan is approved each year by the Executive Committee, the Board of Directors, and its Audit and Risk Committee. At the same time, the Board of Directors'

CSR Committee reviews the actions relating to the dissemination of the ethics and compliance culture within the Group, in particular on the basis of the results of the Ethical Climate Survey.

The Ethics and Compliance programme implemented within the Group since 2017 is based on the following pillars:

- ▶ A **whistleblowing system** (detailed below)
- ▶ A **code available in 7 languages**, accessible on the intranet and internet sites⁸, and procedures (gifts and hospitality, conflicts of interest, sponsorship, assessment of third parties, international sanctions/embargoes, HR due diligence, etc.)
- ▶ **Training** for all employees as well as more specific modules for exposed populations (face-to-face or e-learning)
- ▶ An Ethics and Compliance network made up of 45 people:
 - ◆ **25 officers (approximately 1 for every 1,000 employees) within the Group** to closely monitor the process, promote the ethics and compliance culture, and follow up on the implementation of the guidelines by the teams concerned. TAV Airports has one officer per subsidiary
 - ◆ **20 representatives appointed within the support divisions** in the parent company to ensure that the various processes incorporate the ethics and compliance practices and thus prevent the related risks

- ▶ A **third-party assessment process** (implemented pursuant to the Sapin II Law), which can be activated gradually depending on project type, country and third-party risk, to identify and assess the risks to which Groupe ADP is exposed by entering into or maintaining business relations with a third party. This assessment may concern individuals or entities, residing in France and/or established abroad, in order to ensure their integrity in terms of corruption, fraud, money laundering, financing of terrorism, violation of human and environmental rights, etc., and their compliance with the principles of the Group's ethics policy. For investment projects, this due diligence is heightened. In some cases and depending on the level of risk, an action plan is implemented before any contract is signed.

**more than
29,000
customers and suppliers
were assessed in 2021**

Aéroports de Paris is also a member of Transparency International, the Cercle Éthique des Affaires (Business Ethics Circle) and EDH (Entreprises pour les Droits de l'Homme - Businesses for Human Rights), which allows us to look at best practices in other companies and take inspiration from them for ethics and compliance within the Group.

The whistleblowing system is one of the major pillars of the Ethics and Compliance system which, in addition to natural solutions such as line management for employees, enables the reporting of failings in or breaches of laws, regulations and the company's values.

Since 1 October 2018, the Group's employees and those of its suppliers have round-the-clock access to the whistleblowing platform (<https://alert.groupeadp.fr>) via the Group's website, which meets the requirements of the Potier Act (duty of vigilance) and Sapin II Law (anti-corruption).

⁸ <http://codeofconduct.groupeadp.fr/>

A structured and efficient process

The criteria for the admissibility of alerts and the protection of whistleblowers are specified in a charter (also available on the platform), audited with the assistance of Transparency International, to ensure the effective protection of whistleblowers.

Once the admissibility of an alert has been validated,

"Groupe ADP's charter places whistleblowers at the heart of dialogue and trust-related issues."

Laurence Fabre

Head of the Private Sector programme at Transparency International

the Director of Ethics, who is responsible for the whistleblowing system and reports directly to the Group's Chairman & Chief Executive Officer to ensure independence, is obliged to deal with the alert as quickly as possible and may, in this context, launch an investigation or an audit.

"Investigations should also make it possible to identify areas for improvement in the organisation of processes, so that situations do not recur."

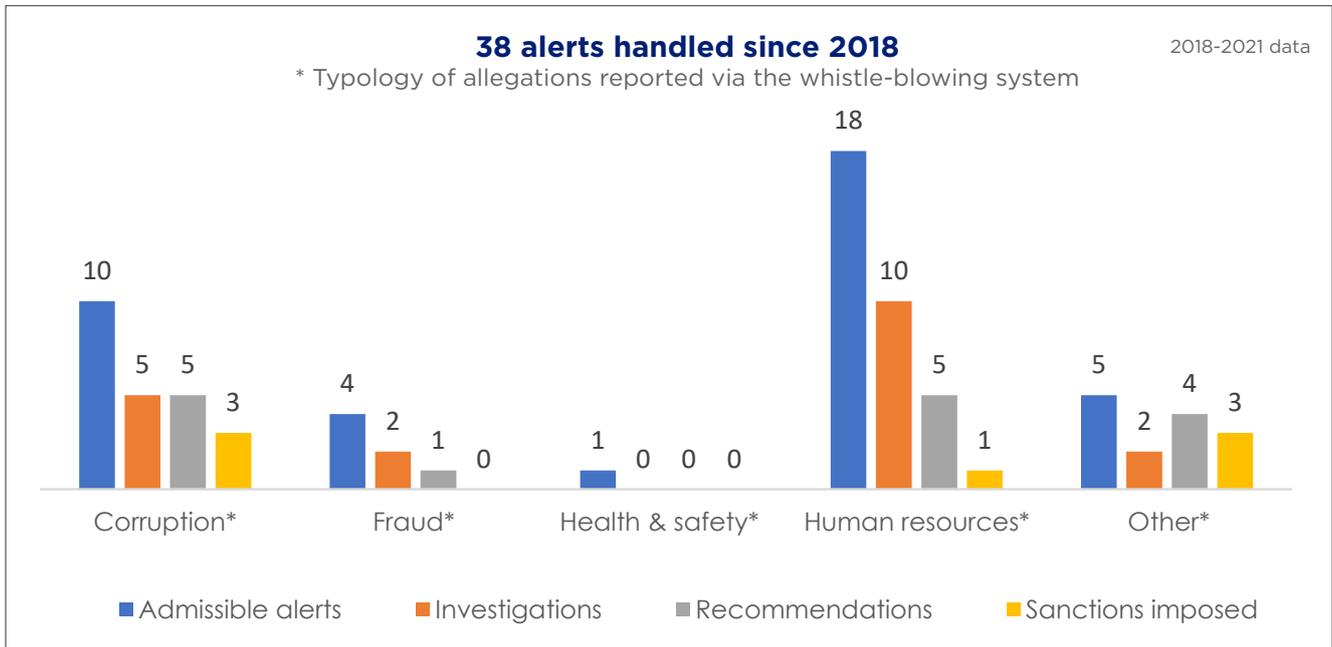
Groupe ADP Investigator

An ad hoc committee, whose members are subject to the same rules of confidentiality, collectively validates the actions to be carried out and identifies areas of improvement in the process.

The internal investigation process has been structured and challenged within the framework of an Investigator's Guide. In some cases, the decision may be taken to appoint an external firm (lawyer, forensic specialist, etc.), subject to the same rules as for any internal investigation.

Throughout this process, the identity of the whistleblower is kept confidential. Acts of retaliation against this person may be sanctioned.

The Ethics and Personal Data Division has received 38 alerts since the system, which is accessible to everyone online, was introduced in 2018.



Widespread and regular communications

The whistleblowing platform and the protection of whistleblowers are the subject of regular communications within the Group in France and the subsidiaries ADP Ingénierie, AIG, Hub One and TAV Airports.

Awareness of and trust in the whistle-blowing system are two indicators⁹ that determine its efficiency. They are measured annually:

- ▶ In 2021, 75% of Group employees (compared to 50% in 2018) were aware of this system.
- ▶ Trustworthy contacts:
 - ◆ Managers, who are widely recognised for their behaviour in terms of ethics and compliance, are most often the first people to whom employees turn to discuss an ethical issue (79%). This trust in line managers, already expressed in 2019, is confirmed and differs positively from what can be observed in other French companies (66%)¹⁰.

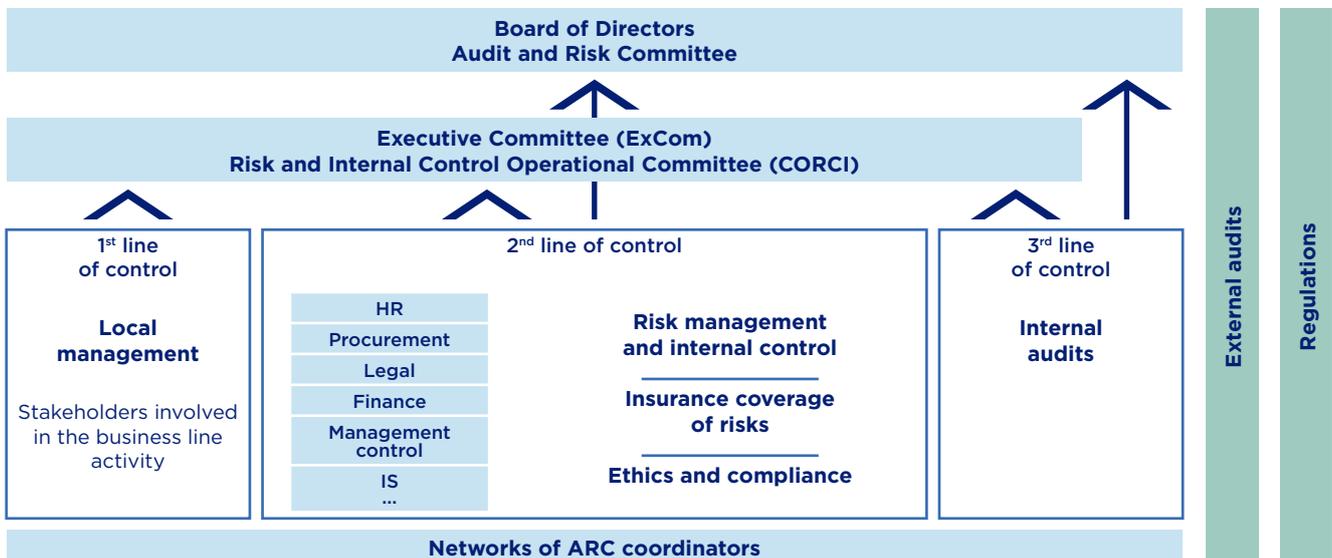
- ◆ Employees also have strong confidence in their ethics officers (75%) and the Group's Ethics Division (76%).
- ▶ In the event of a breach, 78% of employees would be prepared to report an ethical problem if they witnessed it.
- ▶ 64% trust ADP to ensure their protection and anonymity.

Groupe ADP also communicates with all its suppliers and subcontractors through its Supplier CSR Charter, a document signed by them and appended to all new contracts, and through regular reminders to its main suppliers of their obligations in this area with regard to their staff. The next step will be to propose a poster campaign in or near the workplaces of the service providers present on site and to extend this communication principle to all subsidiaries.

1.3. Risk management and internal control

The risk management and internal control systems to which the management systems contribute, as well as the internal audit system, constitute an organisation-wide approach to controlling Groupe ADP's activities and objectives. Led by the Audit, Safety and Risk Management Division, which coordinates the Group's internal audit and control system, this approach relies on:

- ◆ The Board of Directors, which determines the guidelines and ensures their implementation
- ◆ The Board of Directors' Audit and Risk Committee
- ◆ The Executive Committee, which participates in the operational and strategic management of Groupe ADP and discusses all matters relating to its smooth running
- ◆ The Risk and Internal Control Operational Committee (CORCI), made up of directors of the entities
- ◆ The Group's business lines
- ◆ The network of Audit, Risk Management and Internal Control (ARC) coordinators appointed within each Group entity.



⁹ See Annual Ethical Climate Survey 2021: 3,019 of 11,464 employees responded to the questionnaire, representing a response rate of 26% (vs. 28% in 2019).

¹⁰ A similar survey was carried out among 1,000 employees of large companies by the Cercle Éthique des Affaires, which enabled Groupe ADP to benchmark itself on the dissemination of an ethical culture.

It is based on the “three lines of activity control” model recommended by the Institut Français de l’Audit et du Contrôle Interne (French Audit and Internal Control Institute, or IFACI) and the Association pour le Management des Risques et des Assurances de l’Entreprise (Association for Corporate Insurance and Risk Management, or AMRAE).

Internal control refers to “a process, effected by an entity’s board of directors, management, and other personnel, designed to provide reasonable assurance regarding the achievement of objectives relating to operations, reporting, and compliance” (COSO, 2013¹¹).

This process enables the company to ensure that its key risks are under control and to report on its results.

Positioned on the second line of control, it is applied by all the Group’s entities. The Audit, Internal Control and Risk Management Division of Aéroports de Paris participates in its structuring, notably through the publication of key control guides, drawn up in conjunction with the operational and functional structures, and through assessment monitoring.

The implementation of the internal control system is evaluated during mandatory self-assessment campaigns. This approach, in line with current practices, serves the purpose of providing assurance that the fundamentals of activity management are being properly implemented in the Group’s entities.

The self-assessment procedure is supplemented by field tests, the purpose of which is to corroborate the results. The tests will therefore essentially validate the frequency and documentation of key controls, and thus constitute an indicator of the management of the associated risks.

The objective of an internal **audit** is to provide the Group with independent reasonable assurance regarding the degree of control over its operations, to advise on improvements and to contribute to the creation of added value.

Certified by IFACI¹² since 2008 (certification renewed in early 2022 on the basis of 100 requirements), the audit assesses the functioning of the risk management and internal control systems. Through its recommendations, it helps to improve safety and optimise the overall performance of Group entities.

It may be mandated at the recommendation of the Ethics Division to look further into certain aspects of investigations. The annual audit programme is:

- ◆ revised with the Ethics Division
- ◆ presented to the Executive Committee
- ◆ and then studied by the Board of Directors’ Audit and Risk Committee.

Periodic monitoring of the risk management and internal control system is carried out:

- ◆ Through the follow-up of major incidents and incidents associated with unacceptable risks
- ◆ By the audit function
- ◆ By external control structures, such as the French Civil Aviation Authority (DGAC) and the European Commission.

The Group’s crisis management system ensures the continuity of the Group’s control and the quality of its response to sudden and unexpected events, such as the COVID-19 pandemic.

At the crossroads of risk management and crisis management, Groupe ADP has defined a **Business Continuity Policy**, which is broken down into several Business Continuity Plans (BCP), designed to improve the management of risks that have a major impact on service continuity and guarantee the provision of services that are essential to the Group’s operations.

Crisis exercises are carried out several times a year to test the effectiveness of this system, with feedback allowing for improvements.



¹¹ In 1992, the Committee of Sponsoring Organizations of the Treadway Commission (COSO) published its report entitled “Internal Control - Integrated Framework” (initial framework). This framework was updated in 2013.

¹² Certification by the French Institute of Internal Audit and Control (IFACI), which requires regular audits, confirms that the auditing activities of Groupe ADP’s Audit, Internal Control and Risk Management Division comply with international standards.

1.4. Group risk mapping methodology

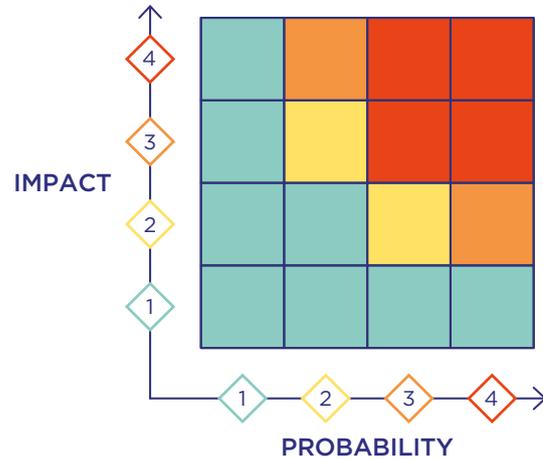
Groupe ADP has put in place a comprehensive risk management policy, which was reviewed in 2020 following an external audit to ensure that the best standards are applied and applicable to all risks, whatever their nature.

Each risk is evaluated on the basis of a maximum credible scenario on a scale of 1 to 4 in terms of impact and probability. The criticality of the risk is determined on the basis of these two assessments and thus makes it possible to identify the "Top 10" risks that are subject to special monitoring and reporting.

In 2021, the "Top 10" Group risks included the following, which may impact third parties:

- ▶ Cybersecurity
- ▶ Occurrence of a health event
- ▶ Safety & security
- ▶ Human resources and employee relations
- ▶ Environment/climate risk

The effectiveness of the systems put in place to manage each risk is also assessed using a dedicated ratings grid based on a scale of 1 to 4.



The risk rating corresponds to the status of the "net" risk estimated at the date the risk mapping was drawn up, after taking into account the management elements and action plans already implemented.

This rating is supplemented by a trend for year n+1, taking into account future developments: changes in context, changes in the effectiveness of the control system and action plans.

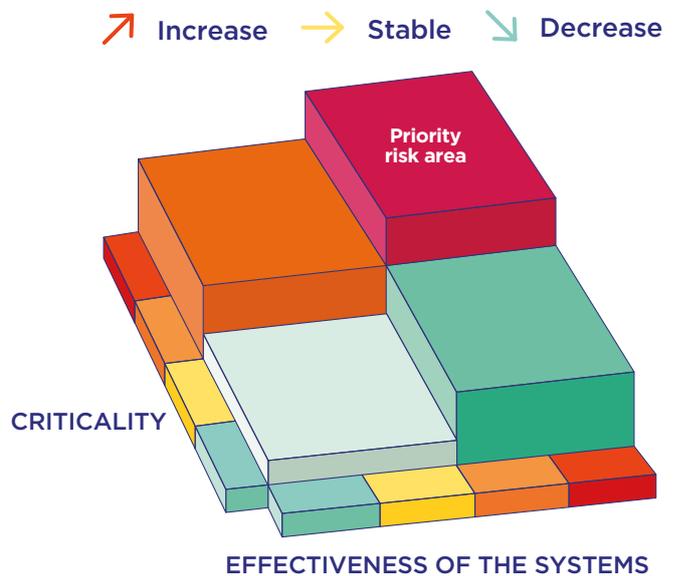
The mitigation priorities are identified by cross-referencing the net criticality of risk and the effectiveness of the control systems.

The risks in the priority risk area must be subject to additional actions to strengthen the effectiveness of their control systems.

Irrespective of their rating, "unacceptable" risks may be identified. These are subject to close monitoring at Group level, regardless of their rating.

After being reviewed by the Risk and Internal Control Operational Committee (CORCI), the Group's mapping is submitted to the Executive Committee and then presented to the Audit and Risk Committee and the Board of Directors.

The risk management system applies to Groupe ADP: Aéroports de Paris SA and its subsidiaries, exclusively controlled in France and abroad. For non-controlled assets, best practices are shared. In addition, asset managers challenge these issues in the bodies in which they represent the Group.



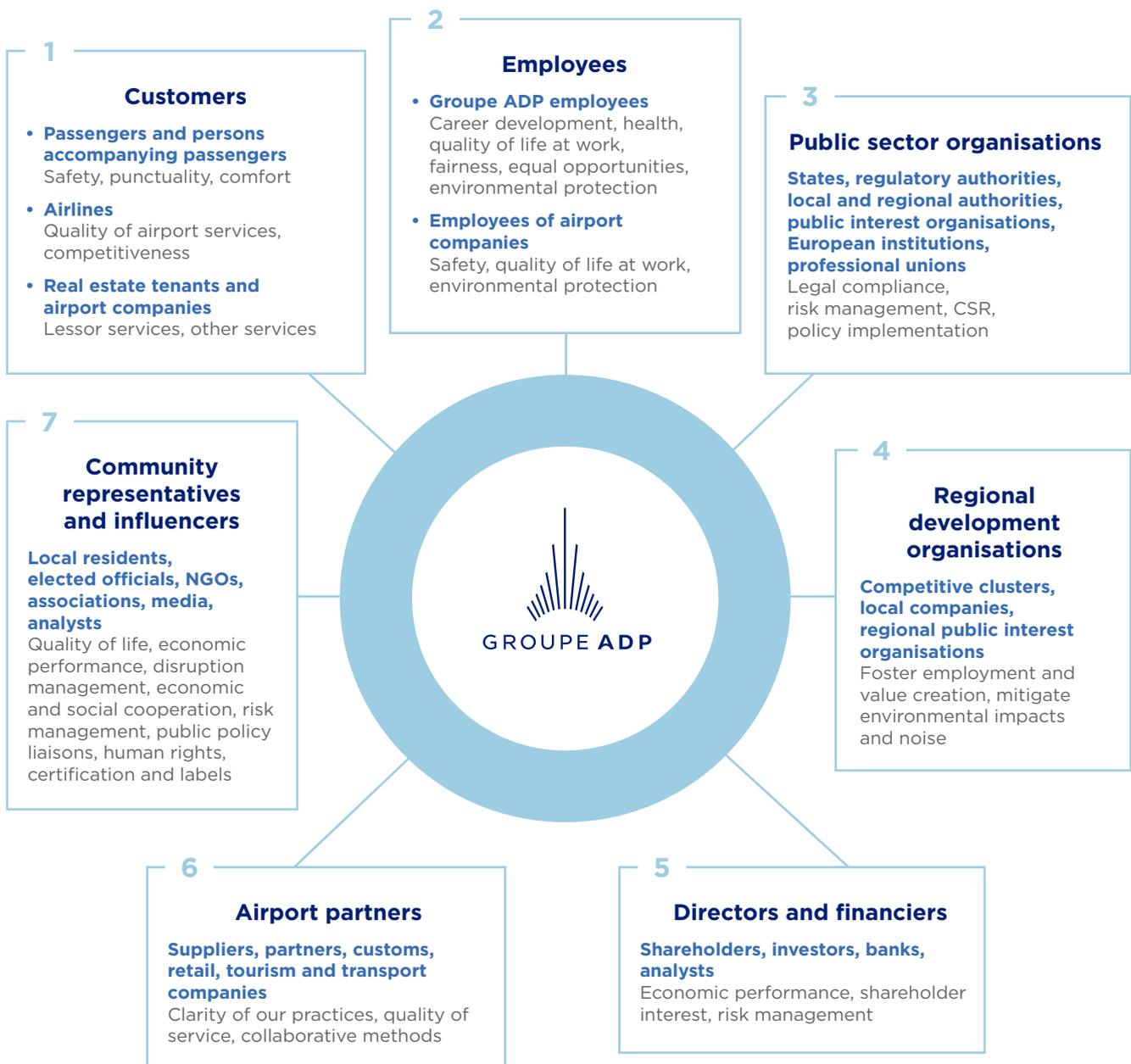
1.5. Dialogue with stakeholders

Groupe ADP has a strong local presence in many regions and as such, it is committed to developing and maintaining strong relationships with its stakeholders.

It listens to, discusses with, and takes on board the expectations of all its stakeholders and incorporates them into the Group's CSR strategy. These regular consultations ensure the Group has a strong grasp of changes and issues, which are then incorporated into the approach to CSR. The Group's stakeholder mapping is reviewed regularly.

The collective and/or individual means of communication and dialogue are also regularly diversified and are detailed in the table below.

In 2021, Groupe ADP created a Stakeholder Committee made up of independent stakeholders representing the categories below or having a view on the climate, aviation, biodiversity, employment or the development of airport spaces.



This committee provides Groupe ADP's governance with collective ideas and a multidisciplinary view on key CSR issues. For the first year, its work notably focused on the long-term development of Paris-Charles de Gaulle, the biodiversity policy and action in favour of employment in our communities.

COMMITTEE MEMBERS



Anne-Romaine ALLARD DE GRANDMAISON,
Member of "Collectif pour un Réveil Écologique"



Olivier JANKOVEC,
Director General of Airport Council International (ACI) Europe



Sergio ALEGRE CALERO,
Director General of the Airport Regions Council (ARC)



Christian MANTEI,
Honorary President of Atout France



Alain BATTISTI,
President of the Fédération Nationale de l'Aviation Marchande (FNAM)



Chloé MORIN,
Associate Expert of the Jean Jaurès Foundation



Olivier BOUCHER,
Head of the Climate Modelling Centre and Deputy Director of the Pierre-Simon Laplace Institute



Khanh NHAM,
Member of the Passenger Community of Groupe ADP



Pierre-Guy COSIMI,
General Secretary of the Syndicat National du Transport Aérien et des Aéroports (SNTA) CFDT



Simone PICHOT,
Student at the French National Civil Aviation School (ENAC)



Stéphane CUEILLE,
CEO of Safran Electrical & Power



Amandine ROGEMAN,
Member of "Les 150"



Myriam EL KHOMRI,
Former Minister, Director of Consulting at SIACI SAINT HONORE



Hélène SOUBELET,
Director of the French Foundation for Research on Biodiversity



Max HIRSH,
Managing Director of the Airport City Academy



Philippe ZAOUATI,
CEO of Mirova





ENVIRONMENTAL VIGILANCE

For many years, Groupe ADP has implemented measures and procedures to avoid, reduce and, as a last resort, compensate for the impact of its activities on the environment in the regions in which it operates. Indeed, the risks to be identified and prevented are, by nature, very much linked to the operational context of the different sites and to the Group's activity in these regions, as well as to the sensitivity of the surrounding environment. In addition, the Group is working increasingly together with the airport community and its value chain to control the impacts of their own activities.

Groupe ADP's environmental ambition, reaffirmed and reinforced in its 2022-2025 environmental policy, requires vigilance that goes well beyond regulatory obligations.

2.1. Environmental challenges and risk mapping

2.1.1. Our challenges

By showing that the risk of a pandemic was by no means theoretical, the Covid-19 crisis has also made environmental threats more tangible. The World Economic Forum's Global Risks Report 2021¹³ ranks the climate crisis at the same severity level as the risk of a pandemic. These are followed by the extinction of biodiversity, the degradation of the environment by human activities and the depletion of natural resources.

The main environmental issues on which the activities of the Group's companies are likely to have a significant impact have been classified according to 7 themes:

- ◆ Climate
- ◆ Air
- ◆ Noise pollution
- ◆ Soil pollution
- ◆ Biodiversity
- ◆ Water
- ◆ Materials/Waste



© Gwen Le Bras for Groupe ADP

Environmental risks can occur:

- ▶ 1. At our sites in France
- ▶ 2. At our sites abroad
- ▶ 3. At our suppliers' and subcontractors' sites in France and abroad

¹³ <https://www.weforum.org/reports/the-global-risks-report-2021>

2.1.2. Risk mapping and analysis of our sites in France

In order to identify and monitor environmental risks at our main Paris airports (Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget), a consolidated risk mapping was produced in 2018. It was established on the basis of environmental analyses, events that have occurred, monitoring of the 2016-2021 environmental and energy policy, and risk mapping carried out for the Group's Paris airports. The environmental aspect of the procurement risk mapping was also drawn up in 2018. A matrix of the regulations in force and the key actions deployed to exceed the regulatory requirements (see 2.1.3) was prepared in 2020 for our international sites, in the countries where TAV and AIG operate.

The risk analysis work made it possible to identify the main risks associated with environmental challenges, to rate each risk according to its probability and impact, and to list the control measures in place or to be implemented for each risk.

MAIN ENVIRONMENTAL RISKS AND CHALLENGES

THEMES	MAIN RISKS	MAJOR CHALLENGES
CLIMATE (see 2.2.3)	<ul style="list-style-type: none"> ▶ Contributing to climate change ▶ Increasing extreme weather events 	<ul style="list-style-type: none"> ◆ Addressing the need to mitigate the impact of CO₂ related to air transport and airport access. ◆ Fulfilling the Group's energy transition goals ◆ Adapting airports to cope with the occurrence of extreme events related to climate change ◆ Selecting materials that require as little grey energy as possible
AIR (see 2.2.4)	<ul style="list-style-type: none"> ▶ Contributing to the degradation of local air quality ▶ Increasing the risk of pollution peaks leading to operational restrictions 	<ul style="list-style-type: none"> ◆ Controlling the impact of airport and aviation activities on local air quality
NOISE POLLUTION (see 2.2.5)	<ul style="list-style-type: none"> ▶ Noise pollution for local residents and airport employees 	<ul style="list-style-type: none"> ◆ Controlling noise pollution at the sites and in communities in order to improve the living conditions of local residents and employees
SOIL POLLUTION (see 2.2.6)	<ul style="list-style-type: none"> ▶ Emergence of historical pollution and occurrence of accidental pollution 	<ul style="list-style-type: none"> ◆ Identifying and treating historical pollution ◆ Preventing pollution to maintain soil and water quality
BIODIVERSITY (see 2.2.7)	<ul style="list-style-type: none"> ▶ Damaging biodiversity (including increased animal risk due to collisions with aircraft) ▶ Trafficking of protected species and bushmeat 	<ul style="list-style-type: none"> ◆ Developing and managing infrastructures in a sustainable way, limiting the artificialisation and sealing of soils ◆ Preserving and restoring biodiversity at airports ◆ Preventing the risk of a pandemic and combating illegal trafficking
WATER (see 2.2.8)	<ul style="list-style-type: none"> ▶ Consumption (quantity, pressure, conflicts of use) ▶ Discharge of polluted water into the natural environment ▶ Flooding (as a consequence of soil sealing) 	<ul style="list-style-type: none"> ◆ Optimising water resource management (drinking water, grey water and rainwater)
MATERIALS / WASTE (see 2.2.9)	<ul style="list-style-type: none"> ▶ Raw material consumption and pressure on resources ▶ Waste production: pressure on resources and pollution 	<ul style="list-style-type: none"> ◆ Preventing waste production ◆ Improving waste management for better resource potential (circular economy)

2.1.3. Our sites abroad

Groupe ADP has a network of 28 airports operated under management or concession contracts in 17 countries (in Europe, Asia, Africa and South America). Given its global presence and the environmental regulations in force in the various countries, Groupe ADP faces a wide range of environmental challenges.

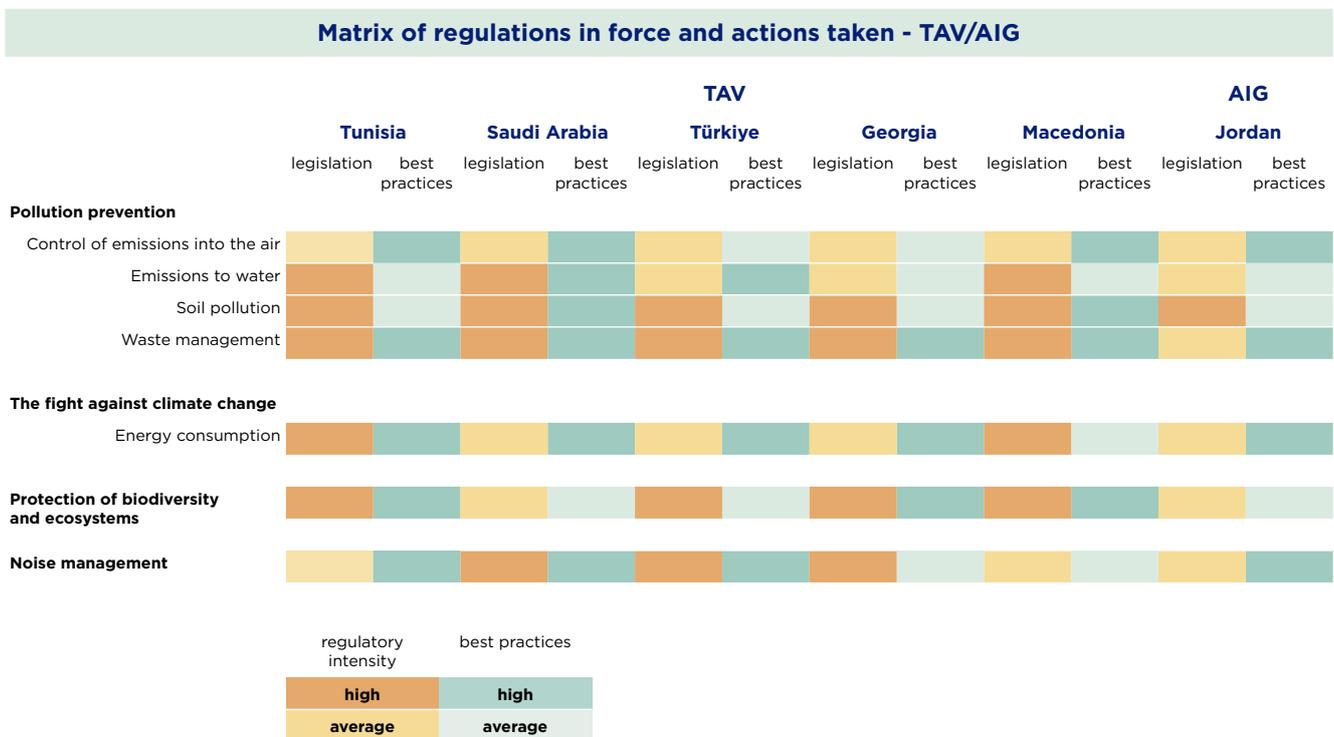
In line with the ISO 26000 standard, which covers the main themes of the law, Groupe ADP has carried out an inventory of local regulations and actions already taken in relation to the environment for AIG and TAV Airports.

To this end, in 2020 the Group sent a detailed questionnaire to each of its subsidiaries in order to determine, as exhaustively as possible, the laws in force and key actions that make it possible to exceed the regulatory requirements for each environmental

theme: pollution prevention, the fight against climate change, protection of biodiversity and ecosystems, and noise management. The countries covered by this study were as follows:

- ▶ TAV Airports: Tunisia, Saudi Arabia, Türkiye, Georgia, Macedonia¹⁴.
- ▶ AIG: Jordan.

A summary of this inventory is presented in the matrix below.



This overview shows the varied nature of the legislation in force and the actions taken in each country. The airports surveyed comply with these laws and some go beyond them.

Our approach to progress in environmental risk mapping

Strengthening and aligning risk mapping with the new Groupe ADP environmental policy:

- ▶ The risk mapping carried out for our Paris airports will be updated in 2022 to address the growing environmental challenges, such as the reduction of CO₂ emissions, noise pollution and biodiversity.
- ▶ For our international locations, risk mapping is to be carried out for the 23 airports that have signed the Airports for Trust Charter (see 2.2.1). This will enable an analysis of the risks incurred by each subsidiary and the priority actions to be taken to mitigate these risks.

¹⁴ Almaty Airport was added to the TAV Airports portfolio after this environmental review was conducted. Kazakhstan will be added as part of a later revision.

2.2. Measures to mitigate risks and prevent serious harm

2.2.1. The Airports for Trust Charter¹⁵ and the Group's new 2022-2025 Environmental Policy

Since 2006, the investment cycles included in the five-year economic regulation agreement (ERA) have enabled ADP SA to continuously improve the environmental performance of its Paris operations, taking advantage of investments relating to sustainable development and the fight against obsolescence. Each investment cycle has been associated with an increasingly ambitious environmental policy.

The environmental policy implemented in 2016 focused mainly on reducing the operational impacts of Groupe ADP in France.

It has made it possible to structure the Group's approach around concrete commitments in line with European ambitions in terms of sustainable development and with the national ecological transition strategy (notably the national low carbon strategy). Actions implemented in 2021 have helped to:

- ◆ reduce our internal CO₂ emissions¹⁶ (scope 1 and 2) by 65% in absolute terms by the end of 2020 (compared to 2009)
- ◆ increase the share of renewables in our total energy consumption to 9.7%
- ◆ reach 35% of clean vehicles in our light vehicle fleet (approx. 800 vehicles) by the end of 2021.

However, in the summer of 2019, the Flygskam (flight shaming) movement, which originated in Sweden and backed by Greta Thunberg, was a strong first signal that civil society was taking into account the pressing need to decarbonise air transport. The Covid-19 health crisis and its economic consequences for air transport have led to the cancellation of ERA 4, initially planned for 2021-2025.

Nevertheless, these events have further strengthened Groupe ADP's conviction that the future and the development of its business requires an accelerated environmental transformation at Group level (including internationally) and the need to adopt environmental ambitions that go beyond its direct impact. The new 2025 Pioneers strategic roadmap is based on this conviction. It is against this backdrop of increasing regulatory requirements and heightened political and social expectations that Groupe ADP has defined a proactive environmental policy for 2022-2025.

In January 2021, the signing of the Airports for Trust Charter marked a new step forward for the Group, demonstrating an environmental ambition shared by 23 of our airports around the world. This charter is the foundation of our strategy of international integration through environmental and social performance and reflects our desire to co-construct our environmental and social ambitions.

The new 2022-2025 environmental policy was the subject of a dedicated presentation to investors in March 2022. Below are the salient points:

Our approach to progress in terms of Group environmental policy

The Group's new environmental policy, which came into effect in January 2022, involves a radical expansion of our scope of action compared to the 2016-2021 period.

Its structure is based on four strategic pillars which are reflected in 15 commitments broken down into operational roadmaps for each of the 23 airports that have signed the charter.

These airports, both in France and abroad, are committed to implementing structural measures that contribute to Groupe ADP's environmental ambition.

¹⁵ See Appendix 1 of this document.

¹⁶ Internal CO₂ emissions (scopes 1 and 2) / CO₂ emissions of stakeholders (scope 3).

THESE 15 NEW COMMITMENTS ARE:

I. Move towards zero environmental impact operations

1.1. Implement the roadmap to achieve carbon neutrality on our internal emissions (scopes 1 and 2) at all our airports by 2030, and net zero CO₂ emissions at Paris-Orly and Paris-Le Bourget by 2030, at Paris-Charles de Gaulle by 2035, and at Amman, Ankara, Izmir, Liège, Zagreb and Santiago de Chile by 2050.

1.2. Strengthen intermodality, reduce the role of the car, improve connectivity with the territories.

1.3. Become a carbon neutral territory by 2050 (geographical scope - scopes 1 and 2 and all ground emissions - plus cruising emissions for flights departing from Europe).

1.4. Avoid/reduce operational waste and maximise material recovery.

1.5. Protect the environment: water, soil, biodiversity; reduce the biodiversity footprint of our value chain.

II. Actively participate in the aviation sector's environmental transition

2.1. Create the conditions for using transition technologies (sustainable aviation fuels) and technological breakthroughs (hydrogen, electric).

2.2. Contribute to the improvement of operations (ground handling, taxiing, flight phase of the landing & take-off cycle, i.e. below 3,000 feet), resulting in the decarbonisation of aviation activities, improvement of air quality and reduction of noise.

2.3. Contribute to the exemplary environmental work of the aviation sector (fight against the trafficking of protected species, waste reduction).

III. Promote the integration of each airport in a local resource system

3.1. Develop an industrial and territorial ecology strategy for building materials and energy.

3.2. Measure and monitor air quality and noise exposure to protect the health of local residents.

3.3. Be a preferred partner to the territories and scientific and associative stakeholders with regard to the preservation and awareness of biodiversity.

IV. Reduce the environmental footprint of airport planning and development projects

4.1. Implement a low-carbon and circular economy construction policy; build as little as possible and in a modular and flexible manner; implement environmental governance of investment projects, with a carbon budget (all Aéroports de Paris and TAV investment projects over €5 million from 2025) and biodiversity.

4.2. Limit the environmental impact of development projects and construction sites (noise impact, waste, air quality, CO₂).

4.3. Improve the ecological value of our sites, ensure ecological continuity and move towards net zero soil sealing as part of our responsibility as a project owner, in accordance with an ambitious trajectory approved in 2022.

4.4. Obtain environmental labels for all projects (e.g. HQE, BREEAM, LEED¹⁷).

¹⁷ High Environmental Quality standard; Building Research Establishment Environmental Assessment Method; Leadership in Energy and Environmental Design.

For each of the risks identified for each environmental issue (see 2.1), targeted actions are implemented as part of the new environmental policy, the objective being to minimise their occurrence and impact. The main ones are described below.

2.2.2. Level of our emissions

Like many airports around the world, Groupe ADP monitors, reports and publishes its internal CO₂ emissions (scopes 1 and 2) annually, as well as a very significant portion of its stakeholders' CO₂ emissions (scope 3), in accordance with the Airport Carbon Accreditation programme (ACA). The programme, which has been in place for over 10 years, is based on independent third-party audits of emissions and action plans published by accredited airports. The accreditations obtained by Groupe ADP are detailed in section 2.3 of this document. Several international airports have already achieved level 3+ (neutrality) and Delhi is the Group's first airport to have achieved level 4+ (transition).

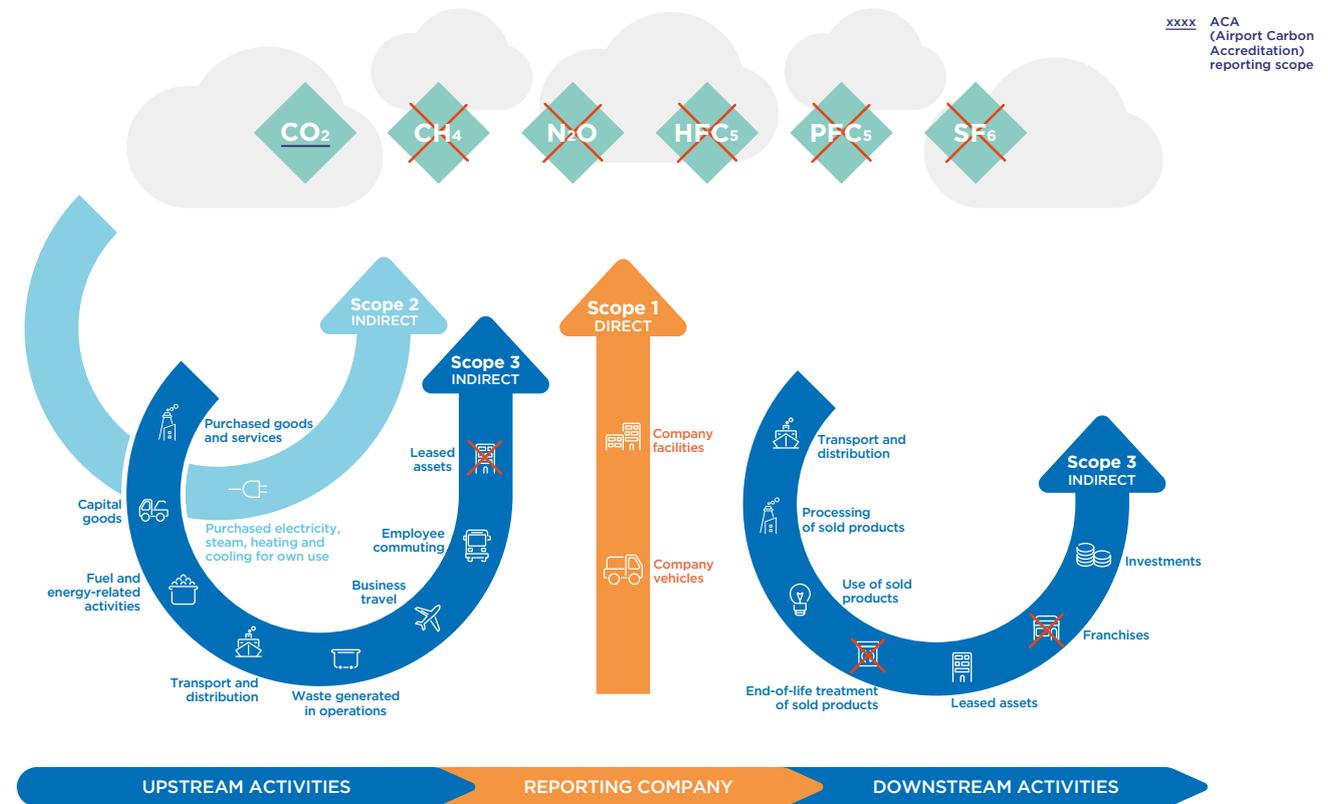
In 2022, Groupe ADP is aiming to achieve ACA 4 certification for Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget.

Beyond this certification process, the greenhouse gas emissions monitored by Groupe ADP are presented in the diagram below, in accordance with the

definitions of the GHG Protocol. In addition to the emissions monitored within the framework of ACA accreditations, Groupe ADP is developing the means (for its Paris airports to date) to monitor emissions and develop roadmaps for additional Scope 3 emission items, including aircraft cruising.

WHAT IS GROUPE ADP'S CARBON FOOTPRINT?

Theoretical definition and applicability for ADP



xxx ACA (Airport Carbon Accreditation) reporting scope

Source: GHG protocol

In 2019, the reference year before the very sharp drop in traffic generated by the Covid-19 crisis, the CO₂ emissions of the main consolidated Groupe ADP airports were as follows:

Emissions Report - Year 2019 - T CO₂		ADP SA	
Scope 1	Direct emissions	49,023	
Scope 2	Indirect emissions linked to energy purchases *	17,457	
Scope 3 (ACA scope) ACA (Airport Carbon Accreditation): ACI's global programme for airport carbon management	Commuting and business travel of airport operator employees	1,728	
	Aircraft - LTO Cycle (Landing & Take-Off = taxiing, landing, take-off up to 3,000 feet)	1,241,920	
	Aircraft - APU (Auxiliary Power Unit)	104,285	
	GSE (Ground Support Equipment)	40,293	
	Access to the airports (employees of all companies)	233,624	
	Access to the airports (PAX)	390,329	
	Operational waste	5,862	
	Resale of energy to third parties	7,824	
	Scope 3 (additional emission items)	Aircraft - half-cruise (50% of the journey from origin to destination above 3,000 feet)	14,663,000
		Purchase of goods and services	433,000
Construction equipment		Unknown	
Upstream energy		10,900	
Logistics (transport of goods by air, retail supply)		Unknown	
	Construction waste	Unknown	

It can thus be seen that Aéroports de Paris is equipped with the means to calculate aircraft cruising emissions, an emission source not historically quantified in the context of ACA reporting and which Aéroports de Paris is now able to quantify annually. This is a significant improvement on previous CO₂ reporting, in that this emission item (14.663 Mt of CO₂ in 2019) is the largest calculated Scope 3 emission item for Paris airports (85% of total emissions).

The detailed ACA reports for Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget are publicly available at: <https://www.parisaeroport.fr/en/group/csr>

For the main consolidated international subsidiaries, Groupe ADP is currently monitoring ACA scope emissions, the 2019 results of which were as follows:

Emissions Report - Year 2019 - T CO₂		Amman (AIG)	Ankara (TAV)	Izmir (TAV)
Scope 1	Direct emissions	1,915	11,641	17,893
Scope 2	Indirect emissions linked to energy purchases *	24,102	363	2,170
Scope 3 (ACA scope) ACA (Airport Carbon Accreditation): ACI's global programme for airport carbon management	Commuting and business travel of airport operator employees	59	7	5
	Aircraft - LTO cycle (Landing & Take-Off)	109,013	134,181	
	Aircraft - APU (Auxiliary Power Unit)	11,593	1,508	
	GSE (Ground Support Equipment)	7,004	546	
	Access to the airports (employees of all companies)	1,265	35,640	189,180
	Access to the airports (PAX)	92,081		
	Operational waste	Unknown	Unknown	
	Resale of energy to third parties	17,740	9,084	

In order to support the reduction of CO₂ emissions from these various emission sources, Groupe ADP has defined and implemented (or is in the process of defining) roadmaps for each item and has updated its climate commitments as part of its new 2022-2025 environmental policy (see section 2.2.1 of this document).

The actions implemented, in the process of being rolled out or envisaged as part of the strategy to meet the environmental challenges mentioned in 2.1.1 are described below.

2.2.3. Climate

► Reducing our contribution to climate change

Groupe ADP has made the fight against climate change a core element of its strategy.

The first challenge is to reduce internal emissions, in line with the Group's reinforced ambitions (carbon neutrality by 2030 at all airports that have signed the Airports for Trust Charter and net zero CO₂ emissions by 2030 to 2050 at the latest depending on the sites - see details by airport in the climate focus section of this document). To this end:

- ◆ We are improving the energy performance of our terminals and buildings
- ◆ We are developing our own renewable energy production capacity (mainly heat)
- ◆ We are using market solutions to ensure that 100% of the electricity consumed is from renewable sources (100% by 2021)
- ◆ We are replacing our service vehicles with low carbon, electric and/or hybrid models.

In addition to reducing its internal emissions, Groupe ADP is actively working on mitigating external emissions (scope 3), in conjunction with its stakeholders and in line with the new ambition to become carbon neutral at the French airports by 2050 (ground emissions plus the cruising emissions of departing aircraft).

Our scope 3 includes emissions from aircraft, their APUs¹⁸, GSE¹⁹ and passenger and employee access to airports. The main source of Scope 3 emissions for airports is aircraft.

Groupe ADP is thus actively involved in the work carried out with the entire aviation sector on decarbonisation:

As an airport operator, Groupe ADP is currently working alongside all players in the air transport sector and numerous energy companies to create and facilitate the conditions for the emergence of a sustainable fuel production sector in France with competitive prices:

- ◆ It participated in the call for expressions of interest launched by the French government in the summer of 2020 to support the development of various sustainable aviation fuel production chains (HEFA, Alcohol-to-Jet, Biomass-to-Liquid, Power-to-Liquid, etc.), and also took part in the call for projects (October 2021), in support of two applications submitted.
- ◆ A sustainable aviation fuel test was also carried out on 18 May 2021 in collaboration with Air France for a flight between Paris-Charles de Gaulle and Montreal. The tanks were filled with seven tonnes of biofuel produced from used cooking oil, representing 16% of the fuel on board and inducing a 15% reduction in CO₂ emissions.
- ◆ At Paris-Le Bourget Airport, sustainable aviation fuel has been in use on a continual basis since June 2021.

Groupe ADP is also involved in the emergence of groundbreaking technologies and is preparing its aerodromes to accommodate electric, hybrid and hydrogen-fuelled aircraft:

- ◆ In terms of hydrogen, Groupe ADP signed a partnership agreement with Airbus and Air Liquide in June 2021 to work on defining an optimised hydrogen supply chain and designing the hydrogen infrastructure for airports.
- ◆ In 2021, Groupe ADP, along with Airbus, Air France-KLM and the Ile-de-France region, published a call for expressions of interest aimed at identifying projects and solutions that will constitute the airport hydrogen ecosystem of tomorrow, an essential step towards the advent of liquid hydrogen aircraft. Eleven projects have been selected and are currently being studied/implemented.

¹⁸ Auxiliary Power Unit.

¹⁹ Ground Support Equipment.

Groupe ADP is also implementing various actions to support airlines in their transition efforts:

- ◆ Reduction of aircraft emissions during taxiing
- ◆ Joint work with air navigation services to roll out new trajectories with less impact on landing and take-off: the Group is notably supporting the air navigation services with a view to the widespread roll out of continuous descents between 2023 and 2025 at Paris-Charles de Gaulle and Paris-Orly.
- ◆ Supply of electricity and air conditioning/heating when aircraft are parked to limit the use of auxiliary engines during aircraft preparation.
- ◆ Greening of ground equipment: Groupe ADP granted ground handling licences for limited services in 2021. The granting of licences was based on a variety of criteria, including the greening of ground handling equipment and vehicle fleets.



© Zoo Studio for Groupe ADP

In addition, Groupe ADP is helping to improve the range of public transport services and implementing a joint employer transport scheme (PDMEC)²⁰ with the other airport companies, which included the introduction of a new car sharing service for employees (Karos) in 2021.

Another Scope 3 item, significant although complex to quantify, concerns CO₂ emissions associated with construction activities:

- ◆ In order to reduce these emissions, we are implementing tools such as the life cycle analysis, particularly in the context of aviation infrastructure projects, which allow us to opt for the most ambitious construction/renovation scenarios.

- ◆ Furthermore, Groupe ADP is committed to a low-carbon construction policy. In 2021, Groupe ADP joined the CIRCOLAB association in order to understand the emerging subject of reuse. Regular discussions take place with external stakeholders (project owners, inspection organisations, companies, project ownership assistance services, etc.) to remove any obstacles that may hinder the implementation of a reuse approach. Lastly, a framework contract has been notified for the services of a project manager specialising in reuse for future projects.

Example of an emission-reduction action:

The work on the F' boarding bridge walkway at Paris-Orly, which provides for the use of 20% metakaolin in the concrete structures, will help to reduce CO₂ emissions by 30%.

Our approach to climate progress

In 2022, Groupe ADP is launching the SBTi²¹ certification process for the climate trajectory of its activities in France (1.5°C scenario for scopes 1 and 2 and well below 2°C for scope 3). The main actions undertaken to reduce the emissions of Groupe ADP stakeholders have been formalised in roadmaps for 2030 and are listed below.

Groupe ADP's new climate commitments, including quantitative data, are presented in the dedicated focus on page 36.

²⁰ The R'Pro'Mobilité and Orly Pro'Mobilité joint employer transport schemes involve 16 companies at Paris-Charles de Gaulle and 5 companies plus the regional public body Grand Orly Seine Bièvre at Paris-Orly. Formed as associations and run by the CCLs of Val-d'Oise and Val-de-Marne, their aim is to implement a joint sustainable transport policy for their employees by offering alternative solutions to cars for the home-work commute.

²¹ Launched in June 2015, the Science-Based Targets initiative (SBTi) is a joint project of the Carbon Disclosure Project (CDP), the United Nations Global Compact, the World Resource Institute (WRI) and the World Wildlife Fund (WWF). The initiative aims to encourage companies to set greenhouse gas (GHG) emission reduction targets consistent with scientific recommendations. At the date of publication of this document, a net zero SBTi application had been submitted for Aéroports de Paris.

AIRCRAFT PARKING AND TAXIING

ELECTRICAL AND AIR CONDITIONING EQUIPMENT



Our challenges

Climate (and air quality) impact of using aircraft auxiliary engines in the absence of alternatives (400 Hz sockets, 50 Hz sockets, mobile electric air conditioning units).

Our actions

- ◆ **100%** of the aircraft contact stands are already equipped with **400 Hz sockets at Paris-Charles de Gaulle and Paris-Orly**, to supply electricity to parked aircraft.
- ◆ Continue the roll-out of **50 Hz** sockets for remote stands.
- ◆ For aircraft air conditioning, a technical policy of deploying **high-powered 50 Hz sockets (250A)** has been selected; ground handlers will connect mobile electric air conditioning units to them.

Our objective

100%

of aircraft contact stands will be equipped by 2025 and remote stands by 2030 at Paris-Charles de Gaulle and Paris-Orly. This trajectory will lead to very significant reductions in CO₂ and pollutant emissions.

TAXIING OF AIRCRAFT

Our actions

- ◆ **Continue the work undertaken with airlines and Air Navigation Services:** pre-departure sequencing; optimisation of taxiing time and reduction of "stop and go"s; widespread roll-out of the engine N-1 or N-2 practice; incorporation of sustainable fuels; roll-out of innovative technologies to develop green taxiing (TaxiBot trial planned at Paris-Charles de Gaulle and electric taxiing trial at Paris-Orly).
- ◆ **Testing of TaxiBots** on medium-body aircraft at Paris-Charles de Gaulle, in partnership with the Air France - KLM Group in 2024 as part of the OLGA (hOListic Green Airport) project²².

Our objective

Reduce taxiing emissions **by 10%** by 2025.

GROUND SUPPORT EQUIPMENT (GSE)



Our challenges

Increase the reductions in CO₂ and pollutant emissions already undertaken by electrifying some of the ground support equipment.

Our objectives

75%

carbon-free equipment **for limited services** (passenger staircases, baggage tractors, baggage conveyors, loaders, pushback tugs) **in 2025** for our Paris-Charles de Gaulle and Paris-Orly airports. This target is set to rise to **90% by 2030**, making Paris-Charles de Gaulle and Paris-Orly among the most advanced European airports in this area.

90% carbon-free equipment
for limited ground handling services

at Paris-Charles de Gaulle and Paris-Orly, both among the most advanced European airports in this area.

²² Project supported by the European Commission and funded by the Horizon 2020 research and innovation programme.

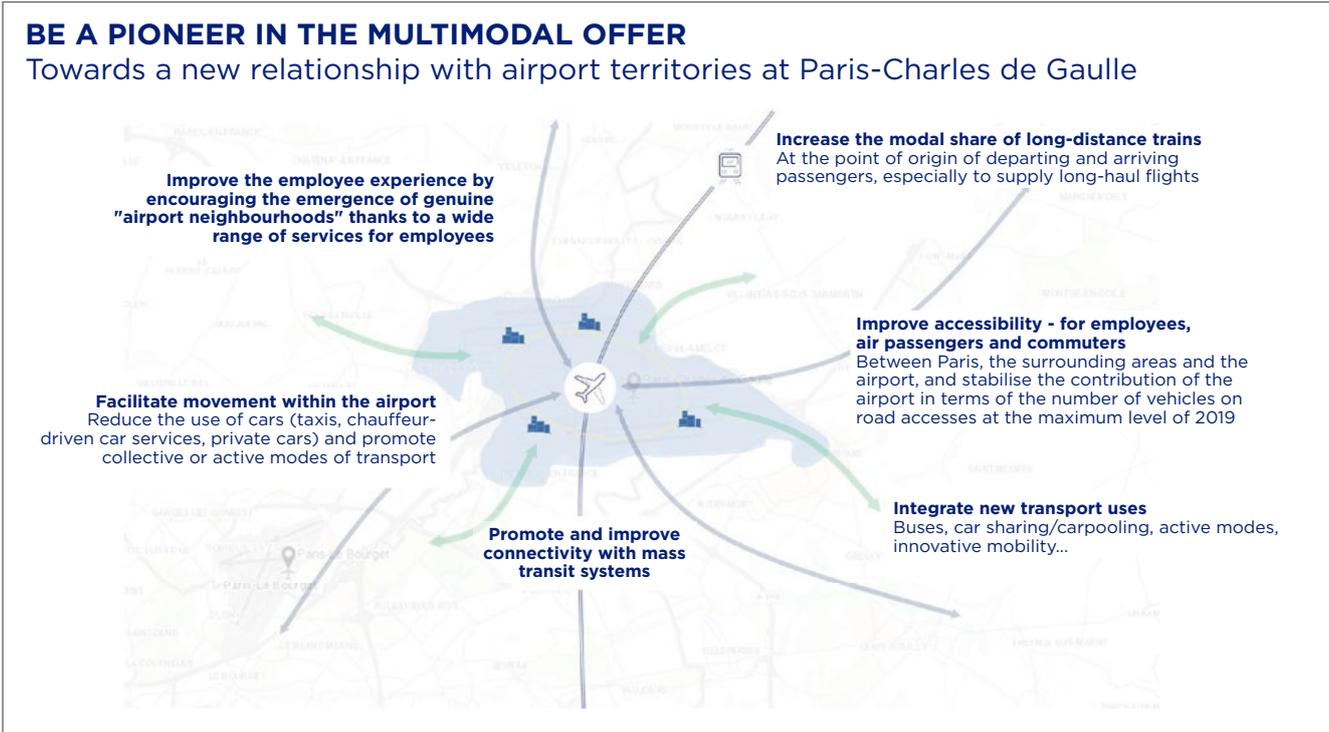
AIRPORT CONNECTIVITY

Our challenges



Offer each traveller the opportunity to choose the mode of transport with the lowest environmental impact, whatever their destination: active modes, bus, train, carbon-free aircraft, etc., by creating integrated multimodal hubs, the new central feature of airports, thanks to:

- ◆ denser and more compact infrastructure
- ◆ better connectivity with the surrounding areas for the development of cross-benefits
- ◆ management of congestion on the roads.



Our objectives



Develop intermodality for long-distance transport with a target of **+50% of passengers at Charles de Gaulle and +100% at Orly** taking rail-air connections by 2025 compared to 2019.

Ensure connectivity for daily journeys: eight new public transport lines will be commissioned or under construction by 2025 to serve the Paris airports with extended service hours:

- 🏠 Opening of the Paris-Orly multimodal hub in 2024, served by Line 14 of the Grand Paris Express.
- 🏠 Other routes to complement this offer, at Paris-Orly, Paris-Charles de Gaulle and Paris-Le Bourget before the end of the decade: Lines 17 and 18 of the Grand Paris Express, CDG Express, BHLS (bus with high level of service) in Val-d'Oise and Seine-et-Marne, Roissy-Picardie regional train, etc.

Review the role of the car at our airports and further encourage sustainable mobility: active modes (bicycle scheme at Orly in particular), electric mobility for employees, and car sharing with the roll-out of a new shared offer at our Paris airports.

Further extend remote working and encourage the reduction of the use of private cars as part of our Joint Employer Transport Schemes (PDMEC).

Best practices in all these areas will be shared with our international subsidiaries.

IMPLEMENTATION OF A CARBON BUDGET FOR INVESTMENT AND PURCHASING PROJECTS

Aéroports de Paris will set up a system for budgeting the carbon impact of investment projects. The emissions taken into account are those linked to construction, maintenance and/or renovation, the consumption of heating and cooling energy, the consumption of electricity and the demolition of infrastructure at Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget airports.

Our objectives for the end of 2022

- ◆ Develop a tool to set an emissions cap for each investment project carried out by Aéroports de Paris, defined in accordance with the highest standards identified, so that project owners and design teams can work with a fixed carbon budget and be guided towards finding innovative solutions in terms of decarbonisation
- ◆ Define a theoretical CO₂ emissions reduction trajectory for Aéroports de Paris' investment projects that is compatible with the French National Low-Carbon Strategy (SNBC) in terms of construction
- ◆ Be able to compare the emission caps of this theoretical trajectory with the sum of the project emissions.

Groupe ADP is also researching the possibility of using low-carbon materials. Within the framework of the European Horizon 2020 project named OLGA, coordinated by Aéroports de Paris, we are planning to use 30% low-carbon concrete (metakaolin) in a Technical Experimentation Assessment project ("ATEX) by 2024-2025, which is a higher rate than that stipulated by regulations in this area.

We are also working on controlling emissions for our procurement and construction projects. In this context, we will define a method for controlling and reducing emissions based on a 3-step approach:

- ◆ **i. Quantification of impacts at the smallest possible scale**
- ◆ **ii. Analysis of levers and projection of possible gains**
- ◆ **iii. Setting of targets on a market-by-market or project-by-project basis, incorporating them into our contractual clauses.**

► Adapting to climate change: Increasing numbers of extreme weather events

Given the nature of its activity, Groupe ADP is exposed to environmental risks of an internal and external nature and in particular to risks related to the effects of climate change: the occurrence of events related to natural phenomena or exceptional weather conditions could have a significant impact on the Group's activity. These events could disrupt the operation of airport infrastructure directly, by reducing operating capacity or by temporarily closing facilities. They could also have an impact on the operation of airlines, essential service providers or the critical networks necessary to the Group's functioning (electricity, water, roads, fuel, etc.).

Groupe ADP revised its risk mapping of the consequences of climate change at the end of 2018, both in France and for its international activities. The mapping takes into account risks such as flooding, high winds, snow, hail, and earthquakes.

To be able to adapt to the consequences of climate change, the means of controlling these risks have been defined and an action plan has been put in place.

CLIMATE FOCUS

AIRPORTS HELPING THE CLIMATE TRANSITION OF AIR TRANSPORT

Commitment	Internal emissions: Production of heating and cooling, service vehicles, electricity purchases		External emissions: Generated by movements of employees, passengers and cargo, and ground and aircraft operations			Commitment target																																																																					
	Scope 1	Scope 2	Scope 3			2025	2030	2035	2040	2045	2050																																																																
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The Group’s climate ambitions are summarised below:

In particular, the commitment to a carbon-neutral territory by 2050 is truly innovative, given its scope, including all ground emissions and all flights departing from the Paris airports. It is based on a favourable European regulatory context (Fit for 55), the European aviation sector’s Destination 2050 initiative, the 2050 carbon neutrality commitment of IATA airlines, and the (French) National Low-Carbon Strategy for road transport.

In addition to these ambitions, Groupe ADP:

- ◆ is building on significant progress already made in reducing its scope 1 and 2 CO₂ emissions for more than a decade and in separating the trajectory of CO₂ emissions from aircraft and air traffic trends. For the record, the energy efficiency of the aircraft fleet increased by 36% between 2000 and 2017
- ◆ acknowledges the need for a rapid climate transition, incorporating the notion of a carbon budget, with a view to respecting a carbon trajectory in line with the IPCC’s (Intergovernmental Panel on Climate Change) 1.5°C scenario for its internal emissions and "well-below 2°C" for its scope 3 emissions, in line with the Paris Agreement.

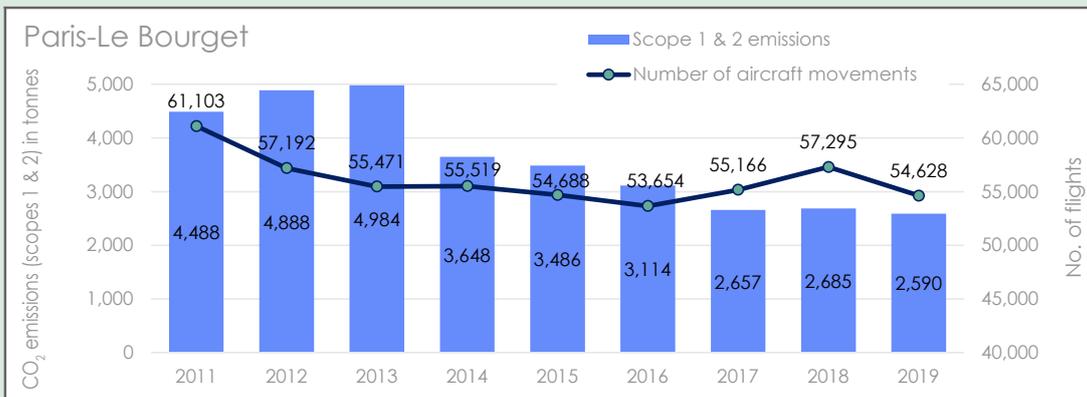
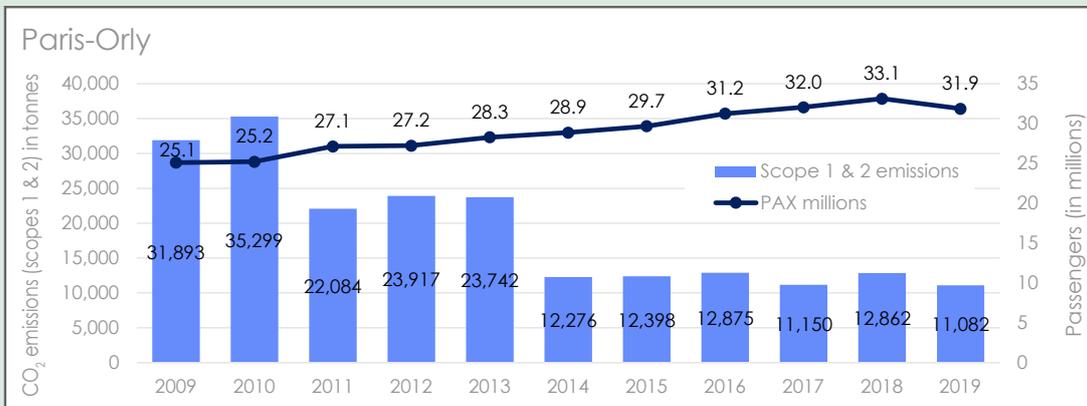
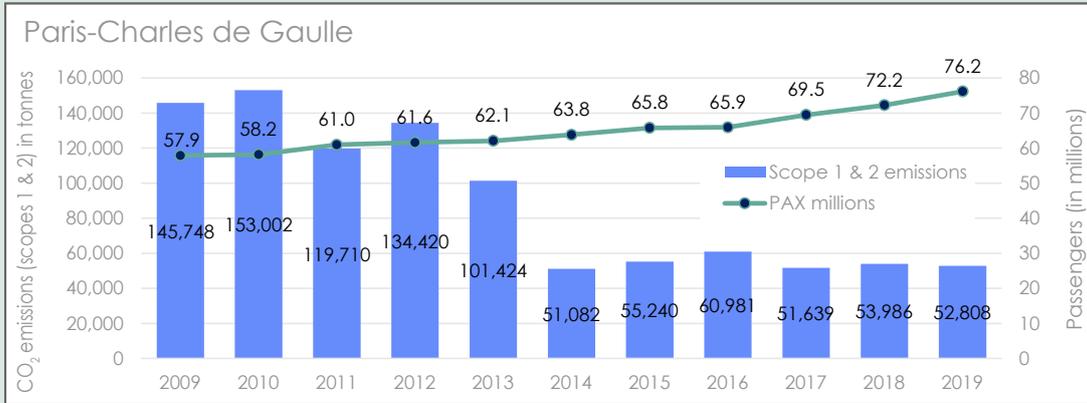
At the beginning of 2022, Groupe ADP launched the SBTi (Science-Based Targets initiative) certification process for its carbon trajectory, based on the latest SBTi standards and requirements.

To date, significant and corroborated progress can be observed:

► **For Scopes 1 and 2 (see diagram on page 29, section 2.2.2)**

The scope 1 and 2 CO₂ emission trajectories of the three Paris airports attest to the beneficial effect of the investments made to increase the use of renewable energies (geothermal energy at Paris-Orly;

connection to the waste heat of the Rungis incinerator to further industrial and territorial ecology; biomass power plant at Paris-Charles de Gaulle; heat pump at Paris-Le Bourget) and to reinforce energy sobriety.

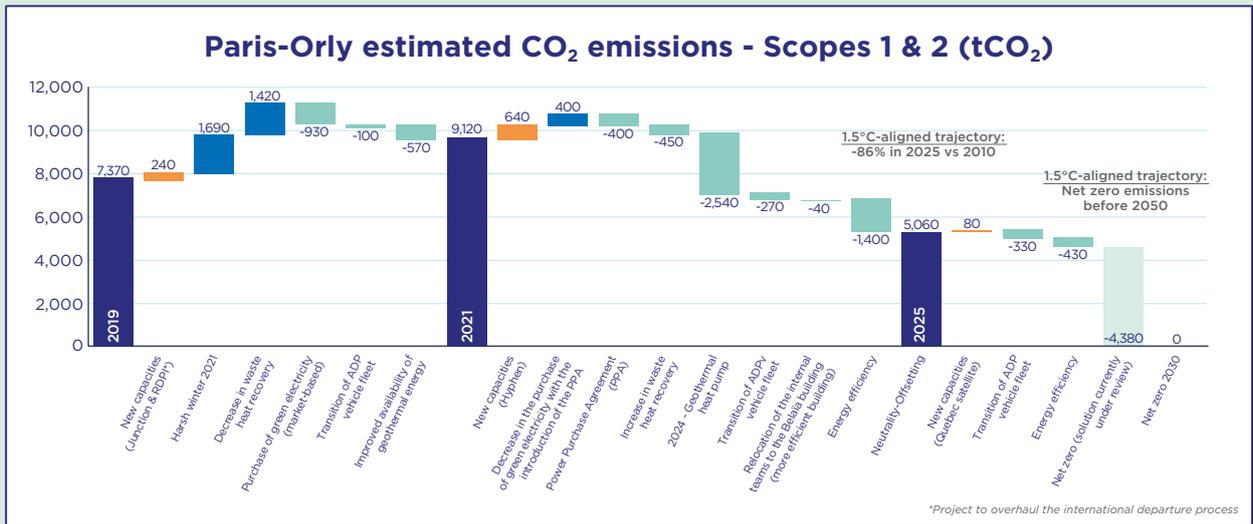
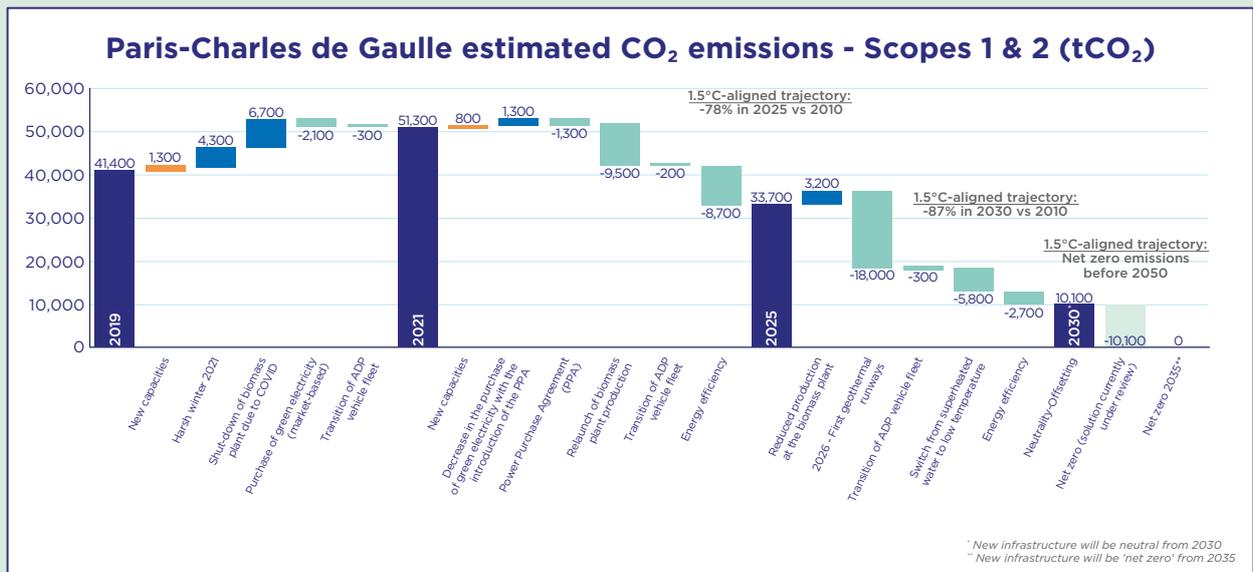


²³ <https://www.parisaeroport.fr/en/group/csr/balance-sheet-and-index/documents>

The actions taken by Groupe ADP to control its energy consumption and reduce its carbon content are regularly detailed in its annual management report and in its annual CSR report²³.

Achieving carbon neutrality and zero net emissions also relies (for all three airports) on a combination of renewable assets (geothermal energy at Paris-Charles de Gaulle in 2026, heat pump at Paris-Orly in 2024), investments in energy efficiency, transition of vehicle fleets, use of 100% decarbonised electricity (in force since 2021), offsetting of for ADP employees' business travel, and innovative solutions to remove residual tonnes of CO₂ from the atmosphere (biomethane, industrial CO₂ capture, nature-based solutions, etc.).

The estimated internal CO₂ emission trajectories from Paris-Charles de Gaulle and Paris-Orly by 2030 are provided below. At the date of publication of this vigilance plan, these trajectories are being updated. The next review will demonstrate and highlight the consistency of the emission reduction trajectory with the SBTi requirements and the IPCC 1.5°C scenario.



2.2.4. Air

► Contributing to reducing the degradation of local air quality

The actions undertaken to limit CO₂ emissions also make it possible to reduce the deterioration of air quality (see 2.2.3 Climate).

► Increasing the risk of pollution peaks leading to operational restrictions

Peaks in regional air pollution levels frequently occur and information/recommendation and alert procedures are triggered by Airparif (air quality observatory in Paris), specifying the actions to be taken to limit pollution. Some of the actions and in particular the French Civil Aviation Authority's (DGAC) national action plan in the event of prolonged peaks, may lead to operational restrictions.

For its Paris airports, Groupe ADP has defined an internal procedure for the management of air pollution peaks, which specifies the actions to be taken by all entities that can act to limit emissions during such peaks.

The procedure is based on awareness-raising actions: transmission of information to Aéroports de Paris employees, to the aviation community, and to all people travelling to our airports via messages on road signs.

The internal procedure also includes actions to reduce emissions, e.g. in case of an information/recommendation procedure:

- ◆ Adaptation of the setpoint temperature in certain areas of the airports at certain times
- ◆ Reduced operation of fixed facilities whose emissions contribute to the pollution peaks
- ◆ Implementation of specific requirements laid down by the ICPE²⁴ operating authorisation
- ◆ And in the event of an alert procedure (non-exhaustive list):
- ◆ Postponement of maintenance work and certain operations that emit particles, nitrogen oxides or VOCs
- ◆ Reduced use of generators
- ◆ Reduced use of solvents
- ◆ Reminder to external stakeholders of best practices in the event of a pollution peak
- ◆ Postponement or reduction of activity on dust-generating sites and use of compensatory measures (watering preferably with non-drinking water, etc.) as far as possible, without jeopardising aeronautical safety and in compliance with contractual provisions.

In addition to the actions undertaken by Groupe ADP, the DGAC²⁵ provides reminders of the prohibition of "engine" tests, the respect of APU operating times, and the prohibition of training laps at general aviation aerodromes, except for those carried out as part of an initial training course provided by a declared, approved or certified organisation, with an instructor on board or supervising the course.

Our approach to progress on ultra-fine particles

Groupe ADP will participate in Airparif's general interest study on ultra-fine particles. The study will carry out measurements at various locations, especially in the vicinity of road traffic and airports. Measurements will first be taken at Paris-Charles de Gaulle (in the summer of 2022, subject to the representativeness of air traffic).

²⁴ Classified Facilities for Environmental Protection.

²⁵ French Civil Aviation Authority.

2.2.5. Noise pollution

► Noise pollution for local residents and airport employees

The Paris airports already have significant measures in place to protect local populations, including:

At Paris-Orly:

- ◆ A full curfew (11:30 pm - 6:00 am) since 1968 and operations capped at 250,000 annual slots since 1996.

At Paris-Charles de Gaulle:

- ◆ The setting of a maximum number of flights in the middle of the night (12:00 am - 05:00 am for departures and 12:30 am - 05:30 am for arrivals), coupled with an obligation to return unused night slots
- ◆ Banning the noisiest aircraft from flying between 10:00 pm and 06:00 am
- ◆ The introduction of so-called soft descent procedures for night flights between 12:30 am and 05:00 am
- ◆ The setting of an overall noise emission cap from aviation activity monitored by an annual indicator (IGMP: Measured and Weighted Noise indicator).

At Toussus-le-Noble:

- ◆ Prohibition of access to the airport for aircraft above a certain noise threshold based on the Calipso²⁶ classification.

To go further, Groupe ADP is resolutely committed, in close liaison with the public authorities, to monitoring (via the Groupe ADP Laboratory), controlling and reducing the noise footprint of its airports in order to continuously improve the quality of life of the local population.

The actions put in place concern each of the pillars of the balanced approach as defined by ICAO²⁷ and translated into European law (Regulation (EU) No. 598/2014 of the European Parliament). The monitoring of noise abatement measures for each of the pillars and the development of new protection measures are summarised in the five-year Environmental Noise Prevention Plans (PPBE) for each airport. These PPBEs are currently being renewed. The main measures include the following:

► Reduction of noise at source:

Through the implementation of a pricing system encouraging the renewal of next-generation fleets offering better acoustic performance, the incentive for which has been strongly reinforced for the 2022 pricing period.

► Land planning and management:

Through the implementation by the State of a Noise Exposure Plan (PEB) preventing any additional populations from being added to areas most exposed to noise, and a Noise Pollution Plan (PGS) which sets out the areas most exposed to noise in which airport residents can benefit from aid to soundproof their homes. Groupe ADP manages the residential soundproofing scheme applicable to the three main Paris airports.

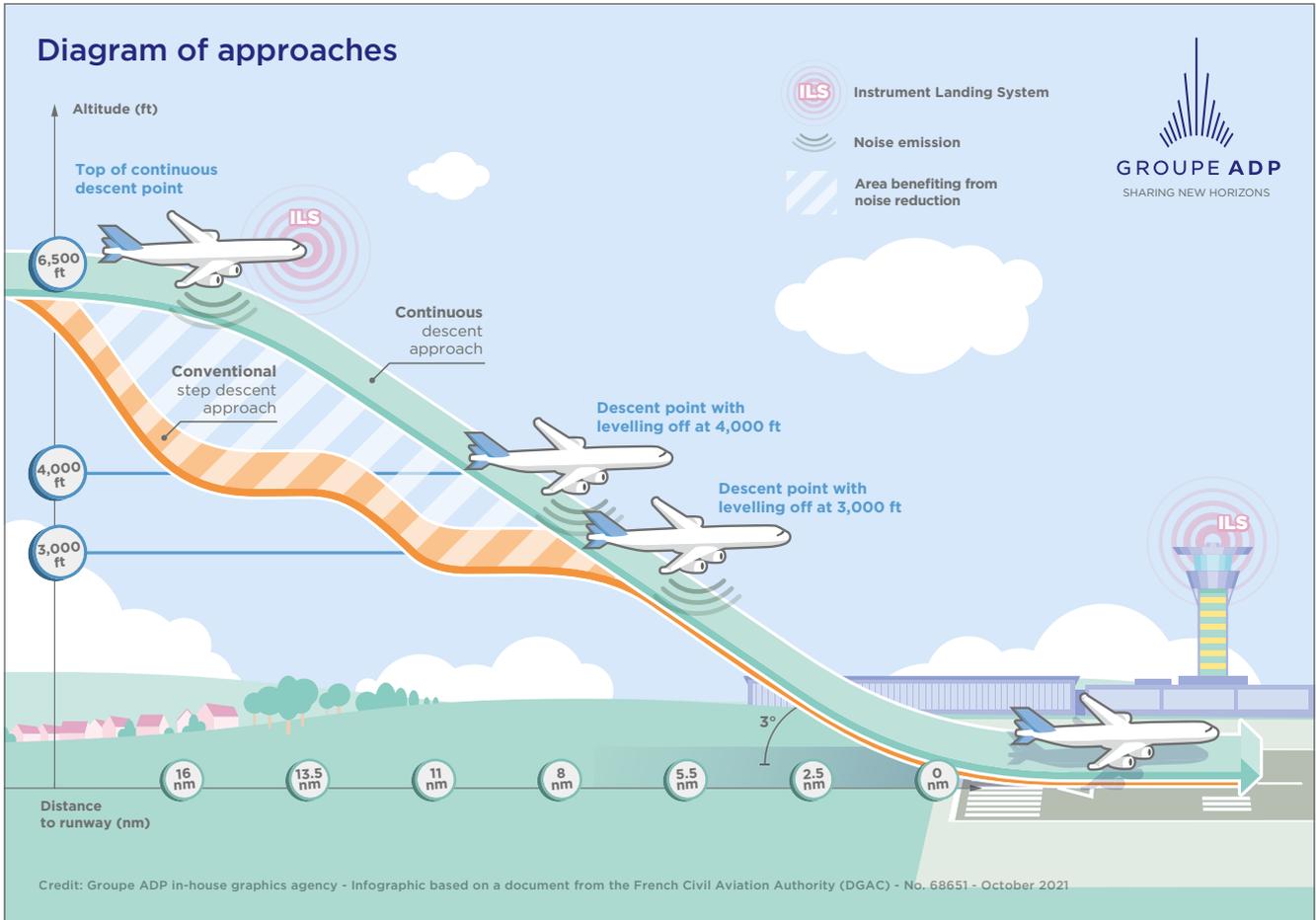
In 2021, the budget dedicated to the scheme received an exceptional allowance of €8 million for France, through funding granted by the amended finance law.

► Low-noise operational procedures:

Through the implementation of [continuous descent](#) arrival procedures which the French Air Navigation Services (DSNA) has set for 2023 and 2025 at Paris-Charles de Gaulle and Paris-Orly respectively.

²⁶ A system to classify light aircraft according to their sound performance (4 performance levels).

²⁷ International Civil Aviation Organisation.



Our approach to progress against noise pollution

- ▶ To take things further, a noise objective has been set in the draft Paris-Orly Environmental Noise Prevention Plan (PPBE), which provides for a 6-dB reduction in ground level noise compared to the level recorded in 2018, once traffic returns to 2018 levels (the hypothetical deadline is 2026). In order to achieve this objective of reducing noise in absolute terms and subject to the PPBE being signed, Aéroports de Paris will be required to evaluate, under the delegation and supervision of the French Civil Aviation Authority (DGAC), the addition of further protection measures at Paris-Orly within the framework of an impact study based on the balanced approach. The latter must be able to produce levels that reconcile the quality of life of the local population with the preservation of the economic and operational capacity of the airport and its stakeholders.
- ▶ The launch of a balanced-approach study in 2022 has also been announced for Paris-Charles de Gaulle (subject to the signing of the PPBE), in order to study measures to reduce noise pollution from night flights (currently dealt with through the temporary action of the night flight monitoring committee).
- ▶ Beyond the framework of the balanced approach, Aéroports de Paris is also working to optimise airport operations in order to avoid noisy operations: reduction of taxiing times, take-off at the runway threshold, respect for slots, engine test procedures, reduced use of APUs, support and encouragement for the use of engine n-1/n-2 taxiing procedures, and optimisation of pre-departure sequencing procedures, resulting in reduced engine use.

2.2.6. Soil pollution

► Emergence of historical pollution and occurrence of accidental pollution

The Group's airports are mainly located in urban, industrial and fairly artificial areas. The Group does not carry out any mining, agricultural or manufacturing activities. The issue of managing the environmental quality of the soil is dealt with in accordance with the regulations in force, and pollution prevention and management measures have been implemented.

The main risks of accidental chemical pollution of the soil on our land are linked to potentially polluting activities carried out by third-party operators, in particular:

- ◆ The storage and distribution of aircraft fuel. These operations are carried out by third-party companies that maintain and operate the tanks and hydrant fuelling systems, and ensure their control and compliance. In France, storage facilities are subject to the legislation on Installations Classified for the Protection of the Environment (ICPE), quality and compliance audits are therefore regularly conducted by the State. The hydrant fuelling systems are subject to regular leakage tests (weekly to daily) under the terms of interdepartmental decrees.
- ◆ Various industrial activities classified as ICPEs. These are located in particular areas of the airports.

Within the framework of the ISO 14001 standard, pollution risks are regularly assessed. In France, an update of the internal procedures for the prevention and management of soil pollution was finalised in 2021, based on feedback from the Paris airports. These procedural elements specify, in particular, the provisions to be included in tenancy agreements as well as the checks to be carried out on at-risk tenants in order to prevent pollution risks and the management and information measures for third parties in the event of accidental pollution.

Environmental monitoring of soil quality is carried out at our airports in France by the Aéroports de Paris Laboratory, certified by COFRAC²⁸, in accordance with the national methodology of the French Ministry of the Environment. This monitoring aims to:

- ◆ Ensure the general monitoring of the quality of groundwater (integrating environment) via networks of piezometers covered by water laws applicable to airports in the Paris region
- ◆ Assess, at the request of the project owners, the possible degradation of the environmental condition of the soil linked to potentially polluting activities
- ◆ In the event of proven pollution, check the compatibility between the environmental condition of the soil and the uses (current or future) in order, if necessary, to treat the concentrated pollution
- ◆ Define the methods for the management of excavated soil in the context of development projects.

In addition, the Laboratory provides a form of technical and regulatory monitoring, including, for example, on the issues of emerging pollutants (PFAS, etc.).

The Group is actively involved in the management of historical accidental pollution at its sites, in conjunction with the tenants and operators of the sites concerned, as well as with government services.

The Laboratory and the Aéroports de Paris Real Estate Division have also worked at Paris-Charles de Gaulle on the development of operational monitoring and prevention tools, which could be rolled out more widely.

²⁸ As part of its public service mission, the [French Accreditation Committee](#) (Cofrac) ensures the competence and impartiality of conformity assessment bodies by accrediting them in accordance with the applicable international standards.

Our approach to progress against soil pollution

- ▶ As part of a partnership between the Aéroports de Paris Laboratory, information systems and site management teams, work is underway to develop monitoring tools to improve the awareness and traceability of information on the tenants of our sites in order to better control third-party pollution.
- ▶ Within the framework of the work conducted by the Laboratory and environmental management systems, we are working on identifying the most critical substances in our processes and looking for more effective means of substitution or treatment (winter products, etc.).

2.2.7. Biodiversity

▶ Damage to biodiversity

Groupe ADP's responsibility and challenges in contributing to activities that harm biodiversity can be identified at two main levels of the value chain:

- ◆ On the one hand, Groupe ADP has a direct responsibility with regard to its global land ownership in various countries and ecosystems, real estate development and infrastructure management activities that involve the artificialisation and fragmentation of habitats (development, construction), pressure on resources (purchase of equipment and raw materials to build and operate infrastructure and supply shops and restaurants in the terminals), and environmental pollution (discharges into water, soil, air).
- ◆ On the other hand, as a crucial link in the air transport value chain, international trade and the tourism industry, Groupe ADP has an indirect responsibility, given these sectors' contribution to climate change and their role in the movement of invasive species.

These activities in the Group's value chain are of course dependent, at varying levels, on the health of ecosystems (biodiversity) and the services they provide: for example, their value in regulating local conditions and supplying materials for developments, and, more indirectly, their value in supplying our stakeholders, and even the cultural and ethical value they hold for the tourism industry.



In order to better adapt the Group's activity and take into account its biodiversity challenges and those of its stakeholders, voluntary strategic commitments were made in 2020 as part of the [act4nature international](#) collective initiative led by EpE (Entreprises pour l'Environnement), and reaffirmed in 2021 in the French Biodiversity Agency's [Committed to Nature Initiative](#) (website in French). As part of the 2022-2025 environmental policy, we are committed to implementing roadmaps at each of our sites, integrating our subsidiaries and more broadly our value chain (suppliers, influence on airlines, etc.), in order to improve the biodiversity index by 2030 compared to the 2022 benchmark.

Through these efforts, the Group aims to include biodiversity in its action priorities, integrate it into governance systems and throughout the entire life cycle. The roll-out of a governance system for biodiversity issues based on quantitative indicators adapted to our challenges and allowing us to address each of the five major pressures (pollution, soil artificialisation, climate change, invasive species, and resource exploitation) is one of the key strategies to help us better meet our challenges and, in particular, prioritise actions according to their criticality, between activities and sites. This project is underway.

The major operational actions in our commitments relate to responsible development and management, with the aim of achieving "positive biodiversity" at our Group sites (starting in France), the integration of criteria for respecting biodiversity in procurement and retail, and raising awareness of biodiversity among our employees and local residents. The majority of the significant achievements to date concern our responsible management of green spaces, with notable successes at Paris-Orly, where synergies have been developed with animal risk management (bird collision prevention).

Examples of achievements:

November 2021: Paris-Orly was awarded the **Aéro Biodiversity** level 3/3 and **EcoJardin** labels for its commitment to a comprehensive ecological management approach for the airport, which includes stopping the use of phytosanitary products and a differentiated management plan for green spaces that aims to take into account the objectives of protecting biodiversity (flora and fauna).



Groupe ADP has acquired a fleet of 10 robot mowers at Paris-Charles de Gaulle Airport in order to trial a new solution for maintaining green spaces. The aim of the experiment is to test alternative solutions for the maintenance of green spaces, in place of phytosanitary products or manual solutions.

► Trafficking of protected species and bushmeat

Wildlife trafficking is one of the four most lucrative criminal activities in the world and one of the main threats to biodiversity. It represents a major public health risk. With increasing contact between wildlife, livestock and humans, IPBES²⁸ predicts more frequent pandemics that will spread more rapidly and cause more damage to the global economy than COVID-19. As destinations and transit points for many international flights, airports represent a significant risk of importing zoonotic diseases³⁰, especially via flights from Africa and Asia.

Groupe ADP is fully aware of these issues and committed to the fight against wildlife and bushmeat trafficking. To facilitate the destruction of seized goods, Groupe ADP has provided the Paris-Charles de Gaulle customs unit with a cold room in which to store them before they are incinerated by an approved operator. An awareness-raising campaign, conducted jointly by stakeholders from the airport industry (Union des Aéroports Français, Aéroports de Paris, and other airports), airlines (Air France-KLM), customs, veterinary services and biodiversity

protection associations (IUCN³¹ in particular), will be deployed in 2022, with a first event in May, on World Endangered Species Day.

Other actions are being studied with all relevant stakeholders to reduce traffic: setting up new indicators to better objectify the warning to political authorities, monitoring the effectiveness of the actions implemented, and promoting the most virtuous players, etc.

²⁸ IPBES: Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. IPBES report on biodiversity and pandemics released on 29 October 2020.

³⁰ Animal diseases that are transmissible to humans.

³¹ International Union for Conservation of Nature.

Our approach to progress for biodiversity:

In order to strengthen our commitment to the preservation of biodiversity, we are working on three major areas:

- ▶ Adopting an approach inspired by "Science-Based Targets for Nature" and using quantitative data on the biodiversity footprint and quality of our sites to identify the right levers for action
- ▶ Implementing the environmental governance of investment projects, with a biodiversity budget in addition to the carbon budget
- ▶ Involving all of our international sites and subsidiaries in the process of taking biodiversity into account, particularly with a view to achieving positive biodiversity
- ▶ Mapping the airports with high local biodiversity issues (e.g. Nosy Be).

2.2.8. Water

▶ Consumption (quantity, pressure, conflicts of use)

As the Group does not carry out any mining, agricultural or manufacturing activities, water consumption is mainly related to direct infrastructure management and operation activities (cleaning, maintenance, cooling, etc.) and to the consumption of domestic hot water by the users of our infrastructure (passengers, stakeholders, employees). The possible pressure on water resources linked to purchases are integrated into the procedure for contracts with a high environmental impact.

With regard to direct use, the 2016-2021 environmental policy set an objective to reduce consumption per passenger at Aéroports de Paris level. To this end, the installation of water-saving equipment has been extended and a strategy of deploying more reliable measurement equipment has been implemented

in order to optimise and monitor consumption in real time. When possible, for operational uses (air conditioning, toilet facilities, watering, etc.), rainwater is reused, as is the case at Orly for cooling and at Amman for irrigation. This is now incorporated into the design phase of new buildings.



► Discharge of polluted water into the natural environment (quality, pressure)

Due to the artificial nature of our sites and the vehicle and aircraft traffic, rainwater is polluted by hydrocarbons. This water is collected and treated on-site by rainwater treatment systems. After treatment, this water is discharged into the public sewerage system. The Aéroports de Paris Laboratory monitors the quality of rainwater discharged into the natural environment. It is also responsible for monitoring the quality and level of the water table through a network of measurement (piezometers). These measurements are consistent with Groupe ADP's policy on polluted sites and soils.

A procedure for monitoring wastewater discharges from activities at Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget airports and the industries based at the airport is in place.

Agreements exist with the managers of the sewerage systems, and the environmental authority monitors the activities related to rain- and wastewater discharges.

The close and ongoing exchange of information between our laboratory (in charge of measurements) and the airport, allows us to promote improvements in everyone's practices: limiting the use of products, improving equipment, new operating methods, and joint monitoring of new treatment technologies and new products.

The two entities share the same objective: to limit the pollution of the airport's rainwater to prevent any risk of the natural environment becoming contaminated.

► Flooding (as a consequence of soil artificialisation)

We are committed to meeting the national target of Zero Net Artificialisation (ZAN) by 2050. In anticipation of future implementing decrees, we made a commitment in October 2020, as part of the [act4nature international](#) initiative, to study the feasibility of deploying a "zero net artificialisation" concept at our main sites and to set a trajectory for de-artificialisation.

In addition, in our new 2022-2025 environmental policy, we are committed to achieving net zero soil sealing as part of our responsibility as a project owner from 2025.

Soil sealing at our sites increases the risk of flooding, which we are trying to prevent. To this end, master

plans for the management of rainwater were drawn up in 2018 for Paris-Charles de Gaulle and Paris-Le Bourget airports and in 2021 for Paris-Orly Airport, in order to identify areas posing a flood risk and to propose solutions to remedy this.

Our approach to progress in water management

- CanaMarne project: as part of the plan to improve rainwater management at Paris-Charles de Gaulle Airport, drawn up in 2013 with the Seine-et-Marne Prefecture, Groupe ADP has approved the extension of the Paris-Charles de Gaulle rainwater discharge pipe to the Marne river for the end of 2024. This project consists of discharging rainwater from the Renardières basin directly into the Marne in order to allow for the treatment of a greater quantity of rainwater.
- Mapping of the 'point zero' condition of sealed/unsealed surfaces was carried out for all the Paris airports in 2021. These mappings serve to define and formalise the reference level in relation to the company's ambition of net zero soil sealing at its Paris airports.

2.2.9. Materials and Waste

The activities of the Group and its stakeholders can generate pressure on raw materials and resources (e.g. for construction, procurement and retail distribution activities). They can also lead to pollution if these materials are not properly managed at the end of their life cycle.

► Raw material consumption and pressure on resources

Construction and equipment purchases related to the Group's activities require the consumption of raw materials, natural resources and various other materials.

Through procurement procedures, the integration of an end-of-life concept for equipment has been introduced in high-stake contracts. In addition, work is being carried out at the design stage to optimise the recycling of materials. Finally, Aéroports de Paris set an objective to recover 70% of its construction waste in its 2020 environmental policy, which was extended to 2021, in line with national objectives. This objective is included in all contracts with subcontractors for projects in France.

In 2020, the Group was the winner of the [DEMOCLES "50 exemplary project owners"](#) call for projects and thus benefits from comprehensive support to improve its construction waste management process.

In 2021, the Group signed a framework contract with a project ownership assistance provider for the management of construction site waste to support its construction and demolition projects.

All of these commitments enable the Group to take into account the hierarchy of treatment methods for construction waste, to improve and monitor its recovery rate, and to ensure the traceability of its waste.

With regard to the pressure on resources linked to retail activities, the integration of environmental requirements into our leases and contractual relationships is being rolled out.

Example:

As part of the renovation works on runway 3 at Paris-Charles de Gaulle, the recycling of 30% of the aggregates helped to reduce our greenhouse gas emissions by 11%.

Our approach to progress in waste management and the circular economy

The support provided through [DEMOCLES "50 exemplary project owners"](#) in 2021 has resulted in the development of an action plan for the next three years. It will enable Groupe ADP to improve and develop its practices in terms of preventing and managing construction waste and promoting a circular economy for significant deconstruction and renovation operations. It will do this through four strategies:

- ◆ Further develop the Group's global policy on the circular economy, in particular by defining recovery rates according to the type of construction site
- ◆ Disseminate knowledge to employees and embed the circular economy culture into practices through relevant training and awareness raising with all stakeholders and by appointing resource officers to coordinate these efforts at the sites
- ◆ Incorporate the circular economy into contract documents for both external contractors and construction companies
- ◆ Become exemplary in terms of traceability in order to carry out end-of-project site inspections and provide feedback.

Among the key actions planned for 2022, the creation of the process will make it possible to collect and trace waste from small construction sites. Initially, this work will be carried out at Paris-Orly Airport. Once the process has been established, it could be extended to other sites and/or entities of the Group.

Another action planned for 2022 is Groupe ADP's participation in the project to create the Multi-Stakeholder Traceability Entity in construction waste (EMAT). The EMAT project aims to unite all building sector stakeholders around a shared objective: to transform the administrative chain of traceability into a chain of trust that creates value, and offer tools and indicators to help decision-makers manage their environmental performance through an integrated and collaborative vision of the circular economy.

► Waste production: pressure on resources and pollution

A significant proportion of the waste (excluding construction waste) generated at airports comes from the Group's stakeholders (passengers, airlines, tenants, etc.). Airport activities generate a wide variety of waste flows (construction site waste, recyclable and non-recyclable ordinary industrial waste, organic waste from passenger and employee catering, waste similar to household waste from terminals and offices, medical waste, green waste, hazardous waste, etc.), some of which are subject to specific regulations (particularly food waste from aircraft).

Groupe ADP implements waste management services at the sites it operates. These services are tailored to the needs of the various stakeholders and the associated waste flows. It is committed, particularly through its environmental policy objectives and management systems, to applying the hierarchy of waste treatment methods in order to minimise the impact of waste on the environment and reduce pressure on resources.

To this end, collection and treatment services are generally subcontracted to service providers who are required, through competitive procedures and

contracts, to deliver a certain level of performance in terms of sorting and recovery, depending on the regulatory context and the local waste management infrastructure. Thus, the recovery rate for non-hazardous waste produced at our French and international sites (by the Group's activities and stakeholders) and managed by our service providers was 36% in 2021 (compared to 25% in 2019), an increase driven by the reduction in international business and thus a reduction in waste volumes from passengers and terminals due to the pandemic.

Our approach to progress in local waste management and reduction

In addition, specific partnership projects are being developed to improve local waste management by integrating reduction schemes. This is notably the case in Paris, but also in Amman, with discussions being held on the treatment of cabin waste, for which regulations require incineration for health reasons, but also, in particular, on the areas of improvement in terms of at-source sorting with our stakeholders (shops and tenants, passengers) and reducing certain types of waste (single-use waste and plastic waste in particular).

2.3. Assessment and monitoring systems

Our environmental and energy policy is based on the systematic integration of ecological practices into all activities, in particular through the application of the international ISO 14001 standard at Groupe ADP airports.

In 2021, the Integrated Management System (IMS) certificates were renewed for Paris-Charles de Gaulle (audit results are pending for Paris-Orly). Abroad, TAV Airports is rolling out an ISO 9001 and ISO 14001-certified management system at its airports (including Izmir Adnan Menderes and Ankara Esenboğa). Ankara Airport also has an ISO 50001-certified management system. AIG's Queen Alia Airport in Amman is ISO 9001, ISO 14001 and ISO 45000-certified.

Since 2015, Aéroports de Paris has also been ISO 50001-certified for its Energy Management System (EMS) applied to its operation and development activities at the Paris airports. The EMS includes, amongst other things, the development of renewable energies (biomass, geothermal, photovoltaic) and energy efficiency. In 2021, this certification was renewed (renewal audit).

16 ISO 14001-certified airports

(environmental management system)

Paris-Charles de Gaulle,
Paris-Le Bourget, Issy-les-Moulineaux
heliport, Toussus-le-Noble aerodrome,
Delhi, Amman Queen Alia, Istanbul,
Ankara Esenboğa, Izmir Adnan
Menderes, Zagreb, Skopje, Ohrid,
Tbilisi, Batumi, Paris-Orly, Liège



3 ISO 50001- certified entities

(energy management system)

Aéroports de Paris SA
(Paris-Charles de Gaulle, Paris-Orly,
Paris-Le Bourget), Ankara, Delhi.

Groupe ADP is also involved in the ACA (Airport Carbon Accreditation) programme supported by the European Union and the United Nations. By 2021, 15 of our airports were ACA-accredited.

[ACA accreditation](#) is a carbon management certification programme established by ACI Europe that has been extended worldwide. It assesses and recognises efforts undertaken by airports to reduce their greenhouse gas emissions.

Roadmaps associated with each CO₂ emission item have been put in place or are being developed to monitor the decrease in CO₂ emissions from these different sources.



15 airports

involved in the Airport Carbon
Accreditation (ACA) programme
supported by the European Union
and the United Nations

Level 1 (mapping): Milas-Bodrum

Level 2 (reduction): Mauritius, Liège, Santiago de Chile

Level 3 (optimisation): Paris-Charles de Gaulle, Paris-Orly,
Paris-Le Bourget, Enfidha, Zagreb

Level 3+ (neutrality): Izmir, Ankara, Antalya, Amman and
Hyderabad

Level 4+ (transition): Delhi, 1st Groupe ADP airport to
achieve this level of certification



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THE MATURITY LEVEL AT THE END OF 2021 OF THESE ROADMAPS IS AS FOLLOWS:

ADP SA

		ADP SA
Scope 1	Direct emissions	Existing roadmap
Scope 2	Energy purchases	Existing roadmap
Scope 3 monitored in ACA	Commuting and business travel of airport operator employees	Existing roadmap
	Aircraft - LTO cycle (Landing & Take-Off)	Existing roadmap
	Aircraft APU (Auxiliary Power Unit)	Existing roadmap
	GSE (Ground Support Equipment)	Existing roadmap
	PAX access to airports	Existing roadmap
	Operational waste	Roadmap being developed
Scope 3 other items	Aircraft - cruising and departure	Existing roadmap
	Terminal retail (carbon content of products sold)	Roadmap being developed
	Purchase of goods and services	Roadmap being developed
	Low-carbon construction	Roadmap being developed
	Construction equipment	Roadmap being developed
	Upstream energy	Existing roadmap
	Logistics	Roadmap being developed
	Construction waste	Roadmap being developed
	Capital investments	No roadmap to date
International investment	Roadmap being developed	





HUMAN RIGHTS VIGILANCE

3.1. Human rights challenges and risk mapping

In its activities and with its employees and other stakeholders, Groupe ADP ensures that it complies with the Human Rights principles set out in the relevant international standards and frameworks, including:

- ◆ the Universal Declaration of Human Rights
- ◆ the UN and OECD Guidelines on Business Conduct and Human Rights
- ◆ the United Nations Sustainable Development Goals (SDGs) and Global Compact
- ◆ the Declaration on Fundamental Principles and Rights at Work and the fundamental conventions of the International Labour Organisation (ILO).

The Group's current mapping identifies a number of human rights risks in the non-financial risks (see Statement of Non-Financial Performance). In this context, the main human rights risks for Groupe ADP in 2021 were directly related to the health crisis and its consequences on air transport:

- ▶ **Health and safety:** risk of personnel being infected with COVID-19, while business continued (partial activity until June 2021), in a context of profound transformation, with a risk of demobilisation and psychosocial problems
- ▶ **Secure employment and working conditions:** resources and the social model had to be adapted, preserving maximum employment and economic balance. Business continuity was difficult to ensure, given the mobility linked to the new structures put in place. Employees had to adapt to this new environment
- ▶ **Diversity and inclusion:** the employment context affected the achievement of the diversity targets set out in the existing agreements.

In addition to human rights, risks likely to have a serious and lasting impact on ethics, information protection, cybersecurity, personal safety, and airport safety and security are also included in the risks identified as "unacceptable" and as such are subject to special monitoring at Group level, regardless of their rating level.

The assessment of risks linked to the duty of vigilance must be exclusively focused on third parties: employees, trade unions, customers, users, local communities, etc. It is exclusively on this level that the mapping of human rights risks will be carried out in 2022.

The Ethics Division works closely with the Legal Affairs & Insurance Division to establish the level of compliance of international subsidiaries. In line with the ISO 26000 standard, which covers the main themes of the law on the duty of vigilance, an initial inventory carried out in 2018-2019 made it possible to identify, for the AIG subsidiaries (Jordan) and the main TAV Airports entities (located in Türkiye, Tunisia, Macedonia, Georgia and Saudi Arabia), the local laws and regulations, the risks detected and the actions already taken in the following areas:

- ◆ **Fundamental principles and principles of labour law:** social dialogue, forced labour, child labour and discrimination
- ◆ **Working relations and conditions:** employer/employee relations, working conditions and social protection, occupational health and safety, human resources development and vocational training.

In order to strengthen, structure and coordinate the Human Rights part of the Duty of Vigilance for the entire Group, the Group Ethics and Personal Data Division was expanded with the appointment of a project manager in September 2021.

To support us in our approach, Groupe ADP also joined the EDH association (Entreprises pour les Droits de l'Homme - Businesses for Human Rights) at the end of 2021. This is the only specialised association of French companies, whose aim is to strengthen the integration of human rights into the policies and practices of companies, through the operational implementation of vigilance procedures. EDH supports its members in a dynamic of continuous progress, improvement of practices and facilitation of dialogue with their stakeholders: sharing of experiences and best practices, development of tools and training in particular, contribution to work carried out in France or abroad on how to integrate human rights into management tools.

Since September 2021, Groupe ADP has identified the human rights for which the Group's activities could represent a risk of violation and has defined them in accordance with the various French and international texts (United Nations and OECD Guidelines on Business Conduct and Human Rights, ILO Conventions, Vigilance Plans of major French international groups, ISO 26000 standard, etc.).

The rights identified can thus be classified into three categories:

i. Fundamental rights, essential for any international company

FUNDAMENTAL HUMAN RIGHTS	DEFINITION OF VIOLATION
Child labour	Use of a child under 15 years of age (unless specifically provided for by law) - or under 18 years of age to perform hazardous work. The use of child labour in violation of the conditions of employment, work, protection or compensation provided for in the country's regulations and international conventions on children's rights.
Forced labour	A person or group of persons, forced to perform a job, service or employment against their will (free and informed consent) and under threat of penalty (direct or indirect sanction or restraint of a physical, psychological or pecuniary nature, loss of rights or privileges) for the direct or indirect benefit of a Group entity.
Discrimination at work (non-union)	Distinction, exclusion or bias, based on illegitimate grounds (see criteria of discrimination which vary according to the country) and directly or indirectly impacting (in its consequences) any equality of opportunity or treatment in any of the stages of the employment relationship: recruitment, promotion, qualification, compensation, training, sanction, dismissal, etc.
Social dialogue (association, collective bargaining, trade union discrimination, right to strike)	Non-recognition of a lawfully established trade union organisation, or of the prerogatives of a designated/elected trade union body/representative in accordance with national legislation, regulations or collective employment agreements in force. Differential or adverse treatment based on lawful trade union activity or strike action.
Decent working hours	Non-compliance with the working hours and rest periods (daily/weekly breaks, paid annual leave and other rest entitlements) provided for and regulated by national regulations, the employment contract or the collective employment agreements in force.
Working conditions	Illegal employment of a worker, French or foreign, in disregard of the regulations in force.
Decent and safe working conditions	Employment in working conditions that do not guarantee a decent living and/or the protection of the physical and mental health and safety of workers.
Respect for privacy	Arbitrary interference with private life, family, home or private correspondence. Processing, disclosing, or making available personal data for purposes other than those specified.
Rights of local communities, indigenous peoples	Negative impact on local populations and residents' rights in society that are affected by the company or its production.

ii. Rights specific to the airport activity and in particular to the public service mission of the Group

HUMAN RIGHTS SPECIFIC TO AIRPORT ACTIVITY	DEFINITION OF VIOLATION
Corporate favouritism	Distinction, exclusion or bias in a contract, security procedure or commercial advantage, based on illegitimate grounds (see criteria of discrimination which vary according to the country or public procurement rules) and directly or indirectly impacting (in its consequences) any equality of opportunity or treatment.
Airport safety and security	Non-compliance with safety and fire obligations at the time of construction and during the operation of an establishment open to the public (ERP - Etablissement Recevant du Public). Non-compliance related to airport security (combination of human and material measures and resources necessary to protect civil aviation against acts of unlawful interference).

iii. Differentiating societal rights (base for legal minimums but intended to mark a voluntary commitment by the Group)

DIFFERENTIATING SOCIETAL HUMAN RIGHTS	DEFINITION OF VIOLATION
Decent wage	Entitlement to the minimum wage (legal or contractual) and/or above the poverty line.
Social protection	Legal, policy and practical guarantees from the organisation to mitigate the effects of reduced or lost income in the event of occupational injury, illness, maternity, paternity, ageing, unemployment, disability or financial problems and to provide medical care and family benefits.
Diversity and Inclusion	Corporate/managerial culture and working environment, which although non-discriminatory, do not promote diversity (in any form: culture, origin, generation, physical/psychological ability, gender/expression/opinion, etc.), inclusion or equal opportunities at all levels.

The current stage consists of conducting around one hundred interviews with some of the Group's stakeholders, in France and abroad, in order to identify and assess the risks of violation of these rights:

- ▶ With managers of the different entities of the Group to structure the vision and identify the key commitments of the Group
- ▶ With a representative panel of employees from different hierarchical levels and professions, and staff representatives to clarify the perception of the existing situation, the risks and the expectations

The input from these interviews will also be used to:

- ▶ Establish an action plan to complement and improve the identified actions to mitigate risks and prevent serious harm, and monitor their effectiveness
- ▶ Identify and formalise the Group's key human rights commitments that will be used to support the process within the subsidiaries and with their respective suppliers.



3.2. Measures to mitigate risks and prevent serious harm

In addition to a proactive policy in which respect for human rights contributes to the smooth running of the company, Groupe ADP is developing its activities in accordance with the principles of the UN's Global Compact and Sustainable Development Goals.

The crisis in the air transport sector, due to the Covid-19 pandemic and the sharp drop in traffic, has considerably slowed down the activity of Groupe ADP, including that of Aéroports de Paris SA.

It characterised the year 2020 and continued into 2021, determining the actions and discussions carried out during this period for the years to come.

3.2.1. Non-discrimination at work and promotion of diversity and inclusion

30 years of commitment to disability

With its first collective agreement signed in 1991, Aéroports de Paris is one of the first three French companies to have taken a voluntary approach to equal opportunities in the workplace; a commitment that is being pursued through its 10th Agreement (2020-2022).

Aéroports de Paris' three-pronged disability policy includes:

- ▶ **1.** A global commitment in terms of recruitment including hiring priorities, personalised support and the principle that all positions, whatever their level of expertise or responsibility, must be accessible to people with disabilities. Thanks to these commitments, since 2014 Aéroports de Paris has exceeded the legal minimum threshold of 6% of positions filled by people with disabilities; since 2018, this rate has risen to 7%. In 2020, it was 7.02%, with the new legal calculation method, which no longer takes into account purchases from the sheltered workshop sector. The 2021 rate will be known in April 2022 in conjunction with the social welfare agencies. It will be impacted by redundancies.
- ▶ **2.** Concrete measures designed to get to know our disabled staff better (HR Disability Network, Quality of Life at Work survey, HandicADP community); preventing or correcting any discriminatory situation or career development (even indirect); improving their working and living conditions (adjustments to workstations, training, working hours, transport and parking, paid leave); or even encouraging them as much as possible to remain in employment or to retrain.
- ▶ **3.** A target of €800,000/year in purchases from companies in the sheltered workshop sector, exceeded in 2019, but since reduced, given the drastic drop in activity in 2020 and 2021. In this respect, Aéroports de Paris actively collaborates with GESAT (association and network of companies in the sheltered workshop sector), a major player in the sector, facilitating the relationship between Aéroports de Paris, its counterparts in the contracting sector and service providers.

In service of these commitments, but also of the specific needs identified thanks to a personalised diagnosis, each Aéroports de Paris division is called upon to take ownership of the issues of diversity and inclusion by drawing up its own action plan for the coming years and to widely share the progress made.



Aéroports de Paris is also a member of [#ManifesteInclusion](#) (2019) with 10 operational commitments to promote the inclusion of people with disabilities in economic life, including in particular the reception and employment of young people with disabilities (internships and work-study programmes), regular internal awareness-raising campaigns on disability, stereotypes and non-discrimination (particularly in recruitment), tools to promote digital inclusion, and commitments in terms of responsible procurement.

Almost 20 years of commitment to gender equality

Through its various collective agreements (from the 1st agreement signed in 2003 to the 6th agreement for 2020-2022), Aéroports de Paris has always gone beyond regulatory requirements when committing to equality in the workplace:

- ▶ Regular awareness-raising/training activities and participation in media events aimed at improving perceptions in terms of gender equality and more generally equality in the workplace
- ▶ Zero tolerance for sexist behaviour and sexual harassment
- ▶ Priority actions for professions with a low proportion of women, such as the participation of our female employees (as sponsors and liaisons for the association "Elles bougent") in communication and awareness-raising actions for secondary school girls and female students on technical and engineering courses
- ▶ The support of several committed organisations acting in favour of gender diversity and equal opportunities through the allocation of the apprenticeship tax and partnerships with schools and companies meeting strong CSR requirements
- ▶ Long-standing commitments to charitable organisations, particularly in the context of sporting challenges, such as the Odyssey race to finance the fight against breast cancer, open to all Group employees wishing to participate
- ▶ An annual equal pay diagnosis and an individual redress system to reduce pay gaps or correct career developments unfavourable to women. The basic pay gap between women and men has been steadily narrowing since 2015 (3.7%), and stood at 2% in 2018 and 2019 and 1.6% in 2021
- ▶ Measures to reduce the impact of parenthood on employees' professional careers:
 - ◆ Gender-neutral approach to absences for maternity, paternity, adoption and parental leave: guarantee of a minimum promotion and variable compensation for managers, calculated on the basis of the company average; full pay during maternity and paternity leave, whatever the duration
 - ◆ Benefits to facilitate parenthood: extra pay for parental leave and chosen part-time work; chosen part-time work up to the child's 6th birthday; flexible working hours; additional family pay; availability in a nursery; additional sick days ("sick child day"); service vouchers; travel and meeting time limits
- ▶ A notable progression in recent years concerns top management, which has increased the percentage of women on the Executive Committee from 8% in 2019 to 33% in 2021, and committing since 2020 to maintain or increase the percentage of women on all Executive Committee managerial committees to a minimum of 40%
- ▶ The Gender Equality Index³² published in March 2022 is 88/100; it has remained at this level since its creation in 2019 due to the current absence of women in the top 10 highest earning positions.

A member of the Diversity Charter since 2013 for Aéroports de Paris and 2014 for Hub One, the Group is pursuing a proactive approach to promoting diversity and going beyond the legal framework of the fight against discrimination:

- ▶ Raising awareness and training our managers and employees involved in HR processes
- ▶ Respecting and promoting the application of the principle of non-discrimination in all its forms and in all stages of HR management
- ▶ Striving to reflect the diversity of French society at different levels
- ▶ Communicating our commitment to all our employees
- ▶ Making the diversity policy a talking point with employee representatives
- ▶ Describing the implementation of our commitment in the annual report.

³² Obligation to calculate and publish this index annually since the law of 5 September 2018 on the freedom to choose one's professional future. The index to measure gender pay equality is assessed out of 100 points and consists of five indicators: pay gap (40 points); distribution of pay increases (20 points); distribution of promotions (15 points); number of women receiving a pay increase after returning from maternity or adoption leave (15 points); number of women in the top-10 pay grades (10 points). Companies with less than 75 points have three years to comply.

Diversity Framework Agreement 2017-2020: Through this agreement, Aéroports de Paris wished to formalise its commitment to diversity and equal treatment at all stages of employees' careers (and in all its processes), based on skills and experience, whatever the potential discrimination criteria defined by law. The renegotiation of this agreement, initially planned for 2020, was postponed to 2022, due to the renewal of the representative bodies, at the request of the trade unions, and then due to the pandemic.

Actions in favour of underprivileged districts: for many years, Groupe ADP has been implementing a social and solidarity economy policy in favour of the areas in which its airports are located, which include many underprivileged neighbourhoods under urban policy. The Grand Roissy-Le Bourget area alone has 24 of these neighbourhoods under urban policy, covering almost 34% of the area's population. Several municipalities around Orly Airport are also concerned. The actions we develop are carried out either directly by Groupe ADP through the Citizen Commitment Division and the ADP Foundation, or via partner organisations supported by the Group, such as GIP Emploi Roissy (Roissy public interest group for employment).

By signing the [PaQte](#) (Pacte avec les Quartiers pour toutes les entreprises - Pact with the Districts for all Businesses), Aéroports de Paris is continuing its action in favour of young people and underprivileged neighbourhoods:

- ◆ Awareness-raising: partnership with secondary schools located in priority districts to offer quality internships and initiatives to 14 and 15-year-olds to help them learn about the company and its various professions; social sponsorship with associations working in these districts
- ◆ Apprenticeship: commitment to recruit 20% of students on work-study programmes and 66% of trainees from priority districts as part of the 2020-2022 jobs and skills forecast management agreement; Raising awareness of non-discrimination among work-study programme teachers
- ◆ Diagnosis of our HR processes to prevent discrimination-related risks (training and tools to promote equal opportunities) and to encourage employment assistance for residents of priority districts.



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Hub One has also been engaged for several years in a voluntary process to promote equality and diversity in all sectors and levels of the company. In particular, the Hub One group has undertaken the following actions since 2017:

- ◆ launch of a diversity training programme for all management staff
- ◆ incorporation of the principle of neutrality in its bylaws
- ◆ support for the "Elles bougent" and "Nos Quartiers ont des Talents" (NQT) associations. Both promote equal opportunities and the professional integration of young people. "Elles bougent" also encourages employing more women in technical professions
- ◆ use of the sheltered workshop sector: "ESATs" (establishments and services for helping people with disabilities to find employment) and "Entreprises Adaptées" (structures that employ people with disabilities), etc.

TAV Airports committed to compliance with the Women's Empowerment Principles ([WEP](#)) in 2016. Since then, in order to promote diversity in the workplace, all HR processes have been assessed and certified in accordance with the equal opportunity model of the Women Entrepreneurs Association of Turkey ([KAGIDER](#)³³). The percentage of women is 26% (25% in 2020) and 28% for managers. The percentage of women in the holding company, which has more administrative staff, is 42% (36% in 2020).

The Board of Directors has had three female members since 2018, compared to one in 2017.

In addition, TAV Airports is one of the founding members of the Women in Technology Association ([Wtech](#)), launched on 31 January 2019, which aims to increase the number of women in the technology sector and enable them to discover their own potential and equal opportunities in the world of science and technology.

Airport International Group (AIG) was the 2021 winner of "Destination Gender Diversity" for private companies in Jordan. This competition supports businesses as part of a 5-year World Bank programme for women's economic participation in Jordan, Lebanon and Iraq. Companies were invited to submit their projects to improve gender diversity and inclusion in the workplace. As winner, AIG will benefit from consultancy services, an assessment of the gender diversity of its workforce, and assistance in the development of an action plan to facilitate achieving gender diversity objectives. This achievement demonstrates the commitment to promoting gender equality in the workplace and increasing the number of women in the company, particularly in management and technical positions. AIG will also take part in the UN Women programme.

3.2.2. Collective bargaining and social dialogue

Aéroports de Paris practices a very active social dialogue. Four agreements provide a framework for social dialogue and trade union rights: establishment of the Social and Economic Committee (CSE) and local representatives and Trade Union Rights and Social Dialogue (2019), configuration of the Group Committee and distribution of its representatives and operation of the Group Committee (2020).

Since 1 January 2020, the Social and Economic Committee (CSE) is the sole staff representation body at Aéroports de Paris. It is assisted by specialised committees, notably the Health, Safety and Working Conditions Committee (C2SCT) and five local committees dedicated to health, safety and the improvement of working conditions (C3SCT). Forty staff representatives make up the local representation.

The functioning of the CSE and its committees was adapted during the crisis, notably by means of meetings that were held partially in-person, combined with the use of audio and video-conferencing, allowing the company to continue to meet its obligations.

In the French subsidiaries, ADP Ingénierie and Hub One, the CSEs have been in place since 2019.

At Group level, social dialogue is structured around a committee that unites Aéroports de Paris SA and its subsidiaries that have staff representative bodies and their head offices in France. It is chaired by the Chairman and CEO and meets at least twice a year. Its scope and operating methods are governed by two collective agreements renegotiated in 2020.

³³ Programme launched to encourage the employment of women and prevent discrimination against them.

3.2.3. Health and safety

Special attention to our subcontractors on construction sites

A Zero Accidents Charter for construction sites was launched on 19 May 2021 and will be systematically integrated into the contracts between us and these subcontractors.

In addition, as part of the Corporate Social Responsibility approach, a detailed study is regularly carried out on the accident rates of service providers. The nature and causes of accidents are reviewed by the Executive Committee twice a month.

Occupational risk prevention is at the heart of Groupe ADP's concerns and values.

A proactive prevention policy

In addition to its regulatory obligations, the Group has a proactive policy on the prevention of occupational risks, which is reflected in the measures and actions to be implemented in the field in order to protect the health and safety of employees and partners, improve working conditions and promote well-being at work.

PRÉVENIR C'EST RÉUSSIR

The "Prévenir c'est réussir" [prevent to succeed] programme conducted within Aéroports de Paris emphasises the fact that success is only possible in a working environment that is safe and respectful to all employees, both male and female. The assessment of our risks and activities has led to the definition of a multi-year action plan based on four priority strategies:

Anticipating risks when travelling means preventing even minor accidents.



Risks related to pedestrian and vehicle movement

This is the main cause of workplace accidents. We will tackle this on the ground by identifying the areas at risk and taking the necessary steps to make them safe. Awareness-raising will be carried out among employees and partners and new ways of working will be tested to limit travel/movements.

Fighting against all abuse means establishing respect at work on a daily basis.



The risks of aggression and abuse to which staff in contact with the public are subjected

Our staff can find themselves in tense situations in the terminals and car parks. Our aim is to analyse the factors that trigger these situations and to develop discussion and support opportunities for employees who have encountered them.

Caring for the well-being of each individual means ensuring the well-being of all.



Psychosocial risks

This commitment, which is essential to the development of employees and the company, involves the removal of risks and the analysis of accidents in order to prevent situations of unease. Awareness-raising and training among managers as well as the inclusion of these issues in each project will be reinforced.

Choosing partners who are uncompromising about safety means reducing risks for everyone.



Prevention of subcontractor accident risks

Every day, our subcontractors' teams work at our airports and we ask the companies that employ them to meet the high standards we set ourselves. Prevention concerns the entire airport community, so support for better risk control is a shared objective.

As a player in the digitisation of companies, a supplier of digital solutions and aware of the new challenges linked to hyper-connection and the porosity of the boundaries between professional and private life, Hub One attaches particular importance to the well-being of its employees. For many years now, the Group has been carrying out several concrete actions to prevent psychosocial risks (PSRs) and improve quality of life at work: signing of a charter for the prevention of acts of harassment and violence at work; signing of an agreement on the right to disconnect and on Quality of Life at Work; perception survey on the use of digital tools; "Bulle détente" relaxation spaces for employees; awareness-raising on well-being at work and PSRs; bi-monthly social listening barometer; awareness-raising and training on PSRs and quality of life at work; 24/7 psychological support platform (individual, free, anonymous and confidential) since 2018.

Prevention of health risks related to the pandemic

All of the Group's airports adapted and continue to adapt their health measures so as to offer passengers a journey that respects the high level of health requirements, and thus help to rebuild confidence in air transport. The priority is and will continue to be to guarantee the health and safety of passengers and all airport staff under the best possible conditions.

As the air transport sector was one of the first activities concerned by the control of the pandemic risk, Groupe ADP was particularly proactive in strengthening health measures, even before adopting measures imposed by the government, to whom we put forward multiple proposals (e.g., thermal cameras, safe work challenge).

In the same vein, Paris-Charles de Gaulle is one of the first European airports to have implemented the

measures recommended by EASA (European Union Aviation Safety Agency) with the aim of achieving a new international health standard for safe air travel.

We have also made our passengers aware, through numerous information campaigns, of the rules to protect themselves and other travellers from Covid-19, including wearing masks throughout their journey through the terminals.

Our commitment to the countries we serve, as well as to our passengers and employees, is to ensure that our health measures are implemented throughout our terminals. The main health measures aimed at strengthening the safety and hygiene of our terminals during the health crisis, which may have changed depending on the regulations and countries concerned, include:

- ◆ Hand sanitiser dispensers
- ◆ Floor markings to respect safety distances
- ◆ Leaving every other seat vacant
- ◆ Cleaning and disinfecting our facilities several times a day
- ◆ Adapting procedures to minimise physical contact
- ◆ Temperature checks on arrivals at the start of the pandemic
- ◆ Covid-19 screening centres set up at CDG and ORY
- ◆ Vaccination centre set up at CDG.

In Paris in particular, in addition to the many measures already rolled out and the adaptations made to its processes throughout the airport journey, the Group signed a partnership with the Cerballiance network of laboratories to facilitate the screening tests required for departing passengers. It also installed thermal cameras for international arrivals and launched an innovation project called "Safe Travel Challenge", which goes beyond the standard health measures.

The airlines themselves have introduced departure checks, such as the verification of travel documents and sworn declarations certifying the absence of Covid-19 symptoms.

In India, which produces a significant portion of the world's vaccines, particularly in the Hyderabad region, airports and their specialised cargo operations have played a key role in the distribution of Covid-19 vaccines in India and internationally.

The Indian airports have also put in place all the necessary health measures to ensure the protection of passengers and employees. The teams have rolled out innovative tools designed, for example, to digitise passenger services while also ensuring physical distancing and offering PCR tests on arrival to support the resumption of traffic.

Our staff also benefited from the following additional measures:

- ▶ Successive adjustments to health protocols to protect employees, in conjunction with the Staff Representative Bodies
 - ▶ Organisation of lockdowns and lockdown easing, consideration of the impacts of health measures on jobs and on the reception of employees
 - ▶ Preparation for the reopening of buildings
 - ▶ Application of the compulsory vaccination measures for certain roles
 - ▶ Health risk assessment and updating of the Single Risk Assessment Document in all divisions
 - ▶ Distribution of health kits for on-site employees, defined according to the type of activity and then adjusted according to changes in regulations
 - ▶ Diffusion of an employee communication plan (posters, recommendations, media for managers, etc.)
 - ▶ Ongoing regulatory monitoring and sharing of practices with major companies
- ▶ Remote working framework:
 - ◆ The exceptional remote working scheme introduced in 2020 and reimplemented to respect successive lockdowns and measures, for all staff in a position compatible with this method of organisation, has made it possible to protect employees and ensure business continuity. Specific information was distributed to employees to make them aware of the best practices to be adopted, and to managers to assist them in a context of long-term remote working, with regard to organisation, communication, management and health matters.
 - ◆ The regular remote working scheme was revised at the end of 2020 by an amendment to the remote working agreement so as to take into account the lessons learned from the mass implementation of remote working during the pandemic.
 - ▶ In addition, the quality of prevention work in the field and the empowerment of employees have made it possible to limit the number of occupational accidents linked to the Covid-19 epidemic among staff in medical and first-aid roles.



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Protection of expatriates and employees on assignment abroad

- ▶ 60 expatriates and families
- ▶ 160 local and family contracts
- ▶ 2,000 assignments per year, of which 1,200 abroad
- ▶ More than 500 employees on assignment per year in at-risk or high-risk countries.

Each country is classified according to its level of risk (5 levels taking into account a varied range of risks: safety, security, health, natural, social, cyber, ethics and compliance, etc.). Each level has a specific validation procedure and a more or less strict framework for assignments and expatriations.

An Aéroports de Paris entity is dedicated to the protection of the Group's employees abroad:

- ◆ It is present throughout the process, from approval of an assignment, to monitoring its execution, and finishing with the post-assignment debriefing for the most sensitive destinations.
- ◆ It makes recommendations on safety, security, health, information protection, and ethics and compliance for employees in high-risk countries.
- ◆ It ensures that employees are trained and made aware of any issues before they leave.
- ◆ It may be required to deploy additional safety measures if necessary.
- ◆ It also ensures the continuous monitoring of the countries and ongoing communication (and specific follow-up for high-risk countries).
- ◆ It organises and controls the performance of safety audits in the countries of operation. And if necessary, it organises and manages the crisis system abroad.

Expatriates and assignment employees are regularly informed about the risks in their country, both in terms of health and the local situation and environment. After Covid-19 restrictions were lifted, for example, the return of employees to the field were organised, following periods of remote working. The Group's entities have implemented government measures specific to each country for their employees.

TAV also has procedures to ensure the safety of its employees abroad and develops them in coordination with Aéroports de Paris. Specific procedures have been put in place for travel during the Covid-19 period, in close liaison with occupational physicians.

3.2.4. Protection of private life and personal data

As part of the Group's activities, Groupe ADP may be required to process a certain amount of personal data related to employees, current and prospective customers, passengers, partners, service providers, etc.

The processing and storage of such data naturally calls for a number of measures to prevent any breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

Aéroports de Paris has appointed a Data Protection Officer (DPO) and Data Protection Correspondents (DPC) in each division. Within the entities subject to the GDPR, only necessary data is collected, processed and stored, in a secure manner and in accordance with processing procedures that comply with regulations³⁴.

A Group data protection policy has been defined and implemented and is monitored. It is based on the Group's Information Systems Security Policy and the general information protection policy. In 2021, a charter for the application of the data protection policy was created and made available to all employees.

Regulatory requirements are taken into account at the design stage (Privacy by Design) and by default throughout the life of projects (Privacy by Default).

The Group's employees are made aware of the protection of personal data, and internal regulations govern the application of these policies by the employees. Employees are subject to confidentiality rules (internal regulations, employment contract, etc.). An e-learning programme has been set up for all employees, and those in key data protection positions are urged to attend a face-to-face training session, which will explain the requirements of the GDPR that they must comply with and/or enforce in their daily activities.

Any service provider with access to sensitive information is also subject to confidentiality rules (contract clause, NDA, internal regulations where applicable, etc.).

Clause repositories propose standard clauses to be included in contracts and agreements (which can be further expanded if necessary with the assistance of the Legal Affairs & Insurance Division).

Stakeholders are informed about the processing of their data. A centralised procedure is implemented by Aéroports de Paris to respond to requests to exercise data rights.

³⁴ EU General Data Protection Regulation 2016/679 (GDPR), 2016/680 "Police-Justice" Directive, French Data Protection Act and its implementing decree amended to comply with the "EU's data protection package".

A GDPR compliance management platform (ARIEL) has been rolled out. It notably includes the processing register. Group methods are put in place (e.g. data protection impact analysis methodology, IS project management methodology that takes into account the protection of personal data).

A data breach management procedure also exists and is implemented. An on-call and crisis management system allows us to react in the event of a data breach.

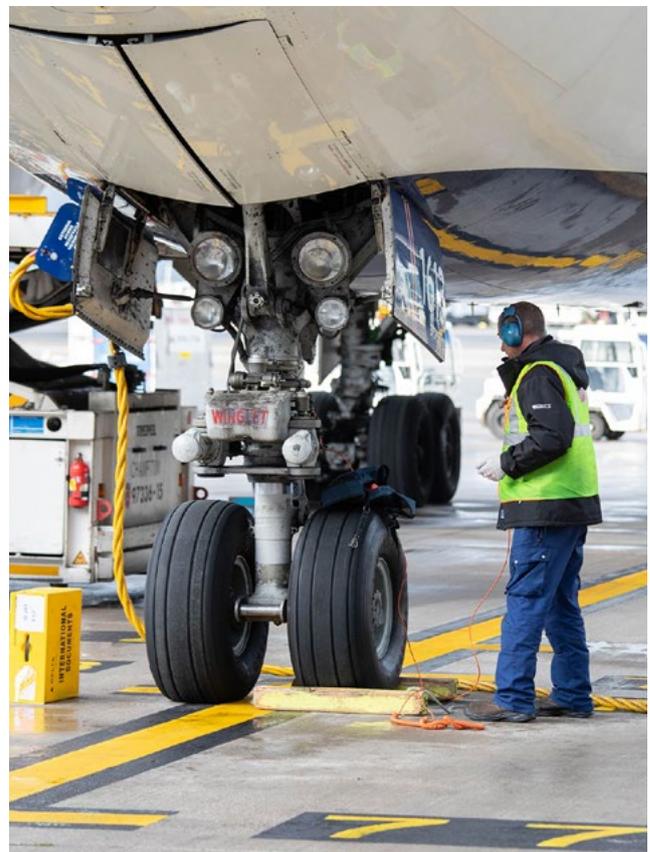
At Group level, the Group Data Protection Policy sets out Groupe ADP's commitments to protect the personal data of its stakeholders and ensure compliance with the relevant regulations. It establishes the organisation put in place for this purpose (1 DPO must be appointed in each company concerned). It specifies the principles and rules for ensuring the adequate protection of the personal data used in Group activities.

3.2.5. Impact on employment and preservation

Preserving jobs and skills as much as possible remains a key issue, even if the company has had to implement measures to reduce activity and control costs, particularly the payroll, to deal with the crisis in the air transport sector since the pandemic. According to traffic forecasts, a return to activity equivalent to that of 2019 will not be possible before 2024-2026.

Despite a partial recovery in 2021, the collapse in traffic since the beginning of 2020 and the difficulty in predicting its recovery, in terms of both time and extent, have required Aéroports de Paris to implement the following measures:

- ◆ Reduce activity to partial operation in 2020 and until 30 June 2021, to adapt its structure and organisation to a rate of activity reduced by more than 50%
- ◆ Outsource certain functions (such as light maintenance of terminals)
- ◆ Postpone some of the capacity investments of some airports
- ◆ Negotiate a collective contractual termination agreement, signed unanimously by the representative trade unions, in order to allow and support the voluntary departure of 1,150 employees. The planned measures concern the ends of careers and retirement on the one hand, and external transfers on the other. 700 will not be replaced; 450 recruitments will be made
- ◆ Apply adjustment measures to certain elements of compensation, which may lead to a maximum wage reduction of 5%. Employees who refused this amendment to their employment contract, and contingent on internal redeployment procedures, were made redundant for economic reasons, notified from 15 January 2022. Support measures were put in place. 162 employees left the company in this context at the beginning of 2022
- ◆ Continue to adjust its resources to its level of activity
- ◆ Implement an industrial project for the long term, adapting the major missions and the organisation: this implied a transformation of the company with significant consequences on employment, while seeking to preserve it as much as possible.



In this difficult context, in 2020 and 2021, the company introduced numerous communication tools to support managers and employees. This included, in particular, regular information on the company's situation to provide an outlook, encourage discussions and prevent psychosocial risks.

The local HR network was trained and mobilised to respond to employees, particularly with regard to salary. Managers, the social service and occupational doctors are still in high demand. To complement this, an external support and counselling hotline has been set up, as well as a solidarity fund.

Furthermore, to enable employees affected by the reduced activity to maintain their employability and receive training, the company used the state-financed National Employment and Training Fund to offer them a specific training programme.

For the other companies in the Group, the objective of maintaining employment also underpinned the policies and decisions implemented, against a backdrop of government measures to promote employment and measures taken by companies for their employees regarding the crisis. However, in 2021, due to the continuing crisis, staff reductions had to be made.

In 2021, as in 2020, Hub One did not resort to partial operation. An amendment to the remote working agreement was concluded in 2021, increasing remote working to 2 days per week and extending it to non-managerial staff. In 2021, Sysdream, a subsidiary of Hub One, did not resort to partial operation, unlike in 2020.

For TAV Airports in Türkiye, the range of existing tools was used in 2020: remote working (continued in 2021); partial activity for all employees, at different rates, according to local rules, which also laid down the partial unemployment allowances; furlough and salary reductions.

In the other countries where TAV Airports Group operates, measures were taken according to the traffic and health situation, in accordance with national provisions, which included remote working, part-time working, compulsory holidays, days without pay, and salary reductions.

For AIG in Jordan, redundancies were prohibited by the state. The rate of activity and remote working varied according to the period, in compliance with local health and safety regulations. Training was also conducted online. No changes were made to salary. Since 30 May 2021, all employees have returned to working on-site.

ADP Ingénierie's situation was marked by existing difficulties, exacerbated by the health crisis. On 21 January 2021, after studying restructuring options for ADP Ingénierie, Groupe ADP's management presented the subsidiary's Social and Economic Committee with a project for the amicable closure of the company as part of the restructuring of the Group's engineering activities, along with an employment protection plan. These proposals were subject to an information and consultation process with ADP Ingénierie's employee representative bodies, in strict compliance with the regulatory framework.

Specific measures were implemented to accompany and support those in charge of the project, to reassure employees about the attention paid to individuals, to offer confidential assistance, to help and meet with employees in difficulty, and to refer employees to third parties (social workers, occupational physicians, specialist physicians). Regular feedback on the process and the support provided has been established, in compliance with the Code of Ethics for psychologists, to inform or alert.

The employment protection plan was implemented in May 2021. By March 2022, employees made redundant for economic reasons had benefited from redeployment assistance and other forms of support (training, transfer and redeployment assistance, business creation or takeover assistance, redeployment leave, etc.).

BE A PIONEER IN THE TRANSFORMATION OF BUSINESS LINES AND ACCESS TO EMPLOYMENT FOR LOCAL POPULATIONS

OUR PROMISE

A concerted transformation of the management of jobs and skills in the air transport and airport business lines in the regions in which we operate



OUR APPROACH

Make the needs of companies known and help connect local candidates with the airport employer community

Anticipate how the industry and associated skills will change in order to define relevant guidelines in conjunction with training stakeholders

Get involved in job fairs to communicate our offerings directly to local residents

Build a sourcing and profiling tool for the airport community and local residents to pool job listings and optimise applications

3.2.6. Relations with local communities

The "Airports for Trust" Charter, a collective commitment for building a sustainable and responsible future, was signed at the end of 2020 by 23 of the 28 airports in our network. Through this charter, the signatories recognise the need to assess the environmental and socio-economic footprint of airports in order to measure their progress in a transparent manner with a shared assessment methodology.

The ambitions it contains for thriving with local communities are as follows:

- ◆ Actively contribute to improving the living conditions of local populations and reducing noise exposure
- ◆ Building a long-term relationship of trust with the territories and local stakeholders
- ◆ Reinforcing the benefits of airport activity for the local communities (in particular, promoting economic development and local employment)
- ◆ Uniting the airport community and acting together to maximise the positive impact of airport activity.

3.2.7. Citizen commitment of Group employees

BE A PIONEER IN THE DISSEMINATION OF A NEW CULTURE OF CITIZEN COMMITMENT AT THE SERVICE OF THE TERRITORIES

OUR PROMISE

Develop a culture of employee commitment



OUR APPROACH

Strengthen employee commitment schemes to help them fulfil their desire to work for the common good and have a positive impact on the communities in which they operate



Develop skills sponsorship and other solidarity actions



Support managers to encourage employee involvement



OUR
QUANTIFIED
OBJECTIVES

INCREASE THE NUMBER OF EMPLOYEE CITIZEN COMMITMENT DAYS **BY FIVE**, bringing it to **5,000 over the 2022-2025 period**

ADP SA

The actions of the Citizen Commitment Division

Thanks to the new online commitment platform, "jemengage.groupeadp.fr", developed in 2021 in close collaboration with Vendredi, a recognised player in the volunteering and skills sharing sector, Group employees wishing to get involved with non-profit organisations are offered tailor-made commitments. It proposes a wide range of assignments and actions with numerous partner associations. It's quick and easy, and in just a few clicks employees can access a wide range of commitment options, adapted to their availability, close to their home or work if they wish, and which can be carried out during part of their working hours or in their free time, on a one-off or long-term assignment, remotely or face-to-face (in compliance with health regulations), alone or with others.

Groupe ADP Foundation actions

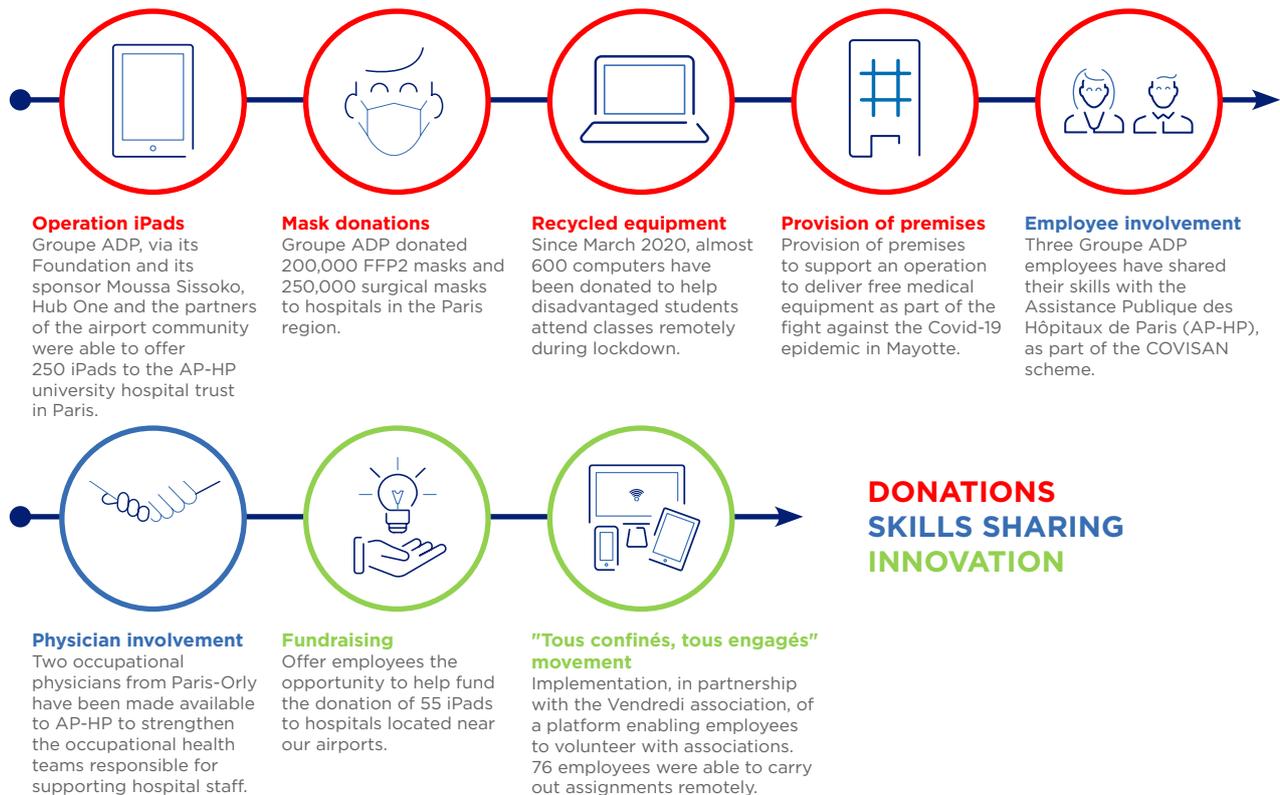
The Groupe ADP Foundation was created in 2015 to support and assist educational projects by joining the fight against illiteracy and reducing school dropout rates. Whether in France, near its Paris airports (Paris-Charles de Gaulle, Paris-Orly, Paris-Le Bourget) or abroad, wherever Groupe ADP is present, it acts on all fronts, from early childhood to adulthood.

In order to carry out its mission, the Foundation relies on community-focused action co-developed with local associations, through long-term partnerships.

It also counts on the mobilisation of Groupe ADP employees who, through various programmes, can use their skills to help the associations supported.

Special mobilisation was put in place during the health crisis:

CITIZEN COMMITMENT DURING THE HEALTH CRISIS



3.3. Assessment and monitoring systems

Health and safety

In addition to complying with legal obligations in terms of safety (Single Risk Assessment Document, prevention plans, monitoring in conjunction with staff representative bodies, etc.), the year 2020 was heavily characterised by the pandemic context.

In accordance with the health and safety principles adopted for Aéroports de Paris, Covid-19 correspondents has been designated to:

- ◆ Ensure compliance with the general health principles and their local application (physical distancing markers and movement instructions, limits in the number of people allowed in enclosed spaces, monitoring of cleaning, posters, monitoring of available equipment - hand sanitiser, soap, waste bins, etc., and the wearing of masks)
- ◆ Provide support and assistance to company employees in relation to the Covid-19 pandemic
- ◆ Participate in the assessment of professional risks for the updating of the Single Risk Assessment Document and the associated action plan to prevent the specific risk of Covid-19
- ◆ Liaise with all internal and external stakeholders.

In response to the Covid-19 pandemic and to help the recovery of air traffic, the Airports Council International (ACI) - the leading association of most of the world's airports - set up the Airport Health Accreditation (AHA) programme in 2020 to assess the alignment of airports' health measures with the international recommendations defined by the International Civil Aviation Organisation (ICAO), EASA and ACI. This programme is based on an audit of the health measures deployed in all processes and areas of the airport. At the date of publication of the last universal registration document, 22 airports in Groupe ADP's network³⁵ had obtained the Airport Health Accreditation.

³⁵ Paris-Charles de Gaulle and Paris-Orly in France, Amman in Jordan, Antananarivo in Madagascar, Ankara, Gazipasa and Izmir in Türkiye, Conakry in Guinea, Medina in Saudi Arabia, Port Louis in Mauritius, Enfidha and Monastir in Tunisia, Delhi and Hyderabad in India, Santiago in Chile, Skopje in North Macedonia and Zagreb in Croatia.

Social dialogue and social commitments through collective agreements

All Aéroports de Paris agreements are regularly monitored within the Monitoring and Interpretation Commissions organised by management and the signatory trade union organisations, and regular reviews are carried out for the Social and Economic Committee on the subjects laid down by French regulations, such as health and safety, employment, and diversity.

Discrimination, Diversity and Inclusion

The percentage of female employees on Aéroports de Paris' management bodies is closely monitored by the Board of Directors. In its deliberations of 18 December 2020, it set three-year objectives: 33% women for the Executive Committee and 40% for each Management Committee reporting to an Executive Committee member. The proportion of women on the Executive Committee has quadrupled in two years, from 8% in 2019 to 33% at the end of 2021. With regard to the Management Committees, six out of 14 exceeded 40% and five reached at least 30%.

An appeal mechanism also allows each employee who feels that he or she has been the victim of unequal treatment in terms of pay, promotion or, more generally, career development, to request an analysis of his or her situation and to benefit from a readjustment in the event of a justified appeal.

The particular attention paid to the gender pay gap has seen the gap decrease since 2015 (3.7%). It fell from 3.4% in 2016 to 3% in 2017, 2% in 2018 and 2019, and was 1.6% in 2021.

Protection of personal data

The control exercised within Aéroports de Paris is organised according to three levels: business line, data protection team and the Audit Division. An audit was carried out in 2019.

The GDPR compliance management platform and data protection impact analyses make it possible to follow the action plans by processing action or by division.

The data protection team carries out self-assessments as part of the internal control.

Aéroports de Paris monitors the compliance of the Group's entities, in particular through Group committees, organised with Hub One (held two to three times a year) for the time being, but which will evolve with the sharing of best practices in this area within the Group.





SUPPLIER AND SUBCONTRACTOR VIGILANCE

4.1. Supplier and subcontractor challenges and risk mapping

4.1.1. A procurement structure that places CSR at the heart its entire value chain performance

Groupe ADP has decided to make corporate social responsibility (CSR) a strategic focus for developing its activities both in France and abroad.

As such, the Group has decided to incorporate the principles of the United Nations Global Compact (of which its parent company has been a signatory since 2003) into its strategy and to promote these principles within its sphere of influence. It also acts on a daily basis to contribute to 11 of the 17 Sustainable Development Goals of the UN 2030 agenda (see Group presentation).

Aéroports de Paris ensures that its procurement practices, its processes and the relationships it has with its suppliers are all underpinned by its CSR policy. In 2014 and then again in 2018 and 2021, it received the "Label Relations Fournisseurs et Achats Responsables" [Sustainable Procurement and Supplier Relations Label], a certification jointly awarded by Médiation Interentreprises (a government body overseen by France's Finance Ministry) and the Conseil National des Achats (French Procurement Council). This label is awarded to French companies in recognition of their ability to maintain sustainable and balanced relationships with their suppliers. As with its responsible purchasing policy, Groupe ADP intends to consolidate its approach and gradually extend it to all of the Group's companies.

Groupe ADP's Responsible Purchasing Policy, formalised since 2015 for Aéroports de Paris and the Group's French subsidiaries, is currently being rolled out more widely, in consultation with the subsidiaries based abroad, notably through the sharing of best practices and the integration of commitments shared with the Group's suppliers. In particular, it sets out the following principles:

- ▶ All our procurement operations must be based on the principles of fairness, competitiveness, equal treatment and transparency, and must ensure that all suppliers, including small businesses, can compete.
- ▶ Our suppliers are encouraged to share Groupe ADP's values of respect for people, safety and the environment as defined in the Group's Supplier CSR Charter. In 2020, AIG started to roll out this Charter to its suppliers also.
- ▶ We are committed to supporting our suppliers in a process of progress and continuous improvement in terms of Corporate Social Responsibility in order to strengthen our position as a responsible customer and co-construct products and services in line with Groupe ADP's quality and sustainability requirements.
- ▶ Our ambition to achieve the highest level of CSR performance is reflected in concrete actions (promotion of ethical practices, process safety, reduction of health and social risks, limitation of the environmental impact of products and services throughout their life cycle, even closer collaboration with the region's SMEs, promotion of solidarity-based procurement and social and solidarity-based economies).

► We ensure transparency, regulatory compliance and ethical trading:

- ◆ Training of all employees in the ethical principles and values of Groupe ADP
- ◆ Implementation of best practices within the procurement teams and training in public procurement rules (where applicable)
- ◆ Supplier assessment in accordance with the requirements of anti-bribery laws and due diligence
- ◆ Protection of personal data collected in the context of our activities in accordance with the regulations in force (including the General Data Protection Regulation in Europe).

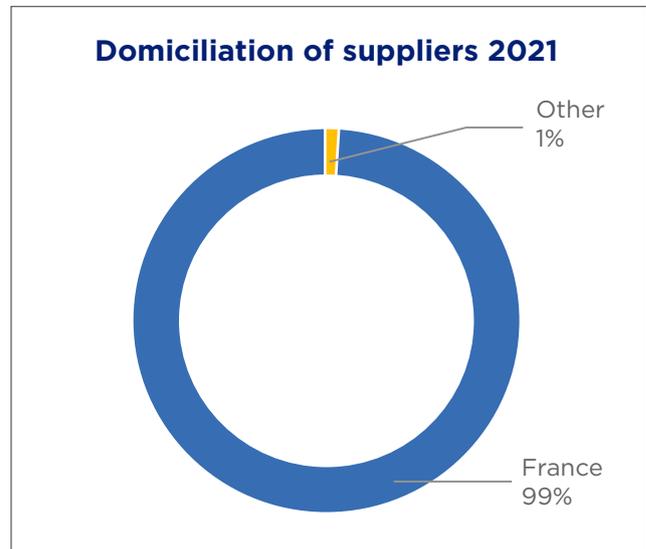
4.1.2. Risk mapping

Aéroports de Paris’ purchases carry social and environmental risks that are identified and differentiated according to their position in the supply chain and our capacity to influence them. Mapping allows us to measure the level of exposure and then to ensure that the risks are dealt with by our systems, that the results are in line with expectations and that action plans in the event of deviations are effectively implemented.

Aéroports de Paris’ capacity to influence as a customer is assessed according to the type of order (catalogue or "made to measure"), the supplier (wholesaler, producer) and the amount. It is interpreted as the freedom to more or less define its requirements towards the supplier and to exercise an expected level of control over the value chain.

The "country risk" is limited due to the fact that the majority of Aéroports de Paris’ suppliers are based in France and not in countries considered to have a high CSR risk. For example, our corruption risk assessment system, based on the recommendations of the French Anti-Corruption Agency, have enabled us to identify potential suppliers on alert (0.2%) and to take measures to protect ourselves from the negative impact of entering into a contract with them.

The mapping carried out has enabled us to identify potential risks that could be generated by our suppliers’ activities. The level of exposure is measured for each procurement segment according to two criteria: severity and probability of occurrence,



covering the four themes of the duty of vigilance: environmental risks, health and safety, human rights and fundamental freedoms.

Our main potential risks are:

- upstream of the value chain for airport equipment and energy
- in the execution phase for services and works
- and at the end of the chain for waste treatment.

None of the services purchased generate "extreme" risks such as explosives or ore extraction.

Potential human rights violations in labour-intensive contracts are moderate, given French social regulations (99% of Aéroports de Paris’ suppliers are based in France) and in light of the prevention and remediation measures we are implementing.

		General purchases	Energy	Airport facilities	IT & Telecoms	Building: Structural work	Operational services
	Capacity to influence						
	Value chain	upstream				on-site	
	Country exposure	✓		✓	✓		
Occupational health & safety	Marked physical constraints: repetitive work, manual handling of loads, awkward postures, mechanical vibrations	▲	▲	▲	▲	●	●
	Harsh physical environment: hazardous chemicals, extreme conditions/temperatures, noise	▲	▲	▲	▲	●	●
	Work patterns: staggered working hours, shift work, night work	▲	▲	▲	▲	●	●
Human rights and fundamental freedoms	Undeclared labour	▲	▲	▲	▲	●	●
	Discrimination	▲	▲	▲	▲	●	●
Environment	Climate risk	▲	◆	◆	◆	●	●
	Biodiversity: deforestation and artificialisation	●	●	●	◆	●	●
	Air, water or soil pollution	●	◆	◆	◆	●	●
	Waste generation	●	◆	▲	◆	●	●
	Depletion of natural resources (wood, water, etc.) and artificial resources (paper, cardboard, etc.)	●	◆	▲	◆	●	●

Effects:

◆	Very strong / extreme
●	Strong
▲	Moderate
●	Limited

4.2. Measures to mitigate risks and prevent serious harm

4.2.1. Commitments required from our partners

Since 2014, the Supplier and Partner CSR Charter is systematically signed by Aéroports de Paris' suppliers or partners for all new contracts and is part of the main contractual documents between them and the company. The same applies to Hub One with its Sustainable Procurement Charter and to AIG, which has been using the Supplier and Partner CSR Charter since 2020.

By adhering to this charter, the Group's service providers undertake to respect all the elements of this code of conduct, notably including compliance with national legislation, the main principles of the United Nations Global Compact and the ethical principles integrated into the Group's strategy. They also undertake to ensure that their respective subcontractors comply with these commitments.

Through this commitment, providers are also encouraged and sometimes even assisted, as part of a continuous approach to improvement, in the application of best practices in terms of respect for

human rights, respect for social practices in terms of labour relations and working conditions, the fight against corruption in their own business, and the protection of the environment.

In 2018, the charter was revised to incorporate the increased requirements set by Law No. 2016-1691 of 9 December 2016 (Sapin II Law) and the law on the duty of vigilance for the prevention of CSR, social, environmental and energy-related risks. The right to audits and monitoring plans has also been strengthened in this new version of the charter.

4.2.2. The normative framework of our procedures: public procurement within Aéroports de Paris

The fact that Aéroports de Paris belongs to the public sphere and the application of the rules of public procurement in its processes creates a context of reinforced security in our relationships with suppliers. The selection process and related procedures ensure transparency and rigorous competition, as well as compliance with applicable social and environmental legislation.

In fact, the holders of contracts are selected at the end of a well-defined and formalised process, imposing the prohibition or the exclusion of irregular offers that do not comply with these laws.

By way of illustration, persons who have been sanctioned for disregarding the obligations laid down in the labour code are prohibited from submitting bids. This includes, for example, undeclared work, bargaining, illegal supply of workers, employment of foreigners without a work permit, discrimination, disregarding provisions on professional gender equality, etc.

Also excluded from the procurement procedure are persons who have not made the necessary tax or social security declarations or who have not paid the taxes, contributions or social security contributions due.

Lastly, abnormally low bids are rejected when they are found to contravene applicable obligations in the fields of environmental, social and labour law, established by French law, European Union law, or collective agreement(s).

According to the rules of public procurement, the selection of the contract holder is made on the basis of the most economically advantageous offer, which is not only assessed on the basis of financial criteria but also social, societal and environmental parameters, such as accessibility, learning opportunities, diversity, production and marketing conditions, environmental performance, etc. It is therefore not the lowest bidder but the best bidder that is selected.

The performance of activities carried out by external entities at our airports and the access of persons are governed by the French Transport Code and are subject to administrative authorisations issued following investigation by the prefectural administration. As a result, this gives the businesses on our sites and their employees a legal and operational legitimacy that guarantees their compliance with the major principles of safety and security.



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4.2.3. Partner selection criteria

Aéroports de Paris' CSR commitments in the procurement process are the subject of:

- ◆ A grid for identifying the relevant CSR criteria and sub-criteria, based on an analysis of the risks represented by the purpose and scope of each contract
- ◆ A weighting of the candidates' bids generally representing between 5% (few risks identified) and 10% (some risks identified) of the overall score, or more in the case of multiple significant risks, or risks that need to be assessed at a higher level (taking into account the expectations on the other components of the score, price for example). Since 2016, Hub One has also included a 5% weighting for CSR criteria in its calls for bids
- ◆ Specific documents and contractual clauses adapted to the consideration of these criteria and sub-criteria (e.g. for the specific criterion based on energy performance, for the purchasing segments identified as "energy-intensive", a technical guide has been drawn up to target the purchasing families with the highest risk in terms of their impact on energy consumption and to raise awareness among procurement advisors and buyers)
- ◆ Accordingly, companies submitting bids must include briefs containing their commitments on their social, environmental and societal practices in the context of each consultation. These commitments now also include the carbon footprint.

Their briefs are analysed by business experts from the General Resources, Supply Chain and Procurement Division who attend the negotiations and, during the hearings, challenge the bidders on their responses and practices.

4.2.4. The predominantly local footprint of Aéroports de Paris' purchases

In line with the Group's purpose and manifesto, we approach procurement as a lever for creating value for all our stakeholders.

The purchases made by Aéroports de Paris enable us to operate our airports and provide our customers with the services necessary to carry out their operational activities. These services are therefore mainly carried out on our sites and are governed by contracts with suppliers who are mainly based in France and therefore subject to French regulations.

Influence is therefore mainly exercised in a direct manner and in a context that does not expose us to excessive and uncontrollable risks in terms of human rights or fundamental freedoms.

4.2.5. Procurement segmentation based on risk analysis

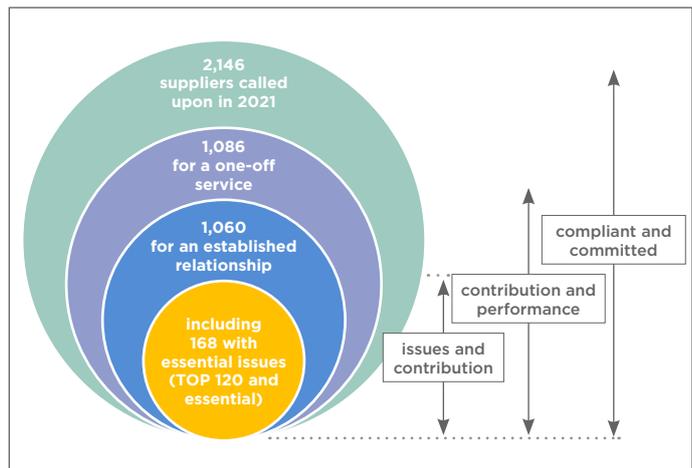
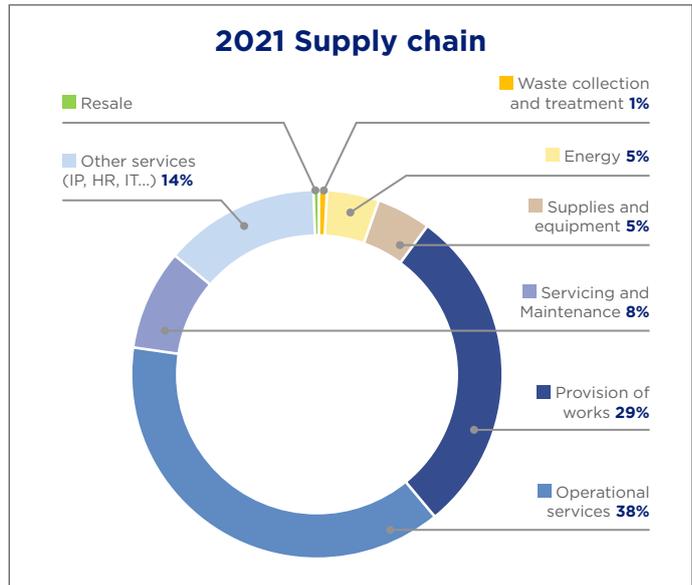
The diversity of Aéroports de Paris' purchases has justified the implementation, in parallel with an exhaustive risk analysis, of a strategy for securing and prioritising partners and suppliers.

A segmentation of our suppliers/partners allows us to differentiate the mitigation actions to be carried out according to the impact of their activity and the issues they represent.

Moreover, the procurement strategy specifications include a "plan B" in the event of a failure of the suppliers concerned by this advanced risk analysis, which enables the integration of contractual provisions designed to stabilise and maintain the continuity of services for Aéroports de Paris.

In addition, the General Resources, Supply Chain and Procurement Division uses two external platforms to assess the administrative compliance of the company's suppliers and partners:

- ◆ Altares, to assess the financial health of suppliers - Buyers use this tool to assess financial risk during the tender process, to define financial risks for suppliers
- ◆ Provigis, to collect all the compulsory legal documents that must be submitted by suppliers under contract with Aéroports de Paris and Hub One. The platform checks a list of specific documents that our suppliers must provide to us twice a year (Urssaf certificate proving that the supplier pays all social security contributions), list of foreign employees excluding Tier 1, K-bis (the official document proving the company's legal existence), ICPE submission (data collection relating to compliance with environmental regulations), etc.



The fight against illegal labour is therefore carried out both upstream and downstream of the relationship with our suppliers: pursuant to labour regulations, we require the production of legal documents (social security and tax certificates and a list of the names of foreign workers) for all candidates for our calls for tenders, and we ensure, via Provigis, that these documents are regularly collected, checked and updated during the performance of the contract.

We pay particular attention to suppliers delivering critical products or equipment, particularly for our non-replaceable suppliers, in order to detect any weaknesses that could impact our business.

4.3. Assessment and monitoring systems

4.3.1. Entities dedicated to responsible procurement, internal control and compliance

For some years now, the General Resources, Supply Chain and Procurement Division of Aéroports de Paris has had two expert units in place, respectively responsible for:

- ◆ CSR and Responsible Procurement, and
- ◆ Internal control and risk mapping.

Through these entities, the various steps taken in the field of responsible procurement can be monitored, taking a qualitative approach that can be audited and certified (ISO 9001:2015 and ISO 20400:2017 more specifically). They also contribute to the proper execution of the commitments of the division's internal customers, being associated with the action plans of the airports and the functional divisions of Aéroports de Paris (ISO 14001, ISO 26001, ISO 50001, etc.).

4.3.2. Audits followed up by a corrective action plan for the partner's actions to ensure continuous improvement

A verification process (external audits) has been in place since 2014 on social aspects and will be extended to environmental aspects from 2022: during the execution phase, suppliers in the main segments presenting a high social/environmental risk and/or image risk are subject to audits conducted by a specialised independent external firm. These audits, carried out in a constructive manner, enable suppliers to be challenged and to make progress over the duration of the contract on the factors that are important to Aéroports de Paris. Suppliers receive feedback and must then propose a corrective action plan to resolve any problems identified and continue to make progress.

The progress of the action plans is analysed in conjunction with the purchasing advisors. These audits covered more than 60% of the turnover of operating service contracts (security, cleaning, safety, green spaces, PRM, etc.) and maintenance contracts, and more than 88% of road and network service contracts in 2018 and 2019; they were continued despite the health crisis in 2020, but in a smaller number given the reductions in activity and budget constraints.

In total, 26 audits were carried out on contract holders in the following sectors: cleaning, safety, airport security, assistance for people with disabilities or reduced mobility, maintenance of green spaces, and infrastructure work.

Audits are used to ensure that our partners comply with their commitments, but they also allow us to define improvements over the duration of the contracts with the suppliers and service providers concerned.

These improvements are:

- ▶ integrated into the regular Supplier Performance Measurement sessions
- ▶ capitalised on over the medium term, during calls for tenders and the renewal of recurring contracts
- ▶ integrated into the procurement strategy guidelines.

The accident rate of our service providers is subject to reinforced monitoring and analysis. An annual study, carried out since 2014 on the services provided, makes it possible to highlight the most accident-prone segments that contribute to Aéroports de Paris' overall results, compare and challenge the various operators within such segments, compare the statistics from one contract type to another, and compare Aéroports de Paris' statistics with national data by branch (CNAMTS³⁶).

Performance reviews are also carried out in conjunction with the airports' occupational safety coordinators in order to draw up an action plan with each company concerned, aimed at significantly reducing accidents and preventing serious ones in particular.

A working group has also been set up to implement an accident alert system for service providers working at our facilities, to identify operational risks and to produce reports that are monitored by the Executive Committee.

4.3.3.A proactive approach to sustainable and responsible procurement

The General Resources, Supply Chain and Procurement Division of Aéroports de Paris, which has been ISO 9001-certified since 2015, has long been committed to sustainable and responsible procurement; and Aéroports de Paris was one of the first 20 companies to sign the first "Responsible Supplier Relations Charter" set up by the Médiation Interentreprises (a government body overseen by France's Finance Ministry) and the Conseil National des Achats (French Procurement Council) in February 2010.

This first step enabled our company to obtain the "Responsible Supplier Relations" label in March 2014, immediately after its creation. This label, which has since become the "Relations fournisseurs et achats responsables" label [Sustainable Procurement and Supplier Relations Label], was awarded to us in its new form in March 2018, and has subsequently been evaluated favourably each year, including in 2020 and 2021, despite the difficulties associated with the Covid-19 pandemic.

In addition, the Charles de Gaulle, Orly and Le Bourget airports and the general aviation aerodromes are ISO 14001-certified for environmental management. This implies the incorporation of environmental requirements into the procurement process for goods and services.

Aéroports de Paris also has ISO 50001 certification, which covers all our Paris airports and the Procurement Division.

2021 was marked by three important events:

- ◆ A new "Sustainable Procurement and Supplier Relations" Charter, with several provisions reinforced, was signed in September by Aéroports de Paris (1st charter signed in 2010 by Aéroports de Paris and in 2016 by Hub One)
- ◆ The eponymous label was renewed and extended to Groupe ADP in November, in recognition of its approach to integrating sustainable and responsible procurement practices
- ◆ Standard & Poor's Global has placed Groupe ADP in the top 6% best performing companies on the Dow Jones Sustainability Index (DJSI) for its responsible and sustainable supply chain management
- ◆ This ongoing commitment to achieving labels and certification for its processes reflects the Group's desire to develop and maintain a responsible approach to procurement and to involve its suppliers, who are essential stakeholders in the operation of all its airports, in this approach, by maintaining sustainable and balanced relationships with them.

These distinctions attest to the implementation of dedicated processes that are part of a responsible approach to procurement, and respectful of the quality of supplier and subcontractor relations and their interests. They also demonstrate that the procurement process incorporates social responsibility and takes into account the impact of procurement on the economic competitiveness of the ecosystem.

³⁶ Caisse Nationale d'Assurance Maladie des Travailleurs Salariés (French national health insurance fund for employees).

APPENDIX 1:

SUMMARY OF THE OBJECTIVES / INDICATORS OF THE 2025 PIONEERS STRATEGIC ROADMAP

No.	Indicator	Scope concerned
ONE AMBITION - Imagining the sustainable airport of tomorrow		
1	Ensure more than 80% of flights depart on time or within 15 minutes of the scheduled time	Airports controlled within Groupe ADP
2	Reduce average taxiing emissions per flight by 10% at Paris-Orly and Paris-Charles de Gaulle	
3	Set a carbon budget for the life cycle of all investment projects over €5 million	ADP SA, TAV Airports
4	Provide 50% of passengers at Paris-Orly and Paris-Charles de Gaulle with biometric facilitation in their departure journey	
5	Aim for excellence in hospitality <ul style="list-style-type: none"> Place Paris-Charles de Gaulle in the top 10 of the Skytrax ranking of the world's best airports, as well as 4 airports in the Top 50 and 8 airports in the Top 100 Achieve an ACI/ASQ score of 4 for passenger satisfaction 	<ul style="list-style-type: none"> All of the Group's airports Airports controlled within Groupe ADP with more than 3 million passengers
6	Roll out the Extime retail and hospitality concept in Paris and initiate the roll-out of the franchise in two terminals outside of the Paris airports	
7	Set up the Paris airports at the highest European level in terms of train-air connections by increasing the number of passengers with train-air connections at Paris-Charles de Gaulle by 50% and and by doubling it at Paris-Orly	
8	Use 10% low-carbon energy in the terminals and airside, almost doubling from 2019, and 40% excluding landing and take-off	Airports controlled within Groupe ADP with ACA certification ≥ 3 in 2021
9	Open the new multimodal hub at Paris-Orly , with the commissioning of the line 14 station in 2024, and make it possible to commission or build 8 additional public transport lines to connect the Paris airports with neighbouring areas	
10	Preserve 25% of land for biodiversity at Paris-Charles de Gaulle and 30% at Paris-Orly and Paris-Le Bourget and set a course for the Group's airports to improve their biodiversity index by 2030	The 23 Group airports that have committed to the "Airports for Trust" Charter
ONE GROUP - Building a global, integrated and responsible group		
11	Stabilise the average maturity of our concession portfolio at 30 years	All of the Group's airports under concession, outside of Paris
12	Open 100 additional international routes to increase the connectivity of our territories	All of the Group's airports
13	Develop the "smartisation" of the Group's airports with three at "full" level and 100% of the others at "friendly" level	Airports controlled within Groupe ADP with more than 4 million passengers
14	Support the the widespread application of continuous descent procedures between 2023 and 2025 at Paris-Charles de Gaulle and Paris-Orly	
15	Promote the achievement of 80% of local purchases in the Paris region, including 20% from SMEs , subject to public procurement legislation	ADP SA
SHARED DYNAMICS - Innovating, supporting & empowering		
16	Conduct 120 experiments in societal, environmental and operational innovations by 2025, 30 of which will lead to industrialisation	ADP SA, TAV Airports, Hub One
17	Carry out at least one employee shareholding operation by 2025	ADP SA
18	Include a CSR criterion in the compensation of 100% of employees	ADP SA, TAV Airports, AIG
19	Increase the number of employee citizen commitment days by five , bringing it to 5,000 over the 2022-2025 period	ADP SA
20	Educate 100% of employees on good ethical and compliance practices	ADP SA, TAV Airports, AIG

APPENDIX 2:

AIRPORTS FOR TRUST CHARTER (front)



GROUPE ADP
SHARING NEW HORIZONS



AEROPORT INTERNATIONAL GROUP
A Groupe ADP company



LIEGE AIRPORT



NUEVO PUDAHUEL



PARIS AÉROPORT



TAV
Airports
A member of Groupe ADP



ravinala
airports



ZAGREB AIRPORT

PRESS RELEASE

19 January 2021

23 airports in the Groupe ADP network launch the "Airports for Trust" Charter and commit to building a sustainable and responsible future.

Groupe ADP and several partners belonging to the world's largest airport network - TAV Airports, Airport International Group (Amman), Liège Airports, ZAG (Zagreb), Nuevo Pudahuel (Santiago de Chile) and Ravinala Airports (Madagascar) - have signed the "Airports for Trust" Charter.

With this charter, the signatories - representing 23 airports out of the Group's current network of 27 - announce their shared commitment to building an even more sustainable and responsible airport industry, and their willingness to do so through close cooperation.

All the airports that have signed this charter share the common ambition of being leaders in terms of environmental protection, by being exemplary in their field of action and by introducing additional initiatives to extend their policy to the entire airport value chain.

To this end, the charter has four main ambitions:

- ◆ **Move towards zero-environmental-impact operations, aiming for carbon neutrality by 2030 for all signatories.** Between 2009 and 2019, Paris Aéroport reduced its CO2 emissions per passenger by 71%. Outside France, six of the Group's airports (Izmir, Ankara, Antalya, Delhi, Hyderabad and Amman) have already achieved carbon neutrality according to the standards of the Airports Council International (ACI) certification programme
- ◆ **Actively participate in the aviation sector's environmental transition** and provide airside solutions. For example, Paris Aéroport is already preparing for the arrival of sustainable fuel alternatives and hydrogen-powered aircraft to enable the advent of low-carbon aviation by 2050
- ◆ **Promote the integration of each airport into a local resource system**, favouring short routes, promoting the circular economy, and increasing the production of resources on site (geothermal heat network in France, solar panels in Bodrum, etc.)
- ◆ Reduce the environmental footprint of airport planning and development projects (**low-carbon design, construction and renovation of infrastructure and buildings**).

Creating value for local communities

The signatory airports firmly believe that the balanced and sustainable development of airport activities need to be intertwined with the creation of value for local communities and thus investment in human development at a local level, with a special focus on young people.

Improving the airports' territorial anchoring is a factor of innovation and collective performance over the long term.

AIRPORTS FOR TRUST CHARTER (back)

As a result, the signatory airports have committed to:

- ◆ Actively contribute to **improving the living conditions of local residents and reducing noise exposure**
- ◆ Build a long-term **relationship of trust with the territories and local stakeholders (particularly in terms of training, integration and employment)**
- ◆ **Reinforce the benefits** of airport activity for the local communities
- ◆ **Unite the airport community** and act together to maximise the positive impacts of airport activity.

The "Airports for Trust" Charter is fully in line with the purpose adopted by Groupe ADP in 2020: "To welcome passengers, operate and imagine airports, in a responsible way all around the world".

As members of the world's leading airport network, these 23 airports consider that their social and environmental responsibility is not only limited to their staff, passengers, customers, suppliers and airport industry players, but also concerns all stakeholders in the countries where the Group operates.

Despite being impacted by the biggest crisis in air transport history, Groupe ADP and its partners are convinced that this difficult period can allow us to build a more sustainable and responsible future, and thus restore the confidence of citizens through resolute action to serve the environment and local communities.

The strength of our network

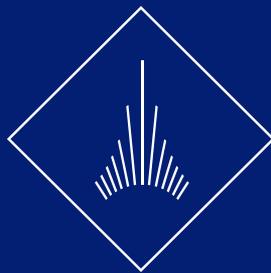
Through this charter, the signatories also acknowledge the need to **assess the environmental and socio-economic footprint of their airports and to measure progress on all objectives in a transparent manner**. They aim to improve the whole network by sharing experiences and best practices.

On the occasion of the signing of the charter, **Augustin de Romanet, Chairman and CEO of Groupe ADP - Aéroports de Paris SA** stated: "The 'Airports for Trust' Charter embodies a shared vision for the future of our airport industry. At a time when the air transport industry as a whole is facing one of the greatest challenges in its history with the fight against global warming, it can seize this opportunity to thoroughly reinvent its industrial model, and design and apply more efficient and responsible processes. For Groupe ADP, this means reducing its carbon footprint and strengthening ties with local communities. Groupe ADP and its partners are already the world's leading airport network and, with the signing of this charter, we aim to become the world's first sustainable airport community."

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Groupe ADP develops and operates airports, including Paris-Charles de Gaulle Airport, Paris-Orly Airport, and Paris-Le Bourget Airport. In 2021, under the Paris Aéroport brand, the Group welcomed 41.9 million travellers at Paris-Charles de Gaulle and Paris-Orly Airports, handled 2.1 million tonnes of cargo and mail, and received almost 118.1 million travellers at the airports it manages overseas. Boasting an exceptional geographic location and a major catchment area, the Group is pursuing a strategy of expanding passenger handling capacity and improving service quality, while also developing its retail and real estate businesses. In 2021, the Group's turnover was €2,777 million, delivering net income attributable to the Group of -€248 million.

Aéroport de Paris SA is a joint stock company with a share capital of €296,881,806. Registered office: 1 rue de France, Tremblay-en-France 93290. Bobigny Trade and Companies Register No. 552 016 628. groupeadp.fr





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