

# FRONTIER'S 2022 ENVIRONMENTAL, SOCIAL, AND GOVERNANCE REPORT



**FRONTIER**

# Table of Contents

## INTRODUCTION

- 4.....A Message from Barry Biffle
- 6.....Our Story
- 7.....Our ESG Approach

## GOVERNANCE AND RISK MANAGEMENT

- 10.....Enterprise Risk Management and ESG Oversight
- 11.....Board ESG Oversight
- 12.....Board Diversity / Business Continuity
- 13.....Business Ethics and Compliance / Whistleblower Policy
- 14.....Political Contributions and Activities / Supply Chain Management

## CUSTOMER & TEAM-MEMBER WELL-BEING

- 16.....Safety Management Systems
- 17.....Safety Culture and Training
- 20.....Data Security and Customer Privacy

## ENVIRONMENTAL STEWARDSHIP

- 22.....Fleet and Fuel Efficiency
- 26.....CleanJoule SAF
- 27.....2022 Scope 1 and Scope 2 Greenhouse Gas Emissions Metrics

## OUR PEOPLE AND CULTURE

- 30.....Employee Characteristics
- 32.....Diversity, Equity, and Inclusion

## COMMUNITY ENGAGEMENT

- 36.....Philanthropy

## APPENDIX

- 39.....United Nations Sustainable Development Goals
- 41.....SASB Index
- 42.....Forward-looking Statements





# INTRODUCTION



# A Message from Barry Biffle, Chief Executive Officer

*We strive to be the most environmentally sustainable airline in North America which has led us to our current position as “America’s Greenest Airline.”<sup>1</sup>*

I’m pleased to present Frontier’s inaugural 2022 Environmental, Social and Governance Report which demonstrates our longstanding commitment to be responsible stewards of our ecosystems and social capital.

Frontier is America’s leading ultra-low-cost-carrier. When we converted to the ULCC model in 2013, we established our “Low Fares Done Right” business strategy with a fleet of 53 aircraft. In 2022, we carried 25 million passengers along more than 300 non-stop routes across the U.S., Mexico, Caribbean and Latin America with a modern fleet of 120 Airbus A320 family aircraft. We’ll continue to grow with a \$15 billion investment in 230 of the most fuel-efficient aircraft in North America to be delivered through the end of the decade.

We strive to be the most environmentally sustainable airline in North America, which has led us to our current position as “America’s

Greenest Airline.”<sup>1</sup> Green isn’t just the color of our logo; it’s our travel standard. With the youngest, most fuel-efficient fleet in North America, we achieved an industry leading 102 available seat miles per gallon in 2022, which is 43 percent more efficient compared to the average of the major U.S. airlines<sup>2</sup>. We achieved this by employing the latest engine technology in our young Airbus A320neo fleet and we began installing lightweight Recaro seats, which are 30 percent lighter than previous designs. Furthermore, we encourage our customers to pack on the lighter side to minimize weight on the aircraft.

When compared to the U.S. industry average<sup>1</sup>, as disclosed on page 22 of this report, we estimate that our investment in new engine technology and weight-reducing measures saved 135 million gallons of fuel in 2022. That’s the equivalent of approximately 475 billion straws disappearing, 20 billion plastic bottles removed from production, 260,000 cars





removed from U.S. highways for a full year, and 15 million seedlings being planted, and we'll only get better. Approximately 70 percent of future aircraft deliveries are for the A321neo aircraft which we believe will achieve greater than 120 miles per available seat mile.

Our sustainability efforts reach farther. We've transitioned from plastic to biodegradable cups, discontinued onboard magazines and we've gone paperless in the cockpit and across all areas of the Frontier organization where possible. We're all about making small changes that can have big impacts.

Moreover, the most prominent feature of the Frontier brand is the animals that are prominently displayed on our aircraft tails. Not only do they contribute to our family friendly culture, but they also spread awareness for North America's most endangered or threatened species and other fascinating wildlife that depend on clean air, land, and oceans to survive. We're committed to leveraging our broad reach to tell their stories and bring awareness and education to the public.

At Frontier, we believe "The Sky is For Everyone." For some, this may be evident, but for us, it's far more profound. We're democratizing air travel so that everyone has the opportunity to experience air travel regardless of socioeconomic status. We make this possible by offering low fares and unbundling our products and services so that our customers can purchase only what they need. This allows us to appeal to a broad consumer base across income tiers and demographics.

Every one of the 20,000 members of Team Frontier — which includes Frontier employees and vendors — are essential to delivering Low Fares Done Right. We foster a culture of continuous improvement, engagement, and inclusion in order to empower team members to best serve our customers with safe and reliable service and innovation, investing extensively in training and development to support and advance our team members to

their fullest potential. To further our commitment to diversification, we also partner with organizations such as the Latino Pilots Association, Women in Aviation International, Organization of Black Aerospace Professionals, and the Rotary to Airline Group, to name a few. I firmly believe we're stronger as a company when we bring people together from different backgrounds, ethnicities, experiences, and education.

We support many charitable organizations through volunteerism, in-kind donations, and fundraising, pledging support to organizations who care for those experiencing homelessness or terminal illness, women recovering from domestic violence, food banks, U.S. military causes, animal shelters, and more.

I am profoundly grateful to every member of Team Frontier for the contributions they have made to our success and ESG accomplishments, and their commitment to continue to espouse the values highlighted throughout this report. To our valued shareholders, I appreciate the trust you've placed in us as we embark on years of sustainable and responsible growth.



Barry Biffle

<sup>1</sup>Measured by ASMs per fuel gallon consumed over the twelve months ended December 31, 2022; other airline average calculated as weighted average of the nine major U.S. Airlines. This and the other data in this introduction, and the rest of this report, was calculated internally and not audited, assurance or otherwise certified by a third-party provider.

<sup>2</sup>For the twelve months ended December 31, 2022.



## Our Story

Frontier Airlines (Frontier) (NASDAQ: ULCC) believes that the sky is for everyone. We strive to make this happen by delivering **LOW FARES DONE RIGHT®**, a superior level of ultra-low-cost service to more than 100 destinations in the United States (U.S.), Latin America and the Caribbean. Our unique product offering is underpinned by our low-cost structure and focus on delivering reliable, dependable and hassle-free service.

And green isn't just the color of our logo; it is our commitment to being America's Greenest Airline through relentless focus on efficiency that allows us to move more people per gallon of fuel than any other U.S. airline. We operate more than **120 Airbus A320 family aircraft and have among the largest A320neo family fleet in the U.S.**

## ABOUT THIS REPORT

This 2022 Environmental, Social, and Governance (ESG) Report summarizes Frontier's ESG strategy, initiatives and performance on ESG topics that we believe are most relevant to our business and important to our stakeholders. Unless otherwise noted, the report reflects our progress during fiscal year 2022 (FY2022) for the period from January 1 through December 31, 2022.

To identify the ESG areas most relevant to our business, and to provide ease of use and comparability with peers, we align our reporting with the SASB Standards for the Airlines industry. We also report on corporate activities that advance several United Nations Sustainable Development Goals (SDGs) which we believe are most relevant to our business. Both are included in the Appendix at the end of this report.





# Our ESG Approach

At Frontier, ESG is embedded in how we operate every day — from our ongoing focus on airline safety and security to our steadfast commitment to ethics and compliance to our sustainable business practices. We are pleased to share our 2022 ESG Report that outlines our current environmental, social and governance initiatives, practices and objectives across four ESG pillars fundamental to our business. We believe that our efforts in these core areas give us a competitive advantage and create long-term value for our customers, team members, shareholders, and communities.

## OUR ESG PILLARS



### Customer and Team Member Well-being

We place people—our customers and team members—first, with their well-being at the forefront of everything we do and strive to be an industry leader in safe and healthy travel practices.



### Environmental Stewardship

Through sustainable business practices and by reducing our environmental footprint, we aim to lead the airline industry in environmental stewardship and serve the needs of eco-conscious air travelers.



### Our People and Culture

Our employees are the key to our success, and we are dedicated to employee engagement, training and development to support our team members' advancement to reach their fullest potential.



### Community Engagement

We believe that air travel should be accessible to all and we take pride in supporting our communities through various philanthropic and volunteer initiatives.

### Governance

Our ESG pillars are built on responsible business practices, including sound corporate governance and compliance, employing high ethical standards to build sustainable long-term shareholder value.



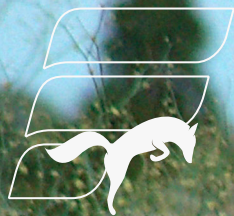
## STAKEHOLDER ENGAGEMENT

We strive to focus our business strategy, initiatives, and reporting on the ESG topics that are most important to our stakeholders. In the following table, we summarize the ways we engage with our stakeholders.



Stakeholders	Ways We Engage	Key ESG Topics Addressed
Customers	<ul style="list-style-type: none"> <li>Customer service channels</li> <li>Social media monitoring and engagement</li> </ul>	<ul style="list-style-type: none"> <li>Customer experience and support</li> </ul>
Employees	<ul style="list-style-type: none"> <li>Employee engagement survey</li> <li>Professional development and training</li> <li>Collective bargaining agreements</li> </ul>	<ul style="list-style-type: none"> <li>Benefits and compensation</li> <li>Employee health and safety</li> <li>Diversity, Equity, and Inclusion (DEI)</li> <li>Employee engagement, training, and development</li> </ul>
Investors	<ul style="list-style-type: none"> <li>Annual meeting of shareholders</li> <li>Quarterly earnings calls</li> <li>Regular calls, meetings, and conference presentations</li> </ul>	<ul style="list-style-type: none"> <li>Financial performance</li> <li>Corporate governance and business ethics</li> <li>Environmental impact</li> <li>Cybersecurity and customer privacy</li> <li>Transparency and reporting</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>Supplier agreements</li> <li>Supplier Code of Conduct</li> <li>Human Rights Policy</li> <li>Procurement and contracting process</li> <li>Regular supplier reviews</li> <li>Quality management process</li> </ul>	<ul style="list-style-type: none"> <li>Supply chain management</li> <li>Business ethics and human rights</li> </ul>
Communities	<ul style="list-style-type: none"> <li>Charitable fundraising events</li> <li>Donation requests</li> <li>Employee volunteer events</li> </ul>	<ul style="list-style-type: none"> <li>Corporate philanthropy</li> <li>Employee volunteerism</li> </ul>
Regulators and Government Agencies	<ul style="list-style-type: none"> <li>Regulatory compliance reporting and audits</li> <li>Information sharing through aviation industry memberships and partnerships</li> </ul>	<ul style="list-style-type: none"> <li>Passenger safety and security</li> <li>Cybersecurity and customer privacy</li> <li>Environmental compliance</li> </ul>





**GOVERNANCE**





# Enterprise Risk Management and ESG Oversight

Risk assessment and oversight are integral to Frontier’s governance and management processes. Our Board provides independent oversight to establish and review progress on our business strategy and enterprise risk management important to the company’s sustainable financial success and long-term value creation. The Board encourages management to promote a culture where risk management is integrated into our corporate strategy and day-to-day business operations. Our full Board administers the oversight of ESG risk exposure and strategy overall and various standing board committees address risks inherent in their respective areas of oversight.

The Nominating and Corporate Governance Committee has primary responsibility for the review of our ESG strategy and practices and periodically reports on these matters to the full

Board. Any pertinent feedback that management receives from shareholders as part of the Company’s shareholder engagement practices is also reported to the Board for consideration.

The Audit Committee and the Safety and Security Committee oversees our exposure to financial and to operational risks, respectively and the actions management has taken to limit or eliminate these exposures. Senior Management, the Audit Committee and the Safety and Security Committee review these risks and the associated mitigation strategies with the full Board at quarterly board meetings. The Audit Committee also oversees our cyber and information security environment. Additionally, the Nominating and Corporate Governance Committee monitors the effectiveness of our corporate governance guidelines, and the Compensation Committee oversees risks related

to our executive compensation, equity incentive plans, and other compensatory arrangements.

In addition, we recently created the role of Lead Independent Director to further independent oversight of our key risk and strategy matters, including ESG risk management. The Lead Independent Director’s responsibilities include coordinating the activities of, and discussions with, the independent directors, including those who serve on our Audit Committee, the overseers of financial and operational risk. The Lead Independent Director’s responsibilities also include briefing our CEO on matters coming out of those independent director sessions, thereby serving as the bridge for ESG recommendations from independent directors to the top of the house.



*Our Board sets high standards for Frontier’s employees, officers and directors. At the cornerstone of this philosophy is the importance of sound corporate governance across our business operations.*





# Board ESG Oversight

Responsible Party of the Board	Oversight Areas for ESG Matters
Board of Directors	Sustainability and ESG strategy and risk management, through oversight of our business strategy and annual strategic planning process.
Nominating and Corporate Governance Committee	Corporate governance and ESG oversight of corporate environmental and social strategy and practices. Shares responsibilities for Diversity, Equity, and Inclusion initiatives with the Compensation Committee.
Audit Committee	Financial risks, fraud and anti-corruption oversight; cyber and information security environment.
Compensation Committee	Human capital management including engagement/development, compensation and benefits programs for our officers, directors, and employees. Shares responsibilities for Diversity, Equity, and Inclusion initiatives with the Nominating and Corporate Governance Committee.
Safety and Security Committee	Activities, programs, and procedures relating to safety performance and physical security of Frontier, including our suppliers, manufactures and third-party providers.





## BOARD DIVERSITY

The effectiveness of our governance framework is largely a function of our qualified, experienced, and diverse Board. The Nominating and Corporate Governance Committee considers a mix of board members that represent a diversity of background and experience, including race, gender, and national origin. For more information, please see our latest Proxy Statement, which can be found in the Investor Relations section of our website. Neither the Proxy Statement nor the other contents of our website are incorporated by reference herein.

At December 31, 2022:



## BUSINESS CONTINUITY

We maintain an Emergency Response Plan that details procedures in case of a major incident or accident involving our aircraft. We conduct annual tabletop exercises with a cross-functional group composed of representatives from nearly all operational groups as well as the Legal, Treasury, IT, and Cybersecurity departments. Sessions on Cyber Risk Management are hosted quarterly with the Frontier Board Audit Committee, which includes topics such as project portfolio, cyber risk assessments, vulnerability management, compliance, and peer benchmarking. For more information on safety and cybersecurity, please see the sections on our Safety Management System and on Data Security and Customer Privacy later in this report.







## BUSINESS ETHICS AND COMPLIANCE

Our Board adopted a [Code of Ethics \(Code\)](#) that applies to all our directors, officers, and employees, including our Chief Executive Officer (CEO), Chief Financial Officer (CFO), and principal accounting officer. The purpose of the Code is to deter wrongdoing and to promote honest and ethical conduct.

To achieve our results, we promote a culture of winning and adherence to high standards of professionalism and integrity as provided within our Code. The Code addresses, among other things, issues relating to conflicts of interest, including internal reporting of violations and disclosures and compliance with applicable laws, rules and regulations, including the following areas:

- Conflicts of Interest
- Confidential Information
- Competition and Fair Dealings
- Gifts and Entertainment
- Political Contributions and Activities
- Compliance with Antitrust Laws
- Insider Trading Laws
- Foreign Corrupt Practices Act
- Harassment and Discrimination
- Anti-Corruption Policy

All full- and part-time employees are required to complete mandatory compliance training on our Code and Anti-Corruption Policy upon joining Frontier and annually thereafter. During FY 2022, approximately 88% of our team members completed this required compliance training covering the topics within our Code. Management strives for as close to a 100% completion rate as is possible in future years.

## WHISTLEBLOWER POLICY

Frontier is committed to high standards of ethical, moral and legal business conduct. We encourage employees, independent contractors, third-party vendors, customers and business partners to notify the Audit Committee of the Board (Audit Committee) and Frontier Management of potential accounting and ethical problems. Frontier has a [Whistleblower Policy](#) that outlines procedures to ensure that employees can submit concerns regarding questionable activity without fear of dismissal or retaliation of any kind. We engage a third-party, independent contractor to provide helpline services in a confidential, anonymous manner. Complaints are taken seriously, addressed promptly and discreetly, and directed to the Compliance Officer and/or the Audit Committee for review. The Audit Committee investigates reports regarding ethics and compliance matters and reports to the Board periodically concerning the information received through the ethics helpline and any related investigations.





## POLITICAL CONTRIBUTIONS AND ACTIVITIES

It is Frontier policy that its funds or assets are not used to make a political contribution to any political party or candidate unless prior approval has been given by Frontier’s CEO or General Counsel. We comply with federal and state contribution laws limiting contributions to political parties or candidates. During 2022, Frontier did not make any corporate contributions or contributions to political parties. Our General Counsel is responsible for monitoring federal and state legislative issues pertinent to our operations and industry. Frontier retains outside lobbyists to assist with certain federal, state and local legislative efforts.

Frontier encourages employees and directors to participate in the political process as individuals and during their own time. Employees may contribute personal funds to political parties or candidates and may participate in volunteer political activities during non-work time. Frontier does not reimburse, compensate, or otherwise incentivize employees for making political contributions. Employees’ views and actions are their own and not made on behalf of Frontier.

## SUPPLY CHAIN MANAGEMENT

Frontier closely monitors our suppliers for quality and efficiency, and as an ultra-low-cost carrier, we also tightly manage our costs throughout our entire supply chain.

Frontier has adopted a Vendor Code of Conduct and Human Rights Policy that reflects the company’s emphasis on responsible business practices, including sound corporate governance and compliance, to encourage its vendors and suppliers to employ high ethical standards and build sustainable long-term relationships between Frontier and its vendors. This Code and Policy is now included in the Requests for Proposals issued by Frontier.







**CUSTOMER & TEAM  
MEMBER WELL-BEING**





## SAFETY MANAGEMENT SYSTEM (SMS)

Frontier Airlines is committed to the highest safety standards in every area of our operations. As required by the U.S. Federal Aviation Administration (FAA), we maintain a Safety Management System (SMS), which provides a standardized framework to control operational risks and build a sound safety culture.

The SMS relies on data and analytics to continuously assess the effectiveness of risk controls and overall safety performance. It is operationalized by data analysis groups composed of designated management and subject matter experts tasked with identifying new hazards, systemic issues, and opportunities to improve risk controls.

The oversight structure for the SMS consists of the Corporate Safety Committee, a cross-functional group composed of Frontier’s Director of Safety, Director of Operations, Chief Pilot, Director of Maintenance, and Chief Inspector. The Corporate Safety Committee meets regularly to openly discuss risks, quality assurance, and potential interfaces and escalate as needed. The Director of Safety meets regularly with the CEO and other executive leadership to relay critical safety updates and findings by the Corporate Safety Committee.

The Board has ultimate oversight of Frontier’s safety management through its Safety and Security Committee. Executive management meets with the Board two to four times a year to discuss safety and security issues across Frontier.

Our SMS and Operations are audited regularly by internal and external stakeholders. We go beyond regulatory requirements and are certified by the International Air Transport Association (IATA)’s Operational Safety Audit (IOSA), a voluntary evaluation system designed to assess an airline’s operational management and control systems.

## SAFETY MANAGEMENT SYSTEM Oversight Structure





## SAFETY CULTURE AND TRAINING

While management sets safety objectives and evaluates safety risks, every Frontier employee plays an integral role in identifying hazards and promoting a positive safety culture. Safety ownership at Frontier means every employee knows their responsibility within the SMS, which encompasses:

### Culture

Frontier promotes trust and collaboration, rather than punishment or blame, so employees can feel comfortable reporting and addressing safety hazards.

### Training

All employees receive safety information and training relevant to their role upon hire and throughout their tenure at Frontier. Employees are trained on hazard communication, including workplace chemical inventory lists, material safety data sheets, and personal protective equipment (PPE) hazard assessment forms.

### Compliance

All employees are required to comply with the safety program rules and procedures, including hazard identification and reporting.

## SAFETY OWNERSHIP AT FRONTIER



Safety first,  
always



Continuous  
compliance through  
empowerment and  
consistent diligence



Continuous learning  
and refinement  
through  
education



Fostering an  
atmosphere of trust  
and collaboration  
to investigate and  
prevent safety  
incidents

Frontier has several avenues for safety incident reporting. The Aviation Safety Action Program (ASAP) is a non-punitive system in which employees can anonymously disclose if they accidentally violated a safety policy or regulation. ASAP reports are handled by the Frontier Safety Department and typically resolved through collaboration with the FAA, company management, and the applicable union. For other types of operational irregularities ranging from minor to severe, employees can file Incident Reports to flag situations that may need further investigation to prevent future issues. Our in-flight crew members may also file Fatigue Reports that result in a no-questions-asked rest period.

In addition, Frontier has developed the following measures for employees to audit and escalate issues of occupational safety:



**First Report of Injury/  
Accident** Form for any  
on-site accidents that do  
not require emergency  
services.



**Safety Incident Report**  
for any health hazards  
presented on the job (as  
mandated by OSHA).



**Safety Hotline** for any  
individual to voice a  
concern. The Safety Hotline  
is a voicemail system that  
is monitored regularly by  
the Safety Department.





EMPLOYEE SAFETY AT A GLANCE FY 2022

2.87 2.73

TRIR

Total Recordable Injury Rate

DART

Days Away, Restricted or Transferred

INDUSTRY PARTNERSHIPS

We are a National Air Carrier Association (NACA) member and share data with other member air carriers certificated under Title 14, Part 121 of the Code of Federal Regulations (CFR). Other industry-wide initiatives we participate in include:



**FAA’s Aviation Safety Information Analysis and Sharing system** – safety analysis and data sharing initiative that leverages internal FAA datasets and safety data from airlines, manufacturers, publicly available sources, and more.



**Commercial Aviation Safety Team** – aviation industry partnership with the U.S. government to reduce the U.S. commercial aviation fatality risk using an integrated, data-driven approach.



**IATA’s Incident Data Exchange** – a worldwide, aggregated, de-identified database of incident reports spanning flight operations, cabin, ground operations safety and security occurrences.

On the ground, we liaise with regulatory bodies like the Department of Homeland Security (DHS) and the U.S. Customs and Border Protection (CBP) for passenger and cargo screening. We maintain active, open lines of communication with the Transportation Security Administration (TSA) at all our locations to ensure proper standards are met for the security of our personnel, customers, equipment, and facilities. During TSA’s 2022 corporate audit of Frontier’s security program, we were deemed fully compliant with no instances of non-conformance.

SPOTLIGHT: COMBATING HUMAN TRAFFICKING



Frontier Airlines is proud to partner with the DHS and the Department of Transportation (DOT) to combat human trafficking through the Blue Lightning Initiative (BLI). As part of the BLI, all in-flight crew receives annual training to help identify and report potential human traffickers and victims to federal law enforcement. Please see the Supply Chain Management section of this report for more information on our commitment to protect Human Rights through our Vendor Code of Conduct and Human Rights Policy.





## Customer Service and Support

We aim to provide smooth and enjoyable travel experiences for our customers. Our Customer Service Plan is available on our website and outlines our commitments to our customers, including how we handle flight delays and cancellations.

In 2022, we transitioned to fully digital communications. Customers can use the Frontier Chatbot, a live agent chat available 24/7, our social media channels and WhatsApp to get the information they need. To better serve our customers, we have also added Spanish-language support to our chat channels.

We value feedback from our customers to help us learn what we are doing well and where we can improve. We randomly sample our customers to survey them on various aspects of their travel experience, including after they make a booking, complete a flight, or interact with our Customer Care team. We share their feedback with the appropriate groups within Frontier and take steps to continuously improve the experience for our customers. Our executive team is regularly briefed on our customer service performance, tracking and responding to metrics like our Net Promoter Score (NPS).





# Data Security and Customer Privacy

The security and privacy of our customers' personal information is a top priority for Frontier, and we believe we have established a strong foundation of oversight, internal policies and procedures, and system safeguards to protect both data and our IT infrastructure.

Our data security and customer privacy programs are led by the Director of Cybersecurity, who oversees a team focused on four pillars: security, architecture, and engineering; security operations; governance, risk, and compliance (GRC); and identity access management. The Director of Cybersecurity reports to the Chief Information Officer (CIO), and both jointly provide quarterly updates to the Board's Audit Committee. During these updates, board members are briefed on internal performance metrics, status of process improvement projects, upcoming regulatory requirements, and current threats and breaches impacting the airline industry.

## SECURITY FRAMEWORKS, COMPLIANCE AND AUDITS

Our cybersecurity program is structured around the National Institute of Standards and Technology (NIST) Cybersecurity and Privacy Frameworks. We broadly integrate best practices from many control frameworks, including ISO 27001, NIST Special Publication 800-53, the Sarbanes-Oxley (SOX) Act, the CPIM Body of Knowledge v2.04, and the Committee of Sponsoring Organizations (COSO) Framework. As a major airline that transacts customer payments at airport terminals, in flight and online, we maintain Level 1 compliance with the Payment Card Industry Data Security Standard (PCI DSS).

Our cybersecurity and privacy programs are subject to frequent internal and external audits, including from a Qualified Security Assessor (QSA) ensuring PCI compliance. We also enlist third-party experts to annually perform penetration testing on our systems, web applications, and mobile APIs. Based on the results of these exercises, we work throughout the year to remediate any vulnerabilities. In addition, we monitor our Security Scorecard and BitSight Rating and use insights from such external evaluations to continually improve our data security program. The privacy program conducts database inventory audits annually.

We also interface regularly with industry groups to monitor threat data and share best practices, including the Aviation Information Sharing and Analysis Center (ISAC) and the National Air Carrier Association (NACA).

## EMPLOYEE TRAINING

As part of their onboarding, all employees are required to acknowledge the Acceptable Use Policy in the Employee Handbook. Annual cybersecurity awareness training is assigned to all full-time employees through our online learning management system (LMS). For Frontier business partners and flight crew, we send out yearly "must-reads" on cybersecurity best practices, including password management, securing personal information, avoiding social engineering, and more.

Some job roles may require additional training. Employees who handle personal information undertake additional California Consumer Privacy Act (CCPA) training upon start and annually. Software engineers who work on web applications are assigned additional training modules and take an onsite course on the most critical web security risks to be aware of when developing code.





# ENVIRONMENTAL STEWARDSHIP



# Fleet and Fuel Efficiency

Our approach to managing our environmental footprint is centered around our aircraft – the heart of our business and largest source of our greenhouse gas emissions and other environmental impacts. As air travel directly results in emissions, we recognize that airlines have an important role to play in climate change mitigation. We believe that our low-cost structure – built on operational efficiency and cost savings – serves as one model for environmental stewardship for our industry by deploying the most fuel-efficient aircraft fleet in the U.S. thereby avoiding emissions that otherwise would have been discharged.

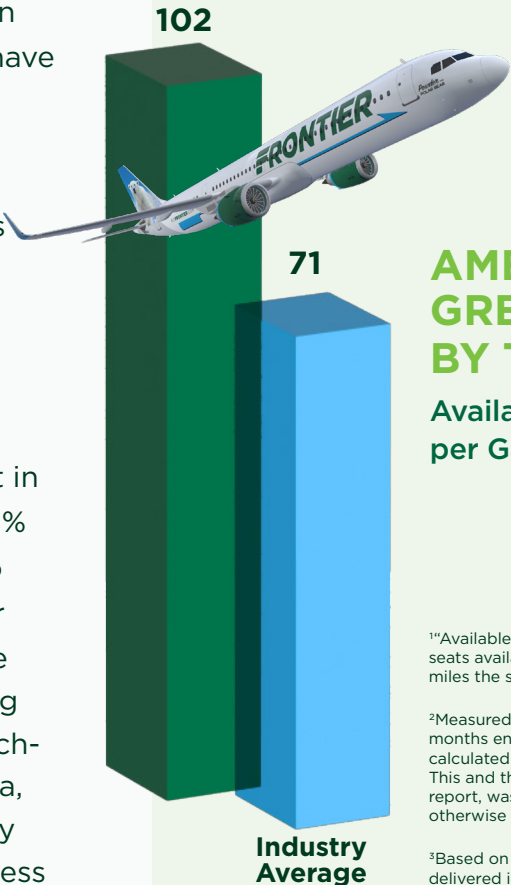
## OUR AIRCRAFT

With our A320neos’ leading the charge, our fleet continues to be the most fuel-efficient of all major U.S. carriers when measured by available seat miles (ASMs<sup>1</sup>) per fuel gallon consumed, generating over 102 ASMs per gallon as of December 2022.

As of December 2022, we’ve made a significant investment in a fleet of 120 Airbus single-aisle aircraft, of which nearly 75% is comprised of the A320neo family, which are expected to deliver 20% improved fuel efficiency compared to the prior generation of Airbus A320ceo family aircraft. And while we celebrated our 28th birthday in 2022, our fleet isn’t showing any signs of age. In January 2023, we were recognized by ch-aviation as having the third youngest fleet in North America, with an average aircraft age of approximately four years. By having one of the youngest fleets in the industry, we burn less

*“The addition of these new A321neos to our fleet will make the greenest airline in the U.S. even greener with these aircraft able to achieve 120 miles per gallon per seat<sup>3</sup>”*

— Barry Biffle, President and CEO, Frontier Airlines



## AMERICA'S GREENEST AIRLINE<sup>2</sup> BY THE NUMBERS

Available Seat Miles (ASMs) per Gallon, FY 2022

<sup>1</sup>“Available seat miles” or “ASMs” calculated as the number of seats available for passengers multiplied by the number of miles the seats are flown.

<sup>2</sup>Measured by ASMs per fuel gallon consumed over the twelve months ended December 31, 2022; other airline average calculated as weighted average of the nine major U.S. Airlines. This and the other data in this introduction, and the rest of this report, was calculated internally and not audited, assurance or otherwise certified by a third-party provider.

<sup>3</sup>Based on internal data since first A321neo aircraft was delivered in September 2022.

Frontier’s Available Seat Miles (ASMs) per Gallon, 2016-2022







fuel – saving our customers cash while reducing our carbon footprint.

And we are just getting started. In October 2022, we were proud to unveil our first Airbus A321neo powered by the groundbreaking Pratt & Whitney Geared Turbo Fan (GTF) engine that significantly reduces fuel burn and regulated air pollutant emissions vs. prior generation engines. This is just the first of 158 new A321neos that we will add to our fleet by 2029, many of which will be powered by the GTF engine.

WEIGHT REDUCTION INITIATIVES

To keep improving the fuel efficiency of our fleet and reduce carbon emissions, we have introduced additional efforts to reduce aircraft weight.

Our weight-saving initiatives begin with our unbundled flying experience, giving customers control to pay only for the services they’d like, making bags, seating assignments and in-flight purchases à la carte options to keep fares low. By charging for carry-on and checked bags, consumers are incentivized to pack less. By offering food and beverage for sale, passengers buy only what they want which allows us to reduce the number of consumables needed on each flight and drives a reduction in spoilage.

We also use environmentally conscious design elements for the interiors of our planes to help reduce weight. In 2021, we began to update the seats throughout our fleet with new premium seating developed by Recaro that is 30% lighter. On an average Airbus A321 aircraft, the fuel savings due to the reduced weight of the new seats equates to approximately 32,000 gallons per year. In addition to retrofitting current aircraft seating, Recaro will supply these seats for our remaining aircraft on order with Airbus as part of our first two orderbooks and scheduled for delivery through 2028.

In addition to installing lighter seats, we also operate a fleet with the highest seat density configuration for narrow-body aircraft of any U.S. carrier. Transporting more people on each flight helps to minimize the relative environmental impact of our operations including associated emissions.

We have further reduced weight throughout our fleet by removing items that were not frequently utilized by passengers. This included eliminating in-flight entertainment devices given that most Americans travel with a personal mobile device and removing onboard magazines, resulting in a significant weight reduction per flight while saving thousands of pounds of paper on an annual basis.

30%  
LIGHTER THAN OUR  
PREVIOUS MODELS

32K  
GALLONS OF FUEL  
SAVED ANNUALLY  
On an average Airbus A321  
aircraft





## OTHER FUEL EFFICIENCY MEASURES

We know that all our efforts can add up to big differences. From day one, our pilots are made aware of efficient operating practices recommended by Airbus to operate in the most economical manner possible. For example, Frontier **pilots may minimize fuel burn by utilizing idle reverse thrust, single-engine taxi, and no Auxiliary Power Unit techniques** whenever safe and operationally warranted. The fuel efficiency of our fleet is further bolstered by our **point-to-point network and enhanced route planning software**, which allows us to focus on direct, non-stop flights and carry only fuel necessary for the flight.



## OTHER ENVIRONMENTAL INITIATIVES

Our commitment to managing the environmental impact from our operation starts with and is grounded in compliance. We **maintain rigorous compliance standards** and strive to operate in accordance with all applicable federal, state, and local environmental laws and regulations. This includes regulations linked to the **handling and disposal of oils and other waste** generated during maintenance and servicing of our aircraft.



## INFLIGHT WASTE

Our à la carte service means we can carry less food and fewer beverages – with **less packaging - on our flights than we did previously**. And we endeavor to further reduce the impact of inflight waste by **eliminating plastic stirrers and serve all in-flight beverages in biodegradable cups**. Even our pilots are helping to reduce paper waste with **paperless cockpits** that utilize mobile tablets for information. In 2022, our flight attendants also went electronic, **eliminating their paper manuals in favor of handheld electronic devices**. Passengers are encouraged to go paperless by using our **mobile app for itineraries, receipts, and boarding passes generating less waste** starting already with their flight reservation.



## NOISE REDUCTION

In addition to running a fuel-efficient fleet, we also prioritize noise reduction where possible. The engines on our A320neos deliver a **50% reduction in noise** versus the previous generation. And the GTF engines that power the next generation of aircraft are even quieter – with a **75% smaller noise footprint**.



## FACILITIES MANAGEMENT

While our aircraft and flight operations account for the most significant portion of our environmental impact, we continue to reduce the impact of the rest of our operations, including our owned company facilities. In 2017, Frontier moved its Denver, Colorado headquarters to a **LEED Certified building designed to achieve maximum energy savings, water efficiency and CO2 standards**.







SPOTLIGHT: RAISING AWARENESS OF ENDANGERED SPECIES

The animals featured on the tails of our aircraft have been a beloved part of our company culture. Flight crews on each aircraft hand out trading cards to children on board to educate them about the animal featured on their plane’s tail. We built this program further in 2019 by spotlighting endangered animals on our airplane tails. Today, we also feature some of these endangered species on our Frontier Airlines World Mastercard, which is made of 85% recycled material.



37  
ENDANGERED  
ANIMALS FEATURED  
ON OUR PLANE TAILS  
IN 2022







In May 2023, Frontier, along with a consortium of Indigo portfolio airlines, executed an agreement to purchase up to 90 million gallons of sustainable aviation fuel, or “SAF”. Not only does this demonstrate our commitment to decarbonize air transportation, the investment also will increase the supply of SAF to the entire airline industry which should enable more widespread adoption than otherwise would be possible. CleanJoule has developed a unique technology to convert abundantly available agricultural residues and other waste biomass into SAF.

According to the International Air Transport Association, SAF could potentially contribute up to 65 percent of the reduction in emissions needed by the aviation sector to reach net zero greenhouse gas emissions by the year 2050<sup>1</sup>. SAF can reduce life cycle greenhouse gas emissions dramatically compared to conventional jet fuel, and this investment marks an important chapter in Frontier’s commitment to climate action.

## WHAT IS SUSTAINABLE AVIATION FUEL?

SAF is a biofuel used to power aircraft that has similar properties to conventional jet fuel but with a smaller carbon footprint. Depending on the feedstock and technologies used to produce it, SAF can reduce life cycle greenhouse gas emissions dramatically compared to conventional jet fuel. SAF’s lower carbon intensity makes it an important solution for reducing aviation emissions, which make up 8% of U.S. transportation emissions, according to the U.S. Environmental Protection Agency<sup>2</sup>.

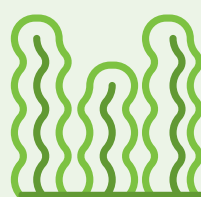
According to the U.S. Department of Energy, an estimated 1 billion dry tons of biomass can be collected sustainably each year in the U.S., enough to produce 50-60 billion gallons of low-carbon biofuels<sup>3</sup>. These resources primarily include:



Corn Grain



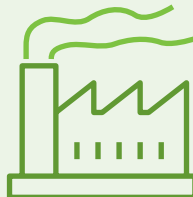
Agricultural Residues



Algae



Forestry Residues



Wood Mill Waste



Fats, Oils and Grease

<sup>1</sup>Source: <https://www.iata.org/en/events/agm/agm-2023/agm-2023-program/financing-saf-panel-summary/>

<sup>2</sup>Source: <https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>

<sup>3</sup>Source: <https://www.energy.gov/eere/bioenergy/sustainable-aviation-fuels>





# 2022 Scope 1 & Scope 2 Emissions

## GREENHOUSE GAS EMISSIONS

The following information was prepared based on a calendar reporting year that is the same as the Frontier Airlines Holding Group’s (ULCC or the Company) financial reporting period and covers each of Frontier Airlines and each of its subsidiaries.

Scope 1 and 2 GHG emissions information was prepared in accordance with the World Resources Institute/World Business Council for Sustainable Development Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition and the GHG Protocol Scope 2 Guidance: An Amendment to the GHG Protocol Corporate Standard.

This data has not been verified, assured, audited, or reviewed by a third-party provider and is subject to change.

- RPM means revenue per passenger mile.
- ASM means available seat miles.

## ORGANIZATION BOUNDARY

The company presents its emissions under the operational control approach, accounting for emissions from operations over which it or one of its subsidiaries has the full authority to introduce and implement its operating policies, using a 5% threshold.

## USE OF ESTIMATES AND ESTIMATION UNCERTAINTIES

Jet fuel estimates are derived from the Company’s internal regression models using U.S. DOT standard. Some data, such as Scope 2 emissions from airport station electricity are estimates. Emissions data are subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data.





# 2022 Scope 1 & Scope 2 Emissions

Scope 1 emissions are direct emissions from the combustion of fuels inside the organizational boundary (described below) and include mobile combustion, stationary combustion and fugitive emissions. Scope 2 emissions are indirect emissions from the generation of acquired and consumed electricity, steam, heat or chilled water occurring at sources outside of the organizational boundary as a consequence of activities from sources inside the organizational boundary, including purchased electricity.

GHG Absolute Emissions in Metric Tons of Carbon Dioxide Equivalent (CO <sub>2</sub> e)		2022 Results		%
Scope 1 Emissions		3,079,573.25		99.85%
Aircraft		3,076,859.90		99.76%
GSE		401.75		0.01%
Facility Heating		2,311.59		0.08%
Scope 2 Emissions (Location-based)		4,652.95		0.15%
Total Scope 1 and Scope 2 Emissions		3,084,226.20		100%
Intensity		Unit	2022	
Scope 1 & Scope 2 (location-based)		mtCO <sub>2</sub> e per thousand RPM	0.120154	
		mtCO <sub>2</sub> e per thousand ASM	0.097153	
Jet Fuel Emissions		mtCO <sub>2</sub> e per thousand RPM	0.119867	
		mtCO <sub>2</sub> e per thousand ASM	0.096921	





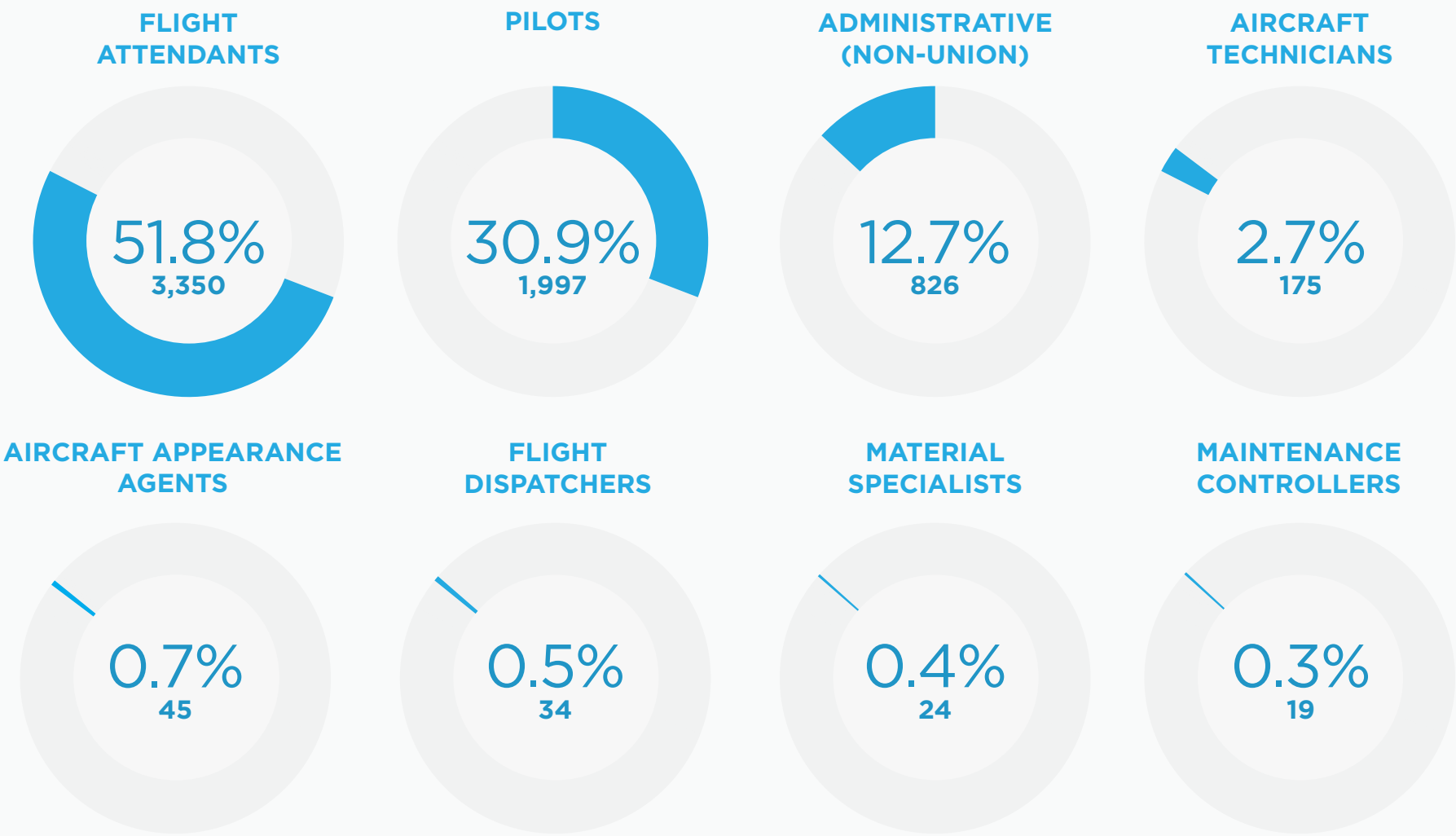
# OUR PEOPLE AND CULTURE





*Our employees are the key to our success. We are committed to providing equal employment opportunities for all individuals, and we are dedicated to employee engagement, training and development to support our team members' ability to reach their fullest potential.*

As of the end of FY 2022, we had 6,470 total employees:



Frontier supports our crew members' choice to participate in unions and collective bargaining. **Approximately 87% of our employees were represented by labor unions** under collective-bargaining agreements as of December 31, 2022. Frontier is currently in contract negotiations with two of our union groups. In 2023, Frontier will also begin contract negotiations with our two largest unions – our pilot and flight attendant groups – in addition to our Aircraft Appearance Agents and Maintenance Controllers. There were no reported work stoppages at Frontier in 2022.





## Benefits and Wellness

Our compensation and benefits offerings are designed to support the financial, mental, and physical well-being of our employees and their families. Our compensation package is continuously evaluated and adjusted to remain competitive within the airline industry. We seek to reduce out-of-pocket costs for company-sponsored medical, dental, vision, disability and life insurance plans and maximize the value of employee health savings accounts and 401(k) retirement savings plans.

We know that mental health is as important as physical well-being. To that end, Frontier has an Employee Assistance Program (EAP), a free and confidential service for our employees and members of their immediate household. The EAP includes tele-counseling and up to three face-to-face visits each year with a licensed counselor for issues including anger management, stress and anxiety, family and parenting issues, substance abuse, coworker conflict, legal advice, and financial planning. Since 2021, we have also offered an incentivized wellness program for employees to invest in their health, earn points and participate in various health and wellness competitions.

## Training and Development

At Frontier, we organize and manage training by position and function of each employee's role. Our central learning and development team creates content for our non-union employees, and the Human Resources Business Partners disseminate the training throughout the company. This includes the safety training discussed in the Safety Management System section of this report. Gaps in training are surveyed and assessed during an annual training review process.

As additional resources, many employees have access to LinkedIn Learning. We also support the ongoing development of our employees through conferences, external training, and executive coaching.

## PERFORMANCE FEEDBACK

For non-union Frontier employees, we measure performance via annual reviews to determine compensation increases and eligibility for promotions. Union employee performance is covered by conditions set by the collective bargaining agreements, wherein wages are determined by longevity.

### SPOTLIGHT: ATTRACTING THE NEXT GENERATION OF PILOTS



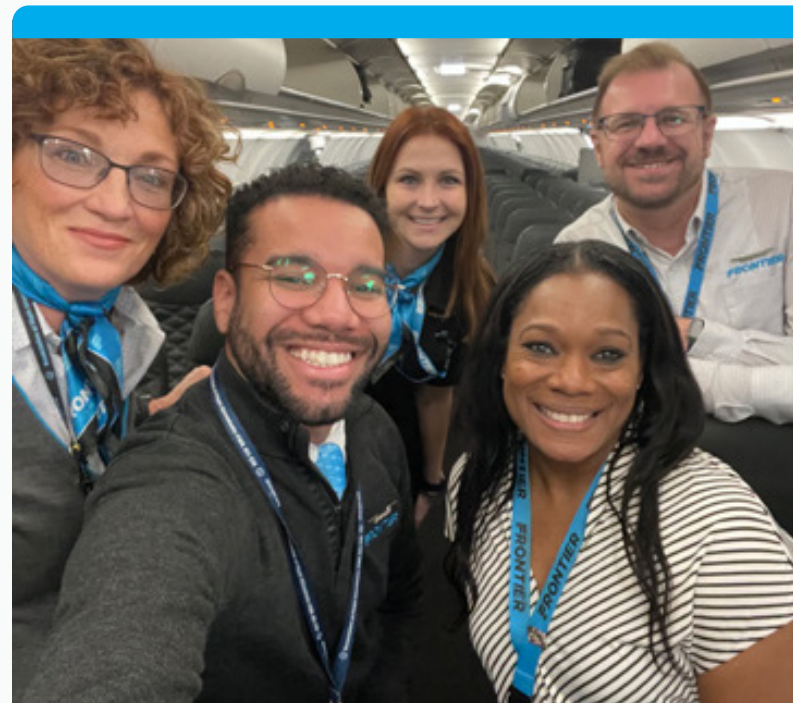
- The **Pilot Cadet Program** is a new program to help build a pipeline of successful commercial pilots through a two-year flight training program, with a direct pathway into a First Officer role. Successful applicants can complete flight training at over 70 ATP Flight School locations nationwide. No prior flying experience is required, and cadets will receive assistance in applying for financial aid to help offset training and living expenses. Since the program was launched in July 2022, we have had **over 1,300 applications**. This program is helping to develop the next generation of pilots; while the program is open to all individuals regardless of gender, it is helping to improve the diversity of our pilot population; initial applications to the program were nearly **25% female**, well over the national average for airline pilots.
- Launched in October 2022, the **Rotor Transition Program (RTP)** supports U.S. military-trained helicopter aviators to transition to fixed-wing commercial aviation and join Team Frontier. RTP candidates receive training and mentorship to help them smoothly transition from the military to commercial aviation.



# Diversity, Equity and Inclusion (DEI)

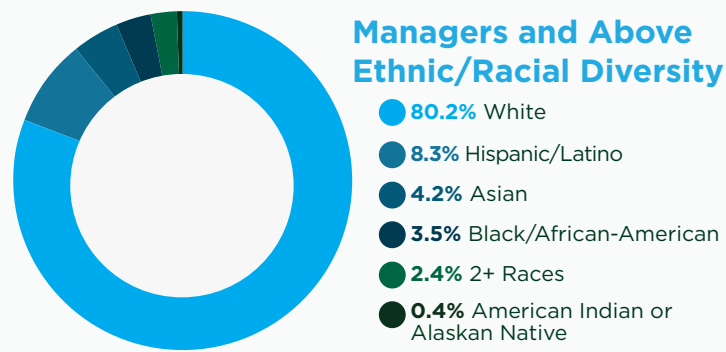
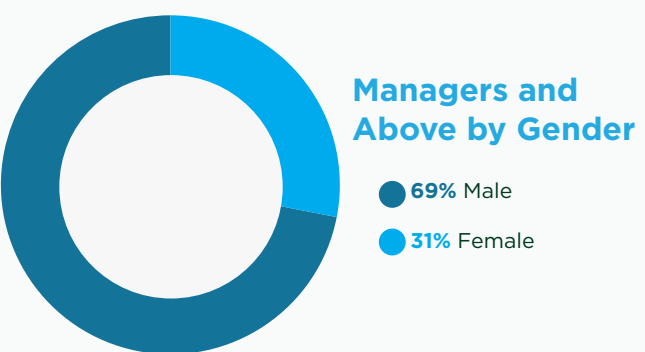
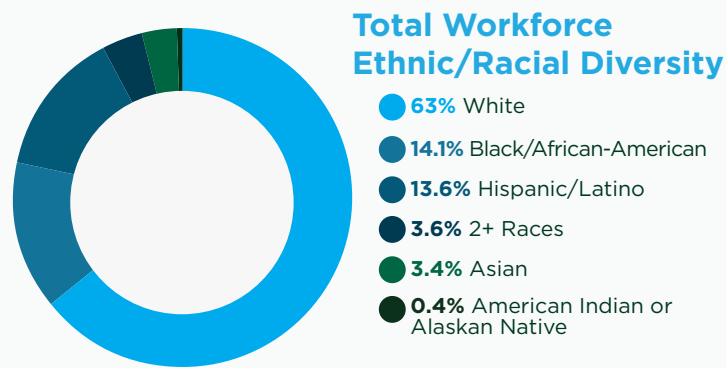
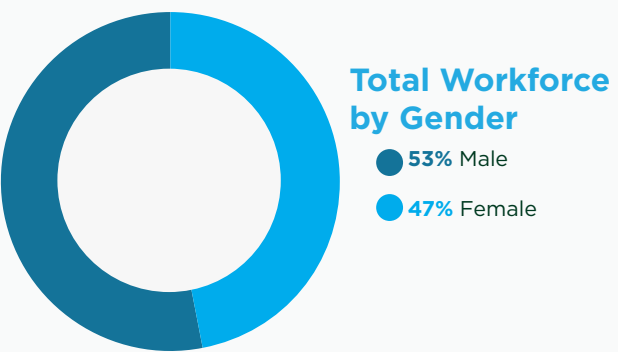
## OUR DEI APPROACH

We know we are stronger as a company when we create a workplace where everyone can bring their whole selves to work. We believe that fostering an inclusive and diverse culture will add value and lead to a more highly engaged workforce, allowing us to deliver better business results. Frontier is committed to providing equal opportunity and fair treatment to all individuals based on merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or other characteristics protected by law.



## CERTAIN DIVERSITY METRICS

The data below represents a snapshot of our workforce as of December 31, 2022 based on self-identification data from employees. Note: may not add to 100% due to non-specified responses.



## STRENGTHENING OUR DIVERSITY

We are committed to closing the gaps in our workforce diversity by creating opportunities for diverse talent to join Frontier and building an inclusive company culture.





PROGRAMS AND PARTNERSHIPS

The aviation industry has historically lacked diversity, and very few commercial pilots are female or minorities. To help foster opportunities and careers in aviation, Frontier has developed partnerships with organizations such as:



PROFESSIONAL ASIAN PILOTS ASSOCIATION



NGPA  
NATIONAL GAY PILOTS  
ASSOCIATION



As detailed in the Training and Development section of this report, Frontier has also established the Pilot Cadet Program which provides a pathway for traditionally underrepresented groups to pursue a career as commercial pilots. This program is complemented by our Ascend Trainee program that provides leadership development opportunities for employees with diverse backgrounds, including female as well as ethnic and racially diverse.

SPOTLIGHT: ASCEND TRAINEE PROGRAM



Ascend is a twelve-month rotational trainee program for employees and business partner employees from diverse backgrounds and experiences to explore career opportunities at Frontier’s headquarters. Participants rotate between three or four departments, completing on-the-job training and projects along with management development courses. Ascend aims to develop future leaders and diversify our corporate staff. In our first cohort of graduates from the program, **80% of the participants were female.**



## BUSINESS RESOURCE GROUPS (BRGS)

Our employee-led voluntary Business Resource Groups (BRGs) bring together employees with similar interests and experiences to create an environment where everyone can bring their talents, passion, and experiences to the team. Our BRGs, which are open to all employees and allies, include:

- Women’s Leadership Network,
- Veteran’s Resource Group,
- Frontier PRIDE,
- Society of Black Professionals, and
- Green Steering Committee.



## DIVERSITY HIGHLIGHTS

We celebrate our differences throughout the year by recognizing meaningful achievements and sharing stories through our company newsletters during Black History Month, Hispanic Heritage Month, Women’s History Month, Pride Month and Breast Cancer Awareness Month.

### SPOTLIGHT: PRIDE MONTH AT FRONTIER

We fly with pride and believe that the sky is for everyone. Frontier proudly participated in LGBTQIA+ pride events in Denver and Orlando in June and October 2022, respectively.



## Employee Engagement and Retention

Our employees are our greatest asset, and our goal is to retain talent and grow careers across all positions. We survey our employees annually to evaluate the quality of Frontier’s employment experience. Our most recent employee satisfaction survey was conducted late 2022. Over 3,700 comments were received from employees representing 57% of all employees, with high marks for fairness and respect, management support, diversity and inclusion, training, teamwork and safety.







# COMMUNITY ENGAGEMENT





Giving back to our communities is in our DNA, and we support many charitable organizations through volunteerism, in-kind donations and fundraising. Our philanthropic causes include support for those experiencing homelessness or terminal illness, women recovering from domestic violence, food banks, animal shelters, and more. For employees experiencing hardship, Frontier’s HOPE League is available to support and is funded through employee donations. Frontier also allows customers to pay it forward by donating their unused Frontier Miles to select non-profit organizations.



Frontier’s employees generously give their time to a variety of causes throughout the year, including visits to local schools and Aviation Day events to promote careers in Aviation and the importance of education.

**SPOTLIGHT: FRONTIER CHARITY GOLF TOURNAMENT**



Frontier holds an annual charitable golf tournament in Colorado’s Rocky Mountains. The event raises money for Folds of Honor, a non-profit that provides scholarships to families of service men and women who have fallen or been left with a disability while protecting their country.

**\$150K**

RAISED IN 2021  
(INAUGURAL SPONSORSHIP)

**\$365K**

RAISED IN 2022







## SPOTLIGHT: SPECIAL OLYMPICS

Frontier is a proud sponsor of Special Olympics Colorado and helped get athletes to Orlando for the Special Olympics USA Games in June 2022. Team Frontier employees volunteered to give the athletes a special sendoff at the Denver airport to cheer them on and send them off.










**APPENDIX**





# United Nations Sustainable Development Goals (SDGs)

The United Nations Sustainable Development Goals (SDGs) are a call to action by all countries to promote prosperity while protecting the planet. Represented by 17 Global Goals and 169 targets, the SDGs address challenges of poverty, inequality, climate change, environmental degradation, and achieving peace and justice. Below, we identified the SDGs where we believe Frontier has the greatest influence and impact through our business strategy, products, and services.

Goal	Description	Specific Goal Targets	Alignment to Frontier	Report Chapter
<div><div>8</div><div>DECENT WORK AND ECONOMIC GROWTH</div><div></div></div>	Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all	8.5	<ul style="list-style-type: none"><li>• Frontier provides jobs with competitive compensation and benefits for over 6,000 employees.</li><li>• We have training and development programs for entry-level and underrepresented groups in aviation.</li></ul>	Our People and Culture
<div><div>9</div><div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div><div></div></div>	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	9.1	<ul style="list-style-type: none"><li>• Frontier annually transports 25 million passengers on more than 300 routes. Our low-cost and fuel-efficient model reduces the cost of air travel and helps connect more families and businesses.</li></ul>	Introduction Environmental Stewardship
<div><div>10</div><div>REDUCED INEQUALITIES</div><div></div></div>	Reduce inequality within and among countries	10.2	<ul style="list-style-type: none"><li>• Through industry partnerships and pilot recruitment initiatives, we aim to train and hire more pilots from historically underrepresented groups in aviation.</li></ul>	Our People and Culture





# UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGS) continued

Goal	Description	Specific Goal Targets	Alignment to Frontier	Report Chapter
<div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div></div>	Ensure sustainable consumption and production patterns	12.5, 12.6	<ul style="list-style-type: none"><li>• We have implemented numerous measures designed to lower aircraft weight and reduce inflight waste.</li><li>• We are committed to regularly report our sustainability initiatives.</li></ul>	Environmental Stewardship
<div>13 CLIMATE ACTION</div> <div></div>	Take urgent action to combat climate change and its impacts	13.3	<ul style="list-style-type: none"><li>• Frontier has a newer, highly fuel-efficient fleet and we reduce our impact by optimizing operational behavior (e.g., takeoff and landing procedures), weight load, and route management.</li></ul>	Environmental Stewardship
<div>17 PARTNERSHIPS FOR THE GOALS</div> <div></div>	Strengthen the means of implementation and revitalize the global partnership for sustainable development	17.16, 17.17	<ul style="list-style-type: none"><li>• We participate extensively through industry partnerships to advance safety and hazard reporting, stop human trafficking, advance diversity in aviation, and more.</li></ul>	Customer and Team Member Well-Being Environmental Stewardship Our People and Culture





# Sustainability Accounting Standards Board (SASB)

The following tables incorporate the SASB Standards (now a part of the IFRS Foundation) related to Airlines. They include the relevant topic metric(s) where available and/or references to sections within this report where additional content related to the metric can be found.

SUSTAINABILITY DISCLOSURE TOPICS & ACCOUNTING METRICS: AIRLINES	Topic	Accounting Metric	SASB Code	FY 22 Response	Report Reference
	Greenhouse Gas Emissions	Gross global Scope 1 emissions	TR-AL-110a.1	See page 27 for our Scope 1 and Scope 2 Greenhouse Gas Emissions	Fleet & Fuel Efficiency
		Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	TR-AL-110a.2		Fleet & Fuel Efficiency
		(1) Total fuel consumed, (2) percentage alternative, (3) percentage sustainable	TR-AL-110a.3	(1) 312 million gallons	Fleet & Fuel Efficiency
	Labor Practices	Percentage of active workforce covered under collective bargaining agreements	TR-AL-310a.1	87%	Employee Snapshot
		(1) Number of work stoppages and (2) total days idle	TR-AL-310a.2	There were no reported work stoppages at Frontier in 2022.	Employee Snapshot
	Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	TR-AL-520a.1	0	Business Ethics and Compliance
	Accident & Safety Management	Description of implementation and outcomes of a Safety Management System	TR-AL-540a.1	See report reference.	Safety Management System
		Number of aviation accidents	TR-AL-540a.2	0	Safety Management System
		Number of governmental enforcement actions of aviation safety regulations	TR-AL-540a.3	0	Safety Management System





ACTIVITY METRIC: AIRLINES

Activity Metric	SASB Code	FY 22 Response
Available seat kilometers (ASK)	TR-AL-000.A	51,089.94 million
Passenger load factor	TR-AL-000.B	80.9%
Revenue passenger kilometers (RPK)	TR-AL-000.C	41,310.28 million
Revenue ton kilometers (RTK)	TR-AL-000.D	Not available
Number of departures	TR-AL-000.E	165,447
Average age of fleet	TR-AL-000.F	Approximately 4 years

FORWARD-LOOKING STATEMENTS

Certain statements in this presentation/document should be considered forward-looking statements within the meaning of the Securities Act of 1933, as amended, the Securities Exchange Act of 1934, as amended, and the Private Securities Litigation Reform Act of 1995. These forward-looking statements are based on the Company’s current expectations and beliefs with respect to certain current and future events and anticipated financial and operating performance. Such forward-looking statements are and will be subject to many risks and uncertainties relating to the Company’s operations and business environment that may cause actual results to differ materially from any future results expressed or implied in such forward-looking statements. Words such as “expects,” “will,” “plans,” “intends,” “anticipates,” “indicates,” “remains,” “believes,” “estimates,” “forecast,” “guidance,” “outlook,” “goals,” “commits”, “strives”, “targets” and similar expressions are intended to identify forward-looking statements. Additionally, forward-looking statements include statements that do not relate solely to historical facts, such as statements which identify uncertainties

or trends, discuss the possible future effects of current known trends or uncertainties, or which indicate that the future effects of known trends or uncertainties cannot be predicted, guaranteed or assured. All forward-looking statements in this release are based upon information available to the Company on the date of this release. 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, except as required by applicable law.

Actual results could differ materially from these forward-looking statements due to numerous factors including, without limitation, the following: unexpected increases in costs to acquire new aircraft, sustainable aviation fuel, whether our investments will actually achieve our goals or their intended outcomes, if we change our goals or plans due to changes in consumer or public perception; the potential future impacts of the COVID-19 pandemic, including any future variants or sub-variants of the virus, and possible outbreaks of another disease or similar public health threat in the future, on the Company’s business, operating results, financial condition, liquidity and near-term and long-term strategic operating plan; unfavorable economic and political conditions in the states where the Company operates and globally; the highly competitive nature of the global airline industry and susceptibility of the industry to price discounting and changes in capacity; high and/or volatile fuel prices or significant disruptions in the supply of aircraft fuel, including as a result of the recent conflict between Russia and Ukraine; the Company’s reliance on technology and automated



## APPENDIX

systems to operate its business and the impact of any significant failure or disruption of, or failure to effectively integrate and implement, the technology or systems; the Company's reliance on third-party service providers and the impact of any failure of these parties to perform as expected, or interruptions in the Company's relationships with these providers or their provision of services; adverse publicity; and/or harm to the Company's brand or reputation; reduced travel demand and potential tort liability as a result of an accident, catastrophe or incident involving the Company, its codeshare partners, or another airline; terrorist attacks, international hostilities or other security events, or the fear of terrorist attacks or hostilities, even if not made directly on the airline industry; increasing privacy and data security obligations or a significant data breach; further changes to the airline industry with respect to alliances and joint business arrangements or due to consolidations; changes in the Company's network strategy or other factors outside its control resulting in less economic aircraft orders, costs related to modification or termination of aircraft orders or entry into less favorable aircraft orders; the Company's reliance on a single supplier for its aircraft and two suppliers for its engines, and the impact of any failure to obtain timely deliveries, additional equipment or support from any of these suppliers; the impacts of union disputes, employee strikes or slowdowns, and other labor-related disruptions on the Company's operations; extended interruptions or disruptions in service at major airports where the Company operates; the impacts of seasonality and other factors associated with the airline industry; the Company's failure to realize

the full value of its intangible assets or its long-lived assets, causing the Company to record impairments; the costs of compliance with extensive government regulation of the airline industry; costs, liabilities and risks associated with environmental regulation and climate change; the Company's inability to accept or integrate new aircraft into the Company's fleet as planned; the impacts of the Company's significant amount of financial leverage from fixed obligations, the possibility the Company may seek material amounts of additional financial liquidity in the short-term and the impacts of insufficient liquidity on the Company's financial condition and business; failure to comply with the covenants in the Company's financing agreements or failure to comply with financial and other covenants governing the Company's other debt; changes in, or failure to retain, the Company's senior management team or other key employees; current or future litigation and regulatory actions, or failure to comply with the terms of any settlement, order or arrangement relating to these actions; increases in insurance costs or inadequate insurance coverage; and other risks and uncertainties set forth from time to time under sections captioned "Risk Factors" in the Company's reports and other documents filed with the SEC, including the Company's annual report on Form 10-K and quarterly reports on Form 10-Q.