XPO Inc

CDP Corporate Questionnaire 2026

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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09/29/2026, 02:38 pm

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

XPO, Inc., together with its subsidiaries, is a leading provider of freight transportation services, with company-specific avenues for value creation. We use our proprietary technology to move goods efficiently through our customers' supply chains in North America and Europe. As of December 31, 2025, we had approximately 37,000 employees serving approximately 55,000 customers through 592 locations in 17 countries. Our company has two reportable segments: North American Less-Than-Truckload ("LTL"), the largest component of our business, and European Transportation. In 2025, XPO generated $8.16 billion in revenue, $656 million in operating income, $1.27 billion in adjusted EBITDA and adjusted diluted earnings per share of $3.73. North American LTL Segment LTL in North America is a bedrock industry providing a critical service to the economy, with secular growth drivers, a favorable pricing environment and an established competitive landscape. XPO is one of the largest LTL networks in North America, with approximately 9% share of the U.S. market, estimated to be $53 billion in 2024. We provide approximately 37,000 shippers with critical geographic density and day-definite domestic services to approximately 99% of U.S. zip codes, as well as cross-border services to Mexico, Canada and the Caribbean. Our capacity and reach give us the ability to manage large freight volumes efficiently and balance our network to leverage fixed costs. For the full year 2025, our customer-focused organization of truck drivers, service center teams and sales professionals worked together to move approximately 16 billion pounds of freight through our network. European Transportation Segment XPO has a unique pan-European transportation platform with leading positions in key geographies: We are the #1 full truckload broker and the #1 pallet network (LTL) provider in France; the #1 full truckload broker and the #1 LTL provider in Iberia (Spain and Portugal); and a top-tier dedicated truckload provider in the U.K., where we also have the largest single-owner LTL network. We

serve an extensive base of customers in the consumer, trade and industrial markets, including many sector leaders that have long-tenured relationships with us. Our range of freight services in Europe encompasses dedicated truckload, LTL, full truckload brokerage, managed transportation, last mile, freight forwarding, warehousing and, increasingly, multimodal solutions customized for our customers, such as road-rail and road-short sea combinations. Our operators use our proprietary technology to manage these services within our digital ecosystem in Europe. Environmental Information Our innovation strategy is focused on providing highly efficient supply chain services that use automation and data science to create value for our shareholders and customers. We use our proprietary technology to provide reliable freight transportation services and make the most of the resources within our company. For many of our customers, the transportation needs of their business account for a significant portion of their value chain emissions. Our technology can coordinate the movement of customer goods in ways that are more efficient. Some of our key priorities in this regard are optimizing the utilization of truck and trailer capacity; streamlining local and linehaul freight flows; and, as described further below, investing in a modern, fuel-efficient fleet. In the course of our business, customers, shareholders and other stakeholders ask us to disclose our emissions data and sustainability strategies and outcomes. During 2025, our Nominating, Corporate Governance and Sustainability Committee of our Board of Directors provided oversight of, and engagement with, our management team on sustainability strategies and disclosures, ensuring our activities meet the evolving needs and expectations of our shareholders and other stakeholders. The Committee met three times during 2025 and supported Board oversight of the company's sustainability strategies, performance and external disclosures. We are proud of our sustainability efforts and initiatives, and note that in 2024, our European business was awarded the prestigious EcoVadis Gold Medal for its Corporate Social Responsibility strategy and performance.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2025

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:
☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:
☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☑ 2 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 2 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 1 year
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

8157000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

983793100

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

XPO

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ India

☑ Italy

☑ Spain

☑ Poland

☑ Czechia

☑ Germany

☑ Canada
☑ France
☑ Romania
☑ Portugal
☑ Slovakia
☑ Luxembourg
☑ Netherlands
☑ Ireland
☑ Morocco
☑ United Kingdom
☑ United States of America

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: ☑ No, this is confidential data	*This information is proprietary and not disclosed*

[Fixed row]

(1.21) For which transport modes will you be providing data?

Select all that apply
☑ Light Duty Vehicles (LDV)
☑ Heavy Duty Vehicles (HDV)

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:
☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

☑ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ All supplier tiers known have been mapped

(1.24.7) Description of mapping process and coverage

Our procurement team maps our supplier tiers.
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

2

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Short term horizons including evaluating current or future governmental reporting, 2025 and 2026 sustainability disclosures and studying and implementing emissions, impacts, reduction abilities, and opportunities.

Medium-term

(2.1.1) From (years)

3

(2.1.3) To (years)

9

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium term horizons including implementing future regulatory requirements (California Air Resources Board, EU regulations, and other state and federal regulations) requiring comprehensive planning and adoption within the next ten years.

Long-term

(2.1.1) From (years)

10

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Long term horizons including emissions reductions evaluation and planning to the extent technologically feasible.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Partial

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ EcoVadis

Other

☑ Internal company methods

☑ Materiality assessment

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Tornado

☑ Wildfires

☑ Cyclone, hurricane, typhoon

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical

☑ Increased severity of extreme weather events

Policy

☑ Changes to national legislation

Market

☑ Changing customer behavior

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Investors

☑ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

Risk Analysis ("RA") is the process of understanding the nature of risks and the level of said risk. RA includes understanding, detecting and evaluating risks, in order to treat / mitigate the risks and activities used to monitor risks. We have thorough processes in place to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities across our company. Our management team evaluates the company's activities, products, and services and identifies the actual or potential risks, as well as the threats and vulnerabilities that may be associated with each risk. We conduct at least annual evaluations of the materiality of those risks including the potential risks of future weather events and impacts on our operations, legislative changes and regulatory enforcement relating to climate change, transitions to new trucks and trailers to comply with environmental regulations and customer and investor review and requests regarding our climate change related

activities. Risks are evaluated for significance based on probability (likelihood of occurrence) and impact (level of potential harm). Those risks which are determined to be high or critical risks are used by management to determine acceptable risk, new / modified controls, etc. These may also be used to establish Department Objectives. If actions taken or controls implemented were effective in mitigating the risk, document the objective evidence of effectiveness. GHG emissions data is analyzed for Europe and North America to identify and prioritize risks and opportunities in our GHG performance. These risks and opportunities are assessed for decisions on which projects should be pursued.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ EcoVadis

International methodologies and standards

☑ ISO 14001 Environmental Management Systems

Other

☑ Internal company methods

☑ Materiality assessment

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical

☑ Increased severity of extreme weather events

Policy

☑ Changes to international law and bilateral agreements

☑ Changes to national legislation

Market

☑ Changing customer behavior

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Investors

☑ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

For XPO Europe: Risk management is grounded in structured governance and clear accountability. XPO Logistics identifies and assesses risks across its European operations and ensures that mitigation measures are in place to maintain operational resilience and protect performance. The Executive Committee provides oversight of the risk management framework, ensuring that risk responses are proportionate and aligned with the organization's strategic priorities.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

	Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed	Primary reason for not assessing interconnections between environmental dependencies, impacts, risks and/or opportunities	Explain why you do not assess the interconnections between environmental dependencies, impacts, risks and/or opportunities
	Select from:	*Select from:*	*N/A*

	Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed	Primary reason for not assessing interconnections between environmental dependencies, impacts, risks and/or opportunities	Explain why you do not assess the interconnections between environmental dependencies, impacts, risks and/or opportunities
	☑ No	☑ Not an immediate strategic priority	

[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we are currently in the process of identifying priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Other location with substantive nature-related dependencies, impacts, risks, and/or opportunities, please specify :Areas with legislation addressing climate change and emissions standards

(2.3.4) Description of process to identify priority locations

Other federal and state agencies, such as the U.S. Environmental Protection Agency ("EPA"), the U.S. Food and Drug Administration ("FDA"), the U.S. Department of Homeland Security ("DHS") and the California Air Resources Board ("CARB"), also regulate our equipment and operations. We may become subject to new or more restrictive regulations relating to emissions, drivers' hours-of-service, onboard reporting of operations, cargo security and other regulations affecting safety or operating methods. Regulatory requirements, and changes to the regulatory environment, may affect our business or the economics of the transportation industry by requiring changes in operating practices that could impact the demand for, and increase the costs of, providing transportation services. Environmental Regulations.

We are subject to various environmental laws and regulations in the jurisdictions where we operate. In the U.S., these laws and regulations deal with the hauling, handling and disposal of hazardous materials, emissions from vehicles, engine-idling, storage tanks (fuel, oil, antifreeze and other products) and related fuel spillage and seepage, discharge and retention of storm water, and other environmental matters. We may be responsible for the cleanup of a spill or other incident involving hazardous materials caused by our business. In the past, we have been responsible for the cost to clean up diesel fuel spills caused by traffic accidents or other events for which we are legally responsible, and none of these incidents materially affected our business or operations. We generally transport only hazardous materials rated as low-to-medium-risk, and only a small percentage of our total loads contain hazardous materials. We do not know of any existing environmental law, regulation or condition that reasonably would be expected to have a material adverse effect on our business, capital expenditures, or operating results. However, future changes to environmental laws or regulations may impact our operations and could result in increased costs.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ No, we have a list/geospatial map of priority locations, but we will not be disclosing it

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Our business depends, in part, on predictable temperate weather patterns. Our productivity historically decreases during the winter season, as it does for the industry in general, because inclement weather impedes operations. Certain seasonal weather conditions and isolated weather events can disrupt our operations and further

impact productivity. We frequently incur costs related to snow and ice removal, towing and other maintenance activities during winter months. Our activities in the southern United States are particularly susceptible to the occurrence of hurricanes and tropical storms and, depending on where any particular hurricane or tropical storm makes landfall, our properties and operations could experience significant damage and disruptions. At least some of our operations are constantly at risk of extreme adverse weather conditions. While many of our locations have emergency response plans to address extreme weather conditions, unusual or prolonged adverse weather patterns in our areas of operations or markets, whether due to climate change or otherwise, can temporarily impact freight volumes and increase our costs. Also, concerns relating to climate change have led to a range of local, state, federal, and international regulatory and policy efforts to seek to address greenhouse gas ("GHG") emissions. Governments around the world are proposing and adopting laws and regulations regarding GHGs which could lead to additional compliance costs or operational disruption now or in the future, including increased fuel and other capital or operational costs or additional legal requirements on the Company. Climate change concerns and GHG regulatory efforts could also affect the Company's customers themselves. Any of these factors, individually or combined with one or more factors, or other unforeseen factors or other impacts of climate change, could affect the Company and have an adverse effect on our business, operations, or financial condition.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Our business depends, in part, on predictable temperate weather patterns. Our productivity historically decreases during the winter season, as it does for the industry in general, because inclement weather impedes operations. Certain seasonal weather conditions and isolated weather events can disrupt our operations and further impact productivity. We frequently incur costs related to snow and ice removal, towing and other maintenance activities during winter months. Our activities in the southern United States are particularly susceptible to the occurrence of hurricanes and tropical storms and, depending on where any particular hurricane or tropical storm makes landfall, our properties and operations could experience significant damage and disruptions. At least some of our operations are constantly at risk of extreme adverse weather conditions. While many of our locations have emergency response plans to address extreme weather conditions, unusual or prolonged adverse weather patterns in our areas of operations or markets, whether due to climate change or otherwise, can temporarily impact freight volumes and increase our costs. Also, concerns relating to climate change have led to a range of local, state, federal, and international regulatory and policy efforts to seek to address greenhouse gas ("GHG") emissions. Governments around the world are proposing and adopting laws and regulations regarding GHGs which could lead to additional

compliance costs or operational disruption now or in the future, including increased fuel and other capital or operational costs or additional legal requirements on the Company. Climate change concerns and GHG regulatory efforts could also affect the Company's customers themselves. Any of these factors, individually or combined with one or more factors, or other unforeseen factors or other impacts of climate change, could affect the Company and have an adverse effect on our business, operations, or financial condition.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

	Identification and classification of potential water pollutants	Primary reason for not identifying and classifying potential water pollutants	Explain why you do not identify and classify potential water pollutants
	Select from: ☑ No, we do not identify and classify our potential water pollutants	*Select from:* ☑ Not an immediate strategic priority	*This information is not available to us at this time, therefore not disclosed*

[Fixed row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Not an immediate strategic priority

(3.1.3) Please explain

This information is not available to us at this time, therefore not disclosed
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to national legislation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Concerns relating to climate change have led to a range of local, state, federal, and international regulatory and policy efforts to seek to address greenhouse gas ("GHG") emissions. In the U.S., various approaches are being proposed or adopted at the federal, state, and local government levels. These efforts could lead to additional costs on the Company now or in the future, including increased fuel and other capital or operational costs, compliance costs, or additional legal requirements on the Company.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased compliance costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

An increase in the cost of new equipment, processes, resources and technology to meet more aggressive emission monitoring, reduction and reporting requirements.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Greater compliance with regulatory requirements

(3.1.1.29) Description of response

N/A

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Increased severity of extreme weather events

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Canada

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Our business depends, in part, on predictable temperate weather patterns. Our productivity historically decreases during the winter season, as it does for the industry in general. Our business depends, in part, on predictable temperate weather patterns. Our productivity historically decreases during the winter season, as it does for the industry in general, because inclement weather impedes operations. Certain seasonal weather conditions and isolated weather events can disrupt our operations

and further impact productivity. We frequently incur costs related to snow and ice removal, towing and other maintenance activities during winter months. Our activities in the southern United States are particularly susceptible to the occurrence of hurricanes and tropical storms and, depending on where any particular hurricane or tropical storm makes landfall, our properties and operations could experience significant damage and disruptions. At least some of our operations are constantly at risk of extreme adverse weather conditions. Any unusual or prolonged adverse weather patterns in our areas of operations or markets, whether due to climate change or otherwise, can temporarily impact freight volumes and increase our costs.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Closure of operations

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ More likely than not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Dependent on the specific event. Operations near specific weather events are more likely to be impacted than operations in other areas.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Improve monitoring of direct operations

(3.1.1.29) Description of response

N/A

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Technology

☑ Transition to lower emissions technology and products

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Electric vehicles show promise in commercial transport applications as an alternative to diesel, particularly in urban areas. Our fleet experts are working with manufacturers of larger electric trucks, and we have completed two pilot programs to advance our understanding of the commercial viability of these vehicles. In the U.S., we purchased nine all-electric eM2 trucks for use in our operations in California. In Europe we have more than 75 all-electric trucks currently deployed and have committed to order more than 275 additional all-electric trucks in 2025 supported by the existing and ongoing installation of more than 350 electric charging stations at our facilities.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ More likely than not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Dependent on regulatory requirements and adoption of electric vehicles.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage in multi-stakeholder initiatives

(3.1.1.29) Description of response

N/A

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Changing customer behavior

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Concerns relating to climate change have led to a range of local, state, federal, and international regulatory and policy efforts to seek to address greenhouse gas ("GHG") emissions. Climate change concerns and GHG regulatory efforts could affect the Company's customers which could impact the Company's reputation or require the Company to provide additional GHG related disclosures to its customers.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Disruption to sales

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Dependent on customer and customer requests.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with customers

(3.1.1.29) Description of response

N/A
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:
☑ Less than 1%

(3.1.2.7) Explanation of financial figures

We do not quantitatively calculate the impact of environmental risks upon our financial metrics
[Add row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:
☑ No, and we do not anticipate being regulated in the next three years

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

	Environmental opportunities identified
Water	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Use of new technologies

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

XPO's use onboard technology devices in tractor units enables detailed emissions reporting for XPO's North American operations. These units collect fleet detail including fuel consumption and emissions. This level of detail and centralized data enables emissions analysis that can be used to identify and prioritize emission reductions opportunities for XPO and its customers.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

Continued investment in technologies that drive information-based decision making and operational efficiencies.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp7

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Reduced water usage and consumption

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

XPO Europe participates in water management strategies including infiltration basins and rainwater harvesting systems that support groundwater recharge, reduce flood risk, and lower overall water consumption.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term
☑ Medium-term
☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:
☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:
☑ Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ No

(3.6.1.26) Strategy to realize opportunity

Water management opportunities are part of the overall Sustainability Scorecard for XPO Europe

Climate change

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Use of more efficient modes of transport

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

Our ongoing North American fleet initiatives companywide include modernizing our tractors and trailers; deploying cleaner fuels where practical, such as natural gas, renewable diesel, biodiesel, biogas, hydrotreated vegetable oil and electricity and exploring the commercial viability of alternative fuel vehicles. We are using biodiesel fuel in many areas, resulting in emissions reductions. We are exclusively using renewable diesel in the state of California. We have taken delivery of nine all-electric trucks to deploy in California. These trucks have begun picking up and delivering customer freight. European operations have been trialing and rolling out cleaner fuels across business units (such as scaling HVO, bio-LNG and bio-CNG or trialing biofuel blends) and scaling new vehicle technologies, such as EV vans and trucks. As of 2024, Europe operate a growing fleet of over 183 natural gas-powered vehicles (LNG + CNG). XPO has had 65 electric trucks in service since 2023, with a further 22 deployed in 2024 and 135 planned to enter operations in 2025–2026.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Returns on investment in low-emission technology

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

Continued evaluation and investment in efficient vehicles across operational uses. Investment in lower emission vehicles where the use case fits the demand, customer or regulatory requirement.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Increased efficiency of production and/or distribution processes

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

Our operations are powered by a fully cloud-based technology stack, distinguishing us as one of the few transportation companies that have moved beyond traditional mainframe systems. This modernization has unlocked the ability to integrate AI solutions that are improving service quality, reducing costs and lowering emissions. In our linehaul operations, our AI-driven models have reduced diversions and extraneous miles driven. Within our pickup and delivery options, our AI initiatives to optimize route assignments are reducing stops per hour, and ultimately, driving meaningfully higher trailer utilization.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

Continued investment in technology to advance the identification and pursuit in network efficiencies.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Use of recycling

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

Strategic, long-standing partnerships to increase waste diversion from landfill to recycling streams or circular reuse. In North American operations we recycle metals, wood, cardboard and other materials, diverting 19% of waste in 2024. We tear down trailers that have reached their end of life at our in-house manufacturing facility in Arkansas and recycle 86% of the materials in these trailers. We recap tires to reduce waste and our non-recyclable footprint. We consistently recycle waste oil in our shops. In European operations a key initiative in this approach is tire retreading, which allows us to extend the lifespan of our tires while significantly minimizing waste and resource consumption. Currently, 24% of our tires are retreaded, reducing the demand for new raw materials and lowering our carbon footprint. In 2024, in France, 31 tonnes of truck batteries and 86 tonnes of used oil were treated by a specialist waste management supplier. The material was made into second life products and remanufactured products. Similar activities are being carried out in other European countries we operate in.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

Identify facilities where waste tonnage and costs are high and seek to implement recycling programs to generate revenue and reduce disposition costs.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp5

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

LED lighting consumes a fraction of the energy used by standard fixtures. We have ongoing initiatives underway to install LED lighting in our buildings. In the US, in 2021, we invested more than $1.4 million in LED lighting across more than 200 locations. In European operations by the end of 2024, we had equipped 109 locations across Europe -covering 648,000 square meters - with intelligent LED lighting. As a result, 54% of our European operations now benefit from efficient lighting systems. To date, this transition has prevented more than 3,787 tonnes of CO_2 emissions, significantly reducing our environmental footprint.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.26) Strategy to realize opportunity

Continued investment in energy efficient technologies in facility locations.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp6

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.8) Organization specific description

By 2024, ten of our operational sites across France, UK, Spain, and Romania have integrated photovoltaic panels, covering a total surface of 84,000 square meters. These solar installations support both self-consumption and energy resale, enhancing our ability to generate and utilize clean energy efficiently. Moving forward, we continue to explore opportunities to expand solar capacity across our sites, further advancing our sustainability strategy. A further deployment plan is in place for 2025, where we will coordinate new solar energy installations to match the premises receiving the most EV units during the period.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Returns on investment in low-emission technology

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:
☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:
☑ Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not calculated

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ No

(3.6.1.26) Strategy to realize opportunity

Continued investment and exploration of renewable energy options in geographies where the financial use case and technology are feasible.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☑ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

We do not quantitatively calculate the impact of environmental opportunities upon our financial metrics.

Water

(3.6.2.1) Financial metric

Select from:

☑ OPEX

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

We do not quantitatively calculate the impact of environmental opportunities upon our financial metrics.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Our Board aims to create a diverse and highly skilled team of directors who provide our company with valuable oversight. When selecting new directors, our Board considers, among other things, the nominee's breadth of experience, financial expertise, integrity, ability to make independent analytical inquiries, understanding of our business environment, skills in areas relevant to our growth drivers, and willingness to devote adequate time to Board duties — all in the context of the needs of the Board at that point in time, and with the objective of ensuring a diversity of backgrounds, expertise and viewpoints. Our Board endeavors to include highly

qualified women and individuals from historically underrepresented groups in the candidate pool and has engaged in a purposeful process of regular refreshment. The section entitled "Director Qualifications Standards" of our Corporate Governance Guidelines provides our standards for nominating well qualified directors.
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply
☑ Director on board
☑ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Nominating, Corporate Governance and Sustainability Committee is tasked in its charter with supporting the Board in its oversight of the company's sustainability strategies and external disclosures; this includes engaging with management on material sustainability matters and stakeholder perspectives.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Director on board

☑ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Nominating, Corporate Governance and Sustainability Committee is tasked in its charter with supporting the Board in its oversight of the company's sustainability strategies and external disclosures; this includes engaging with management on material sustainability matters and stakeholder perspectives.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Director on board

☑ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Nominating, Corporate Governance and Sustainability Committee is tasked in its charter with supporting the Board in its oversight of the company's sustainability strategies and external disclosures; this includes engaging with management on material sustainability matters and stakeholder perspectives.
[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ As important matters arise

(4.3.1.6) Please explain

As matters arise our CEO reports and discusses with the Nominating, Corporate Governance and Sustainability Committee which is tasked in its charter with supporting the Board in its oversight of the company's sustainability strategies and external disclosures.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ President

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ As important matters arise

(4.3.1.6) Please explain

XPO Europe maintains a Sustainability scorecard tracking initiatives including those related to water and biodiversity.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ President

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ As important matters arise

(4.3.1.6) Please explain

XPO Europe maintains a Sustainability scorecard tracking initiatives including those related to water and biodiversity.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Other C-Suite Officer, please specify :Chief Legal Officer and Corporate Secretary

(4.3.1.2) Environmental responsibilities of this position

Strategy and financial planning

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Annually

(4.3.1.6) Please explain

The Chief Legal Officer and team manage recurring annual reporting and assessment responses related to sustainability (e.g. CDP, EcoVadis and others). This team prepares the annual Sustainability report and coordinates internally with customer-facing teams on sustainability requests.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:
☑ Yes

(4.5.3) Please explain

XPO Europe maintains a Sustainability scorecard. The Key Performance Indicators (KPIs) provide a structured framework to measure the progress of our sustainability initiatives. Our approach considers lead time requirements, category priorities, target variances, industry trends and our value chain. We also aim to comply with extensive European regulations such as the Green Deal, Fit for 55, and the broader set of EU rules already in place and those still to come. These initiatives cover a range of material issues at both the corporate and line of business (LOB) levels, as detailed in our renewed Europe Double Materiality Matrix. Progress against these KPIs is included within the Executive incentive programme, demonstrating the company's commitment to achieving our sustainability goals over a sufficiently long-term horizon to achieve meaningful change.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:
☑ Yes

(4.5.3) Please explain

XPO Europe maintains a Sustainability scorecard. The Key Performance Indicators (KPIs) provide a structured framework to measure the progress of our sustainability initiatives. Our approach considers lead time requirements, category priorities, target variances, industry trends and our value chain. We also aim to comply with extensive European regulations such as the Green Deal, Fit for 55, and the broader set of EU rules already in place and those still to come. These initiatives cover a range of material issues at both the corporate and line of business (LOB) levels, as detailed in our renewed Europe Double Materiality Matrix. Progress against these KPIs is included within the Executive incentive programme, demonstrating the company's commitment to achieving our sustainability goals over a sufficiently long-term horizon to achieve meaningful change.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ President

(4.5.1.5) Further details of incentives

XPO Europe maintains a Sustainability scorecard. The Key Performance Indicators (KPIs) provide a structured framework to measure the progress of our sustainability initiatives. Our approach considers lead time requirements, category priorities, target variances, industry trends and our value chain. We also aim to comply with extensive European regulations such as the Green Deal, Fit for 55, and the broader set of EU rules already in place and those still to come. These initiatives cover a range of material issues at both the corporate and line of business (LOB) levels, as detailed in our renewed Europe Double Materiality Matrix. Progress against these KPIs is included within the Executive incentive programme, demonstrating the company's commitment to achieving our sustainability goals over a sufficiently long-term horizon to achieve meaningful change. Details of the incentive program are not shared publicly.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Achievements are measured against targets using a strict predetermined calculation for each. This method incorporates industry specific measurement standards; as well as Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) requirements.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ President

(4.5.1.5) Further details of incentives

XPO Europe maintains a Sustainability scorecard. The Key Performance Indicators (KPIs) provide a structured framework to measure the progress of our sustainability initiatives. Our approach considers lead time requirements, category priorities, target variances, industry trends and our value chain. We also aim to comply with extensive European regulations such as the Green Deal, Fit for 55, and the broader set of EU rules already in place and those still to come. These initiatives cover a range of material issues at both the corporate and line of business (LOB) levels, as detailed in our renewed Europe Double Materiality Matrix. Progress against these KPIs is included within the Executive incentive programme, demonstrating the company's commitment to achieving our sustainability goals over a sufficiently long-term horizon to achieve meaningful change. Details of the incentive program are not shared publicly.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Achievements are measured against targets using a strict predetermined calculation for each. This method incorporates industry specific measurement standards; as well as Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) requirements.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?	Primary reason for not having an environmental policy	Explain why you do not have an environmental policy
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Not an immediate strategic priority	*We are reviewing and will implement environmental policies as appropriate.*

[Fixed row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ UN Global Compact

(4.10.3) Describe your organization's role within each framework or initiative

XPO Logistics Europe (a subsidiary of XPO) formally joined the UN Global Compact in 2024. This membership reflects XPO's broader commitment to responsible business conduct, consistent with the OECD Guidelines for Multinational Enterprises.
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

No

☑ No, we have assessed our activities, and none could directly or indirectly influence policy, law, or regulation that may impact the environment

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ No, and we do not plan to have one in the next two years

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ It is not possible or relevant for my organization or the intermediary organization to be registered

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

N/A

(4.11.9) Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select from:

☑ Judged to be unimportant or not relevant

(4.11.10) Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

N/A
[Fixed row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☑ In voluntary sustainability reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ No

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

(4.12.1.5) Status of the publication

Select from:

☑ Underway - previous year attached

(4.12.1.6) Content elements

Select all that apply

☑ Governance

☑ Strategy

☑ Greenhouse gas emissions figures

(4.12.1.7) Page/section reference

Throughout sustainability report

(4.12.1.8) Attach the relevant publication

XPO-SustainabilityReport-2025.pdf

Row 2

(4.12.1.1) Publication

Select from:

☑ In voluntary sustainability reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☑ GRI

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☑ Underway - previous year attached

(4.12.1.6) Content elements

Select all that apply

☑ Governance

☑ Strategy

☑ Greenhouse gas emissions figures

☑ Climate-related targets

(4.12.1.7) Page/section reference

Throughout sustainability report

(4.12.1.8) Attach the relevant publication

XPO Sustainability report 2025 V12_compressed.pdf

(4.12.1.9) Comment

File too large to attach but is available here: https://lets.go.xpo.com/l/896661/2025-06-20/21dxt2
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ No, but we plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

We expect to further develop our sustainability disclosure and scenario analysis to identify environment-related outcomes in the next two years.

Water

(5.1.1) Use of scenario analysis

Select from:

☑ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☑ No, but we are developing a climate transition plan within the next two years

(5.2.20) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ Not an immediate strategic priority

(5.2.21) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

Not an immediate strategic priority. As outlined in our 2025 Sustainability Report we have taken steps to begin to develop our climate goals and disclosure. We expect to further develop our sustainability disclosure and develop climate goals in the next two years.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ We have not evaluated whether environmental risks and opportunities have affected our strategy and financial planning, but plan to do so within the next two years

(5.3.3) Primary reason why environmental risks and/or opportunities have not affected your strategy and/or financial planning across all business areas

Select from:

☑ Not an immediate strategic priority

(5.3.4) Explain why environmental risks and/or opportunities have not affected your strategy and/or financial planning across all business areas

Not an immediate strategic priority. As outlined in our 2025 Sustainability Report we have taken steps to begin to develop our climate goals and disclosure. We expect to further develop our sustainability disclosure and develop climate goals in the next two years.
[Fixed row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: ☑ No, but we plan to in the next two years

[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

	Investment in low-carbon R&D	Comment
	Select from: ☑ No	*Our organization does not have material research and development relating to carbon products.*

[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

Carbon

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☑ No, but we plan to in the next two years

(5.10.2) Primary reason for not pricing this environmental externality

Select from:

☑ Not an immediate strategic priority

(5.10.3) Explain why your organization does not price this environmental externality

Not an immediate strategic priority. As outlined in our 2025 Sustainability Report we have taken steps to begin to develop our climate goals and disclosure. We expect to further develop our sustainability disclosure and develop climate goals in the next two years.

Water

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☑ No, and we do not plan to in the next two years

(5.10.2) Primary reason for not pricing this environmental externality

Select from:

☑ Not an immediate strategic priority

(5.10.3) Explain why your organization does not price this environmental externality

Not an immediate strategic priority.

Other

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☑ No, and we do not plan to in the next two years

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, but we plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Not an immediate strategic priority. We expect to further develop our sustainability disclosure and engage with suppliers, investors and other value chains stakeholders in the next two years to the extent requested by external parties.
[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

	Assessment of supplier dependencies and/or impacts on the environment
Climate change	*Select from:* ☑ No, we do not assess the dependencies and/or impacts of our suppliers, and have no plans to do so within two years

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ No, we do not prioritize which suppliers to engage with on this environmental issue

(5.11.2.3) Primary reason for no supplier prioritization on this environmental issue

Select from:

☑ Not an immediate strategic priority

(5.11.2.4) Please explain

XPO engages with Suppliers on environmental issues through the Supplier Code of Conduct. XPO encourages the Supplier to strive to reduce its energy consumption and related greenhouse gas emissions as well as the amount of waste it produces and sends to landfill by adopting appropriate measures and performance monitoring systems. As a responsible corporate entity, XPO is committed to promoting sustainability throughout operations. In this regard, we expect the Supplier to actively collaborate with our environmental projects and plans, and promptly disclose sustainability related information to enable effective analysis and support XPO's ongoing sustainability efforts.

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

XPO engages with Suppliers on environmental issues through the Supplier Code of Conduct. XPO encourages the Supplier to strive to reduce its energy consumption and related greenhouse gas emissions as well as the amount of waste it produces and sends to landfill by adopting appropriate measures and performance monitoring systems. As a responsible corporate entity, XPO is committed to promoting sustainability throughout operations. In this regard, we expect the Supplier to actively collaborate with our environmental projects and plans, and promptly disclose sustainability related information to enable effective analysis and support XPO's ongoing sustainability efforts.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Other, please specify :Supplier Code of Conduct

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Other, please specify :Signature of the Supplier Code of Conduct and internal monitoring of compliance to such

(5.11.6.12) Comment

Reporting against the Supplier Code of Conduct is not available.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ No other supplier engagement
[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:
☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:
☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customer inquiries regarding emissions and environmental strategy.

(5.11.9.6) Effect of engagement and measures of success

Our business units have discussed the requests with customers and aligned our future disclosure goals regarding climate concerns with the needs of our customers. Customers continue to be supportive of our climate strategy and initiatives.

Climate change

(5.11.9.1) Type of stakeholder

Select from:
☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing
☑ Share information about your products and relevant certification schemes
☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:
☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:
☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Investor and shareholder engagement on sustainability initiatives, strategy and reporting.

(5.11.9.6) Effect of engagement and measures of success

Our Investor Relations have discussed the requests with investors and shareholders and aligned our future disclosure goals regarding climate concerns with the needs of our investors and shareholders.
[Add row]

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

	Environmental initiatives implemented due to CDP Supply Chain member engagement	Primary reason for not implementing environmental initiatives	Explain why your organization has not implemented any environmental initiatives
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Not an immediate strategic priority	*Not an immediate strategic priority. We will evaluate and implement environmental initiatives to the extent practicable.*

[Fixed row]

C6. Environmental performance - Consolidation approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used	Provide the rationale for the choice of consolidation approach
Climate change	*Select from:* ☑ Operational control	*We continue to evaluate climate impacts for disclosure under applicable local, state and federal law as well as international regulations.*
Water	*Select from:* ☑ Other, please specify :Not relevant	*Not relevant*
Biodiversity	*Select from:* ☑ Other, please specify :N/A	*Not relevant*

[Fixed row]

C7. Environmental performance - Climate change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We have operations where we are able to access electricity supplier emission factors or residual emissions factors, but are unable to report a Scope 2, market-based figure

(7.3.3) Comment

In North America, our Scope 2 emissions reporting data is provided by a third party energy management company with the majority of the reporting available as location-based aggregation.
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are excluded from your disclosure of climate-related data?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

In North America, emissions from forklifts, terminal tractors, outsourced linehaul, and rental for our North American LTL segment have not been evaluated.

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

☑ Scope 3: Downstream transportation and distribution

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not evaluated

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.10) Explain why this source is excluded

We are still in the process of gathering data sources for all relevant scope categories. We are reporting on data that is currently available to us, but will continue to gather supplier data and expand the scope of calculations into missing categories where possible in coming years.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Percentage excluded is unknown

Row 2

(7.4.1.1) Source of excluded emissions

In North America, data is not yet available for Scope 3 categories

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 3: Capital goods
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.10) Explain why this source is excluded

We are still in the process of gathering data sources for all relevant scope categories. We are reporting on data that is currently available to us, but will continue to gather supplier data and expand the scope of calculations into missing categories where possible in coming years.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Percentage excluded is unknown
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1401005

(7.5.3) Methodological details

Prior to reporting year 2023, reporting year 2021 was the last year that XPO submitted a CDP report. As such, this is the most applicable year from which to establish an emissions baseline.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

43697

(7.5.3) Methodological details

Prior to reporting year 2023, reporting year 2021 was the last year that XPO submitted a CDP report. As such, this is the most applicable year from which to establish an emissions baseline.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

913503

(7.5.3) Methodological details

Prior to reporting year 2023, reporting year 2021 was the last year that XPO submitted a CDP report. As such, this is the most applicable year from which to establish an emissions baseline. In scope are the GHG emissions from third-party road transportation services. Emissions were calculated using emissions factors set by ADEME (French Environment and Energy Management Agency) and EPA SmartWay Transport Partnership.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

3558

(7.5.3) Methodological details

Prior to reporting year 2023, reporting year 2021 was the last year that XPO submitted a CDP report. As such, this is the most applicable year from which to establish an emissions baseline

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not Evaluated
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1308417

(7.6.3) Methodological details

This total represents Scope 1 Emissions from reporting units of North America LTL and XPO Logistics Europe. North America reporting 1,018,758 MT CO2e in Scope 1 emissions. The majority (1,011,029 MT CO2e) reported in mobile emissions from our LTL segment trucks equipped with Samsara (approx. 99% of our North American LTL segment P&D linehaul trucks and tractors). Emissions from forklifts, terminal tractors, outsourced linehaul, and rental for our North American LTL segment have not been evaluated. XPO Logistics Europe reported 289,658 MT CO2e reflecting both stationary and mobile emissions.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1325813

(7.6.2) End date

12/31/2024

(7.6.3) Methodological details

This total represents Scope 1 Emissions from reporting units of North America LTL and XPO Logistics Europe. North America reporting 977,238 MT CO2e in Scope 1 emissions. The majority (971,036 MT CO2e) reported in mobile emissions from our LTL segment trucks equipped with Samsara (approx. 99% of our North American LTL segment P&D linehaul trucks and tractors). Emissions from forklifts, terminal tractors, outsourced linehaul, and rental for our North American LTL segment have not been evaluated. XPO Logistics Europe reported 348,575 MT CO2e reflecting both stationary and mobile emissions.

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1246378

(7.6.2) End date

12/31/2023

(7.6.3) Methodological details

For the North American LTL segment this figure includes an aggregate of 889,025 metric tons of C02e calculated from 1,958,206,097 lbs of C02 emissions based on SmartWay calculations from our LTL segment trucks equipped with samsara (approx. 99% of our North American LTL segment P&D linehaul trucks and tractors). Estimates carbon emissions at 21.815 lbs per gallon of fuel used. Outsourced linehaul and rentals for our North American LTL segment have not been evaluated. For the European Segment this figure includes an aggregate of 357,353 metric tons of C02e calculated from direct emissions in the segment including approximately: (i) Stationary Fuel - 9,305 tons of C02e, (ii) Bioenergy - 15 tons of C02e, (iii) Refrigerants – 6,945 tons of C02e, (iv) Co. Personal Vehicles – 2,408 tons of C02e, and (v) Delivery Fleet Vehicles 338,679. Total Scope Breakdown (question 7.16) is shown as follows: United States - Scope 1 (889,025). Includes operations in Canada. France – Scope 1 (173,800) and Scope 2(449) United Kingdom – Scope 1 (107,399) and Scope 2(278). Includes emissions from operations in Ireland. Germany – Scope 1 (76,154) and Scope 2(197). This number is an aggregate for our other European operations which are not further broken down. Includes emissions from operations in Spain, Portugal, Italy, Morocco, Luxembourg, Germany, Netherlands, Czechia, Slovakia, Poland and Romania
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

24681

(7.7.4) Methodological details

This total represents Scope 2 Emissions from reporting units of North America LTL and XPO Logistics Europe. North America reporting 23,756 MT CO2e, primarily from electricity generation in facilities. Europe reporting 925 MT CO2e. North American Scope 2 data was not reported in prior year (2023).

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

24499

(7.7.3) End date

12/31/2024

(7.7.4) Methodological details

This total represents Scope 2 Emissions from reporting units of North America LTL and XPO Logistics Europe. North America reporting 23,646 MT CO2e, primarily from electricity generation in facilities. Europe reporting 853 MT CO2e. North American Scope 2 data was not reported in prior year (2023).

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

924

(7.7.3) End date

12/31/2023

(7.7.4) Methodological details

Not calculated for our North American LTL Operations. This figure includes location-based emissions from the generation of purchased electricity, heat, steam or cooling by our European Segment including an aggregate of 924 tons of C02e calculated from direct emissions in the segment including approximately: (i) Electricity – 830 tons of C02e and (ii) Electricity for EVs – 95 tons of C02e.
[Fixed row]

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

7600

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Capital goods

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

18746

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

250235

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

646785

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

884

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1087

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

9885

(7.8.6) Please explain

Includes Scope 3 emissions for our European segment. Percentage of emissions calculated using data obtained from suppliers or value chain partners has not been evaluated. Not evaluated for our North American segment.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2024

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

6944

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

42227

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

254700

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

598229

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

2201

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

4798

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

10052

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ No third-party verification or assurance
Scope 2 (location-based or market-based)	*Select from:* ☑ No third-party verification or assurance
Scope 3	*Select from:* ☑ No third-party verification or assurance

[Fixed row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Decreased

(7.12) Does your organization have significant land sector activities in its operations or value chain?

	Agriculture, forestry or other land sector activities
	Select from: ☑ Not evaluated

[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☑ Not evaluated	*Select from:* ☑ No

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:

☑ No, and we do not plan to within the next two years

(7.15.2) Primary reason for not providing an emissions breakdown by greenhouse gas type

Select from:

☑ Not an immediate strategic priority

(7.15.3) Explain why your organization does not break down its Scope 1 or 2 emissions by greenhouse gas type

Not an immediate strategic priority
[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☑ By business division

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	*North America LTL*	*1018758*
Row 2	*Europe*	*289658*

[Add row]

(7.19) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Transport services activities	*1308417*	*Our business operations are transportation services*

[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO2e)
Row 1	*North America LTL*	*23756*
Row 2	*Europe*	*925*

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

	Scope 2, location-based, metric tons CO2e	Comment
Transport services activities	*24681*	*Our business operations are transportation services*

[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ No

(7.26) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

Row 1

(7.26.1) Requesting member

Select from:
☑ DS Smith Plc

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

Not disclosed
[Add row]

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Row 1

(7.27.1) Allocation challenges

Select from:

☑ Doing so would require we disclose business sensitive/proprietary information

(7.27.2) Please explain what would help you overcome these challenges

We face limited resources, diverse raw data coming from multiple systems, business units, countries, being normalized and other challenged when calculating and allocating emissions on a per customer basis. Less than Truckload shipments are comprised of shipments from multiple customers and emissions not easily attributed to individual customers. We have the opportunity to provide limited emissions data to customers as they express interest, however, providing customers with full emissions data, including shipments to different customers, would facilitate insight into transportation percentages and shipment weights allocated to individual customers which is sensitive and proprietary data.
[Add row]

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

(7.28.1) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Select from:

☑ Yes

(7.28.2) Describe how you plan to develop your capabilities

We have the ability to provide emissions data to customers as they express interest, however, providing customers with full emissions data, including shipments to different customers, would facilitate insight into transportation percentages and shipment weights allocated to individual customers which is sensitive and proprietary data. We continue to review methods to allocate emissions from shipments comprised of multiple customers to individual customer shipments in order to provide customers with emissions data.
[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ Don't know

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

12878

(7.30.1.3) MWh from non-renewable sources

90815

(7.30.1.5) Total (renewable + non-renewable) MWh

103693.00
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes

[Fixed row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply
☑ Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, and we do not anticipate setting one in the next two years

(7.53.1.5) Date target was set

04/13/2021

(7.53.1.6) Target coverage

Select from:

☑ Business division

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.1.11) End date of base year

12/31/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

432165

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

3570

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

435735.000

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

25

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

326801.250

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

0.000

(7.53.1.79) % of target achieved relative to base year

400.00

(7.53.1.82) Explain target coverage and identify any exclusions

XPO Logistics Europe has a strategic objective on their ESG/CSR Scorecard to achieve a 25% reduction in absolute carbon emissions (Scopes 1 and 2) by 2030, based on a 2019 baseline. (Global mass)(GHG and GLEC Protocols)

(7.53.1.83) Target objective

XPO Logistics Europe has a strategic objective on their ESG/CSR Scorecard to achieve a 25% reduction in absolute carbon emissions (Scopes 1 and 2) by 2030, based on a 2019 baseline. (Global mass)(GHG and GLEC Protocols)
[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply
☑ No other climate-related targets

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☑ Yes

[Fixed row]

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Implementation commenced	*11*	*58*

[Fixed row]

(7.73) Are you providing product level data for your organization's goods or services?

Select from:

☑ No, I am not providing data

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:
☑ No

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

data not available

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

data not available

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

data not available

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

(9.2.4) Please explain

data not available

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:
☑ 76-99

(9.2.2) Frequency of measurement

Select from:
☑ At least once a quarter

(9.2.3) Method of measurement

Monitored and reported by third party utility provider

(9.2.4) Please explain

North American water consumption is monitored by a third party utility provider and reported as needed.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total consumption

(9.2.2.1) Volume (megaliters)

475

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Unknown

(9.2.2.4) Five-year forecast

Select from:
☑ Unknown

(9.2.2.5) Primary reason for forecast

Select from:
☑ Unknown
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

	Identification of facilities in the value chain stage
Direct operations	*Select from:* ☑ No, we have not assessed this value chain stage for facilities with substantive water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

	Identification of facilities in the value chain stage
Upstream value chain	*Select from:* ☑ No, we have not assessed this value chain stage for facilities with substantive water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
	Select from: ☑ No, and we do not plan to address this within the next two years	*Select from:* ☑ Not an immediate strategic priority	*Not an immediate strategic priority*

[Fixed row]

(9.15) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category
Water pollution	*Select from:* ☑ No, and we do not plan to within the next two years
Water withdrawals	*Select from:* ☑ No, and we do not plan to within the next two years
Water, Sanitation, and Hygiene (WASH) services	*Select from:* ☑ No, and we do not plan to within the next two years
Other	*Select from:* ☑ No, and we do not plan to within the next two years

[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Land/water management

☑ Species management

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	Select from: ☑ No

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

	Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity	Comment
Legally protected areas	*Select from:* ☑ Not assessed	*N/A*
UNESCO World Heritage sites	*Select from:* ☑ Not assessed	*N/A*
UNESCO Man and the Biosphere Reserves	*Select from:* ☑ Not assessed	*N/A*
Ramsar sites	*Select from:* ☑ Not assessed	*N/A*
Key Biodiversity Areas	*Select from:* ☑ Not assessed	*N/A*
Other areas important for biodiversity	*Select from:* ☑ Not assessed	*N/A*

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party	Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party	Explain why other environmental information included in your CDP response is not verified and/or assured by a third party
	Select from: ☑ No, and we do not plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years	*Select from:* ☑ Judged to be unimportant or not relevant	*N/A*

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Director, Legal Counsel

(13.3.2) Corresponding job category

Select from:
☑ Other, please specify :Counsel
[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub to facilitate collective action in priority basins.

Select from:

☑ No