NATS

Pay Gap Report 2023



Contents

Foreword by Chris Last 3

Employee demographics 4

Gender pay gap 5

Ethnicity pay gap 6

Disability pay gap 7

Review of our actions from 2023 8

Review of activities from 2023 9

Action plan 2024 13

Close from Martin Rolfe 15

Our statutory declaration 16

Useful definitions 17





Foreword by Chris Last

This year, we have decided to publish our disability pay gap in addition to gender and ethnicity.

We have a combined report to provide a broader picture of our pay differentials and to enable us to take a joined-up, consistent approach to tackling disparities.

Due to the timings of our pay awards in 2023, our mean and median gender pay gaps have increased. Our Air Traffic Controllers and Engineers, which have a higher proportion of men, all received their pay award in March. Our other colleagues received their pay award in May, and there are more women in this group. Both pay awards were backdated, however due to the staggered implementation it distorts our calculations for the April 2023 snapshot. Had we applied the pay award to all employees at the same time, there would have been no change to our mean gender pay gap, an improvement of 1.6% to our median gender pay gap compared to last year and our mean bonus gap would be 6.5%. Our bonus gap improved this year, however our 2022 bonus gap was not typical, due to bonus restrictions during the pandemic.

This year, we have taken steps to make sure we have a centrally co-ordinated approach to Equality, Diversity and Inclusion (EDI) and we are working together as an organisation to build an even more inclusive culture. In February 2023, we welcomed a new EDI Programme Manager and we now have an EDI programme in place, with groups across the business supporting our corporate objectives.

In terms of diversity, increasing representation of women and people from ethnic minority backgrounds in STEM professions

still remains a challenge. This is not just a problem for us, but a challenge the UK faces. We are taking proactive steps to attract people from underrepresented groups, not only to our current roles, but to STEM in general. In our recent Trainee Air Traffic Control and early careers recruitment campaigns, we have targeted our advertising and events to provide more information on career opportunities for women in aviation.

We also made progress in our outreach work. We launched our STEM ambassador toolkit, held our Future Minds event for young women, appointed an Educational Outreach Programme Manager and worked with our charity partners Fantasy Wings and Jon Egging Trust to provide experiences for young people from ethnic minority backgrounds and disadvantaged backgrounds.

We have undertaken benchmarking exercises to find out how our colleagues feel about working at NATS and how our efforts related to EDI compare to other organisations. Being assessed as a Best Companies 1 star 'Very Good Company to Work For' and within the Inclusive Top 50 UK Employers on our first attempts has been encouraging. The inclusion of our disability pay gap this year has been another step forward for us, however we want to build on the feedback and our initial pay gap analysis to continue to improve.

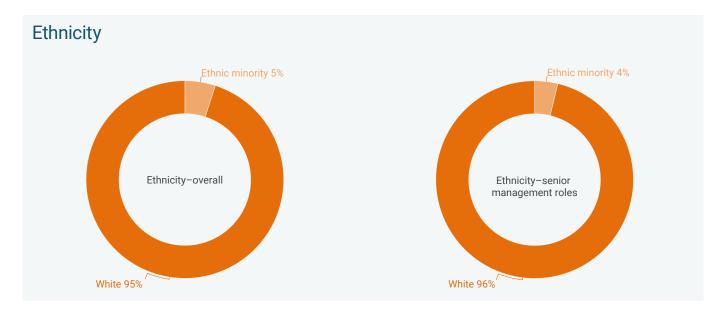
Car.

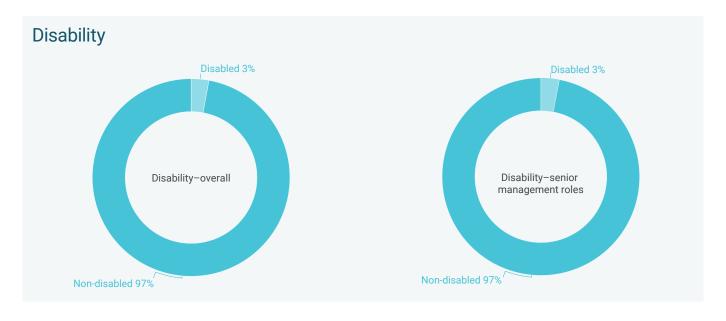
Chris Last HR Director



Employee demographics







Gender pay gap

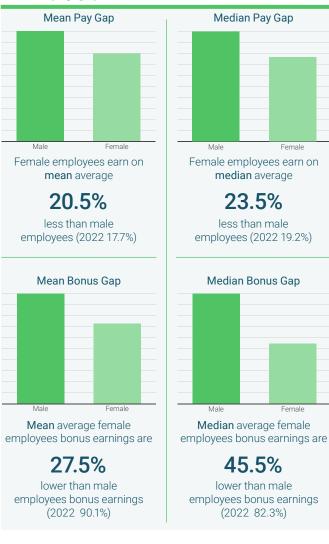
Why we have a gender pay gap?

We have more men than women across NATS, with more men in our senior roles and our higher paid operational and engineering grades.

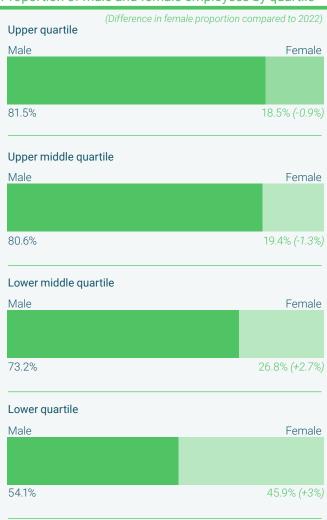
Our bonus gap has significantly improved this year, however it's important to note that our bonus gaps for 2022 were not typical. This was due to bonus restrictions during the pandemic. The only payments made were in relation to the Long-Term Incentive Plan for our Executive team (which related to the performance

period January 2018 to December 2019) and a small number of relocation payments. Our bonus gap for this year looks at bonus payments between April 2022 and March 2023, which again was an exceptional year in that lump sum payments linked to the pay deals are included in these calculations. The staggered pay deal mentioned earlier also has an impact, if they had been implemented at the same time the mean pay gap would be **17.7%** and the mean bonus gap would be **6.5%**.

Gender pay gap



Proportion of male and female employees by quartile



Ethnicity pay gap

Why we have an ethnicity pay gap

Our pay quartiles highlight the lack of ethnic diversity we have at NATS. We have more colleagues from an ethnic minority background in the lower pay quartiles, as well as gaps in our diversity data for ethnicity declarations. We hope by publishing our data, we can encourage more colleagues to share their ethnicity, so we can take positive action to address the pay gap. The staggered pay deal mentioned earlier also has an impact, if they had been implemented at the same time the mean pay gap would be **22.8%** and the mean bonus gap would be **17.2%**.

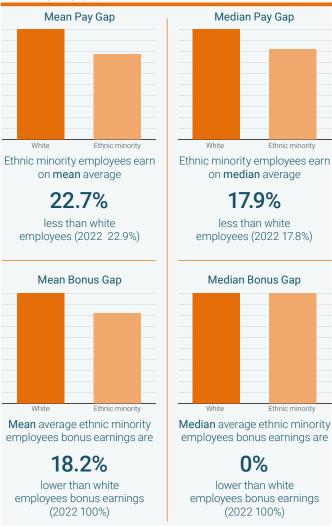
In our data analysis, we have used the terminology drawn from our ethnicity data and the categories used are as follows:

- White-those who recorded 'white'.
- Ethnic minority includes:
 - Arab
 - Bangladeshi

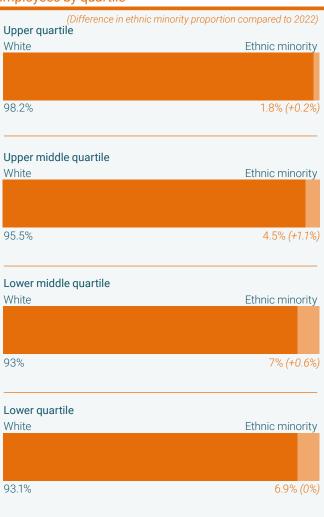
- Black/African
- Black/Caribbean
- Chinese
- Indian
- Mixed White and Asian
- Mixed White and Black African
- Mixed White and Black Caribbean
- Other Asian Background
- Other Black/African/Caribbean Background
- Other Ethnic Group
- Other Mixed/Multiple Ethnic Background
- Other White Background
- Pakistani

Any employee who did not provide data or chose 'prefer not to provide' was excluded.

Ethnicity pay gap



Proportion of white and ethnic minority employees by quartile



Calculating our ethnicity pay gap

In the absence of any government guidance on how to calculate our ethnicity pay gap, we have mirrored the rules we use for our gender pay calculations.

Disability pay gap

We have been working with our Disability Network to raise the awareness and importance of colleagues declaring if they have a disability or don't have a disability. We set a declaration target of 80%, which we achieved and so for the first time we are able to publish our disability pay gap.

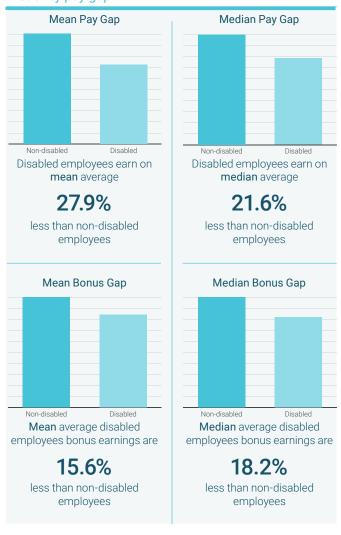
Why we have a disability pay gap

Of the small proportion of colleagues who have declared themselves as disabled (2.1%), there is a higher percentage in the lower pay quartile, and this reduces as you go up the pay quartiles.

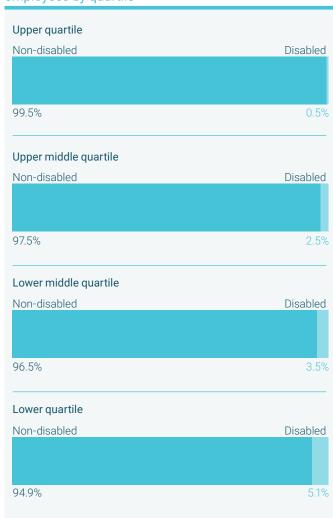
It's important to note that 20% of our colleagues have not declared this data at all and there are likely to be employees who have declared but may not want to share their disability for a number of reasons. So we need to consider this data with caution, however we hope by publishing it will encourage employees to share their information, as we take positive action to reduce this imbalance.

Employees who did not provide data or chose 'prefer not to provide' were excluded.

Disability pay gap



Proportion of disabled and non-disabled employees by quartile



Calculating our disability pay gap

In the absence of any government guidance on how to calculate our disability pay gap, we have mirrored the rules we use for our gender pay calculations.

Review of our actions from 2023

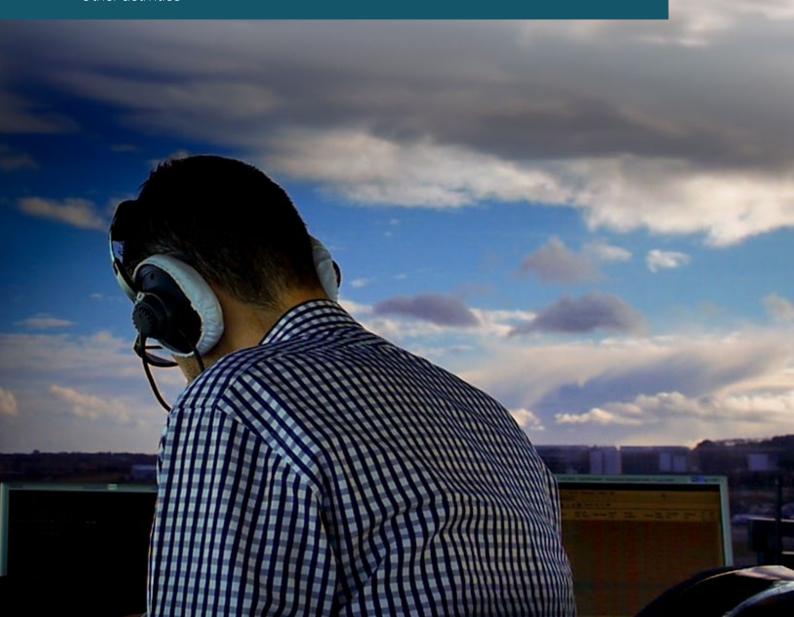
Actions	Progress	
A 50:50 gender diversity for new recruits to the business.	32% of new recruits into the business declared their gender as 'female'.	
At least 14% of our new joiners are from ethnic minority backgrounds.	11.5% of new recruits into the business were from an ethnic minority background, an increase from 6% in the previous year.	
Our disability declaration increases above 80%.	We reached the declaration rate target.	
The overall diversity of our Senior Leadership Team* to increase by a 1–3% year-on-year improvement, over a rolling five-year period.	The overall diversity (gender, ethnicity and disability) of our Senior Leadership Team* has increased by 2% to 11.1%.	
The overall diversity of our promotions to increase by 1–3% year-on-year improvement, over a rolling five-year period.	The overall diversity (gender, ethnicity and disability) of our promotions has increased by 4% to 16%.	
Ensure our leaders and managers are assessed on their contributions to achieving our EDI objectives.	Our Senior Leadership Team* now has an EDI related objective.	
Increase attendance at EDI events and increase allyship support.	We celebrated National Inclusion Week 2023. We recorded all our sessions and worked with operational colleagues to adapt the timings and format to make it more accessible around their shift patterns. See Internal engagement for more detail.	
Join Inclusive Companies and use opportunities for networking and learning.	We became a member of Inclusive Companies and entered their Inclusive Top 50 UK Employers List and placed 44th.	
Undertake further education on discrimination as part of anti- bullying and respect at work campaigns.	We will focus on this in early 2024, following our inclusive learning feedback sessions.	
Work towards becoming a Top 25 UK Employer by 2040.	We participated in the Best Companies b-Heard survey, and they accredited us with 1 star — recognising us as a Very Good Company to Work For. We also ranked in 13th in the UK's Best Big Companies to Work For league table for companies with more than 2,000 employees.	
To focus on inclusive assessment to ensure fair recruitment. * We categorise the Senior Leadership Team as the CEO and two level	We promoted the use of gender diverse interview panels, and introduced a hiring manager toolkit, providing guidance on interview panels, scoring and inclusive recruitment. See Recruitment and attraction for more detail.	



Review of activities from 2023

During 2023 we strived to improve our workplace diversity through multiple actions. We have grouped the activities into the following four categories:

- Learning and development
- Recruitment and attraction
- · Communications and engagement and inclusive culture
- Other activities



Learning and development

Here we will summarise our achievements in supporting career development for those from underrepresented groups and being inclusive in our approach to learning, professional development and talent development. EDI content is now included in our corporate and early careers inductions. Highlighting our commitment to EDI at the start of the employee journey and signposting the different ways colleagues can access support and get involved.

Leadership is important in creating an inclusive culture in our organisation, so all our aspiring leaders now have an introduction to our EDI programme via our Leadership Essentials course, along with a dedicated session on leading inclusive teams. All our main EDI development sessions, including inclusive team working, unconscious bias and positive challenge are open to all colleagues throughout the year. We also have a coaching and mentoring programme.

To help increase engagement and ensure our learning and development offering is accessible, we have been taking steps to understand how we can make it more inclusive. We held feedback sessions and developed an e-learning version of our unconscious bias training to provide an alternative format for colleagues to access the material.

Recruitment and attraction

Here we will summarise our achievements in increasing the diversity of people we attract to our organisation and being inclusive in our approach to recruitment and attraction.

External communications

We have revised our attraction strategy to ensure our job adverts and promotional material is reaching a broader demographic of people and we are utilising more innovative processes to capture their interest. To reach a more diverse audience, we have focused on our social media presence, considering both reach and demographic of candidate base. We are now utilising new channels to target different audiences, for example putting more resource into Instagram, where we know 80% of our following is between 18 and 25 years old. We also advertise our roles on inclusive job board platforms including Vercida, Inclusive Companies and Stonewall.

To make our content more accessible to people who can't attend career events in person, we introduced several virtual offerings such as virtual career fairs and virtual assessments. This can help attract people from across the UK and for those who can't travel based on financial restrictions or caring responsibilities. For example, our 'Women of NATS' webinar, specifically targeting a female audience, has been watched by 1500+ people.

This year, we also sponsored Southampton Pride, an event celebrating our LGBTQ+ colleagues, but also to highlight NATS as an inclusive employer in the region. This was the first external, inclusion related event we have sponsored as a business.



Our recruitment process and practices

We created starting salary guidance to support managers and recruiters to make sound and fair decisions on starting salaries for new joiners and for making promotional moves into our managerial group. This supports our aim to attract and retain the best talent to succeed, while encouraging pay parity principles.

All hiring managers and early career assessors receive mandatory training, including upskilling to prevent bias in the hiring process. We provide guidance on conducting interviews, scoring templates and sample competency-based questions. Our new scoring methodology also helps to ensure decisions are driven by data and evidence.

We are coaching hiring managers to challenge their own thinking around the type of person required, essential versus desirable skills, and to consider transferable skills and different options for filling a post e.g. flexible working and job share options. We have now agreed a new recruitment policy with our Trades Unions for fairer and inclusive recruitment. Changes to this policy mean flexible working is considered for all suitable roles, making them more accessible and attractive to a broader range of candidates.



This year, we hired 38 people for our Early Careers scheme, where 21 were male, and 17 were female, making a 55% and 45% gender split.

55% male 45% female

There were also 34% from an ethnic minority background, which is an improvement on 18% in 2022.

66% white 34% ethnic minority

For 2022 and 2023 Early Careers scheme combined, we have 36 male and 39 female, which gives a 48% and 52% gender split.

% male 52% female

Outreach

We have taken steps to broaden our outreach and focus on partner organisations who work with young people from groups who are underrepresented at NATS and in the wider STEM industry.

We presented at Fantasy Wings' annual conference, an organisation that seeks to help individuals from black, Asian and minority ethnic backgrounds and women access opportunities within the aviation industry.

We ran our 'Future Minds' programme, which helps young women to hear about the career options available in aviation and the STEM industry. This year, we offered half the places to young women who had a connection at NATS and half to young women associated with charities, Fantasy Wings and Developing the Young Workforce. This helped broaden the opportunity to communities beyond our geographical locations and to those who may not have considered a career in STEM before.



We have appointed an 'Educational Outreach Programme Manager,' focusing on our work experience provision and community outreach.

Communications and engagement and inclusive culture

Here we will summarise the achievements we have made in 2023 to engage with colleagues on EDI topics, fostering an inclusive environment.

Internal engagement

We aimed to increase attendance at EDI events and increase allyship support. We have made progress against this goal and some notable highlights are detailed below:

- We celebrated several cultural and diversity awareness events, including Women's History Month, International Women's Day, Neurodiversity Awareness Week, Pride, South Asian Heritage Month, Black History Month, World Menopause Day and faith celebrations. We also acknowledged professional recognition events, such as International Women in Engineering Day and National Engineering Day.
- Our Women's Network delivered a programme of events and networking opportunities, including a regular media club and briefings for new starters. The network also formed a team in 2022, focused on supporting and building allyship and educating colleagues on how they can support gender equality.
- During Black History Month, GlobeAll, our network representing employees from ethnic and cultural minority backgrounds, worked with senior leaders to deliver a second tranche of mentoring circle sessions. Improving ethnicity

- declaration rates was a key focus, as well as providing a progress update on our Business in The Community Race at Work Charter commitments.
- ▶ For the first time we celebrated Neurodiversity Celebration Week, where our Disability Network hosted a virtual 'Let's talk about neurodiversity' discussion. This has helped to start the conversation on how we support neurodiverse colleagues and increase an individual's confidence in sharing any adjustments they may need.
- ▶ This year we introduced a new EDI podcast, where we invite colleagues and external guest speakers to talk about EDI topics. We have heard personal stories from colleagues during Black History Month, International Men's Day and we spoke with an external guest speaker on the importance of visibility and STEM outreach opportunities for young people.
- During World Menopause Day we re-promoted our Menopause plan, which, at no cost to employees, offers confidential, personalised support for colleagues going through the menopause. We also promoted additional support and resources available via our Employee Assistance Programme provider and a webinar hosted by Aviva.

External engagement and benchmarking

In 2023, we focussed on increasing our inclusion related external communications, to highlight the great work we have been doing and how important EDI is to us as an organisation. We have also taken part in a few benchmarking exercises, to get perspective on how well we are doing compared to other big companies and to get ideas on how we continue to improve.

Earlier this year we published our first EDI dashboard, which tracks our progress in developing equitable processes, a more diverse workforce and inclusive culture. It includes our aspirational goals from our 2022/23 pay gap report, relating to representation and progression, but also additional measures to understand our culture, such as survey results and our declaration rates.

We continue to support Aerobility and other leading aviation advocates to create a new Equal Skies charter. The charter has been designed to encourage organisations to show a commitment to the equality of the disabled community.

Other activities

- As part of our feedback from the Stonewall Workplace Equality Index, we have:
 - Revisited the Respect at Work policy to include explicit examples of unacceptable and inappropriate behaviour in relation to sexual orientation and gender identity.
 - ▶ Updated the Employee Handbook to remove any gender specific and non-inclusive language.
- We have updated our Reasonable Adjustment guidance document.



Kathryn Leahy Chief Operations Officer

This year's reports reflects that, whilst we remain committed to achieving gender equality, our journey is not a simple one, however we strive daily to achieve our aims. You will see that the timing of our pay awards for negotiated and non-negotiated grades can skew the gap, this is not unique to NATS, and we understand and manage this. Overall progress is challenging, therefore, we require extra effort, new initiatives and courage.

Our disability network is doing a great job to create an inclusive environment where colleagues with disabilities and long-term health conditions feel confident to share their needs. We want to build on this great work and continue to foster that culture here. The work we have done to remove gender bias and discrimination through recruitment is working. Our reach into the local

communities we serve remains a huge opportunity to attract new colleagues from ethnic minority backgrounds. Partnering with our Airport customers on their community and early careers programmes will open up opportunities for people to experience what we do and see the many career options.

In my interview, having recently joined the business, I asked questions around the work we are doing as a business to address our challenges, as the subject is so close to my core values. So while we still have lots of work to do, as a new leader in the business I am, and continue to be, hugely encouraged by the passion and commitment we are demonstrating to address this imperative.



Tammy Haydon Disability Network Co-chair

As co-chair of the Disability Network I am thrilled we are publishing our disability pay gap for the first time. This shows NATS' commitment to ensuring equal opportunities and fair treatment for all colleagues, regardless of disability or long-term health conditions. Over the last year the network has worked with the business to improve accessible recruitment, increase

access to workplace adjustments, and deliver training and support for those with disabilities/long term health conditions, their managers, and the wider team. Our next focus is improving the workplace adjustment process, making it quicker and easier for colleagues to identify and access the adjustments they need.



Zain Ahmed GlobeAll Co-chair

As someone from an ethnic background, I appreciate the effort that has gone into calculating our ethnicity pay gap, despite it not being a legal requirement for us to declare it. I would encourage all colleagues to share their

information around their ethnicity to help the business create a more robust report, so we can continue to make improvements.



In 2023, we employed a permanent EDI Programme Manager and we now have an EDI programme with four workstreams: Attract, Engage, Educate and Lead. We have dedicated leaders responsible for the delivery of actions under each workstream and a summary of the proposed actions are below:

Attract workstream:

- Refresh our internal opportunities intranet page to improve awareness of internal development opportunities and roles.
- Launch our revised talent assessment methodology.
- Highlight our inclusive benefits and culture externally in our job adverts to help attract a broader range of candidates.
- Implement and launch new HR data system in Summer 2025, which will have more diversity data options. This will help us to better understand the demographic breakdown of our organisation and check we are providing the appropriate facilities and support.

Engage workstream:

- Create a bespoke EDI module for our corporate induction, so our new joiners are aware of our organisation's stance on EDI and can be signposted to the support networks available.
- Implement a tiering system for our internal and external EDI related communications. Through this, we will support our networks with campaigns and maximise opportunities to share stories with intersectional content.
- Deliver National Inclusion Week 2024 programme of events and continue to work with operational and international colleagues to build on engagement.
- Launch an EDI belonging campaign to support internal engagement and welcome all new joiners in 2024.

Educate workstream:

- Refresh our 'Respect at Work' training to make it more relevant for our colleagues and include best practice approaches to help prevent all forms of discrimination.
- Continue to explore opportunities for developing colleagues from underrepresented groups to support their career journey and personal growth.
- Make neurodiversity awareness training available to all, so we are able to support colleagues with different approaches to learning.
- Carry out inclusive coaching training for our internal coaching bank, so our coaches are upskilled to flex their style.
- Review leadership curriculum to ensure we are providing a range of inclusive learning opportunities for our leaders.
- Use Learning at Work Week to broaden the awareness of our

- inclusive learning opportunities.
- Expand our EDI digital curriculum content to cover a broader range of topics

Lead workstream:

The majority of actions under the 'Lead' workstream are the same as those developed as part of our employee engagement (b-Heard) action plan in response to colleagues' feedback. We are looking to use the same actions, as we are striving for similar aims in both pieces of work.

- Explore mentoring opportunities between senior leaders and members of our Employee Networks. We want to use this to support the development of colleagues from underrepresented groups and to support our leaders to gain greater understanding of the barriers some people face in progressing in the organisation.
- Develop a listening strategy to ensure we have clear mechanisms in place that enable two-way feedback loops between colleagues and leadership teams and that our leaders and managers feel supported in escalating issues and following up.
- ▶ Ensure our colleagues have opportunities to share their feedback on what we could improve upon as an organisation and what's working well.
- Design a 'Promotion Induction' session for colleagues who have recently been promoted to a new role or grade to help them explore any learning needs required.

Inclusive environment and benchmarking:

- Progress work on 'Inclusive Environment', including establishing a workplace adjustment process.
- Review feedback from Inclusive Top 50 UK Employers benchmarking exercise to build on the progress we have made to make our organisation more inclusive.
- Revise our 'Transitioning in the workplace' guidance to support colleagues and line managers.

2024 targets:

- ▶ A 50:50 gender diversity for new recruits to the business.
- At least 14% of our new joiners are from ethnic minority backgrounds.
- ► The overall diversity of our Senior Leadership Team* to increase by a 1–3% year-on-year improvement, over a rolling five-year period.
- ➤ The overall diversity of our promotions to increase by 1-3% year-on-year improvement, over a rolling five-year period.

^{*} We categorise the Senior Leadership Team as the CEO and two levels of management below.



Close from Martin Rolfe

This year, I am delighted we have been able to expand our pay gap reporting by including our disability data for the first time.

Achieving our disability declaration target reflects the collaborative work we have been doing with our Disability Network to raise the awareness and importance of self-declaration.

As part of our commitment to our company objective to be a Top 25 UK employer by 2040 we wanted to hear directly from colleagues on how they feel about working here, so we can better understand where we are doing well and where we can improve. This year we engaged with Best Companies and used their b-Heard employee engagement benchmarking survey. We were assessed as a 1 star 'Very Good Company to Work For', which I'm pleased with, but the real benefit has come from the feedback highlighting the main areas we now need to focus on. We have set up a dedicated working group to shape and deliver our short, medium and long term action plans.

I also recognise the ongoing commitment and work our Employee Networks, support groups and our EDI Steering Group is doing to positively influence and contribute to our EDI vision and Top 25 objective. Throughout the year they proactively raise awareness and acknowledge cultural and diversity events, as well as supporting and driving positive change with our policies and business processes.

Senior leadership visibility has also been an important focus for us this year. We have been working with our leaders to introduce an EDI objective, where they take accountability for making positive changes to create and uphold an inclusive, respectful and diverse workplace.

Making Inclusive Companies Top 50 UK Employers list on our first attempt is a positive indication that we are making progress in this space. The feedback we received from our submission will be incorporated into our action plans, which, alongside the introduction of our EDI Programme Manager and Educational Outreach Programme Manager, will ensure we continue to make meaningful changes and make NATS an even more attractive and inclusive organisation to join.

I confirm the information and data reported is accurate as of the snapshot date 5 April 2023.

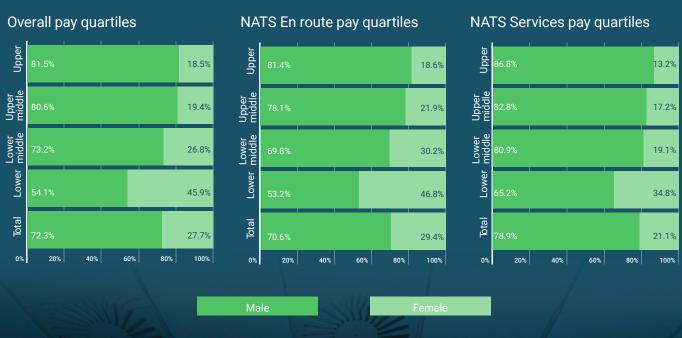
Martin Rolfe
Chief Executive Officer



Our statutory declaration

Gender pay figures snapshot 5 April 2023

	Overall	NATS En route	NATS Services
Mean hourly pay gap	20.5%	21.4%	16.1%
Median hourly pay gap	23.5%	23%	17.6%
Mean bonus pay gap	27.5%	29.5%	19.6%
Median bonus pay gap	45.5%	45.5%	10.9%
Proportion of men and women who received bonus pay	96.3% Male 92.1% Female	95.9% Male 91.7% Female	97.7% Male 93.8% Female





Useful definitions

Unequal pay vs. Gender pay gap

While both unequal pay and the gender pay gap deal with the difference in pay women and men receive in the workplace, they are two different measurements:

Unequal pay refers to the pay difference between two individuals or groups of workers carrying out the same comparable work. Under the Equal Pay Act 1970, it is unlawful to pay people unequally because they are a man or woman.

The gender pay gap however is a measure of the difference between men's and women's average earnings across an organisation. It is expressed as a percentage of men's earnings. There are a number of potential reasons for gender pay gaps, in our case it is the historic imbalance between the number of higher paid men and women employed in the company.



Pay quartiles*

Pay quartiles reflect the balance of employees in four equal sized groups based on their hourly pay. The groups are calculated by listing all employees from the lowest hourly pay rate to the highest and then dividing the entire group into four equal parts. Each quartile reflects the percentage of male and female, white and ethnic minority or disabled and non-disabled employees.

Pay quartiles are useful way to give an indication of women's, ethnic minority and disabled employee representation at different levels of the organisation.



Mean average*

The mean pay gap figure uses hourly pay of all employees to calculate the difference between the mean hourly pay of men, white or non-disabled employees, and the mean hourly pay of women, ethnic minority or disabled employees.

A mean involves adding up all of the numbers and dividing the result by how many numbers were in the list.

Mean averages are useful because they place the same value on every number they use, giving a good overall indication of the pay gap. But very high or low hourly pay can 'dominate' and distort the figure.

Median average*

This is the difference between the hourly pay of the median man, white or non-disabled employees and the hourly pay of the median woman, ethnic minority or disabled employees. The median for each category who is in the middle of a list of hourly pay ordered from highest to lowest paid.

A median involves listing all of the numbers in numerical order. If there is an odd number of results, the median is the middle number. If there is an even number of results, the median will be the mean of the two central numbers.

Medians are useful to indicate what the 'typical' situation is. They are not distorted by very high or low hourly pay (or bonuses). However, this means that not all pay gap issues will be picked up. They could also fail to pick up as effectively where the pay gap issues are most pronounced in the lowest paid or highest paid employees.

*Definitions based on https://gender-pay-gap.service.gov.uk/

