

## Individual Commitments of Groupe ADP in act4nature international

### Company overview

As one of the world's leading airport groups, with over 26,000 employees and 336 million passengers, [Groupe ADP](#) has created and operates 26 airports in the Paris region and worldwide. Through its multi-local presence, in connection with and serving the regions, Groupe ADP is putting stakeholders at the heart of its [2025 – Pioneers For Trust strategy](#), with a participative approach to governance and paying particular attention to its regional impact. In the Paris region, the Group's three airports cover more than 2,000 hectares of green space, including areas of significant ecological interest, such as wetlands and permanent grasslands. Moreover, given the particularly dense urban nature of the Paris region, these grasslands provide continuous and discontinuous ecological corridors (known as "steppingstones") between several sensitive biodiversity areas. These areas attract and shelter a rich diversity of local flora and fauna of regional, national and even international importance, particularly birds, which are thought to number more than a hundred different species per airport.

As an airport operator, Groupe ADP may also be required to take responsibility for land management and construction projects. Airports are made up of various urbanised surfaces, including roads, aircraft taxiways and runways, office buildings, car parks, underground infrastructure, and energy production facilities. These spaces can serve Groupe ADP's operations or be made available to other stakeholders within the airport ecosystem (cargo, airline offices, ground handling services, hotels, etc.). Groupe ADP, through its various subsidiaries, also plays a role in non-airport-related activities, such as passenger customer services and retail (shops and restaurants), tourism in Paris, IT, and more.

Consequently, Groupe ADP is committed to introducing a Biodiversity Policy covering its direct operations and its entire value chain (air transport, retail, food and beverage, neighbouring municipalities, etc.), both in France and internationally.

### Materiality assessment

The initial results of our 2023 Group CSR double materiality analysis indicate that biodiversity is one of the major material issues for Groupe ADP.

In 2021, Groupe ADP carried out the Dependencies and Impacts Study<sup>[1]</sup> on biodiversity using the ENCOR method, covering its Paris airports. The Group's main dependencies identified include, in order of importance, water, sand, wood, and natural fibres.

The Group's main impacts relate to operations<sup>[2]</sup> within scopes 1 and 3 combined (90% of all identified impacts). The main scope 1 impact is pressure on land use, mainly related to operations and then, to a lesser extent, buildings and real estate.

The study also revealed the essential role that Groupe ADP has to play in the entire airport value chain (>85% of the overall impact is related to scope 3). The main pressures exerted by scope 3 emissions are aggravating climate change, deteriorating air quality related to emitting activities (air transport, road traffic, etc.) and changing land use linked to energy production and transport. In addition, the study showed that if we were to consider upstream emissions within retail (scope 3 of scope 3), this would become our greatest impact on biodiversity.

Although measuring the impacts of invasive exotic species is complex, Groupe ADP is aware of its role to play, particularly within scope 3.

### Links to previous act4nature commitments

Firstly, Groupe ADP has put awareness and engagement among its business teams and decision-makers on biodiversity issues at the heart of its priorities. The Group has also strengthened an internal biodiversity champions network, now made up of 50 members across 17 different entities. The network was mobilised to develop new act4nature commitments to ensure buy-in and facilitate their rollout. Results were subsequently shared with all steering committees and will be submitted for approval at the end of the act4nature review process.

This renewal of our biodiversity commitments marks a turning point for Groupe ADP. Thanks to the completion of the Dependencies and Impacts Study in 2021, for the first time, Groupe ADP has structured commitments around its dependencies and impacts in place. 2025 will be marked by the development of the next Group-wide strategy, as Groupe ADP works to strengthen its biodiversity ambitions. The act4nature commitments will provide a solid basis for this future work. The Group wishes to go beyond regulatory compliance alone, with the aim of aligning itself with international, European and national policy frameworks, such as the Kunming-Montreal Framework Agreement and the European Biodiversity Strategy. To do so, the Group will expand and update its Dependencies and Impacts Study, assess biodiversity risks and opportunities in its operations, and work on the resilience of its economic model, with the aim of consolidating strategic orientations based on a "no net losses and net gains on biodiversity" trajectory.

By analogy with the French biodiversity strategy, Groupe ADP's 20 biodiversity commitments are structured around the following four pillars:

**Pillar 1: PRESERVE** natural environments at airports, in line with territorial ecological continuities.

**Pillar 2: RESTORE** biodiversity within urbanised environments and develop sustainable construction models.

**Pillar 3: MOBILISE** stakeholders within the airport community and beyond to reduce the pressures arising from our value chain.

**Pillar 4: ELEVATE** biodiversity to a strategic level and develop appropriate governance tools to guide it.

### Individual commitments

		operational and strategic levels		airports, including a global biodiversity indicator <sup>(4)</sup>		
1 5	1.2 Preserving environments of strategic importance	Dedicate spaces to biodiversity	France	Amount of space dedicated to biodiversity <sup>(5)</sup>	Guarantee 25% but aim for 30%	From 2025 and ongoing
1 5	1.3 Operating sustainably	Maintain, improve and roll out differentiated and sound management practices in our semi-natural environments	International	Number of airports using a differentiated green space management plan: later mowing, manual weeding, mulching, etc.	100% of airports <sup>(6)</sup>	End of 2026
		Reduce chemical pollution	France	Zero phytosanitary rates at our airports across our scope of responsibility <sup>(7)</sup>	100% of airports phyto-free	From 2025 and ongoing <sup>(8)</sup>
		Improve our understanding of light pollution	France	Participatory science protocols to better understand nocturnal pollinators	1/airport	By 2025
		Reduce the impact of invasive exotic species	France	Maps and action plans related to the treatment of invasive exotic species	1/airport	From 2026 and ongoing
1 5	1.4 Cohabiting safely	Improve our understanding of bird behaviour to prevent aviation safety risks	France	Supporting wildlife risk teams with introducing actions that are favourable to biodiversity, in accordance with aviation safety	1/airport	Between 2025 and 2030
		Take steps to prevent risks to animals while preserving biodiversity	France International	Number of aerodromes implementing species-preserving animal risk prevention practices <sup>(9)</sup>	100%	Ongoing By 2028
1 3 5 7	1.5 Promoting regional	Improve and share our knowledge of regional biodiversity to support the preservation and development of ecological corridors	France	Production of a common regional map of green and blue corridors	1 common map/airport	End of 2028
		Improve our understanding of noise issues on biodiversity	Corporate	Scientific monitoring to characterise noise impacts on regional biodiversity	1 monitoring activity conducted	End of 2028
Pillar 2: RESTORE biodiversity within urbanised environments and develop sustainable construction models						
3	2.1 Integrating biodiversity issues into our projects	Integrate biodiversity issues into our projects from the design stage, throughout the life cycle of projects, as well as in internal tools and processes for sustainable project management	France	Rollout of environmental performance standards on biodiversity in projects	10%	By 2026
6	2.2 Reducing the impact of urban sprawl by embracing biodiversity within projects	Reduce flood risks through nature-based solutions	France	Re-greening projects integrated into the permeabilisation process	100%* *of eligible projects	From 2025 and ongoing
		Embrace biodiversity in projects by re-greening spaces and creating habitats	France	Implementation of projects that incorporate re-greening and introducing wildlife in areas that have been built on <sup>(10)</sup>	1/year per airport	By 2025
6	2.3 Restoring environments	Restore habitats, give spaces back to nature and enrich biodiversity at our airports and nearby	Corporate	Number of biodiversity restoration projects* *beyond the ERC regulatory approach compensation project <sup>(11)</sup>	1 project/year per airport	From 2025 and ongoing
6 9	2.4 Supporting innovation in favour of biodiversity	Support innovation in favour of biodiversity, and the development of nature-based solutions (NBS)	Corporate	Launch of a special biodiversity innovation award	1	Between 2025 and 2030
Pillar 3: MOBILISE stakeholders within the airport community and beyond to reduce the pressures arising from our value chain						
2 4 9	3.1 Integrating biodiversity into procurement	Support our upstream value chain with a partnership approach to integrate biodiversity in procurement	Corporate	Percentage of suppliers in relevant impact sectors <sup>(12)</sup> committing to a biodiversity approach during contract renewals	100%	By 2027
		Increase biodiversity standards in our procurement guidelines	Corporate	Integration of contractual clauses and biodiversity monitoring in relevant markets <sup>(12)</sup> during contract renewals, especially regarding the spread of invasive exotic species	100% of new relevant markets	From 2027
2 4 8	3.2 Supporting our brands, shops and restaurants	Support our brands, shops and restaurants and support their partners to build skills, structure their approach to biodiversity and coordinate with their value chain	Corporate	Mobilisation of brands around a charter for the preservation of life <sup>(13)</sup>	100% of corporate brands have signed the charter	By 2026
2 4 7 9	3.3 Raising awareness among passengers	Engage with airlines on the collapse of biodiversity to promote best practices, especially in wildlife trafficking	Corporate	Creation of an internal working group on wildlife trafficking <sup>(14)</sup>	1 group	From 2025 and ongoing
		Raise awareness among passengers and mobilise them on the collapse of biodiversity, especially regarding wildlife trafficking, to promote best practices	Corporate	Actions carried out to raise awareness among passengers	1/year	By 2027
8	3.4 Raising awareness and mobilising employees	Raise awareness and mobilise employees, from strategic bodies to training teams, to ensure the development of expertise in integrating biodiversity in our activities	Corporate	Each entity of the Group sees raised awareness or training on biodiversity <sup>(15)</sup>	100%	By 2027
2 4 9	3.5 Coordinating with airport community stakeholders	Coordinate with airport community stakeholders, contribute to raising awareness, mobilisation and supporting economic and institutional airport community stakeholders, in particular occupants of the land* *Including land-occupying airlines	France	Rate of integration of biodiversity standards in renewed contracts with land tenants <sup>(16)</sup>	100%	By 2026
2 4 7 8 9	3.6 Becoming rooted in our regions and raising awareness among local residents	Raise awareness among local residents, especially young people and school pupils, to promote best practices and understand the challenges of airport biodiversity issues	France	Number of regions made aware of biodiversity issues <sup>(17)</sup>	3/year	From 2025 and ongoing
		Build links with municipalities within our neighbouring regions around shared biodiversity issues	France	Signing a joint charter with the regions on biodiversity issues	1/airport	By 2027
Pillar 4: ELEVATE biodiversity to a strategic level and develop appropriate governance tools to guide it						
1 3 10	4.1 Valuing biodiversity on a strategic level	Value biodiversity on a strategic level by improving the financial quantification of issues and ensuring the funding of our biodiversity commitments	Corporate	A map and study of biodiversity financial impacts	1	By 2026
1 2	4.2 Working with our stakeholders	Work collaboratively with our stakeholders on the biodiversity strategy, promoting it and creating buy-in throughout our value chain	Corporate	A presentation of biodiversity commitments to the external stakeholders' committee And monitoring environmental issues <sup>(18)</sup>	1 presentation  1 annual follow-up <sup>(19)</sup>	End of 2025  From 2025 to 2030
		Reduce climate pressures caused by our activities on biodiversity	Corporate	Zero net emission commitments on direct activities and the value chain by 2050	SBTi certification obtained	2025 and ongoing
1	4.3 Improving links between climate and biodiversity in our policies	Improve the integration of biodiversity into our climate policies, among others, by ensuring that biodiversity issues are analysed within our climate commitments	Corporate	Percentage of carbon offsetting projects critically analysed for their biodiversity externalities	100%	2025 and ongoing
			Corporate	Nature-based solutions integrated into the development of climate change mitigation and adaptation plans	1 shared action plan	By 2026
1 5 10	4.4 Aligning ourselves with institutional frameworks	Align with institutional frameworks by subscribing to initiatives and reference standards at international, European and national level	Corporate	Assessment of the implementation of a zero net biodiversity loss trajectory aligned with the Kunming-Montreal Framework Agreement	1 assessment	By 2026
9	4.5 Supporting biodiversity through philanthropy	Support biodiversity through philanthropy via research projects and regional initiatives that aim to protect biodiversity and educate young people	Corporate	An active philanthropic project per year	1 project/year	By 2025

1

The Dependencies and Impacts Study is disclosed in the 2023 Universal Registration Document (URD) on page 305.

2

Airport operations activities are defined by the activities and services necessary for the proper functioning of an airport. This includes:

1 The Dependencies and Impacts Study is disclosed in the 2023 Universal Registration Document ([URD](#)) on page 305.

2 Airport operations activities are defined by the activities and services necessary for the proper functioning of an airport. This includes the management, maintenance and coordination of infrastructure, passenger and customer services, aircraft services, traffic flow management, passengers and goods, as well as safety and security.

3 The scope is defined as follows:  
France, represents the three Paris airports of Paris-Charles de Gaulle, Paris-Orly and Paris-Le Bourget.  
International, includes all airports consolidated financially.  
Corporate, includes the scope of financial consolidation across the physical entities of the matters being targeted.  
Some commitments are more specifically targeted at France in order to take into account differences in the regulatory, economic and scope of the responsibility context for international airports. Furthermore, Groupe ADP favours a gradual approach to support international subsidiaries, so the level of ambition required may vary depending on their date of integration into the Group.

4 Groupe ADP, supported by the European Commission, has been working since 2021 on the development of an innovative operational and strategic biodiversity management tool dedicated to the airport sector. The tool will simultaneously address data consolidation needs, in order to facilitate the measurement of biodiversity impacts at airports, and improve management and operational decision-making in favour of it.

5 Across its airports, Groupe ADP manages thousands of hectares of green space and aviation grasslands, recognised as permanent grasslands by the National Biodiversity Strategy. These areas included in the land on which Groupe ADP undertakes not to build and to introduce a management plan for the period of commitment. Groupe ADP will focus on preserving classified habitats or identifying them as endangered habitats based on species observations made in its atlases.

6 This commitment invites Paris airports to update and maintain differentiated management plans. International airports are invited to design and implement their own differentiated management plans. Differentiated management plans are essential to the conservation of species. They promote co-habitation between species and airport operations by allowing the creation of habitats and the maintenance of their ecological quality, as well as the implementation of practices that reduce pressures on biodiversity.

7 Groupe ADP's scope of responsibility includes all areas within airport majority owned by the Group within a consolidated financial scope, the management of which has been delegated in its entirety to Groupe ADP. This commitment is made by Groupe ADP subject to compliance with the health, safety and security issues related to airport operations, including collaboration with government delegations in charge of its practices.

8 Paris airports reached zero phytosanitary in 2015 for Paris-Orly, in 2023 for Paris-Le Bourget and in 2024 for Paris-Charles de Gaulle. Their commitment is to maintain the quality of practices in order to avoid any further pollution of grasslands and green spaces. The implementation of the zero phyto approach required many changes in practices for green space management teams and the emergence of new management challenges. Groupe ADP is also committed to promoting its practices among other airport stakeholders.

9 There are a variety of practices to prevent animal risk that respect biodiversity. These may include sound or visual scare practices, or diversionary

10 Here, it is a matter of working both to embrace biodiversity and promote habitats in urbanised areas. The Group will look at solutions for both embracing plant life, for example, projects to re-green micro-spaces (roofs, walls, the borders around buildings) and green space ecological maintenance projects (multi-stratification, local or even wild local species, species adapted to climate change), as well as wildlife, such as nesting boxes, choice of cavity materials, glass adapted to birds, insect shelters, later mowing, etc.

11 According to the sectors identified in France's National Biodiversity Strategy, the joint IPBES-IPCC report and the results of Groupe ADP's Dependencies and Impacts Study.

12 Including green space contracts and relevant sectors identified in France's National Biodiversity Strategy, the joint IPBES-IPCC report and the results of Groupe ADP's Dependencies and Impacts Study.

13 The charter will be co-written by the Sustainable Development Division and the Customer Division, in consultation with the Extime joint venture. The charter will aim to address the material issues identified in terms of preservation of life, such as responsible consumption, plastic pollution and sustainable food. The Group will organise annual meetings to monitor the progress of signatory brands.

14 Groupe ADP is committed to maintaining links by leading a working group with relevant internal stakeholders (baggage, passenger journeys) in order to raise awareness of biodiversity issues, particularly regarding wildlife trafficking. The working group will include external stakeholders on a case-by-case basis. Note that Groupe ADP already participates in several working groups to limit wildlife trafficking. These working groups include, among others, the General Directorate of Customs, Air France, IUCN and WWF.

15 The Group has 28,000 employees across 15 divisions, each made up of between 3 to 10 departments. This commitment relates to divisions that will be responsible for identifying relevant departments and/or employees. Awareness raising could take the form of field visits, frescoes, citizen engagement actions, e-learning, seminars or even environmentally-themed coffee breaks.

16 Here, standards will have to be adapted according to stakeholder challenges. Land tenants include, among others, hotel groups, airlines, postal sorting centres, cargo, etc. The issues addressed will include, in particular, more environmentally-friendly building maintenance and upkeep, alignment with common standards for differentiated management plans, and zero phytosanitary approaches.

17 The Group organised the first edition of the "Rencontres des Territoires pour la Biodiversité de Paris-Charles de Gaulle" in 2024. This initiative brought together elected representatives from municipalities in the regions surrounding the airport to share our common biodiversity challenges. In addition, the "Maison de l'Environnement" at our airports have organised days of meetings, visits to grasslands, events and conferences for local residents and school pupils. These events provide space for discussions with our neighbours. Groupe ADP is committed to dedicating some of its events specifically to environmental and biodiversity issues.

18 Groupe ADP's Stakeholders' Committee brings together 16 experts from different backgrounds, including Hélène Soubelet, Director of the Biodiversity Research Foundation. Among other achievements, she participated in the drafting of the white paper on biodiversity to guide the Group in improving its understanding of the issues. More information can be found in [URD 2023, p. 60](#).

19 Groupe ADP undertakes to submit its biodiversity commitments to the Stakeholders' Committee, and then to present a specific environmental issue once a year to ensure follow-up with them.