

FRONTIER AIRLINES, INC.

VENDOR CODE OF CONDUCT AND HUMAN RIGHTS POLICY

INTRODUCTION

Corporate integrity, compliance with law, ethical decision making and the highest standards for safety, environmental protection, and the wellbeing of workers are important to Frontier Airlines, Inc. These principles apply to all aspects of Frontier's business, and encompass all manufacturers, distributors, service providers, and other vendors (each a "**Vendor**" and collectively "**Vendors**") that provide services and products used by Frontier.

These principles are reflected in Frontier's Vendor Code of Conduct and Human Rights Policy ("**Code and Policy**"), which establishes the minimum standards that must be met by any Vendor that sells services or goods to or does business with Frontier, consistent with the highest standards, regarding:

- Vendor's treatment of workers and customers;
- workplace safety;
- the impact of Vendor's activities on the environment; and
- Vendor's legal and ethical business practices.

To the extent this Code and Policy sets a higher standard than required by commercial practice or applicable laws, rules or regulations, Frontier expects its Vendors to adhere to these higher standards. It is each Vendor's responsibility to know and understand the expectations and requirements set forth in this Code and Policy, and to meet those standards.

Legal Compliance and Documentation

Frontier upholds the standards of lawful and ethical conduct from itself and its Vendors, including those located outside of the United States. All Vendors must comply with all applicable laws, rules, and regulations, of the United States and any other country in which they conduct business, and should endeavor to operate with higher standards than those required by law.

Specifically, the Vendor shall implement and maintain a reliable system to verify the eligibility of its workers, including: age eligibility; and the legal status of foreign workers. Vendor shall also implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

Health and Safety

Vendor shall provide a safe, healthy, and sanitary working environment. Vendor shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards and work-related accidents and injuries that are not specifically addressed in this Code and Policy.

General and industry-specific procedures and safeguards include those relating to:

- health and safety inspections;

- equipment maintenance;
- eye wash and other related safety stations, where applicable;
- maintenance of Vendor's facilities where services are performed for or on behalf of Frontier; or where goods destined for Frontier are manufactured, distributed, packaged or otherwise handled ("**Facilities**");
- worker training covering the hazards typically encountered in their scope of work;
- fire prevention; and
- documentation and recordkeeping.

Vendor shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

Threats or Violence

The Vendor shall ensure that neither it nor its employees engage in intimidation, threats or hostile behaviors, physical abuse, sexual abuse, vandalism, arson, sabotage, use of weapons, bullying, carrying weapons onto Frontier property (including airport locations and aircraft) or Vendor Facilities, or any other act, which, in Frontier's opinion, is inappropriate in the work environment.

Insider Trading

Vendors and their personnel will not use any non-publically disclosed information obtained in the course of their business relationship with Frontier as the basis for trading or enabling others to trade in the stock or securities of Frontier or any company.

Reporting Channels

Frontier expects each Vendor to provide employees and third parties with readily available access to adequate reporting channels, to include a means for anonymous reporting, to raise legal or ethical concerns without fear of retaliation. Furthermore, it is expected that Vendors will investigate these reports and take action to prevent, detect and correct any retaliatory actions or threats thereof.

Alcohol and Drugs

The Vendor shall ensure that its employees comply with Frontier policies and applicable law regarding the abuse of alcohol and the possession, sale, and use of illegal (at the federal or state level) substances. Such employees must report to work and remain while at work completely free of illegal drugs, which include abused or non-prescribed prescription drugs, and alcohol.

Environmental Protection

Vendor shall perform services for Frontier and operate its Facilities, at a minimum, in compliance with all environmental laws, including laws and international treaties relating to:

- waste disposal;
- emissions;
- discharges; and
- hazardous and toxic material handling.

Vendor shall identify and manage hazardous chemicals and other materials, if released into the environment, to ensure their safe handling, movement, storage, use, recycling and reuse, and disposal.

Vendor shall endeavor to consistently look for new and better ways to conserve resources, reduce the impact of products being used on behalf of Frontier, and reduce manufacturing waste.

Gifts and Entertainment; Compliance with Foreign Corrupt Practices Act

Vendor must maintain the highest ethical standards with respect to its relationship with Frontier and its employees. As a general matter, Vendors may give or receive gifts or entertainment to Frontier or its employees only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. Vendors must compete solely on the merits of their company reputation, products, services and offerings and Frontier procurement decisions may never be influenced by conflicts of interest or appearance of conflicts of interest.

Specifically, no Vendor should offer or provide any benefit that might compromise, or appear to compromise, Frontier or its employees' objective assessment of the Vendor's services, products, or prices. Vendor may provide, at the more, only promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice.

Vendors, pursuant to the Foreign Corrupt Practices Act (FCPA), are prohibited from offering or giving money or any other item of value to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, or official of a public international organization. The FCPA prohibits the payment of bribes, kickbacks, or other inducements to foreign officials. This prohibition also extends to payments to a sales representative or agent if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. This includes so-called "facilitation" or "grease" payments intended to expedite or secure performance of a routine governmental action unless there is a formal, published, legal governmental fee schedule for such expedited services and the government provides a receipt for such service (*i.e.* expedited U.S. passports). Personal safety payments are also permitted where there is an immediate and/or imminent threat to life, health, or safety. This prohibition applies even in locations where such activity may not violate local law or custom.

Vendor Diversity

Frontier is committed to having a robust and diverse Vendor base comprised of small and diverse Vendors. As such, Frontier provides ample opportunities for small, minority-owned, women-owned, veteran-owned, service-disabled veteran-owned, lesbian, gay, bisexual, transgender, queer, questioning, intersex, asexual (LGBTQIA+)-owned, and disability-owned businesses to participate in Frontier procurement processes.

Competition and Antitrust

The Vendor will not enter into formal, informal, or implied anti-trust or anti-competitive relationships that fix prices, collude, impact bids or proposals, limit supply or control markets. Vendors will, at no time, attempt to circumnavigate Frontier's established bidding/contracting process, share or exchange current, historical or future pricing information with their competitors or potential competitors. Vendors will in no way participate in any activity that is aimed at, or unintentionally, restrains, limits or impacts competition in their marketplace.

Protecting Confidential & Proprietary Information and Cybersecurity

The Vendor is expected to ensure that all Frontier sensitive, confidential and proprietary information is adequately protected in accordance with agreements between the parties, and all applicable laws, rules and regulations. The Vendor must comply with all applicable data privacy laws pertaining to the collection, processing, use, transfer and destruction of personal data and information. Any vendor providing technology solutions to Frontier must ensure that their products are free from cyber risks.

Audits

Vendor acknowledges that this Code and Policy sets out standards that Frontier may audit to determine whether Vendor is meeting the requirements set out in this Code and Policy.

POLICY ON HUMAN RIGHTS AND THE PREVENTION OF SLAVERY AND HUMAN TRAFFICKING

In accordance with the International Bill of Human Rights, Frontier is committed to supporting human rights, and in doing so, encourages its Vendors to condemn all forms of slavery, human trafficking, forced, bonded, or indentured labor. For avoidance of doubt, all employment and work performed should be voluntary on the part of the employee. Frontier requires that each Vendor:

- Conduct itself in a way that respects human rights
- Comply with all applicable anti-slavery and human trafficking laws and not use any slave, bonded, child, illegal or compulsory labor
- Comply with all applicable minimum wage laws and maximum hours laws, and provide meal and rest breaks as required by applicable law or as appropriate
- Provide a work environment that is free from hostility, harassment and discrimination and treat their workers with dignity and respect

Frontier expects each Vendor to provide products that are made from responsibly sourced materials and support efforts to eliminate the use of materials, including constituent minerals, that directly or indirectly finance or benefit groups that are known to be perpetrators of serious human rights abuses.

No Discrimination, Abuse, or Harassment

Vendor shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Vendor shall treat workers with respect and dignity and shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment.