Climate lobbying report

Aligning Climate Leadership with Advocacy

UNITED AIRLINES HOLDINGS, INC.
Cautionary statement regarding forward-looking statements

This report contains certain “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act of 1995. All statements that are not statements of historical facts are, or may be deemed to be, forward-looking statements. Such forward-looking statements are based on historical performance and current expectations, estimates, forecasts and projections about our future financial results, goals, plans, commitments, strategies and objectives and involve inherent risks, assumptions and uncertainties, known or unknown, including internal or external factors that could delay, divert or change any of them, that are difficult to predict, may be beyond our control and could cause our future financial results, goals, plans and objectives to differ materially from those expressed in, or implied by, the statements. No forward-looking statement can be guaranteed. Forward-looking statements in this report should be evaluated together with the many risks and uncertainties that affect United Airlines Holdings, Inc.’s (“we,” “us,” “our,” “United” or the “Company”) business and market, particularly those identified in the “Management’s Discussion and Analysis of Financial Condition and Results of Operations” and “Risk Factors” sections in the Company’s Annual Report on Form 10-K for the year ended December 31, 2021, as updated by its subsequent Quarterly Reports on Form 10-Q, Current Reports on Form 8-K and other filings with the Securities and Exchange Commission (“SEC”). The forward-looking statements included in this document are made only as of April 13, 2022, and except as otherwise required by applicable law or regulation, the Company undertakes no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events, changed circumstances or otherwise.

About This Report

This report contains information from third parties, including trade associations and coalitions, and the Company makes no representation or warranty as to the accuracy of any such third-party information.
As an industry that depends on fossil fuels to operate, we recognize our contribution to climate change, and our responsibility to solve it. That’s why United is the only airline in the world to commit to achieving 100% green by 2050 – without relying on traditional carbon offsets. We are committed to investing in new technologies and taking tangible steps that have the potential to permanently reduce our emissions from flying.

Full-scale solutions to decarbonize the airline industry will take time, making it even more critical that a company like United invests today. Compared to other industries, decarbonization solutions for aviation are still emerging, which means these solutions need our partnership and investment now. Successful development of these technologies – such as sustainable aviation fuel, electric-powered aircraft and carbon removal – will require support from a variety of stakeholders including policymakers, suppliers, innovators, customers, non-governmental organizations and more.

For this reason, we turn to industry associations and business groups to drive meaningful conversation that helps advance change and progress. While we might not always align with these groups on specific policy positions, they are integral stakeholders in the policymaking process. We believe we can best facilitate positive policy outcomes through collaborative and inclusive engagement.

On behalf of the Board of Directors, we appreciate the interest of our shareholders in understanding United’s direct and indirect advocacy surrounding climate initiatives. We understand the urgency of addressing the climate crisis and where we see divergence on climate priorities, we intend to engage constructively to drive better alignment. This is our commitment to you and all future generations.

Sincerely,
Scott Kirby
Introduction

Climate leadership is a core feature of United’s commitment to our customers, shareholders, employees and the communities we serve.

In fact, it’s larger than that. As Scott Kirby stated, we’re a member of a fossil fuel-dependant industry and we recognize both our contribution to climate change and our responsibility to help solve it. Our shared purpose is “Connecting People. Uniting the World,” which is why we want to help honor our planet and ensure the world has a future.

Global aviation accounts for about 3%¹ of global greenhouse gas (GHG) emissions and at United, we are taking action to eliminate our emissions from flying.

Today more than ever, airlines play a critical role reconnecting people all around the world. As we emerge from the COVID-19 pandemic, we are returning to flying responsibly by doing the right thing – for our people, for our planet and for our communities across the world.

¹IEA, “Tracking Aviation” (June, 2020)
Governance oversight

Given the importance of our Environmental, Social and Governance (ESG) performance to our financial performance and growth and our talent acquisition and retention, our ESG strategy is continuously shaped through priority assessments by our Chief Executive Officer and other senior management with insight, input and oversight from our Board of Directors. We also actively engage with a diverse group of stakeholders to listen to their concerns related to our ESG performance, and their feedback informs our ESG strategy. Through these assessments and conversations with stakeholders, we have announced several bold, quantifiable and time-bound ESG goals. These include pledging to become 100% green by eliminating our GHG emissions by 2050 without relying on the use of traditional carbon offsets. Additionally, we are utilizing systems that manage our ESG data and reporting.

Our governance framework includes direct oversight by United’s Board of Directors of our climate change risks, assessments, disclosures, strategy and external engagement. The Public Responsibility Committee has primary oversight responsibility for our ESG initiatives and risks, reviewing our sustainability and climate-related strategic goals and objectives, including periodically assessing our performance against these goals and objectives as well as other relevant and appropriate sustainability and corporate responsibility scorecards and rankings. Management periodically updates the Board on the implementation of United’s climate strategy and our public engagement on climate issues.

United’s public engagement on climate issues is coordinated through our Government Affairs departments to ensure consistency across business divisions and geographies. At the senior executive level, United’s CEO is passionate about environmental sustainability issues and provides leadership in support of our initiatives, and our environmental programs and policies, including environmental sustainability, are overseen by United’s President and the Senior Vice President of Government Affairs and Global Public Policy. United’s Chief Sustainability Officer and Managing Director of Global Environmental Affairs and Sustainability has day-to-day responsibility for environmental and sustainability matters, and reports to the Senior Vice President of Government Affairs and Global Public Policy, allowing for even greater synergies and alignment of our lobbying activities with our climate strategy.

Transparency through active stakeholder engagement and robust public reporting of our strategy to and performance on climate change topics is essential to our climate strategy, allowing for our various stakeholders to measure our climate change performance and track our progress against our climate goals. One year after announcing our 100% green pledge, we disclosed key ESG qualitative and quantitative data in our 2021 Annual Report on Form 10-K, including our 2020 and 2019 Scope 1 (direct), Scope 2 (indirect) and Scope 3 (other indirect) GHG emissions and carbon intensity emission rates. We also report clear information around our performance and progress toward our ESG goals through our Corporate Responsibility Report in alignment with recognized external ESG reporting frameworks, including the Taskforce on Climate-Related Financial Disclosures.
Confronting the climate crisis: United’s strategy

United’s strengthened climate commitments reflect the increasing urgency of the crisis. In 2020, we established an industry-leading target to go 100% green by 2050 and achieve net zero GHG emissions without relying on traditional carbon offsets. As the only airline that has committed to reduce 100% of our GHG emissions without relying on traditional carbon offsets, we are investing in the solutions that can actually reduce, and ultimately remove, the emissions from flying. At United, we believe that it is not acceptable to declare success by simply purchasing carbon credits while enabling the status quo within our industry.

In 2021, we established a strong mid-term goal of reducing our carbon intensity 50% compared to 2019 by the year 2035. We recognize the need to demonstrate mid-term progress en route to our ultimate goal of net zero GHG emissions by 2050. Our 2035 carbon intensity goal is based in science, aligns with the goals of the Paris Agreement and demonstrates clear progress toward our 2050 net zero GHG emissions goal.

United is investing in solutions that reduce our environmental impact in the air, on the ground and at our facilities, which will benefit our customers, stockholders, employees and the communities we serve. Our strategy to achieve our climate goals is centered around four key pathways:

1. Reducing United's environmental footprint;  
2. Innovating for potentially transformative carbon reduction technology;  
3. Removing carbon emissions in the atmosphere; and  
4. Collaborating with employees, customers, airports, suppliers, cross-industry partners and policymakers to facilitate faster action and the commercialization of technology solutions concerning climate change.

Reducing United's Environmental Footprint

Today, nearly all (98%) of United’s GHG emissions are from the combustion of fossil jet fuel. Reducing our consumption of conventional jet fuel by maximizing our fuel efficiency and working to replace the conventional fossil fuel we use with lower carbon alternative fuel is the nearest-term and fastest mechanism for United to reduce its emissions. Sustainable aviation fuel (SAF) is an alternative fuel derived from renewable or waste products that can reduce lifecycle GHG emissions by up to of 85% compared to conventional fossil fuel. In addition, SAF is “drop-in” ready, meaning it is interchangeable with conventional jet fuel and requires no modifications to our aircraft engines or airframes. This also makes it compatible with the existing fuel distribution and storage infrastructure at airports. United has long championed the development, deployment and commercialization of SAF and has nearly twice
Alongside developing and using SAF, United is concentrated on introducing newer, more fuel-efficient aircraft into its fleet as well as improving the efficiency of its existing fleet. From 1990 to 2021, United improved its mainline fuel efficiency more than 30%. In the second quarter of 2021, United announced United Next and entered into firm narrow-body aircraft orders for 200 Boeing 737 MAX aircraft and 70 Airbus A321neo aircraft, which are expected to have an 11% overall improvement in fuel efficiency and 17-20% lower carbon emission per seat compared to older planes. In conjunction with its SAF mission and improving the fuel efficiency of its fleet, United has been revamping its flight and ground operations, implementing operational and procedural initiatives to drive fuel conservation. Over 4,000 units of United’s ground service equipment (GSE) around the world are electric or use alternative fuels and, as of the end of 2021, nearly 32% of its GSE fleet have been electrified. United has worked collaboratively across its organization and with air traffic control providers to improve fuel efficiency through the implementation of best practices by providing training to its pilots and dispatchers and supplying them with the tools needed to execute on those strategies.

2 As of year-end 2021
In February 2021, United announced an investment in, and agreement to work with, Archer Aviation to accelerate the development and production of their electric aircraft. This is an urban mobility solution that has the potential to serve as an “air taxi,” giving United an opportunity to accelerate the development of clean technologies on a broader scale and its customers another opportunity to reduce their carbon footprint before they even board a United flight.

In July 2021, UAV announced that, along with Breakthrough Energy Ventures and Mesa Airlines, it invested in electric aircraft startup Heart Aerospace Incorporated. Heart Aerospace is developing the ES-19, a 19-seat electric aircraft that has the potential to fly customers up to 250 miles with zero emissions when powered by renewable electricity.

In December 2021, United became the largest airline to invest in zero-emission engines for regional aircraft with a new equity stake in hydrogen-electric engine developer, ZeroAvia, Inc. These engines support the retrofit of select narrow-body engines, replacing fossil fuel burning engines with zero-emission alternatives.

Removing Carbon Emissions in the Atmosphere

To achieve 100% green by 2050, we believe aviation will rely on carbon removal technologies. Our climate strategy extends beyond reducing our emissions to focus on atmospheric carbon removal and utilization. We are investing in carbon capture technologies to sequester carbon and to potentially utilize and recycle captured carbon to make low-carbon fuels.

In 2020, United became the first airline to announce a commitment to invest in direct air capture, a carbon capture and sequestration technology.
Climate Leadership and Coalition Building

Scaling the technologies that can decarbonize aviation requires thoughtful and action-oriented collaboration with employees, customers, airports, suppliers, cross-industry partners and policymakers. Through partnership, we believe we can accelerate commercialization and scale to achieve our 2050 100% green ambition.

- **United worked with federal policymakers** and a broad, multi-industry coalition to champion the Sustainable Skies Act SAF Blender’s Tax Credit with the intent to create an economic incentive for increased SAF production within the United States.

- **United is a founding member of the Biden Administration’s First Movers Coalition**, a collective of leading companies committing to purchasing low-carbon technologies in hard-to-abate sectors. As part of its membership, United has committed to using emerging technologies with significant emissions reductions by 2030 and has also set a target of replacing at least 5% of conventional jet fuel demand with SAF that reduces lifecycle GHG emissions by 85% or more – compared with conventional jet fuel – by 2030.

- **In order to broaden the base of support for climate action across partisan lines and industry boundaries, in February 2021, United became a founding member of the Bipartisan Policy Center’s Net Zero Business Alliance.** Our CEO is working with key corporate leaders from the power, forestry, energy and food sectors to make the case for urgent climate action to leaders from diverse partisan and ideological backgrounds.

- **At the international level, United was the only airline whose CEO attended the 2021 UN Conference of the Parties (COP26) climate conference**, supporting the pathway to net zero emissions for air travel through the use of SAF and other technologies.

- **During the COP26 conference, the Sustainable Aviation Buyers Alliance (SABA), a non-profit initiative of the Environmental Defense Fund and Rocky Mountain Institute that is developing a sustainability framework for SAF, announced that United and other airlines have founded its new Aviators Group.** Through SABA, United intends to work collaboratively with its customers and industry peers to support low-carbon technologies such as SAF.

- **United has supported the adoption of more aggressive industry targets**, with both Airlines for America (A4A) and the International Air Transport Association (IATA) committing to net zero emissions by 2050 for domestic and international carriers, respectively (see below for more information). In addition, United, along with other A4A members, have pledged to work toward the Biden Administration’s SAF Grand Challenge to collectively make 3 billion gallons of SAF available domestically by 2030.
Policy and Advocacy

United is deploying capital and resources to ensure that we meet our climate targets. Supportive public policy will be a critical enabler of United’s decarbonization strategy. United advocates directly and indirectly for such policies, which range from tax incentives for lower carbon fuel and carbon removal technologies to R&D funding, and from Next Generation air transportation system deployment to pricing carbon emissions. United engages with policymakers at the international, federal, state and local levels to advance climate solutions and scale decarbonization technologies, in alignment with the Paris Agreement goals. More specifically, we advocate for such policies as:

- Incentives and investments in new low-carbon aviation technologies like SAF, electric aircraft, green hydrogen fueled aircraft and carbon capture and sequestration (CCS)
- Improvements to air traffic control to reduce unnecessary fuel use
- Investments in aviation infrastructure to improve operational efficiency and reduce energy use
- Renewable power and fuel standards

As part of our collaborative efforts, United works directly with policymakers, business and NGO coalitions, think tanks, and traditional business trade associations that represent a wide variety of United’s policy interests in the general business community and aviation industry. As a business that operates in nearly every state and in countries across the world, we are members of a wide range of organizations, from general business associations to others more specific to our industry. A portion of the support provided to these organizations may be used by the organizations for lobbying. Our primary trade associations advocate for a broad range of issues, including climate strategy, as well as broader industry issues like operational efficiency improvements, infrastructure investments, health and safety standards, tax policy and workforce development, among others. Some of our trade associations are actively engaged in advancing our four decarbonization pathways outlined above. While United's positions may not always fully align with these organizations, we work with them to advance progress where opportunities exist and use our influence with these organizations to advocate for policy changes when needed.

Climate Positions of United’s Top Trade Associations

As part of this ongoing engagement, we evaluated our major trade associations’ climate policy positions against our own key priorities, as well as the goals of the Paris Agreement. We applied two criteria for selection: (1) trade associations to which we pay in excess of $25,000 in annual dues used for lobby activities overall, and (2) trade associations active in climate lobbying. Using this threshold, we evaluated four associations:

1. Airlines for America
2. Business Roundtable (BRT)
3. International Air Transport Association
4. U.S. Chamber of Commerce

Overall, these trade associations all acknowledge the reality of a changing climate and support GHG emissions reductions through market-based mechanisms and technological innovation. All organizations support the intent of the Paris Agreement, though not all have publicized their own targets. We believe that all trade associations have positions on climate change that, to varying degrees, support the priorities of United and its decarbonization strategy.

We do not pay in excess of $25,000 annually to any social welfare or nonprofit organizations in connection with climate lobbying.
### Trade Association Climate Change Positions

**Airlines for America:** A4A advocates on behalf of its member airlines to advance policies and measures that promote airline safety, security and competitiveness. As part of this work, A4A member airlines have a long-standing commitment to reducing their carbon dioxide (CO\textsubscript{2}) emissions through improving fuel efficiency via new aircraft technology, SAF, and air traffic management and infrastructure improvements. Climate change is a critical issue for A4A and in 2020, the organization announced new climate goals that align with United’s long-term climate ambitions.

**Goals:**

- Net zero carbon emissions by 2050
- The production and deployment of commercially viable SAF to make 3 billion gallons of SAF available to U.S. aircraft operators in 2030.

A4A also supports implementation of the internationally agreed-upon global market-based mechanism, the International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), to enable carbon-neutral growth in international air travel.

### Alignment with United’s Climate Positions and the Paris Agreement

United has worked alongside A4A to develop and advance meaningful industry climate commitments for over a decade. Since 2009, United has worked closely with A4A on engaging in ICAO’s development of CORSIA, and the industry commitment to achieve carbon-neutral growth beginning in 2020, although as discussed above, United is now committed to not relying on traditional carbon offsets to achieve its 2050 net zero goal. United was chair of A4A’s Environment Council in 2016 and in 2017 was chair of the International Noise and Emissions Committee.

A4A supports United’s climate priorities including net zero by 2050 via fuel efficiency, new aviation technologies, SAF, improvements to air traffic control, infrastructure improvements and CCS.

A4A’s goal of net zero by 2050 aligns with the goals of the Paris Agreement.
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<td><strong>Business Roundtable</strong>: “BRT believes corporations should lead by example, support sound public policies and drive the innovation needed to address climate change. To this end, the United States should adopt a more comprehensive, coordinated and market-based approach to reduce emissions.”³</td>
<td>BRT supports United's climate priorities including SAF, improvements to air traffic control, infrastructure improvements and CCS.</td>
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<td>Elements of the strategy:</td>
<td>BRT is unique among our trade associations in advocating for a price on carbon.</td>
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<td>• Prioritize and accelerate international cooperation</td>
<td>BRT’s goal of reducing net U.S. GHG emissions by at least 80% from 2005 levels by 2050 is consistent with the 2°C pathway under the Paris Agreement.</td>
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<td>• Promote effective carbon pricing across regions</td>
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<td>• Trigger investment in innovation and clean energy technologies</td>
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<td>• Create an enabling environment for low-carbon products</td>
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<td>• Better align frameworks for climate risk disclosure</td>
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<tr>
<td>• Invest in climate resilience and adaptation</td>
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<td>• Safeguard policy predictability and long-term flexibility⁴</td>
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<td>“Business Roundtable believes that to avoid the worst impacts of climate change, the world must work together to limit global temperature rise this century to well below 2 degrees Celsius above preindustrial levels, consistent with the Paris Agreement”⁵</td>
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BRT supports a goal of reducing net U.S. GHG emissions by at least 80% from 2005 levels by 2050.

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³ Business Roundtable, “Addressing Climate Change” (September 2020)
⁴ Business Roundtable, “A Call to Action from the Global Business Community: Global Businesses Support Climate Action that Enhances Competitiveness” (October 28, 2021)
⁵ Business Roundtable, “Market-Based Solutions Best Approach to Combat Climate Change” (September 16, 2020)
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<td><strong>IATA:</strong> IATA has committed to net zero emissions by 2050 and the goals of the Paris Agreement to limit global warming to less than 1.5°C. Its strategy is to abate as much CO₂ as possible from in-sector solutions such as SAF, new aircraft technology, more efficient operations and infrastructure, and the development of new zero-emissions energy sources such as electric and hydrogen power. Any emissions that cannot be eliminated at source will be eliminated through out-of-sector options such as CCS and credible offsetting schemes, such as CORSIA. In October of 2021, the 77th Annual General Meeting of IATA approved a resolution for the global air transport industry to achieve net zero carbon emissions by 2050.</td>
<td>United is a member of IATA and was a member of IATA’s Climate Change Task Force that developed the airline industry’s commitment to action on climate change. IATA supports all of United’s climate priorities including net zero by 2050 via fuel efficiency, new aviation technologies, SAF, improvements to air traffic control, infrastructure improvements and CCS. IATA’s resolution for the global air transport industry to achieve net zero carbon emissions by 2050 aligns with the Paris Agreement.</td>
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<td><strong>US Chamber of Commerce:</strong> “The climate is changing and humans are contributing to these changes. We believe that there is much common ground on which all sides of this discussion could come together to address climate change with policies that are practical, flexible, predictable, and durable. We believe in a policy approach that is supported by market-based solutions, developed through bipartisan legislation in Congress, and acknowledges the costs of action and inaction and the competitiveness of the U.S. economy. The Chamber believes that an effective climate policy should:**</td>
<td>The Chamber’s position toward climate change has evolved to acknowledge both the risks and opportunities inherent with climate change. The evolution in position more closely aligns with the decarbonization strategies of United, which also seeks to increase investments in low-carbon solutions.</td>
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<td>• Support a market-based approach to accelerate GHG emissions reductions across the U.S. economy</td>
<td>The Chamber supported the decision for the U.S. to rejoin the Paris Agreement and asserts that the climate is changing, humans are contributing to these changes and inaction is not an option.</td>
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<td>• Leverage the power of business</td>
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<td>• Maintain U.S. leadership in climate science</td>
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<tr>
<td>• Embrace technology and innovation (including carbon capture and storage/utilization)</td>
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<td>• Aggressively pursue greater energy efficiency</td>
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<tr>
<td>• Support trade in U.S. technologies and products</td>
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<td>• Encourage international cooperation”</td>
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The Chamber has observer status at the United Nations Framework Convention on Climate Change and expressed support for the Paris Agreement. The Chamber also recently indicated support for federal regulations to limit fugitive methane emissions and supported Article 6 of the Paris Rulebook, which outlines accounting and transparency requirements for countries’ climate commitments.7

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7 U.S. Chamber of Commerce, “4 Takeaways from the UN COP26 Climate Conference” (November 19, 2021)
Initial Publication can be located here: [https://www.uschamber.com/climate-change/4-takeaways-from-the-un-cop26-climate-conference](https://www.uschamber.com/climate-change/4-takeaways-from-the-un-cop26-climate-conference)
Next steps

United directly engages in activities that are aligned with the Paris Agreement, including establishing its own interim and 2050 GHG reduction pledges, and championing the Sustainable Skies Act (which would establish a new Blender’s Tax Credit for SAF), as well as participating in other key technology incentives for carbon capture technology, hydrogen fuels and clean power. Additionally, United has taken the lead in establishing bold new commitments to address climate change as a founding member of the First Movers Coalition, as a founding member of the Sustainable Aviation Buyers Alliance and by participating at COP26 as the only airline represented by its CEO.

United also engages at leadership and working group levels with its trade associations to drive strategic decisions in those organizations, including climate positions. In the last 18 months, all of United’s key trade associations have staked out stronger positions on climate. United will continue its climate advocacy within these trade associations:

**A4A** – United helped to drive A4A’s recent decision to establish a collective goal of net zero carbon emissions by 2050. Through the Board of Directors and the environmental working group, United will continue to promote and drive continuous improvement across the industry by identifying positive, market-based policies that will accelerate the commercialization at scale of aviation decarbonization technologies.

**BRT** – As a member of its Board of Directors, United intends to more directly advocate for climate policies that accelerate the transition to clean energy, including within transportation.

**IATA** – United, as a member of its Board of Directors, publicly supported the recent net zero ambition adopted by IATA. Through this role and within the climate working groups, United will continue to support global cooperation and market-based policies to decarbonize aviation.

**U.S. Chamber of Commerce** – We acknowledge that the diverse business interests represented by the Chamber hold varying views on climate change. As a member of the Board of Directors and of the Chamber’s Task Force on Climate Actions, United intends to advocate for policies and strategies that advance United’s decarbonization strategy.

When it comes to supporting specific policies, we may continue to advocate for legislation or policies in ways that diverge from our trade associations. However, we need collaborative partnerships to help build the systemic changes necessary to combat climate change and achieve our commitment to 100% green by 2050. We also understand that members of such partnerships may have differing opinions and strategies related to climate change. As our partnerships develop, we will continue to evaluate how the positions and activities of our partners, including our trade associations, align with our decarbonization goals and climate strategy.