Responsible Business Policy

2025

NATS Internal

Introduction

Our purpose is advancing aviation and keeping the skies safe. As a leading provider of air traffic management services, we recognise the critical role we play in maintaining a safe, resilient and efficient air traffic system. We are committed to operating as a responsible business, ensuring that our activities deliver positive social and economic outcomes to society as a whole, while upholding the highest standards of integrity, sustainability and social responsibility.

This policy outlines our approach to embedding responsible business principles across our operations. It reflects our commitment to:

- **Environmental Protection:** Reducing our own environmental impacts and playing our part in working with customers, partners and suppliers to achieve a net zero aviation industry
- **Employee Matters:** Fostering a safe, diverse and inclusive workplace, investing in the development of our people to be an employer of choice
- **Ethical Governance:** Upholding transparency, integrity and accountability
- **Stakeholder Partnerships:** Building positive and ethical relationships with our stakeholders, positively contributing to economic, environmental and social progress, including support for both corporate charities and smaller initiatives that align with our values

This policy applies to NATS Holdings Ltd. and all its subsidiaries, guiding our collective efforts to operate responsibly and make a meaningful impact.

We expect all NATS employees and contract staff fulfilling NATS roles to uphold our business values and align their actions with this policy.

Our Values

Our four values are at the heart of how we will deliver our strategy. Each value plays an important part in the everyday lives of our employees and supports their development, as well as contributing to a transparent and non-discriminatory workplace. Our values help us to foster a culture of collective responsibility across our business.

We are respectful

We value everyone regardless of background. We treat each other, customers, partners and suppliers with dignity and professionalism. We acknowledge the value each of us brings, our differences, and our contributions.

We are safe

Safety is our core value. Our commitment to the safety of our people, operations and positive safety culture remains consistent and unwavering.

We are courageous

We have the courage to think differently, to speak up and create a positive working environment in pursuit of our goals and to strive for better.

We are one team

We accomplish more together. We share knowledge and collaborate, both within functions and across divisions so our successes are shared across the business.

Our Strategy

We've established a 2040 corporate strategy to guide the long-term direction of the business, ensuring that our business model ties into what our customers expect now and into the future, and is responsive to changes in the external landscape. This focuses on four central objectives to be carbon negative, support new airspace users, be a top 25 company to work for and deliver additional revenue from building market leading propositions — all of which embed and respond to sustainability drivers.



We'll be carbon-negative

We've minimised our direct environmental impact and we are carbon negative across our estate; we've limited waste ad invested in carbon capturing technology. We're leading on reducing our industry's impact on our planet and working with our customers to help them do the same.



We'll be a Top 25 UK company to work for

We want to retain our brilliant people and attract the best new talent. Inclusion, career development and wellbeing are front and centre. We're working in a safe and diverse environment that encourages innovation and continuous improvement.



Every airspace user will rely on our services

We're relentless in our pursuit of safety, for all airspace users and everyone who works with us and for us. We're delivering the UK's ATM service and a single unsegregated airspace. We're constantly evolving and leading our industry to meet ever more complex technical demands. We're solving the issues our customers face through our innovation and pioneering technology.



We'll be delivering an additional £500m in revenue per year

We achieve by being sustainable and commercially successful. We partner with customers, selected partners, suppliers and innovators to develop and deliver new solutions in the UK and beyond. We work in an efficient culture, delivering value for money and cost efficiencies every day. We've adapted to the big changes in our industry, and we're focusing on R&D and innovation.

Our Commitments

As a responsible business, we have defined clear commitments that guide our approach, are grounded in our core values and are strengthened by ethical governance. These commitments address our key areas of influence, ensuring that our strategies reflect our focus on sustainability, fairness and transparency. By embedding them into our daily operations and decision-making, we deliver long-term value for our stakeholders while upholding the highest standards of integrity and accountability - both within our organisation and across our value chain.

Senior management actively monitors the progress of our commitments to ensure they align with our strategic objectives and meet stakeholder expectations. By engaging with stakeholders, we assess feedback and identify emerging challenges to refine our strategies and adapt to evolving societal needs and industry advancements.

ENVIRONMENT

We are committed to ensuring that our business practices contribute to the protection of our natural world, biodiversity and ecosystems and prevent pollution. We shall achieve this by:

- Reducing our greenhouse gas emissions in line with the Paris Agreement 1.5 degrees Celsius pathway
- Committing to stakeholder engagement and capacity building on environmental issues and not funding climate-denial or lobbying against climate regulations
- Adopting the principle of sustainable consumption, seeking to minimise resource use by considering the lifecycle impacts of the products and services we use
- Continual improvement of our environmental management system to enhance environmental performance
- Committing to fulfil our legal and other compliance obligations
- Regularly assessing climate-related risks, opportunities and dependencies, ensuring business continuity, the resilience of our air traffic system and corporate strategy

Near term Science-Based Target
We commit to reduce absolute scope 1, 2 and 3* greenhouse gas emissions by 41% by FY2026 from a FY2019 base year.

Net Zero
We commit to achieving net zero emissions by 2035/36, in line with the Paris Agreement's goal of limiting global warming to 1.5°C.

1st Net Zero Centre
Our aspiration is to achieve the goal of establishing the first net zero air traffic control centre by the year 2030.

Renewable Energy
We commit to increase our annual procurement of renewable electricity from 0% in 2018/19 to 100% by the year 2030.

Carbon Negative
We commit to being carbon negative across our estate by 2040 to actively remove more carbon from the atmosphere than we produce.

Aviation Decarbonisation
We commit to work with our customers, partners and suppliers to achieve a net zero aviation industry by 2050.

* Scope 3 GHG emissions covering purchased goods and services, fuel and energy related activities, upstream transportation and distribution, business travel and employee commuting.

PEOPLE

We uphold the principles of the Universal Declaration of Human Rights and remain committed to the highest standards of ethical behaviour and integrity, including robust measures against fraud, corruption and bribery. We are committed to supporting the growth and development of all employees, maintaining a safe, collaborative, transparent and non-discriminatory workplace. We shall achieve this by:

- Promoting diversity, equality and inclusion across the organisation, ensuring our policies, practices and workplace culture remain free from bias and discrimination
- Creating a working environment where employees can always be themselves at work, promoting inclusivity through our employee networks and providing support through our employee assistance and peer support programmes
- Ensuring our recruitment and nomination processes maintain the relevant competence and experience on sustainability matters and EDI
- Publishing our pay gap reports for gender, ethnicity and disability

- Actively seeking to prevent all aspects of modern slavery and human trafficking in our corporate activities and our value chain
- A Code of Ethics and Professional Behaviours, Respect at Work, Anti-Bribery and Corruption Policy communicated to all employees
- Maintaining a robust whistleblowing process and reporting channels which encourage confidential reporting of any unlawful or unethical conduct without fear of reprisal
- Continuing an open and collaborative approach with the recognised trades unions representing our staff

Recruitment
We're committed to achieving a 50:50 gender diversity among our new recruits, with at least 14% of our new joiners coming from ethnic minority backgrounds.

Diversity
We aim to achieve a 1–3% year-on-year increase in the overall diversity* among our Senior Leadership Team* and promotions, measured over a rolling five-year period.

Top 25 Employer
We aim to retain our brilliant people, attract top talent, and foster a safe, diverse environment that prioritises inclusion, wellbeing, and continuous improvement.

* We categorise the Senior Leadership Team as the CEO and two levels of management below.
* Diversity: Gender, ethnicity and disability.

STAKEHOLDERS

We are committed to creating sustainable value for shareholders, customers, suppliers, employees and communities, recognising that collaboration is key to realising this goal. We shall achieve this by:

- Regular engagement with our stakeholders, maintaining open, honest and constructive dialogue to understand material topics, shape our plans and take regard of their views in our decisions
- Embedding a culture of working together, extending this ethos to our relationships with partners and suppliers to drive best practices, champion innovation and ensure sustainable development
- Ensuring our practices address local concerns while protecting the natural environment and delivering societal and economic benefits
- Supporting children and young people nationally, particularly those from underrepresented groups and disadvantaged backgrounds through our Future Minds STEM outreach programme
- Supporting charitable and community initiatives through corporate charities, fundraising, volunteering and donating through our Give As You Earn Scheme and our Community Fund

Community Outreach
We aim to continually improve and develop our STEM scheme and inspire young people through our educational outreach initiatives.

Charitable Giving
We're committed to match funding through our Community Fund to support employees' own fundraising efforts.

Supplier Engagement
NATS commits that 50% of its suppliers by spend covering capital goods will have science-based targets by 2026.

DISCLOSURE

We are committed to transparency and accountability in our responsible business practices and will ensure our reporting is clear, accurate, aligned with industry best practices, regulatory requirements and stakeholder expectations. We will achieve this by:

- Ensuring our annual GHG disclosures and progress against targets are externally verified — applying the principles of relevance, completeness, consistency, transparency and accuracy— and ensuring environmental claims are truthful, clear, comparative and substantiated
- Ensuring compliance with disclosure requirements and other relevant reporting standards
- Ensuring annual reporting on our progress is made publicly available consistent with good business practice
- Integrating responsible business practices into our risk management system, annual business planning cycle and executive governance structure

Reporting Progress

We are committed to providing regular updates on key responsible business metrics, including environmental, social, and governance performance, to stakeholders through annual reports and other communications.

CEO Commitment

I take ultimate accountability for the responsible business strategy within NATS and am fully committed to this policy, including the necessary resources to support its implementation and ongoing success. Achieving our goals requires the collective support of every member of the organisation. I encourage all employees to engage with this policy, reflect on its principles in the context of their work, and recognise the role they play in helping NATS uphold the highest standards of responsibility, sustainability and transparency.



Martin Rolfe
Chief Executive Officer

Definitions

The following key terms are used throughout this policy:

- **Net Zero –** Achieving a balance between the greenhouse gases emitted and those removed from the atmosphere, aligning with climate targets such as the Paris Agreement's 1.5°C pathway.
- **Carbon Negative –** Going beyond Net Zero by removing more carbon dioxide from the atmosphere than is emitted, actively reducing the overall carbon burden.
- **SBT (Science Based Target) –** A greenhouse gas (GHG) emissions reduction target aligned with climate science to limit global warming to 1.5°C, as set in accordance with the Science Based Targets initiative (SBTi).
- **Greenhouse Gas (GHG) Emissions –** The release of carbon dioxide (CO_2) and other gases contributing to climate change.
- **Sustainability –** The responsible management of environmental, social and economic factors to ensure long-term success and minimal negative impact.
- **Environmental Management System (EMS) –** The framework we use to monitor, improve and ensure compliance with environmental responsibilities.
- **Stakeholders –** Individuals or groups affected by or influencing our business, including employees, customers, suppliers, regulators and communities.
- **Whistleblowing –** The process allowing employees to confidentially report unethical or unlawful conduct without fear of retaliation.
- **Modern Slavery –** Encompasses forced labour, human trafficking and exploitative practices.

Related Documentation

NATS routinely reviews its internal policies to ensure they reflect best practices and comply with legislation in every country where we operate. Documentation relating to our responsible business policy includes:

- Responsible Business Report
- Pay Gap Report
- Climate Transition Plan: 5 Year Plan
- Anti-Slavery and Human Trafficking Statement
- Safety policy
- Comprehensive HR and recruitment policies including company-wide Code of Ethics and Professional Behaviours, Respect at Work, Just Culture, and Menopause Policies
- A whistleblowing policy open to all employees and third parties, including customers and suppliers
- Extensive supply chain governance, policies and procedures including a Supplier Charter
- Wellness, mental health and stress management policy
- Tax Strategy

To view our publicly available documentation visit: NATS.aero.