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### A Message from Barry Biffle, Chief Executive Officer

"We strive to be the most environmentally sustainable airline in North America supported by our investment of more than a billion dollars per year in the most fuel-efficient fleet on the continent."

I'm proud to present Frontier's 2023 Environmental, Social and Governance (ESG) Report which coincides with our 10th year as an ultra-low-cost carrier. It also marks the beginning of our transition to a more reliable, simplified network strategy designed to benefit our customers and boost our efforts to mitigate greenhouse gas (GHG) emissions.

In 2013, Frontier was reimagined as an ULCC when we adopted the timeless strategy we continue to refer to today as *Low Fares Done Right*. It's our profound commitment to democratize air travel by leveraging our low-cost structure in order to offer low fares and appeal to a broad consumer base across income tiers and demographics.

Every single member of Team Frontier forms the backbone of *Low Fares Done Right*. Each day, they faithfully uphold our safety-first culture and execute to deliver the lowest adjusted cost per available seat mile in the industry and enable our low-fares strategy. Moreover, they are playing a pivotal role in our network transformation as we strive to deliver an enhanced experience to our customers. Late in the year, we began to implement the early stages of our network simplification strategy, a profound shift in our operations in which aircraft and crew will return nightly to their home base on about 80% of our scheduled flights. Amid unrelenting uncontrollable constraints. I believe

this is the key to unlocking greater network reliability and cost efficiencies by way of shorter-stage trips, more concentrated maintenance, and a well-defined, more streamlined recoverability path when disruptions do occur.

All stakeholders win in this makeover. Customers benefit from improved on-time arrivals and departures, lower costs stimulate demand with lower fares, and a more efficient operation supports relatively lower GHG emissions, contributing to our longstanding aspiration to being responsible stewards of our delicate ecosystem.

While an improved travel experience for our customers is key to our long-term viability, safety will always be top-of-mind and our highest priority. In 2023, over 30 million passengers safely traveled with Frontier. As we grow, we'll continue to promote a safety culture at Frontier. It's what we refer to as "Safety Ownership". It's not just a mantra; it's our commitment to foster an environment of trust and collaboration so any employee is encouraged to report and address safety concerns. We also employ a non-punitive system so that employees can anonymously self-report if they accidentally violate a safety regulation. Our safety-first push is reflected in our Total Recordable Injury Rate (TRIR) and Days Away, Restricted or Transferred Rate (DART), both of which declined 14% and 16%, respectively, compared to 2022 as disclosed later in this report.



As we observe our 10th anniversary, we're also celebrating another year as "America's Greenest Airline." It's not an unintended distinction; by design, we strive to be the most environmentally sustainable airline in North America supported by our investment of more than a billion dollars per year in the most fuel-efficient fleet on the continent. In 2023, we achieved an industry leading 104 available seat miles per gallon, 44 percent more efficient compared to the average of the major U.S. airlines, saving approximately 160 million gallons of fuel and an estimated 1.4 metric tons of CO2e.<sup>2</sup> Furthermore. our year-over-year capacity growth in 2023 outpaced the increase in greenhouse gas emissions - an unavoidable, near-term consequence of the airline industry - by 20% and validates the limited environmental impact of every available seat mile (ASM) we add to our network. We achieved this by several factors, most notably by employing the latest engine technology in our young Airbus A320neo fleet, minimizing APU usage, and leveraging enhanced route planning software and long-range communication, among other factors. By the end of the decade, the high-density A321neo is currently expected to increase to 68% of our fleet and will improve our fuel efficiency by 10% on the basis of ASMs per gallon.

We're also in the early stages of adopting the use of sustainable aviation fuel (SAF). In 2023, Frontier, along with a consortium of Indigo portfolio airlines, executed an agreement with CleanJoule, the world's leading innovator of full-performance SAF, for the right to purchase up to 90 million gallons. The agreement demonstrates our efforts to decarbonize air transportation, but moreover, the investment will help increase the supply of SAF to the larger airline industry which should enable more widespread adoption than otherwise would be possible.

As in prior years, we continue to 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 so many more. I'm particularly proud of our longstanding support for Folds of Honor, an organization which provides scholarships to families of our brave service men and women who have fallen or been left with a disability while protecting our country and our interests abroad. Since our sponsorship began in 2021, we've raised over \$1 million for Folds of Honor through our charity golf tournament held every June in beautiful Beaver Creek, Colorado. Giving back to our communities will always be an unwavering component of our culture.

At Frontier, I believe we're a stronger company when we promote an inclusive and diverse workforce based on a variety of backgrounds, ethnicities, experiences, and education. I'm proud of our longstanding history of fostering such a culture, but we have more to do. To support our objectives to close the gaps in our workforce diversity, among other factors, we partner with organizations such as the Latino Pilots Association, Women in Aviation International, and the Organization of Black Aerospace Professionals, to name several, to help facilitate opportunities and careers in aviation. Further, we offer employee-led voluntary Business Resource Groups which bring together employees with similar interests and experiences to create an environment where everyone can bring their talents, passions, and experiences to the team. I'm confident this will lead to a more highly engaged workforce and allow us to consistently execute on our business objectives and deliver superior results.

Every member of Team Frontier deserves credit for the ESG accomplishments highlighted throughout this report, and I am beyond grateful to lead this amazing team of dedicated, caring professionals. To our valued shareholders, I appreciate the trust you've placed in us as we embark on years of sustainable and responsible growth.



<sup>&</sup>lt;sup>1</sup>Measured by available seat miles ("ASM") per fuel gallon consumed over the twelve months ended December 31, 2023; other airline average calculated as weighted average of the nine major U.S. airlines. This, and all other related data in this report was calculated internally and not audited, assurance or otherwise certified by a third-party provider. ASMs are defined as the number of seats available for passengers multiplied by the number of miles the seats are flown.

<sup>&</sup>lt;sup>2</sup> Per the EPA Greenhouse Gas Equivalencies Calculator.

### **Our Story**

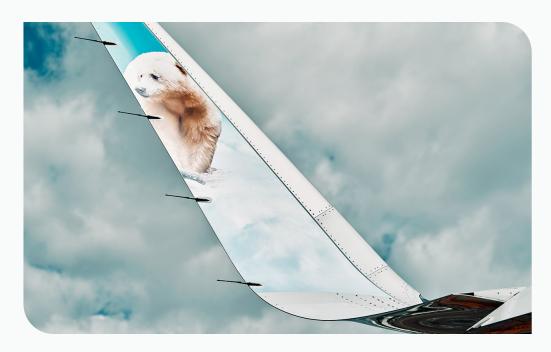
Frontier Group Holdings, Inc. (Frontier Airlines, Frontier, or the Company) believes that the sky is for everyone. We strive to make this happen by delivering **LOW**FARES DONE RIGHT®, a superior level of ultra-low-cost service to more than 90 destinations in the United States (U.S.), Latin America and 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. As of December 31, 2023, we operate 136 A320 family aircraft, the largest A320neo family fleet in the U.S. and we have commitments for an additional 210 Airbus aircraft to be delivered through 2029.



Our 2023 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 2023 for the period from January 1 through December 31, 2023.

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 Sustainability Accounting Standards Board (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 2023 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 prioritize the well-being of our customers and team members by striving 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 ecoconscious air travelers.



Our Pawsitive 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	Customer service channels	Customer experience and support
	<ul> <li>Social media monitoring and engagement</li> </ul>	
	<ul> <li>Customer satisfaction survey</li> </ul>	
Employees	Professional development and training	Benefits and compensation
	<ul> <li>Collective bargaining agreements</li> </ul>	<ul> <li>Employee health and safety</li> </ul>
	<ul> <li>Business Resource Groups</li> </ul>	<ul> <li>Diversity, Equity, and Inclusion (DEI)</li> </ul>
		<ul> <li>Employee engagement, training, and development</li> </ul>
Investors	Annual meeting of shareholders	Financial performance
	<ul> <li>Quarterly earnings calls</li> </ul>	<ul> <li>Corporate governance and business ethics</li> </ul>
	<ul> <li>Regular calls, meetings, and conference</li> </ul>	Environmental impact
	presentations	Transparency and reporting
Suppliers	Supplier agreements	Supply chain management
	<ul> <li>Vendor Code of Conduct</li> </ul>	<ul> <li>Business ethics and human rights</li> </ul>
	<ul> <li>Human Rights Policy</li> </ul>	
	<ul> <li>Procurement and contracting process</li> </ul>	
	<ul> <li>Regular supplier reviews</li> </ul>	
	<ul> <li>Quality management process</li> </ul>	
Communities	Charitable fundraising events	Corporate philanthropy
	Donation requests	Employee volunteerism
	Employee volunteer events	
Regulators and	Regulatory compliance reporting and audits	Passenger safety and security
Government	<ul> <li>Information sharing through aviation industry</li> </ul>	<ul> <li>Cybersecurity and customer privacy</li> </ul>
Agencies	memberships and partnerships	Environmental compliance





## **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 works with 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 oversee 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 created the role of Lead Independent Director to further the 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 oversight of the Company's 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, financial reporting and external audit oversight; cyber and information security environment oversight.
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	Oversight of activities, programs, and procedures relating to safety performance and physical security of Frontier, including with respect to the Company's management of critical original equipment manufacturers (OEMs) and third-party providers.





#### **BOARD DIVERSITY**

Our qualified, experienced, and diverse Board oversees the effectiveness of our governance framework. The Nominating and Corporate Governance Committee considers a mix of board members that represent a diversity of background and experience, including but not limited to 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, 2023:

**BOARD MEMBERS** 

11

**FEMALE** 

18%

RACIALLY/ETHNICALLY DIVERSE

#### **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 <u>Code of Ethics (Code)</u> 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 Dealing
- 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 upon joining Frontier and annually thereafter, and all Frontier employees at manager level and above, and all those in purchasing or procurement roles, are required to complete mandatory Anti-Corruption Policy training upon joining Frontier and annually thereafter. During FY 2023, 100% of our team members completed the required compliance training regarding our Code and 100% of applicable Frontier employees completed the Anti-Corruption training. Management strives to continue a 100% completion rate 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 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 2023, 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 nonwork 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 <u>Vendor Code of Conduct and Human Rights Policy</u> 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.







#### **SAFETY MANAGEMENT SYSTEM (SMS)**

Frontier Airlines aims to establish high 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 Committee 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 2023**

2.46

2.28

### **TRIR**<sup>1</sup> Total Recordable Injury Rate

#### DART<sup>2</sup>

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 regulations are met for the security of our personnel, customers, equipment, and facilities. During TSA's 2023 corporate audit of Frontier's security program, we were deemed fully compliant.

## 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.

<sup>&</sup>lt;sup>2</sup> DART is calculated as (Number of OSHA recordable injuries and illnesses that resulted in Days Away; Restricted; Transferred) x 200,000 / (Total employee hours worked)



<sup>&</sup>lt;sup>1</sup>TRIR is calculated as (Number of OSHA recordable incidents) x 200,000 / (Total employee hours worked)



## **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 introduced a digital chatbot along with live agent chat available 24/7 and social media channels such as WhatsApp as well as Spanish-language support. In early 2024, we introduced priority chat support for elite loyalty customers and priority phone-based support for elite loyalty customers and customers with upcoming or recently completed travel (+/- 24 hours). We value feedback from our customers to help us learn what we are doing well and where we can improve and as such, 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). FRONTIER



### **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 Chief Information Officer and Director of Cybersecurity, who together oversee 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.





### **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 GHG 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, as compared to the Industry Average illustrated in the chart to the right.

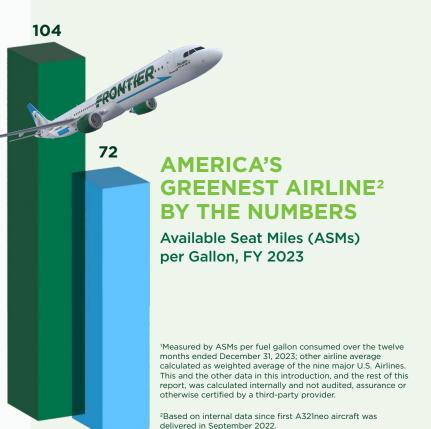
**OUR AIRCRAFT** 

With our A320neos' leading the charge, our fleet continues to be the most fuel-efficient of all major U.S. carriers when measured by ASMs per fuel gallon consumed, generating over 104 ASMs per gallon as of December 2023 and saving approximately 160 million gallons of fuel as compared to the industry average<sup>1</sup>.

As of December 2023, we've made a significant investment in a fleet of 136 Airbus single-aisle aircraft, of which nearly 79% 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 29th birthday in 2023, our fleet isn't showing any signs of age with an average age of 4.3 years as of December 2023. By having one of the youngest fleets in the industry, we burn less fuel – saving our customers cash while reducing our carbon footprint.

"We expect that 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.2"

— Barry Biffle, CEO, Frontier Airlnes



**Industry** 

Average



Frontier's Available Seat



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 versus prior generation engines. By the end of the decade, the GTF powered A321neo is expected to comprise 68% of our fleet and contribute to an overall 10% improvement in our fuel efficiency factor to approximately 115 ASMs per gallon.

30%
LIGHTER THAN OUR
PREVIOUS MODELS

GALLONS OF FUEL SAVED ANNUALLY
On an average Airbus A321 aircraft

#### **WEIGHT REDUCTION INITIATIVES**

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

Our weight-saving initiatives begin with incentivizing consumers to pack less and pack light. 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 installing new premium seating developed by Recaro that is 30% lighter than prior seating utilized. On an average Airbus A321 aircraft, the fuel savings due to the reduced weight of the new seats equates to approximately 32,000 gallons of fuel per year. In addition, 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 one of the highest seat density configurations 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 and associated GHG emissions, as highlighted on the next page.





# 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 out-and-back 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 focus on 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 and flight attendants are helping to reduce paper waste with paperless cockpits that utilize mobile tablets for information and by eliminating 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. Frontier's Denver, Colorado headquarters is a LEED Certified building designed to achieve 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.

FRONTIER
America's Greenest Airline

CARDHOLDER

Powder THE POLAR BEAR







In May 2023, Frontier, along with a consortium of Indigo portfolio airlines, executed an agreement for the right to purchase up to 90 million gallons of sustainable aviation fuel, or "SAF". Not only does this demonstrate our efforts to decarbonize air transportation, the investment also will help increase the supply of SAF to the larger 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 2050¹. 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:









Residues





and Grease

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

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

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



### 2023 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 financial reporting period and covers 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.

#### 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.

#### **USE OF ESTIMATES AND ESTIMATION UNCERTAINTIES**

Emissions data are subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. Some data, such as Scope 2 emissions from airport station electricity are estimates.





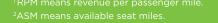
## 2023 Scope 1 & Scope 2 Emissions

Scope 1 emissions are direct emissions from the combusion of fuels inside the organizational boundary 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.

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

GHG Absolute Emissions in Metric Tons of Carbon Dioxide Equivalent (CO₂e)	2023 Results	2023 %	2022 Results	2022 %
Scope 1 Emissions	3,587,279	99.85%	3,079,573	99.85%
Aircraft	3,584,766	99.78%	3,076,860	99.76%
GSE	479	0.01%	402	0.01%
Facility Heating	2,034	0.06%	2,311	0.08%
Scope 2 Emissions (Location-based)	5,347	0.15%	4,653	0.15%
Total Scope 1 and Scope 2 Emissions	3,592,626	100%	3,084,226	100%

Intensity	Unit	2023	2022
Scope 1 & Scope 2 (location-based)	mtCO₂e per thousand RPM¹	0.1167	0.1202
	mtCO2e per thousand ASM2	0.0950	0.0972
Jet Fuel Emissions	mtCO2e per thousand RPM1	0.1164	0.1199
	mtCO2e per thousand ASM2	0.0948	0.0969





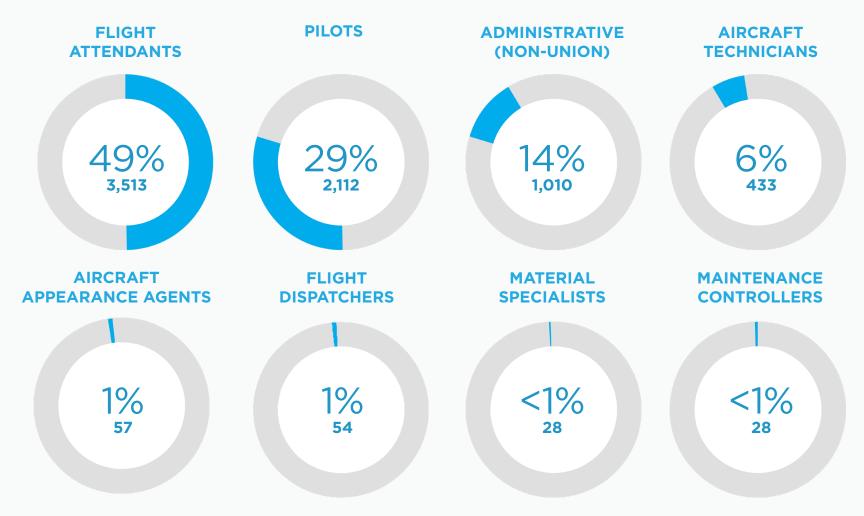




### **Employee Characteristics**

As of the end of FY 2023, we had 7,235 total employees within the following functional areas:

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.



Frontier supports our crew members' choice to participate in unions and collective bargaining. **Approximately 86% of our employees** were represented by labor unions under collective-bargaining agreements as of December 31, 2023. Frontier is currently in contract negotiations with five of our union groups including our Pilot, Flight Attendant, Aircraft Appearance Agent, Material Specialist, and Maintenance Controller groups. There were no reported work stoppages at Frontier in 2023.



### **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 face-to-face visits 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 online learning libraries. 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

**FRONTIER** 



- The **Pilot Cadet Program** is a 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. 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; **currently over 12% of our participants are female**, well over double the national average for commercial 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.



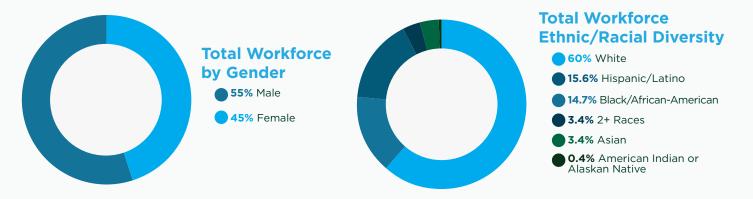
## **Diversity, Equity and Inclusion (DEI)**

#### **OUR DEI APPROACH**

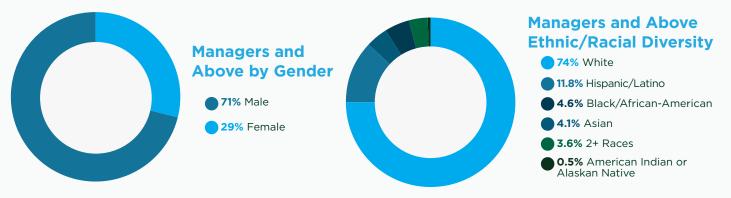
We know we are stronger as a company when we create a workplace where everyone can bring their whole selves to work. We believe that fostering an inclusive and diverse culture will add value and lead to a more highly engaged workforce, allowing us to deliver better business results. Frontier is committed 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, 2023 based on self-identification data from employees. Note: may not add to 100% due to non-specified responses.







#### STRENGTHENING OUR DIVERSITY

We aim to close 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 gender and ethnic 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:

















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 2023, we increased participation by 80%.

#### **BUSINESS RESOURCE GROUPS (BRGS)**

Our employee-led voluntary 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,
- Green Steering Committee, and
- Hispanic Resource Group (late 2024).



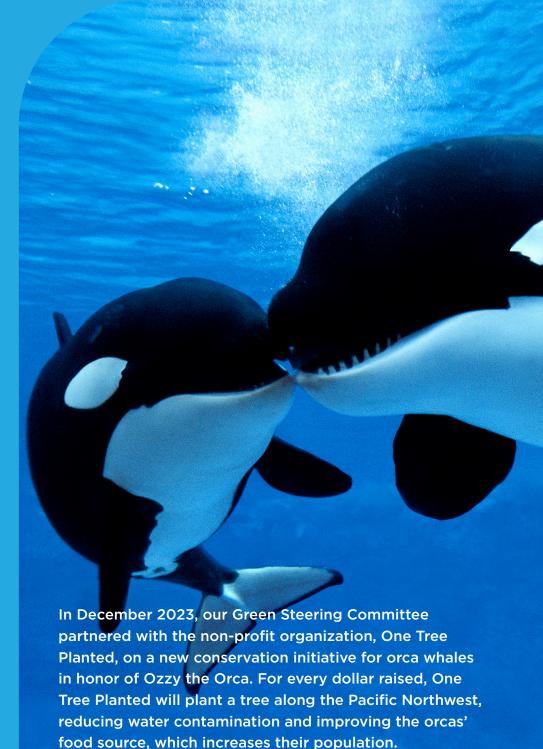
#### **DIVERSITY HIGHLIGHTS**

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 2023, respectively.









## 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.





SINCE INAUGURAL SPONSORSHIP WE HAVE RAISED CLOSE TO

RAISED IN 2023

\$395K

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.

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.







#### SPOTLIGHT: AMERICAN ASSOCIATION OF RETIRED PEOPLE'S WISH OF A LIFETIME

Frontier donated flights to the American Association of Retired People's Wish of a Lifetime program to send 11 military veterans and their companions to Washington D.C.

















## **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
8 DECENT WORK AND ECONOMIC GROWTH	Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all	8.5	<ul> <li>Frontier provides jobs with competitive compensation and benefits for over 7,000 employees.</li> <li>We have training and development programs for entry-level and underrepresented groups in aviation.</li> </ul>	Our People and Culture
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	9.1	• Frontier annually transports 30 million passengers on more than 350 routes. Our low-cost and fuel-efficient model reduces the cost of air travel and helps connect more families and businesses.	Introduction Environmental Stewardship
10 REDUCED INEQUALITIES	Reduce inequality within and among countries	10.2	<ul> <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
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Ensure sustainable consumption and production patterns	12.5, 12.6	<ul> <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
13 CLIMATE ACTION	Take urgent action to combat climate change and its impacts	13.3	<ul> <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
17 PARTNERSHIPS FOR THE GOALS	Strengthen the means of implementation and revitalize the global partnership for sustainable development	17.16, 17.17	<ul> <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 Version 2023-12 of 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.

Topic	Accounting Metric	SASB Code	FY 23 Response	Report Reference
Greenhouse Gas	Gross global Scope 1 emissions	TR-AL-110a.1	See page 27 for our Scope 1 and	Fleet & Fuel Efficiency
Emissions	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 Scope 2 Greenhouse Gas Emissions		Fleet & Fuel Efficiency
	(1) Total fuel consumed, (2) percentage alternative, (3) percentage sustainable	TR-AL-110a.3	(1) 365 million gallons	Fleet & Fuel Efficiency
Labor Practices	Percentage of active workforce covered under collective bargaining agreements	TR-AL-310a.1	86%	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 2023.	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 page 16 for details on our Safety Management System	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

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**ACTIVITY METRIC: AIRLINES** 



	Activity Metric	SASB Code	FY 23 Response
)	Available seat kilometers (ASK)	TR-AL-000.A	60,868.26 million
	Passenger load factor	TR-AL-000.B	81.4%
	Revenue passenger kilometers (RPK)	TR-AL-000.C	49,564.45 million
	Revenue ton kilometers (RTK)	TR-AL-000.D	Not available
	Number of departures	TR-AL-000.E	188,841
	Average age of fleet	TR-AL-000.F	4.3 years

#### FORWARD-LOOKING STATEMENTS

Certain statements in this release should be considered forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended, Section 21E of 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. Words such as "expects," "will," "plans," "intends," "anticipates," "indicates," "remains," "believes," "estimates," "forecast," "guidance," "outlook," "goals," "targets," "aims," "expects," "aspires," 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 risks and uncertainties relating to the Company's operations and business environment as 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.

This document uses qualitative descriptions and quantitative metrics to describe our ESG policies, programs, practices, goals, targets and performance. Many of the standards and metrics used in preparing this document continue to evolve and are based on management assumptions believed to be reasonable at the time of preparation, but they should not be considered guarantees and are subject to uncertainty, risks and changes in circumstances that are difficult to predict and many of which are outside of our control. In addition, historical, current, and forward-looking ESG-related statements may be based on standards and frameworks for measuring progress that are still developing, internal controls and processes that continue to evolve, methodologies for measuring data that are still evolving and subject to change and assumptions that are subject





to change in the future, such as unexpected delays, difficulties, and expenses in executing against, or changes in laws, enforcement, investor sentiment or demands, other stakeholder preferences, or litigation, relating to or otherwise affecting our execution of, the targets, goals and commitments outlined in this document. These factors may also impact our ability to achieve any ESG-related targets or goals we have set, to the timelines and/or anticipated costs. Moreover, given the uncertainties, estimates, and assumptions involved, our ability to meet our targets, goals, or other evolving expectations, is inherently difficult to assess far in advance.

Our commitments, targets, aims and goals may change over time for many reasons, such as the evolving and changing nature of, or availability of, standards, changes to business as well as changes in business priorities and stakeholder significance, new industry practices, technology or science, or changes to law or regulatory guidance. While information presented in this report has been subject to internal review processes and control, much of this information is subject to assumptions, estimates, third-party information or methodologies that are still evolving and subject to change. While we are not aware of any significant or material flaws with the data and other information we have relied upon for this report, such data and information has not been subject to third-party assurance and we have not independently verified the accuracy of this data or information or the assumptions underlying such data or information.

Additionally, while certain matters discussed in this document may be significant, any significance should not be read as necessarily rising to the level of materiality used for the purposes of complying with, or reporting pursuant to, the U.S. federal securities laws and regulations.