



XPO Inc

# 2025 CDP Corporate Questionnaire 2025

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.

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## 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, 2024, we had approximately 38,000 employees serving approximately 55,000 customers through 614 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. 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 \$52 billion in 2023. We provide approximately 36,000 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 2024, our customer-focused organization of truck drivers, service center teams and sales professionals worked together to move approximately 18 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. Strategic Developments XPO has operated solely as an asset-based LTL service provider in North America since November 2022, when we completed the spin-off of RXO, Inc. (“RXO”). This followed our completion of two additional components of our strategic plan: the spin-off of GXO Logistics, Inc. (“GXO”) in August 2021, and the sale of our North American intermodal operation in March 2022. In December 2023, we completed the Yellow Asset Acquisition, in line with our commitment to expand capacity in key freight markets and operate the network more efficiently. In connection with this transaction, we purchased 26 LTL service centers previously operated by Yellow Corporation and assumed existing leases for two additional locations. 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. Our Nominating, Corporate Governance and Sustainability Committee of our Board of Directors provides 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. 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**

12/31/2024

**(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:

1 year

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

Select from:

1 year

**(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?**

8072000000

**(1.5) Provide details on your reporting boundary.**

	<b>Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?</b>
	Select from: <input checked="" type="checkbox"/> 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 States of America
- United Kingdom of Great Britain and Northern Ireland

### **(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]*

**(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?**

### (1.24.1.1) Plastics mapping

Select from:

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

### (1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

- Judged to be unimportant or not relevant

### (1.24.1.6) Explain why your organization has not mapped plastics in your value chain

*XPO does not manufacture or use plastics in a capacity materially related to its business. We do not believe we have material exposure to plastics-related business risks.*

*[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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> 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?
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select from:</i> <input checked="" type="checkbox"/> Both risks and opportunities	<i>Select from:</i> <input checked="" type="checkbox"/> 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

Other

- Internal company methods
- Materiality assessment

### (2.2.2.13) Risk types and criteria considered

Acute physical

- Cyclones, hurricanes, typhoons
- Storm (including blizzards, dust, and sandstorms)

Policy

- Changes to national legislation

Market

- Changing customer behavior

Technology

- Transition to lower emissions technology and products

Liability

- Non-compliance with regulations

### (2.2.2.14) Partners and stakeholders considered

*Select all that apply*

- Customers

- Employees
- Investors
- Local communities

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

Select from:

- No

### (2.2.2.16) 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

Enterprise Risk Management

- Internal company methods

International methodologies and standards

- ISO 14001 Environmental Management Standard

Other

- Materiality assessment

#### (2.2.2.13) Risk types and criteria considered

Acute physical

- Cyclones, hurricanes, typhoons

Policy

- Changes to national legislation

#### Market

- Changing customer behavior

#### Technology

- Transition to lower emissions technology and products

#### Liability

- Exposure to litigation
- Non-compliance with regulations

### (2.2.2.14) Partners and stakeholders considered

*Select all that apply*

- Customers
- Employees
- Investors
- Local communities

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

*Select from:*

- No

### (2.2.2.16) Further details of process

*XPO in Europe, as a company headquartered in France, must comply with the French Duty of Vigilance law, which seeks to identify the risks and set out the reasonable measures of vigilance put in place by the company to prevent serious violations of human rights and fundamental freedoms, the health and safety of individuals, and the environment that may result from the activities of the company and those of the companies it controls, directly or indirectly. In 2020, the company oversaw the most recent review of our vigilance process, specifically the risk mapping, risk assessment and risk mitigation and prevention requirements of the Law. Direct greenhouse gas emissions resulting from fleet and warehouse operations was identified as an environmental risk. XPO in Europe publishes an annual sustainability report with its findings. Additionally there are 60 sites in Europe that are ISO 14001 certified.*

*[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: <input checked="" type="checkbox"/> No	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	N/A

[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

Federal and state agencies, such as the U.S. Environmental Protection Agency and the California Air Resources Board (“CARB”), regulate our equipment, operations, and cargo. As such, the state of California and other locations adopting similar emissions requirements may require us to modify our operations and

incorporate the use of reduced or zero-emissions vehicles which are priority locations where our organization has substantive dependencies, impacts, risks, and opportunities where action is needed to maximize the potential for positive impacts.

### (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  
 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. 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. 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. 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. In addition to the potential for additional GHG regulation or incentives, enhanced corporate, public, and stakeholder awareness of climate change could affect the Company's reputation or customer demand such as customers requesting more fuel-efficient transportation or increased transparency to carbon emissions in their supply chains. 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 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

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. 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. 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. 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. In addition to the potential for additional GHG regulation or incentives, enhanced corporate, public, and stakeholder awareness of climate change could affect the Company's reputation or customer demand such as customers requesting more fuel-efficient transportation or increased transparency to carbon emissions in their supply chains. 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 effect on our business, operations, or financial condition.*

[Add 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

#### Plastics

##### **(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:

Environmental risks exist, but none with the potential to have a substantive effect on our organization

##### **(3.1.3) Please explain**

*XPO does not manufacture or use plastics in a capacity materially related to its business. We do not have material exposure to plastics-related business risks.  
[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

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

N/A

### (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

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

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

N/A

### (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

- France
- Spain
- United Kingdom of Great Britain and Northern Ireland
- 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:

Likely

### **(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

### **(3.1.1.27) Cost of response to risk**

0

### **(3.1.1.28) Explanation of cost calculation**

N/A

### **(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:

- Unknown

### (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

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

N/A

### (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)

### (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: <input checked="" type="checkbox"/> 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

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

United States of America

### (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**

*Unknown at this time*

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

*Select from:*

- No

### **(3.6.1.24) Cost to realize opportunity**

0

### **(3.6.1.25) Explanation of cost calculation**

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

### **(3.6.1.26) Strategy to realize opportunity**

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

## 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

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- France
- Portugal
- Spain
- United Kingdom of Great Britain and Northern Ireland
- United States of America

### (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

### (3.6.1.24) Cost to realize opportunity

0

### (3.6.1.25) Explanation of cost calculation

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

### (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

### (3.6.1.5) Country/area where the opportunity occurs

*Select all that apply*

United States of America

### **(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

### (3.6.1.24) Cost to realize opportunity

0

### (3.6.1.25) Explanation of cost calculation

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

### (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

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- France
- United Kingdom of Great Britain and Northern Ireland
- United States of America

### **(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

### (3.6.1.24) Cost to realize opportunity

0

### (3.6.1.25) Explanation of cost calculation

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

### (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

#### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- France
- United Kingdom of Great Britain and Northern Ireland
- United States of America

#### (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<sub>2</sub> 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

### (3.6.1.24) Cost to realize opportunity

0

### (3.6.1.25) Explanation of cost calculation

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

### (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

#### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- France
- Romania
- Spain
- United Kingdom of Great Britain and Northern Ireland

#### (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

### **(3.6.1.24) Cost to realize opportunity**

0

### **(3.6.1.25) Explanation of cost calculation**

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

### **(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.*

*[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: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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
- Chief Executive Officer (CEO)

**(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

#### (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

*[Fixed row]*

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

### **Climate change**

#### **(4.3.1) Management-level responsibility for this environmental issue**

Select from:

Yes

### **Biodiversity**

#### **(4.3.1) Management-level responsibility for this environmental issue**

Select from:

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

#### **(4.3.2) Primary reason for no management-level responsibility for environmental issues**

Select from:

Judged to be unimportant or not relevant

#### **(4.3.3) Explain why your organization does not have management-level responsibility for environmental issues**

*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. Biodiversity is judged to be not relevant to our organization.*

*[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.*

### 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

#### (4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

0

### (4.5.3) Please explain

*XPO Logistics Europe (a subsidiary of XPO) maintains a ESG/CSR scorecard covering six categories and according to Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) standards. Appointed cross-functional team(s) present achievements to XPO Logistics in Europe's Executive Committee, which is our Governance body. The targets are demanding and encompass both yearly and multi-year objectives throughout the award's entire performance cycle, with many goals culminating in full achievement by the end of the period. Including the scorecard in the incentive program demonstrates the company's commitment to incentivizing our executives and managers to achieve our sustainability goals. This is applied along a sufficiently long-term horizon to drive and 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

#### (4.5.1.3) Performance metrics

Emission reduction

Implementation of an emissions reduction initiative

Resource use and efficiency

Reduction in total energy consumption

#### (4.5.1.5) Further details of incentives

*XPO Logistics Europe (a subsidiary of XPO) maintains a ESG/CSR scorecard covering six categories and according to Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) standards. Appointed cross-functional team(s) present achievements to XPO Logistics in Europe's Executive Committee, which is our Governance body. The targets are demanding and encompass both yearly and multi-year objectives throughout the award's entire*

performance cycle, with many goals culminating in full achievement by the end of the period. Including the scorecard in the incentive program demonstrates the company's commitment to incentivizing our executives and managers to achieve our sustainability goals. This is applied along a sufficiently long-term horizon to drive and 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**

The CSR scorecard sets rigorous European-level goals that build toward long-term value, with most targets reflecting rising expectations for the new 2024–2026 period. Initiatives are mainly quantitative, and the remainder are subject to predetermined hurdles or binary milestones. Our CSR scorecard is organized into six categories, covering the ESG/CSR Groups: Governance, Environment and Social, with a varying and different number of specific initiatives per year, and with each initiative weighted equally within the year.

[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: <input checked="" type="checkbox"/> No, but we plan to within the next two years	Select from: <input checked="" type="checkbox"/> 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. By becoming a signatory, we are enhancing our accountability and taking concrete actions, such as reviewing our value chain, engaging with local communities, and recognizing the power of the business community to drive meaningful change.

[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**

Select all that apply

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:

No

#### **(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

**(4.12.1.3) Environmental issues covered in publication**

Select all that apply

- Climate change

#### (4.12.1.4) Status of the publication

Select from:

Complete

#### (4.12.1.5) Content elements

Select all that apply

Governance

Strategy

Emissions figures

#### (4.12.1.6) Page/section reference

*Throughout sustainability report*

#### (4.12.1.7) Attach the relevant publication

*XPO-SustainabilityReport-2025.pdf*

*[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.  
[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

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

Select from:

Not an immediate strategic priority

### **(5.2.16) 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**

*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**

*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
	<i>Select from:</i> <input checked="" type="checkbox"/> 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
	<i>Select from:</i> <input checked="" type="checkbox"/> No	<i>Our organization does not have material research and development relating to carbon products.</i>

[Fixed row]

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

**(5.10.1) Use of internal pricing of environmental externalities**

*Select from:*

No, but we plan to in the next two years

**(5.10.3) Primary reason for not pricing environmental externalities**

*Select from:*

Not an immediate strategic priority

#### **(5.10.4) Explain why your organization does not price environmental externalities**

*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]*

#### **(5.11) 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	<i>Select from:</i> <input checked="" type="checkbox"/> 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]

## (5.11.9) 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
	<i>Select from:</i> <input checked="" type="checkbox"/> No, but we plan to within the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority	<i>Not an immediate strategic priority. We will evaluate and implement environmental initiatives to the extent practicable.</i>

*[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	<i>Select from:</i> <input checked="" type="checkbox"/> Operational control	<i>We continue to evaluate climate impacts for disclosure under applicable local, state and federal law as well as international regulations.</i>
Plastics	<i>Select from:</i> <input checked="" type="checkbox"/> Other, please specify :N/A	<i>Not relevant</i>
Biodiversity	<i>Select from:</i> <input checked="" type="checkbox"/> Other, please specify :N/A	<i>Not relevant</i>

[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 <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> 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 within your selected reporting boundary which are not included in your disclosure?**

Select from:

- Yes

**(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary 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 relevant but not yet calculated

**(7.4.1.6) Relevance of Scope 3 emissions from this source**

*Select from:*

- Emissions are relevant but not yet calculated

**(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents**

0

**(7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents**

0

**(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 all Scope 3 categories and thus far is limited to data related to leased company vehicles used for company travel and employee commuting.

#### (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: 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

#### (7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

0

#### (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)

### (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 1

### (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 CO2e calculated from 1,958,206,097 lbs of CO2 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 CO2e calculated from direct emissions in the segment including approximately: (i) Stationary Fuel - 9,305 tons of CO2e, (ii) Bioenergy - 15 tons of CO2e, (iii) Refrigerants – 6,945 tons of CO2e, (iv) Co. Personal Vehicles – 2,408 tons of CO2e, 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)

24499

### (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 1

### (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 CO2e calculated from direct emissions in the segment including approximately: (i) Electricity – 830 tons of CO2e and (ii) Electricity for EVs – 95 tons of CO2e.*

*[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)

6944

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) 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)

42227

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) 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 CO<sub>2</sub>e)

254700

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) 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)

598229

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) 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)

2201

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

#### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

#### (7.8.5) 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 CO<sub>2</sub>e)

4798

#### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

#### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

#### (7.8.5) 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. North American leased company vehicles included in this category for business travel. No other categories evaluated for North America.*

### Employee commuting

### (7.8.1) Evaluation status

Select from:

Relevant, calculated

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

10052

### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) 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. North American leased company vehicles included in this category for employee commuting. No other categories evaluated for North America.*

## Upstream leased assets

### (7.8.1) Evaluation status

Select from:

Not evaluated

### (7.8.5) Please explain

*Not evaluated*

## Downstream transportation and distribution

### (7.8.1) Evaluation status

Select from:

Not evaluated

### (7.8.5) Please explain

*Not evaluated*

## Processing of sold products

### (7.8.1) Evaluation status

Select from:

Not evaluated

### (7.8.5) Please explain

*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

12/31/2023

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

6960

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

0

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

819494

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

72678

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

1235

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

1638

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

51989

**(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

**(7.8.1.19) Comment**

*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 in 2023.*

*[Fixed row]*

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

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> 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:*

Increased

**(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

**Change in renewable energy consumption**

**(7.10.1.2) Direction of change in emissions**

*Select from:*

Decreased

**(7.10.1.4) Please explain calculation**

XPO Europe generates and consumes renewable solar energy at several locations. Year-over-year consumption fell from 311 MWh in 2023 to 254 MWh in 2024. Specific grid conversion factor data is unavailable to convert to MT CO2e.

## Change in methodology

### (7.10.1.1) Change in emissions (metric tons CO2e)

103009

### (7.10.1.2) Direction of change in emissions

Select from:

Increased

### (7.10.1.4) Please explain calculation

Global Scope 1 + Scope 2 emissions increased year over year by 103,009 MT CO2e. This breaks down in the following ways: North America LTL reported categories in 2024 that it did not have data to report in 2023. Scope 1 stationary combustion emissions of 6,202 MT CO2e and Scope 2 electricity emissions of 23,646 MT CO2e. This accounts for a total increase of 29,848 MT CO2e in categories that were not included in 2023. Additional put/take categories year-over-year include: North American LTL Scope 1 mobile emissions increase of 82,011 MT CO2e European Transportation decrease in total Scope 1 emissions of (8,778) MT CO2e and decrease in total Scope 2 emissions of (72) MT CO2e.

[Fixed row]

## (7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

No

## (7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

No

## (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	977238
Row 2	Europe	348575

[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
Transport services activities	1325813

[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	23646
Row 2	Europe	853

[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
Transport services activities	24499

[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

**(7.27) 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: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> 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**

**(7.30.1.1) Heating value**

Select from:

Unable to confirm heating value

**(7.30.1.2) MWh from renewable sources**

### (7.30.1.3) MWh from non-renewable sources

87820

### (7.30.1.4) Total (renewable + non-renewable) MWh

88074.00

[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: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> 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

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

348575

**(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

853

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

349428.000

### (7.53.1.79) % of target achieved relative to base year

79.23

### (7.53.1.80) Target status in reporting year

Select from:

Underway

### (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)*

### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*Achievements by year and looking ahead: 2023: Increase CO2eq reduction to 5% from 2022 Scope 1+2 emissions, with an additional savings of 10 M tonnes of CO2eq. Deployed 100 EVs across own fleet. Increased renewable energy supply by 20% 2024: 200 EVs deployed across Europe. Increase of MM activity by 25% from baseline. Increase biofuels offer by 30%. Fleet Euro VI 95%. Improve qualification of fixed subcontracted capacity. Additional 17M of Kg CO2eq savings 2025: 150 EV charging stations on XPO premises. Partner and subcontractor assignments and allocations also based on eco performance (emissions). Four sites carbon neutral certified. Euro VI Fleet increase to 98%. Gold Medal in EcoVadis sustainability rating 2026: Emissions reduction of 12% on grams CO- 2eq per tonne-km over four-year period. 258 EV charging stations on XPO. Biofuels use of 15M litres. Three biodiversity promotion initiatives. Additional 30 M kg CO2eq savings. 15% increase of MM activity. Black carbon accounting added.*

[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.**

Select from:

Yes

**(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
Implementation commenced	1

[Fixed row]

**(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.**

**Row 1**

**(7.55.2.1) Initiative category & Initiative type**

Transportation

Other, please specify :Lower emission transportation operations

**(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur**

Select all that apply

- Scope 1
- Scope 2 (location-based)

#### (7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

#### (7.55.2.9) Comment

*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]

#### (7.73) 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

## C11. Environmental performance - Biodiversity

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

	<b>Actions taken in the reporting period to progress your biodiversity-related commitments</b>
	Select from: <input checked="" type="checkbox"/> No, we are not taking any actions to progress our biodiversity-related commitments, but we plan to within the next two years

[Fixed row]

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

	<b>Does your organization use indicators to monitor biodiversity performance?</b>
	Select from: <input checked="" type="checkbox"/> 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	<i>Select from:</i> <input checked="" type="checkbox"/> Not assessed	N/A
UNESCO World Heritage sites	<i>Select from:</i> <input checked="" type="checkbox"/> Not assessed	N/A
UNESCO Man and the Biosphere Reserves	<i>Select from:</i> <input checked="" type="checkbox"/> Not assessed	N/A
Ramsar sites	<i>Select from:</i> <input checked="" type="checkbox"/> Not assessed	N/A
Key Biodiversity Areas	<i>Select from:</i> <input checked="" type="checkbox"/> Not assessed	N/A
Other areas important for biodiversity	<i>Select from:</i> <input checked="" type="checkbox"/> 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
	<i>Select from:</i> <input checked="" type="checkbox"/> 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	<i>Select from:</i> <input checked="" type="checkbox"/> 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

Chief Legal Officer

#### (13.3.2) Corresponding job category

*Select from:*

Other C-Suite Officer

[Fixed row]

