

**Frontier Communications**

# Code of Ethics



# Our Purpose and Mission

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## ● ● ● Purpose

Build Gigabit America

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## ● ● ● Mission

Create and support a digital society to promote community inclusion and a healthier environment

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# Introduction

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## Why We Have a Code of Ethics

Our Code of Ethics (“Code”) explains how we should operate on a day-to-day basis. It helps us understand the Company’s policies, the laws and regulations that affect our operations, and how to make sound business decisions in complex situations.

## Who Must Follow Our Code

All Frontier employees are expected to uphold the highest standards of business ethics and to know and follow applicable policies, laws, and regulations. Frontier is committed to conducting its business with integrity, honesty, and accountability. Directors, officers, executives, managers, employees, and business partners are expected to abide by this commitment. Our subsidiaries, affiliates, agents, vendors, representatives, contractors, and consultants are also expected to follow our Code.

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“Frontier,” “Frontier Communications” and “the Company” refer to all subsidiaries and affiliates of Frontier Communications Parent, Inc. The terms “employee” or “you” and “employees” or “we” refer to all Frontier’s directors, officers, and employees, unless otherwise noted.

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## Our Responsibilities

This Code, together with our purpose, mission and values, provides a framework of ethical standards and guidance on important matters. Ultimately, it is up to each of us to make wise choices, to act ethically, and to exercise personal accountability.

All directors, officers and employees should behave in accordance with the Code and applicable laws, rules, regulations and policies in the cities, states and countries in which the Company operates. If you are ever unsure of the most appropriate way to conduct yourself or manage our business, you are expected to ask questions and raise concerns.

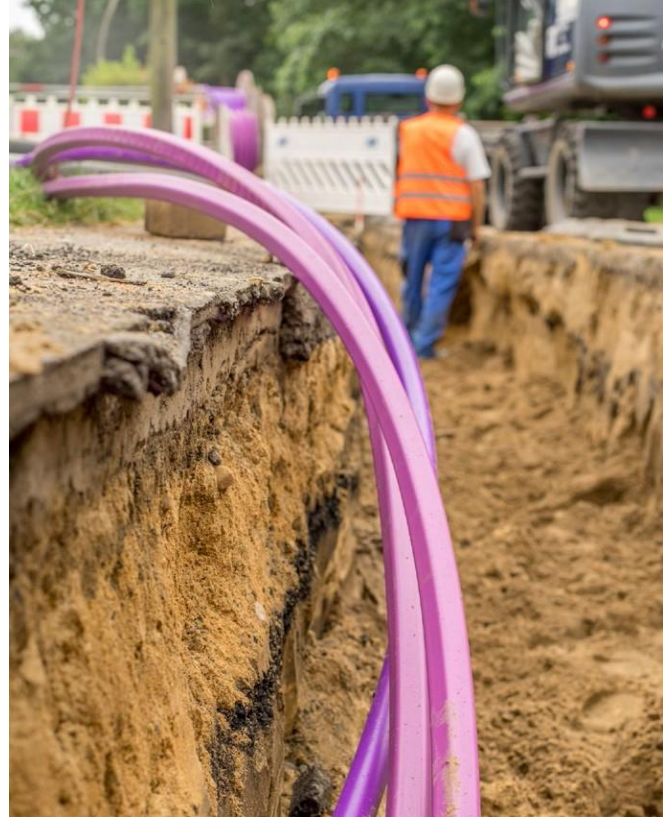
# Introduction

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Frontier leaders, managers, and executives have additional responsibilities to lead by example and promote compliance with our Code. Leaders, managers, and executives are expected to foster a workplace where employees feel comfortable discussing concerns and reporting issues and should:

- Promote the standards of our Code at all times;
- Ensure those you supervise know the relevant standards of our Code;
- Provide guidance regarding any issues employees raise about our Code or Company policies;
- Support those who ask questions or report problems in good faith;
- Report actual or potential issues to the appropriate resources for guidance or follow-up;
- Protect anyone from retaliation who makes a good faith report of suspected misconduct.

In addition, officers and other employees who contribute to Frontier's financial record keeping must strictly follow Frontier's finance and accounting standards, policies, and guidelines. Additional requirements for select Frontier officers can be found in the *Specific Code of Business Conduct and Ethics Provisions for Certain Officers Policy*. Members of Frontier's Board of Directors are subject to this Code and to additional guidance relating to their special responsibilities.





# Sharing Your Concerns

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## Asking Questions and Making Reports

This Code covers a wide range of business practices and procedures. However, it cannot cover every issue that may arise or answer every question we might face. The Code sets out basic standards to guide you. If at any time you're not sure what to do, seek guidance—*before* you act. You can seek guidance from your manager, your GM or Department head, your Human Resources representative, Frontier's Legal Department, or contact the [Ethics Hotline](#) (or call 1-877-773-8325).

If you see or become aware of possible illegal or unethical conduct, such as inappropriate accounting, you have a duty to report it promptly. Reporting your concerns swiftly helps Frontier respond quickly, avoid escalation of an undesirable situation, prevent such behavior in the future, and protect our reputation for integrity.

There are several ways to ask questions or raise concerns. For example, you can contact:

- Your manager
- Your Human Resources representative

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Use good judgment and common sense. If something seems unethical or improper, it probably is. If you're not sure how to proceed, always seek guidance before acting. Remember that your decisions impact your reputation and Frontier's.

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If you feel it would be inappropriate to discuss the matter with your manager or your local Human Resources representative, you can also contact:

- Frontier's Legal Department
- The [Ethics Hotline](#) or call 1-877-773-8325

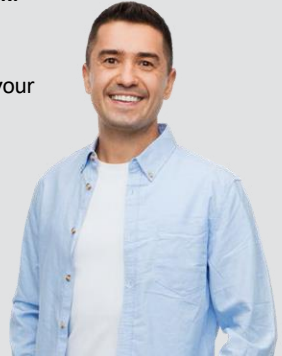
You may also report such concerns confidentially by writing to the Chair of the Audit Committee, the Chairman of Frontier's Board of Directors or the Lead Independent Director. This information is also available on Frontier's [Investor Relations](#) web page.

# Sharing Your Concerns

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You can report any of your concerns anonymously through the **Ethics Hotline**. The Hotline is staffed by an independent external party and is available 24 hours a day, 7 days a week.

Frontier is sensitive to the need for confidentiality in all investigations and respects your right to report anonymously. But, because anonymous reports can be more difficult to investigate, Frontier encourages you to share your identity when making a report, if possible.



## Our Non-Retaliation Commitment

Anyone can report good faith concerns about misconduct or potential violations of law and/or participate in internal investigations without fear of retaliation. **Any individual who retaliates against someone for making a report or participating in an investigation in good faith is subject to disciplinary action, up to and including termination. Anyone making a false report in bad faith is also subject to disciplinary action.**

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Acting in *good faith* means you come forward with all of the information you have and that you believe you are giving an honest and accurate report. It does not mean that your report must turn out to be true, only that you acted with pure motives.

*Retaliation* occurs if an employee is treated unfairly because he or she made a report. Retaliation includes demotion, suspension, threats, harassment, firing, or other negative behavior directed toward the reporting party.

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## Investigations and Audits

If you observe or become aware of what seems to be illegal, unethical, or inappropriate behavior, or if you have accounting or auditing concerns, you must

report the behavior and fully cooperate in any internal investigation. Frontier's investigative team responds to all reports promptly, thoroughly, and fairly. The Company takes appropriate action in compliance with applicable law in response to such reports. Due to confidentiality concerns, however, "reporters" are not given a detailed account of the investigation or Frontier's responsive actions.

From time to time, the Legal Department requires assistance with litigation responses or with requests from government or other external agencies for information. Please refer to the *Dealing Ethically with Local, State, and Federal Governments* section of this Code for more information regarding government investigations.

## Consequences of Code Violations

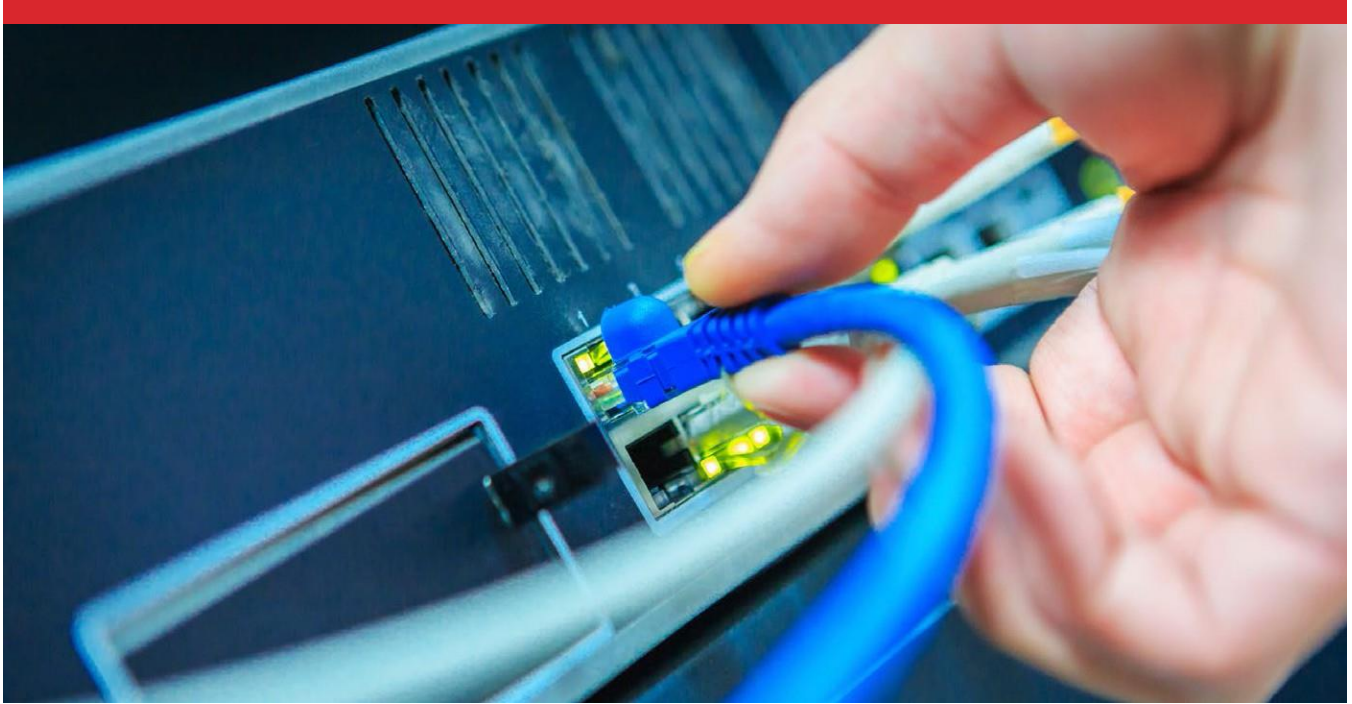
Frontier takes compliance with the Code and law seriously and the Company must ensure prompt and consistent action against violations of this Code. If, after investigating a report of an alleged prohibited action by a member of the Board of Directors or an Executive Officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board of Directors. If, after investigating a report of an alleged prohibited action by any other person, the relevant manager, Human Resources representative or Frontier's Legal Department determines that a violation of this Code has occurred, the relevant manager, Human Resources representative or Frontier's Legal Department will report such determination to the Chief Legal Officer.

Upon receipt of a determination that there has been a violation of this Code, the Board of Directors or the Chief Legal Officer will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

If you violate the standards in this Code, you can be disciplined, which may include termination. Any waiver of this Code must meet the conditions set forth under the *Waivers of Our Code* section at the end of this document.

# Competing Ethically

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Frontier succeeds by competing vigorously in the marketplace. We follow all competition laws (also called *antitrust laws*). We aim to outperform our competitors through hard work, superior service, and great products, not through unethical or illegal business practices. To underscore this commitment, when interacting with competitors, employees are expected to be honest, lawful, and respectful.

## **Compete for Customers by Offering Competitive Solutions at a Fair Price**

Competition laws benefit consumers by encouraging fair and open competition that promotes competitive prices, features, and products. To ensure our business activities align with applicable antitrust and competition laws, we must not make untrue or misleading statements about our competitors' products and services.

## **Business Practices that Violate or Appear to Violate Competition Laws**

Antitrust and competition laws generally forbid agreements between competitors that would eliminate or restrict competition. Any discussion or perceived attempt to reach an anti-competitive agreement may be considered illegal. When interacting with competitors, you must not agree to—or even discuss—any of the following:

- Setting current or future prices
- Dividing territories, markets, customers, or suppliers
- Boycotting or restricting dealings with a particular customer or supplier
- Sharing costs, margins, or terms and conditions of sale
- Disclosing marketing plans or similar confidential information



# Competing Ethically

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Violations of antitrust and competition laws are serious and could subject you and the Company to severe consequences, including fines and imprisonment for the individuals involved. If any competitor attempts to discuss these topics with you—even, for example, at a legitimate trade association meeting—you should refuse to participate and report the conversation to the Frontier Legal Department. If you are unsure whether a discussion topic is anti-competitive, always ask the Frontier Legal Department.

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An illegal “agreement” can take the form of a signed contract, a handshake, or an informal understanding between two or more parties.

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## Gathering Competitor Information Legally and Ethically

Like all companies, Frontier needs accurate information about industry developments to stay competitive. Frontier only acquires competitive information in ways that are legal and aboveboard. When gathering competitive information, remember the following guidelines:

- You may review and collect any public information
- You must not lie or misrepresent yourself when gathering information
- You must respect other people’s obligations to protect confidential information
- You must never recruit people with the intent to obtain confidential information
- You must return or destroy another company’s confidential or proprietary information if you receive it inadvertently or inappropriately
- You should not accept, disclose or use competitive information if there is reason to believe it was disclosed through breach of a confidentiality agreement
- You must ensure that third parties acting on behalf of Frontier live up to our standards



# Treating One Another with Respect

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## Promoting a Positive Workplace

Frontier is committed to creating and maintaining a diverse and inclusive work environment that emphasizes treating all with dignity and respect. In addition, Frontier works to ensure equal opportunities for success in all aspects of employment. Our Company does not make any employment-related decisions based on race, color, religion, national origin, ancestry, sexual orientation, gender, marital status, age, physical or mental disability, veteran status, or any other legally protected status.

Frontier also promotes a work environment free of favoritism or abuse of position. As such, romantic relationships between individuals in a supervisor-subordinate relationship are prohibited, and employees in such relationships are subject to reassignment.

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To support diversity and equal opportunity, we must each do our part. All of our workplace relationships must be professional and free from unlawful bias.

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Further, Frontier does not tolerate illegal discrimination, harassment, or threats of any kind. Comments or conduct relating to a person's race, color, religion, national origin, ancestry, sexual orientation, gender, marital status, age, physical or mental disability, or veteran status that fail to respect the dignity of the individual are unacceptable. Such unacceptable behavior can be either sexual or non-sexual in nature and can include, among other things, the following:

- Derogatory comments or jokes
- Visual displays, such as offensive photographs, videos, and drawings
- Unwelcome conduct, including physical contact, such as touching, hugging, and massaging
- Assault, bullying, or intimidation

Frontier does not tolerate harassment or discrimination (whether committed by a coworker, a supervisor, or even a non-employee) and does not tolerate retaliation against anyone for a good faith report of discrimination or harassment.

# Treating One Another with Respect

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If you have any questions about the laws or policies governing labor and employee relations that aren't answered by this Code, you should refer to our [Human Resources Policy Manual](#) concerning discrimination and sexual harassment, which is published on [the Link](#) and can be obtained from the HR Department. In addition, the HR Department and the Legal Department are available for guidance.

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## Upholding Health, Safety, and Security Regulations

Safety is a top priority at Frontier. Together, we strive to provide a safe, secure, and healthy work environment for all. In order to promote an injury-free workplace, be attentive to your surroundings, follow all applicable safety rules and practices, and promptly report to the Environmental, Health and Safety Department any work-related accidents, injuries, unsafe equipment, practices, or conditions.

### Substance abuse

A big part of keeping the workplace safe is reporting to work in proper condition to perform your duties. That means coming to work free from the influence of drugs and alcohol. Frontier strictly prohibits the use, sale, possession, manufacture, distribution, or transfer of alcohol, drugs, and other controlled substances at work, on Company premises and on Company property.

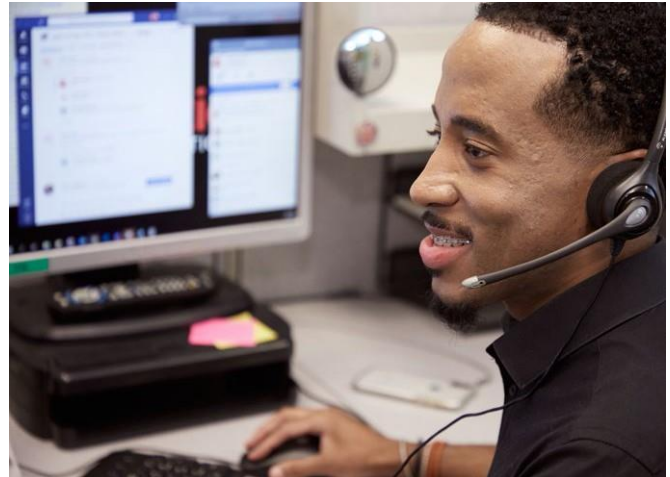
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Some medications have side effects that can be just as dangerous as illegal drugs. Make responsible decisions and exercise due care when taking medicines that may cause impairment.

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### Off-duty misconduct

Frontier respects individual privacy and, in general, will not become involved with employees' actions outside of work. However, off-duty conduct that impairs your work performance, puts the safety of others at risk, or has a



negative impact on Frontier's reputation or business can subject you to disciplinary action, up to and including termination of your employment.

### Workplace violence and weapons

Violence or threatening behavior is not permitted under any circumstances in the workplace. Weapons are *never* permitted in any Frontier facility or in any Frontier vehicle. In some jurisdictions, where specifically allowed by law, weapons may be allowed inside locked, personal vehicles. You are solely responsible for such weapons and any and all consequences that result from your possession of them. Frontier strongly discourages possession of weapons at any time during your workday, even if local law permits such possession. Regardless of whether you own or possess a weapon, if you commit any violent, threatening, intimidating, or dangerous act, you may be subject to disciplinary action, up to and including termination of employment. In addition, you risk criminal prosecution. If you observe threats or acts of violence or are concerned that a situation may escalate toward violence, report your concerns to Corporate Security right away. If you feel someone's immediate safety is at risk, call 911 immediately.

For a list of all of our health, safety, and security policies, please refer to the [Environmental, Health and Safety Manual](#) available on the [Frontier Policy Library](#) or contact your local Human Resources representative for guidance.



# Doing Business the Right Way

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## Acting on Behalf of Frontier

Authority to act on behalf of Frontier is subject to certain limits. You may enter into agreements, sign documents, and otherwise make commitments on behalf of the Company only with proper authorization and a belief that the documents are accurate and truthful. Be careful not to give others the impression that you are authorized to bind the Company when you don't have specific approval to do so. If you have questions about appropriate authority to act on behalf of the Company, please ask your manager, your VP, or consult [Frontier's Authorization Policy](#).

## Conflicts of Interest

We all have a responsibility to do what's right—for ourselves, for our stakeholders, and for our Company. Sometimes what seems right for us is not right for the Company and our stakeholders. This is called a conflict of interest. When this happens, we must always choose the best interests of Frontier.

We all have a duty of loyalty to the Company and are expected to avoid any situation that creates—or even

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A **conflict of interest** occurs when an individual's personal interests or loyalties either interfere or could reasonably appear to interfere with the Company's interests or opportunities or when an employee, officer or director (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company.

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appears to create—a conflict of interest. If a conflict of interest arises and cannot be avoided, you must bring the situation to the attention of your manager so that he/she can consult with the Legal Department and provide you appropriate guidance.

It is not possible to identify every type of situation that presents a conflict of interest. You are responsible for using your best judgment to evaluate activities that may result in a conflict of interest. To help you identify instances in which conflicts may occur, some of the most common situations are discussed as follows. The HR and Legal Departments are available to advise you; you are expected to take reasonable steps to seek their counsel.

# Doing Business the Right Way

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## Outside employment

Frontier policy does not prohibit all outside employment. However, Frontier is your primary employer and outside employment must never affect your work at Frontier, cause you to misuse Frontier information or assets, or result in consequences that could damage Frontier. Consult your manager if you believe your actions could—or could be perceived to—be a conflict of interest. A conflict of interest would include running your own company or working for one that competes with Frontier in any way. If you are a management employee, you must get approval from your manager, who will consult with your Executive Vice President, to take on outside employment.

## Serving on a Board of Directors

Serving as a board member for an outside company that does business with Frontier is always considered a conflict of interest and requires proper prior approval. All requests for approval must be submitted in writing to our Legal Department.

## Business with family and friends

A conflict of interest may arise when you, your family member, or close, personal friend have a personal or financial interest in a company that is a supplier, reseller,

customer, a potential supplier, or a competitor of Frontier. Your interest—or your family member's interest—in the other company may cloud your vision with respect to what is right for Frontier. If you find yourself caught between your loyalty to Frontier and your interest in the other company, you must immediately tell your manager, who will consult with the Legal Department, and remove you from any decision-making process.

When a personal or family relationship between employees exists—particularly one that is also a reporting relationship—it may seem that one employee is favored. You should not supervise or be in a position to influence the hiring, work assignments, or assessments of your family members. If such a relationship exists or develops, you must notify your manager, who will provide guidance after consultation with the Legal Department.

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A family member includes your spouse, domestic partner, sibling, child, parent, or other relative by blood or marriage living in your home.

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## Corporate opportunities

In order to make objective business decisions on behalf of the Company, you must never compete with Frontier. Directors, officers and employees may not use Company property, information or position for personal gain. This means that without the consent of the Board of Directors, you may not take for yourself, or advise others to take, any business or investment opportunities that you discover through your position at Frontier. You owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

## Financial interests

Holding stock in any other public company is permissible—even when that company is in some way competitive with Frontier—so long as the investment is not of a size that could influence your judgment on Frontier matters or that amounts to management participation in the other company.





# Doing Business the Right Way

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## Political involvement

Frontier supports community involvement by its employees. If you consider running for public office or serving as a public official, you should decide whether doing so would create an actual or apparent conflict of interest. If you intend to run for public office, you should notify the VP of HR and your VP before seeking election. If you run for public office, serve as a public official, or campaign for a political candidate, you cannot be paid by Frontier for any time spent in these activities.

## Loans

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees or their family members are of special concern. Loans by the Company to, or guarantees by the Company of, obligations of any director or executive officer are expressly prohibited.

## Disclosing potential conflicts

Conflicts of interest may not always be apparent. If you have a question, consult with your manager. He or she will consult with the Legal Department and Human Resources to determine if a conflict of interest exists and, if so, how to resolve it without compromising your integrity or the Company's interests. Executive officers and members of the Board of Directors should consult with the Chief Legal Officer. Prompt and full disclosure is always the best first step towards identifying and resolving any potential conflict of interest.

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If you become aware of a conflict or potential conflict involving another employee, you must bring it to the attention of the Legal Department or to your manager or local HR representative, who will report it to the Legal Department. You can also make a report to the [Ethics Hotline](#) or call 1-877-773-8325. Remember, retaliation of any kind for a good faith report of a potential conflict of interest will not be tolerated.

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## Addressing/resolving conflicts

Sometimes a situation that initially appears to present a conflict of interest turns out not to be a true conflict after a review of the facts and circumstances. In these instances, the proposed activity may be permitted if it is not harmful to the Company. The determination of how to address a potential conflict of interest and/or whether to waive it is made by:

- The Board of Directors, in the case of the Chief Executive Officer or directors
- The Nominating and Corporate Governance Committee of the Board of Directors, in the case of executive officers other than the Chief Executive Officer
- Your manager, in consultation with the Legal Department, in the case of other employees

All requests for a waiver must be submitted in writing to the Legal Department. These requests will then be directed to the appropriate decision maker for analysis.

## Acceptance of Gifts and Entertainment

Entertainment, gifts, and special deals are frequently offered by vendors or contractors in business settings to create goodwill and maintain sound working relationships. However, offering or accepting certain entertainment and gifts may give the wrong impression or result in the appearance of a conflict of interest. In addition, at Frontier, these should never be used to gain an unfair advantage with customers or suppliers. We only accept gifts or entertainment that meet the criteria set forth below and only in circumstances that do not influence, or appear to influence, our independent and sound judgment.

## Giving and receiving gifts and entertainment

No employee, family member of an employee, or Frontier agent should offer or accept a gift or entertainment unless it meets the following criteria:

- It is consistent with customary business practices
- It is not excessive in value
- It is infrequent
- It is unsolicited
- It cannot be construed as a bribe or payoff
- It does not violate any agreement, law, or regulation

# Doing Business the Right Way

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*Entertainment* includes events where both the person offering and the person accepting attend, such as meals or sporting events. Gifts are usually goods and services, but can be any item of value. For example, when the person offering a meal or entertainment is not attending the event, it is considered a gift.

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Gifts in the form of cash or cash equivalents (such as a gift card, loan, or reimbursement) are strictly prohibited. If you are ever in doubt as to whether you should offer or accept a gift or entertainment, you should discuss the situation in advance with your manager who will consult with the Legal Department.

If you are offered or receive a gift or offer of entertainment that would violate this policy, you should politely decline it and explain that such offers are against Frontier policy. If the offeror persists or makes subsequent offers, you should immediately report this to your manager or to the Legal Department so Frontier can take appropriate action. You should avoid any actions that may cast doubt on your or Frontier's integrity or motivation.

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Refusing a gift or entertainment need not be socially tricky. For example, simply say the offer is appreciated but that Frontier policy doesn't allow you to accept it.

Local, state, and federal laws often impose special rules on relationships with government customers, suppliers, and officials that may differ from other commercial relationships. All expenses for government representatives should be reviewed by the Legal Department prior to incurring the expense and making the payment. If you are working with government officials, refer to the *Dealing Ethically with Local, State, and Federal Governments* section of our Code for more details.

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## Affiliate Relationships

Relationships between affiliates in the telecommunications industry are governed by federal and state regulations. All affiliate transactions between and among Frontier Communications companies must follow Company policy and all applicable laws and regulations.

If you are involved with affiliate transactions, make sure you know and follow the rules about information sharing, pricing, accounting, and transferring products and services. For more information, contact the Legal Department.

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The term *affiliate transaction* means that a product, service, fixed asset, payment, or obligation is transferred among Frontier companies.

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# Doing Business the Right Way

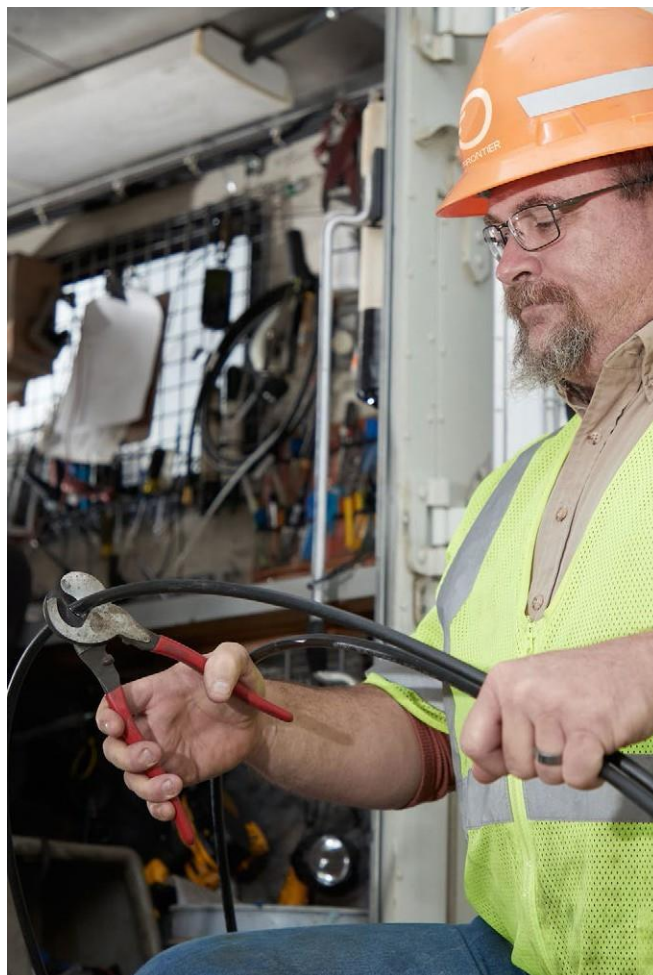
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## Use of Company Resources

The Company's email, Internet, and Intranet access and other communications equipment and systems (collectively, "Technology Resources") are Frontier property. They are intended for use as communication and research tools in connection with authorized Company business. Generally, we should use these Technology Resources for authorized business purposes only. Incidental, appropriate personal use of the Company's Technology Resources is permitted, but should be limited to personal time and must not interfere with your job responsibilities. Because these Technology Resources belong to Frontier, you should not have any expectation of privacy when using them. All work product, files, messages, images, and information transmitted on these systems are the sole property of Frontier. Frontier reserves the right to access, review, monitor, and/or record any communications of any kind that cross the Frontier network at any time, without notice. You may never use Frontier's Technology Resources in a manner that violates the law or Frontier's policies. Examples of prohibited communications include transmitting messages or accessing websites that are offensive, derogatory, or pornographic. Inappropriate use of Frontier Technology Resources may result in disciplinary action, up to and including termination. If you have additional questions regarding the appropriate use of Technology Resources, please refer to our [Electronic Communications Policy](#) and [Electronic Communications Policy Guidelines](#) or ask your manager or HR representative.

## Use of Social Media

Frontier encourages us to use social media in a way that is true to our values of integrity, honesty, and accountability. In general, you should remain professional, respectful, and protective of Frontier, its brands, and products whenever you contribute to blogs, wikis, social networks, chat rooms, virtual worlds, or use any other kind of social media. In addition, you should adhere to copyright, fair use, and financial laws when using social media.



Only Frontier's Social Media Team ([social.media@ftr.com](mailto:social.media@ftr.com)) may establish and manage Frontier social media accounts, including YouTube, LinkedIn, Twitter, and Facebook, among others. You may not create Frontier-branded accounts without express permission from the Social Media Team.

If you have additional questions regarding the appropriate use of social media, please refer to our [Social Media Policy](#) and [Social Media Guidelines](#), or ask your manager or HR representative.

# Protecting Frontier's Reputation and Assets

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## Keeping Accurate Financial Records

The reliability of Frontier's financial records must be beyond question. All of our books, records, accounts, and financial statements must be timely and reasonably detailed. Each document must completely and accurately reflect our assets, liabilities, and transactions.

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This obligation applies to expense reimbursement requests. Your expense reports must be documented completely and recorded accurately. If you are not sure whether a certain expense is reimbursable, you can consult Frontier's [ProCard Policy](#) or [Fuel Card Policy](#), available on [the Link](#), or ask your manager.

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Frontier expects us all to be watchful and accurate when producing or reviewing any financial records to ensure they meet the Company's internal standards, Generally Accepted Accounting Principles, and all regulatory requirements. Frontier strictly prohibits engaging in any

actions, omissions or practices, whether intentional or reckless, that would result in rendering the Company's financial statements materially inaccurate or misleading. Every individual involved in creating, transmitting or entering information into the Company's financial and operational records is responsible for doing so honestly, completely, and accurately, and with appropriate supporting documentation. We never make or approve a document that intentionally obscures or improperly records a transaction.

If you have any concerns or suspicions about accounting or auditing matters, you must report them immediately to your manager, your HR representative, the Legal Department, or through the [Ethics Hotline](#) (or call 1-877-773-8325). Managers and HR representatives who receive an employee report related to accounting or auditing matters are required to immediately forward the report to the Legal Department.



# Protecting Frontier's Reputation and Assets

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If you report a concern to management and the issue remains unresolved—or when it would be inappropriate to report the matter to management—you should report it directly to the Chair of the Audit Committee. Remember, Frontier does not tolerate retaliation of any kind against anyone for a good faith report of concerns or suspicions.

## No Insider Trading

There are many laws against using inside information when buying, selling, or trading securities (e.g., stock). These laws apply to Frontier's securities and to the securities of other companies. Frontier expects us all to act ethically and to fully comply with these laws.

Trading a security (e.g., buying or selling stock) based on inside information or tipping is a very serious violation of the law that can result in severe consequences for you and Frontier. If you become aware of inside information about Frontier (or any other company) that has not been made available to the public for at least two full business days, you are prohibited by law, as well as by Frontier's Code, from trading the security or advising others to buy, sell, or hold it.

If you have any questions about whether the information you possess qualifies as inside information, or whether the law prohibits a purchase or sale of Frontier's security

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Generally, *inside information* is any information not yet disclosed to the public—both positive and negative—that a reasonable investor would consider important in deciding whether to purchase, sell, or hold a security. Examples of inside information include, but are not limited to:

- Information about potential mergers, acquisitions, or divestitures
- Internal financial information, projections, or forecasts
- Important product developments
- The acquisition or loss of a major contract
- Major organizational changes, such as changes in executive management
- Other business plans

*Tipping* is directly or indirectly disclosing nonpublic information to any other person (including a family member) so that he/she may use that information or recommending or suggesting that anyone else buy, sell, or hold a Frontier security (or any other company's security).

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or a security in other companies, you must contact the Legal Department before making the purchase or sale. Any employee involved in insider trading is subject to disciplinary action, up to and including termination, and risks criminal prosecution.

For more information on insider trading, please refer to Frontier's Insider Trading Policy.

## Investor and Public Relations

It is important that Frontier speaks with one voice when interacting with the public—both the investor community as well as the public at large. Unless you are expressly authorized to do so, you should not make public statements on Frontier's behalf. If an investor, security analyst, media contact, reporter, or other key public contact requests information from you—formally or informally—politely decline to comment and refer the inquiry to our Corporate Communications or Investor Relations Departments.



# Protecting Frontier's Reputation and Assets

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## Safeguarding Physical Assets

Safeguarding Frontier's assets is crucial to Frontier's business success. Theft, carelessness, and waste of Frontier's equipment and systems have a direct effect on the Company's profitability. For this reason, we are all responsible for protecting Frontier's assets and making sure they are used appropriately and only for authorized purposes.

It is never appropriate to use any Company device or system to provide unauthorized, free, or discounted service for yourself, a customer, a friend, or family member. Immediately report any suspected incident of fraud, theft, or misuse to your manager, your local HR representative, the Legal Department, or through the [Ethics Hotline](#) (or call 1-877-773-8325). Managers and HR representatives are required to immediately forward such reports to the Legal Department.

## Protecting Intellectual Property

### Frontier's intellectual property portfolio

The obligation to protect Frontier's assets includes preserving its intellectual property assets. Remember that intellectual property can be proprietary and confidential even if it is not labeled as such. For this reason, never share Frontier information with anyone without a legitimate business need to know. If you are not sure whether information is Frontier intellectual property, you should contact the Legal Department for clarification before sharing the information.

You should not discuss internal Company matters or developments with anyone outside of the Company, except as required by your job duties and in compliance with applicable laws or confidentiality agreements. Your obligation to guard confidential information from improper disclosure continues even after your employment with Frontier ends.

The unauthorized use or distribution of any of Frontier's intellectual property is strictly prohibited and may be illegal. Unauthorized use or distribution of any of Frontier's intellectual property may result in disciplinary actions, up to and including termination, as well as civil or criminal penalties.

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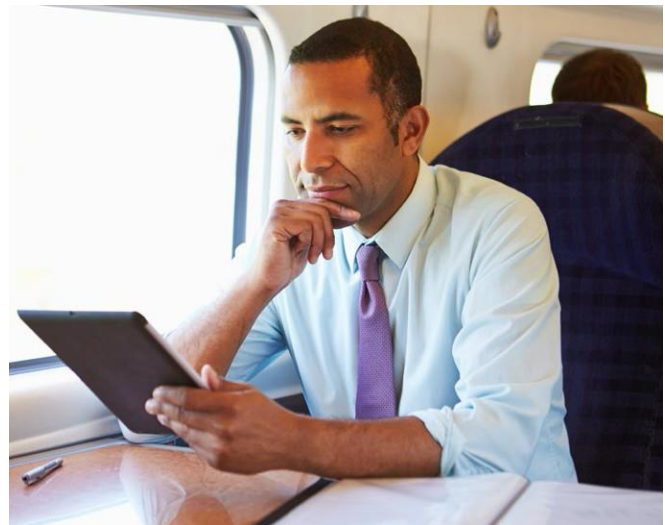
*Intellectual property* owned by Frontier includes trade secrets, patents, trademarks, copyrights, and know-how. Examples that may fall under this protection are business, sales, marketing, and service plans; cost and pricing information; engineering and manufacturing ideas and practices; designs, databases, records, salary, and other compensation/benefit information; and any unpublished financial data and reports or other confidential information.

*Confidential information* is a type of intellectual property. It includes all non-public information that might be of use to our competitors, or harmful to Frontier or its customers or suppliers, if disclosed. Confidential information may also include information that a supplier or customer has entrusted to the Company.

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## Records retention

Properly managing Frontier's business records is critical to protecting valuable information and complying with applicable contractual, legal, regulatory, and business requirements. Such records include all electronic, email, imaged, and paper documents created, received, and maintained by Frontier. It is important that you retain or destroy records according to our [Records Retention Policy](#) and [Records Retention Schedule](#). Please consult our Legal Department if you have any questions concerning either.



# Protecting Frontier's Reputation and Assets

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Never discuss confidential or competitive information in a public area (real or virtual), such as an elevator, restaurant, airplane, Internet bulletin boards, chat rooms, personal web pages, or blogs.

Remember to guard Company information when faced with inquiries about Frontier from the media, investment analysts, or others. For more information on external requests for information, please refer to the *Investor and Public Relations* section of the Code.

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## Protecting Other Sensitive Information

### Confidential customer information

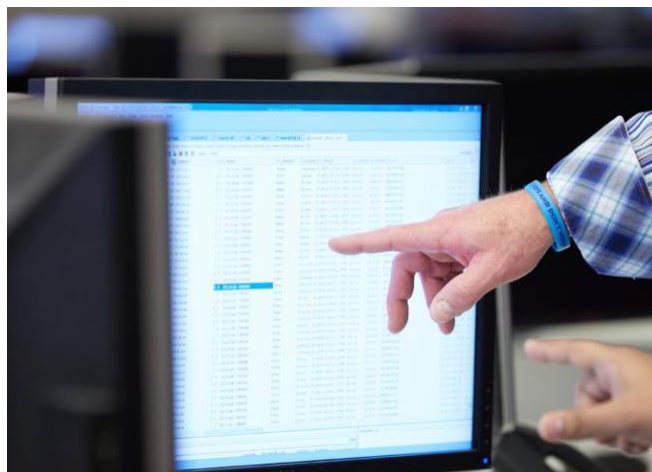
Federal and state laws require Frontier to protect information about customers and the services they purchase from Frontier and its affiliates. Only specifically authorized employees ("Authorized Employees") can access records containing confidential customer information and customer proprietary network information ("CPNI"). Authorized Employees must adhere to all applicable legal requirements associated with the access and use of customer information and CPNI.

Authorized Employees may not disclose customer information or CPNI to third parties, except as authorized or required by law. For example, a valid subpoena or authorization by the customer would both be reasons for disclosure. However, a member of the Legal Department should determine the validity of the subpoena or customer authorization before you comply with the request. All questions regarding requests for customer records or disclosure of customer information should be directed to the Corporate Security Department or the Legal Department.

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When sharing confidential customer information, Authorized Employees should always confirm that they are dealing with the authorized customer representative on the account.

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You should ensure that any third-party providers that do work on Frontier's behalf, such as contractors and vendors, understand Frontier's expectation that they will also protect customer privacy and identifying information.

If you are aware of, or even suspect, a breach of customer privacy—including a loss of customers' personal identifying information—you must notify the Security Department or Legal Department immediately.

In keeping with our overarching commitment to privacy, you may not record or photograph any meeting, conference, or individual discussion without the knowledge and consent of all other participants. In addition, unless you receive prior approval, you may never record or videotape any customer, business provider, or competitor without that person's knowledge and approval.

### Employee personally identifiable information

Our obligation to protect confidential and sensitive information extends to our coworkers. Never access another employee's systems, records, or equipment, outside of your express and authorized job responsibilities, without that employee's knowledge and approval and the approval of your manager. Violations of this provision are a basis for immediate discipline, which may include termination.

# Protecting Frontier's Reputation and Assets

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## Other third-party information

It is important that Frontier respects other companies' intellectual property, including their confidential information. If you have authorized access to another company's confidential information, you must protect it as you would protect Frontier's own confidential information.

In the event you have the right to use the intellectual property belonging to another company, you should always respect patents, trademarks, and copyrighted material, including information publicly available on websites and software, and carefully follow all applicable license terms.

Requesting or accepting the confidential information of another company without its consent is prohibited as discussed in the Competing Ethically section of the Code.

## Dealing Ethically with Local, State, and Federal Governments

It is Frontier's policy to cooperate with government authorities investigating Frontier or other companies. Timely and appropriate handling of government investigations is very important. Federal and state laws regulating Frontier's business are serious and could result in civil and criminal charges if broken or disregarded. These penalties apply to the Company and to those individuals within the Company who violate the law or whose negligence results in a violation of the law. Accordingly, if you receive a request that makes you believe that a government investigation or inquiry of any type is underway, you should immediately notify the Legal Department before you take any action or promise any response.

It is essential that we provide only accurate, complete, and honest information to our government customers. Any fraud or intentional over-billing with a government contract may be a criminal violation, in addition to being a violation of our policy. Government contracts are subject to additional scrutiny and reporting, so you must be particularly careful when dealing with such contracts. It is crucial that you report concerns about a potential violation immediately to the Legal Department, which can guide you in this area.



## Bribery and corruption

Frontier expects all employees to be honest in their dealings with the government, other businesses, and individuals. Never engage in any type of bribery or ask a third party to make a bribe on our behalf. If any contractor, supplier, or other party offers you a bribe, you must report it to the Chief Legal Officer immediately.

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A *bribe* is offering something of value to others in order to obtain or keep their business, gain an advantage, or influence decisions.

The special attention given to government contracts extends to foreign government officials. The U.S. Foreign Corrupt Practices Act ("FCPA") prohibits giving anything of value directly or indirectly to officials of foreign governments or foreign political candidates in order to obtain or retain business. Because Frontier only operates in the U.S., Frontier rarely has dealings with foreign officials. Nevertheless, you should know about the FCPA because the U.S. government takes violations very seriously. Frontier is strictly prohibited from making illegal payments (e.g. bribes) to government officials of any country.

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In addition, our federal, state, and local governments have laws and regulations regarding business gratuities to government personnel. The promise, offer, or delivery of a gift or favor to an official or employee of the government violates Frontier policy and would likely be a criminal offense. For more information about this area, contact the Legal Department.

# Protecting Frontier's Reputation and Assets

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## Import/export laws

As a U.S. company, Frontier must follow U.S. import and export laws and regulations. As a wholly domestic operation, Frontier's activities don't often trigger these laws or international trade control laws. Nevertheless, it is important that we be aware that there are rules relating to imports and exports, such as filing certain documentation and paying certain duties and taxes. If you have any questions regarding import or export laws, please contact the Legal Department.

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An *export* occurs when a product, software, technology, or piece of information is shipped to another country. An export can also occur when technology, technical information, a service, or software is disclosed or provided to a citizen of another country, regardless of where that person is located. Although Frontier does not export in the traditional sense of the word, you should be aware of these regulations because they may become relevant if Company technology is disclosed to a citizen of another country.

*Import* activity, or bringing the goods we purchase from a foreign or external source into another country, is also generally subject to various laws and regulations.

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## Sanctions and boycotts

Trade sanctions can limit, or even prohibit us, from doing business with certain countries, entities, or individuals. We are committed to following the sanctions that apply to us when handling imported or exported goods. In addition, Frontier does not participate in boycotts that are not approved by the U.S. government. If you ever receive a request for Frontier to participate in boycotts against certain people or countries, report the request to the Legal Department. Frontier only conducts business with reputable companies. Finally, we never participate in or condone money laundering or terrorist financing.

# Supporting Our Communities

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## Conserving Resources

One of our values is “using resources wisely.” Frontier complies with the environmental laws, rules, and regulations in effect in the locations where we do business. In addition, we should all look for ways to use Company assets appropriately and to recycle and reuse.

## Fair Labor Practices

As part of its commitment to the larger community, Frontier upholds individual human rights. Our Company provides reasonable working hours and fair wages for those who work on its behalf and respects the rights of workers to join or not join labor unions. Frontier has a zero-tolerance policy for the use of forced labor or human trafficking practices and never knowingly does business with subcontractors, business partners, and suppliers who violate these policies.

## Community Activities

### Charitable efforts and volunteerism

Frontier encourages us to make a positive difference in the communities where we live and work through volunteer and charitable activities. Often, these activities are team efforts sponsored by the Company. Unless you are expressly allowed to do so by your manager, keep in mind that you may not create the impression that you are acting on behalf of Frontier. Frontier does not reimburse employees for personal charitable contributions.

### Political contributions

Frontier strongly supports our freedom to participate in political activities that align with our personal beliefs. However, you may only participate in political activities on your own time, at your own expense, and on your own behalf. Never use Frontier equipment, resources, or premises for personal or political purposes. Frontier does not reimburse employees for political contributions.



# Supporting Our Communities

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If you have any doubts as to whether your actions could affect our Company or be seen as a violation of our Code, seek approval or guidance from the Frontier Legal Department prior to acting.

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Corporate political contributions are subject to complex rules and regulations. To safeguard its reputation, the Company is not permitted to make any political contributions without the express approval of the Chief Executive Officer and Chief Legal Officer, who will ensure that Frontier complies with all federal, state, local, and foreign laws governing political contributions. Such contributions are governed by Frontier's Political Contribution Policy and will be disclosed on the Investor Relations page of the Company's website, which will be updated regularly.



# Waivers of Our Code

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## Waivers of Our Code

Every Frontier employee must follow the Code. If you seek a waiver of this Code for any reason, you must make full disclosure of your particular circumstances in writing to the Legal Department for approval in advance of your action. Officers or members of the Board of Directors who believe that a waiver is necessary must request approval from the Board of Directors or a committee acting on behalf of the Board of Directors. If such a waiver is granted to a member of the Board of Directors or an executive officer of Frontier that relates to any element of the Code of Ethics definition set forth in Section 406 (i) of the Sarbanes-Oxley Act of 2002, Frontier will disclose such waiver as required by law or applicable stockexchange rules.

# Resources

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## Reporting

[\*Ethics Hotline\*](#)

[\*Investor Relations\*](#)

## Where to Find Policies, Procedures, and Other Materials

[\*The Link\*](#)

[\*Frontier Policy Library\*](#)

## Individual Policies

[\*Human Resources Policy Manual\*](#)

[\*Environmental, Health and Safety Manual\*](#)

[\*Authorization Policy\*](#)

[\*Electronic Communications Policy\*](#)

[\*Electronic Communications Policy Guidelines\*](#)

[\*Fuel Card Policy\*](#)

[\*Insider Trading Policy\*](#)

[\*Social Media Policy\*](#)

[\*Social Media Guidelines\*](#)

[\*Specific Code of Business Conduct and Ethics Provisions for Certain Officers Policy\*](#)

[\*ProCard Policy\*](#)

[\*Records Retention Policy\*](#)

[\*Records Retention Schedule\*](#)

November 2022

# Resources

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