



# CONTENTS

<b>FROM OUR CEO .....</b>	<b>4</b>
<b>A NEW FRONTIER .....</b>	<b>6</b>
Looking back and ahead .....	7
Our Purpose: Building Gigabit America .....	9
Our commitment to ESG .....	15
<b>ENVIRONMENT .....</b>	<b>16</b>
Building energy-efficient fiber networks .....	18
Reducing energy use and establishing Green Initiatives .....	19
Greening our fleet .....	21
Reducing our greenhouse gas emissions .....	23
<b>SOCIAL: OUR PEOPLE .....</b>	<b>24</b>
Building a great place to work .....	25
Focusing on worker safety .....	31
Valuing diversity, equity, and inclusion .....	35
<b>GOVERNANCE .....</b>	<b>39</b>
Leading with integrity .....	40
Doing business the right way .....	44
<b>DATA AND REPORTING .....</b>	<b>49</b>
GRI Index .....	50
SASB Index .....	56
Performance Tables .....	61







## ABOUT THIS REPORT

Rallied around a single purpose, Building Gigabit America™, Frontier is focused on connecting a digital society, closing the digital divide, and working toward a more sustainable environment.

This report is a first on multiple fronts: It serves as Frontier's inaugural environmental, social and governance (ESG) report. It comes one year after we relisted on NASDAQ on May 4, 2021, under the symbol FYBR, which reflects our new strategy. We are excited to share how we delivered on our purpose and ESG commitments in 2021—and the path we are forging as we move into 2022.

ESG principles will guide how we operate as a purpose-led organization. As a testament to our commitment to our ESG journey, we are also raising our ambitions for transparency. We are aligning to global ESG standards, including the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board's (SASB) standards for the Telecommunication Services sector. Regular progress reports will both celebrate and guide our actions toward our ESG goals.

Information and data reflect the fiscal year ended December 31, 2021, unless otherwise noted.

# FROM OUR CEO

## Grit, resilience, and reliability were defining characteristics of 2021.

Perhaps “new” is a more apt term. 2021 was a remarkable year for our company. We emerged from bankruptcy in late April with a new strategy and a strong conviction that focusing our efforts on a new purpose — Building Gigabit America — would enable us to create remarkable value for all stakeholders.

Building Gigabit America is a shared ambition and a guide for how to work together for our customers and a recognition that our company has an important role to play in enabling the digital society, realizing community inclusion, and reducing our collective impact on the environment.

Over the past year, we’ve made real progress in pursuing this purpose and executing our strategy — by adding world-class leadership, introducing a purpose-driven culture, improving the customer experience, and making our operations more efficient and sustainable.

The shift to a work-from-home culture, coupled with increasing data demand, led to a period of digital transition for most Frontier stakeholders. Businesses are now being run out of households. Living rooms became the new schools and conference rooms. And the importance of secure, high-speed connectivity is greater than ever.



**Nick Jeffery**

President and Chief Executive Officer



We are expanding our fiber-optic network to meet the growing demand for high-speed broadband, a critical link to connecting a digital society, enhancing community inclusion and being better stewards of the environment. In 2021, we set an ambitious target: 10 million total locations for our fiber expansion by the end of 2025. We are well on our way. We built fiber at record rates, passing approximately 638,000 locations, and reached our target of 4 million total fiber locations by year's end.

We also continue to innovate to provide top-notch service for our customers. Customer loyalty rose in 2021, as evidenced by record-high Net Promoter Scores (NPS) and record-low churn across both fiber and copper customers. We are optimistic it will continue to rise in 2022 as we diligently focus on the customer.

To ensure we embed sustainability in our company, with our purpose as our guide, we are weaving our emerging ESG ambitions into every aspect of our business. Our commitment to ESG will make us a stronger business, and it's the right thing to do.

Building Gigabit America united our team and serves as a rallying cry as we transform our business. We are creating a new Frontier that is deeply focused on our purpose, providing exceptional customer experiences, and proudly serving the communities in which we work and live.

We have hard work ahead of us, but momentum is building as we unite our team around our purpose. Above all, I want to thank our team for standing behind those principles and bringing their best each and every day.



**Nick Jeffery**  
President & CEO



**A NEW  
FRONTIER**

# LOOKING BACK AND AHEAD

We began in 1935, making the brave choice to build in the parts of rural America other companies weren't interested in. We represented a friendly alternative to the large and remote corporate brands — connecting people and communities.

Today, Frontier is a leading communications provider offering gigabit speeds to empower and connect millions of consumers and businesses in 25 states. We are building critical digital infrastructure across the country with our fiber-optic network and cloud-based solutions, enabling connections today and future proofing for tomorrow.

## FRONTIER AT A GLANCE

**Founded  
in 1935**

**Reached  
4M fiber  
locations in  
2021**

**Largest  
pure-play fiber  
company  
in the U.S.**

**Serving  
25 states**

**2.8M  
broadband  
customers**

**~16,000  
employees**

**180,000-mile  
advanced  
fiber network**

**Diverse board  
and leadership  
team**

“We’re committed to Building Gigabit America. Built on a sophisticated fiber-optic infrastructure, it will empower us all as we advance through the digital age together.”

**Nick Jeffery**

President and Chief Executive Officer



2021 was a pivotal year, as we built a new team and began executing our fiber-first strategy.

**March**

Nick Jeffery joined as President & CEO and introduced our Purpose: Building Gigabit America

**April**

New Board of Directors announced  
Emerged from Chapter 11 (April 30)

**May**

Re-listed on NASDAQ with new ticker symbol: FYBR  
Q2-Q3: Hired a new leadership team

**June**

Introduced People Pulse All-Employee Survey

**July**

Launched Consumer Offer

**August**

Announced plans to reach 10M+ fiber locations by 2025  
Launched “Dumb Policies” Program

**October**

Launched new commercial partnership with AT&T

**November**

Launched new partnership with Eero

**December**

Launched new partnership with YouTube TV

**2021 Highlights**

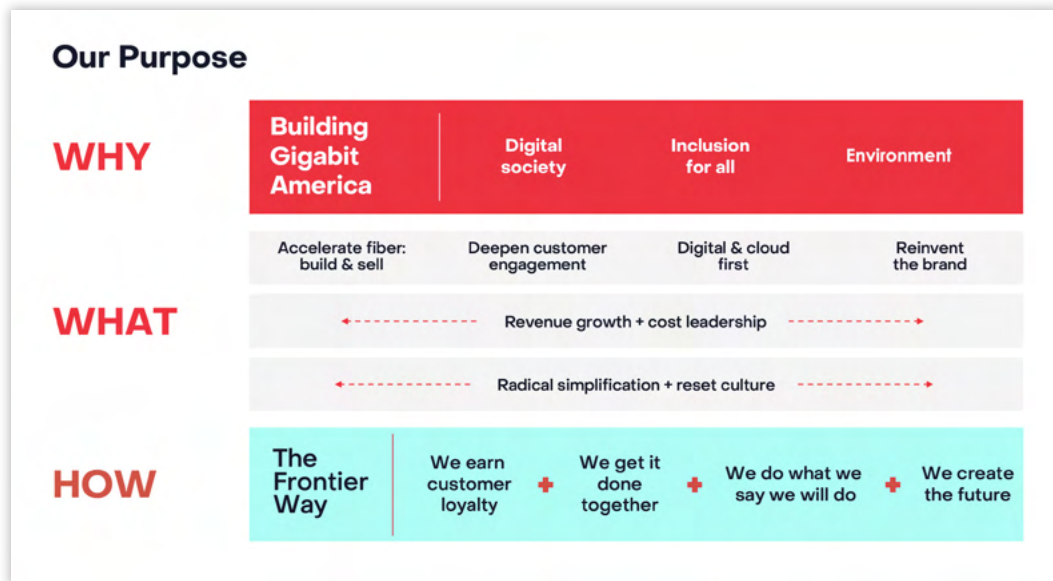
In 2021, we re-emerged with a new listing, a new ticker, a new Board and leadership team and a new purpose. Today we trade under “FYBR,” and it describes exactly how we “tick.”

In 2021, we:

- Delivered record fiber broadband growth
- Built fiber at a record pace
- Achieved positive fiber NPS for the first time in company history

We are excited to share highlights from our ESG journey in 2021 throughout this report.

# OUR PURPOSE: BUILDING GIGABIT AMERICA



## IT'S OUR "WHY."

Building Gigabit America united the Frontier team and serves as a rallying cry as we work to transform our business. It introduced a sense of ambition, a guide for how to work together for our customers and a recognition that our company has an important role to play in enabling a digital society, promoting community inclusion and reducing our collective impact on the environment. We support our purpose with a "What" and a "How". We couldn't get there any other way.



## THE WHY: THREE PARTS

### 1. Digital Society

Our technology is delivering a digital infrastructure that changes the lives of the people we are connecting.

With the right network, students can participate in virtual education, families can access online healthcare and stay-at-home parents can start businesses — all opportunities that advance inclusion. Our fiber-optic products enable communities to access the digital society and all the benefits it provides.

## By the numbers

**4 million** total fiber locations

**638,000** new fiber locations in 2021

**100,000** new homes connected to next-gen broadband technology





## 2. Community Inclusion

As demand grows for more enhanced digital options, so, too, does the digital divide. And the stakes for people, families and communities are rising.

The pandemic, for example, made distance learning an educational requirement. This highlighted the gap between those who do and do not have access to technology and high-speed internet. To close the digital divide, we must focus on both access and equity.

“At-home connectivity is more critical than ever — and making it accessible for everyone is central to our purpose of Building Gigabit America. Participating in the Affordable Connectivity Program will allow us to expand our reach and deliver critical connectivity to even more families for free or reduced cost.”

**Nick Jeffery**

President and CEO

Our focus on accessibility led us to work with numerous government initiatives and other programs to offer connectivity to qualified people, schools, libraries, community-based organizations, and healthcare providers.

We joined the [Affordable Connectivity Program](#) earlier this year to expand access to blazing fast internet speeds and uninterrupted connectivity for more households across the country. We previously offered discounted services to customers as part of the Emergency Broadband Benefit that emerged to support families throughout the constraints of the pandemic. Under this new program, we can bring even more options at no or reduced cost to households.



### 3. Environment: Red Loves Green

The nature of our business gives us an opportunity to make a real difference for the environment.

Fiber is a climate-friendlier alternative to more traditional telecom infrastructure. By focusing on fiber, we build and sell products that connect communities and enable breakthrough innovations in high-need areas such as remote learning, connected healthcare and the dynamic, evolving workplace — all while reducing environmental impact.

This year, we launched Red Loves Green, a program that will bring attention to the ambitious actions we're taking — and will take — to protect the environment and create a sustainable future.

We see ourselves as stewards of the environment with an opportunity to lead on sustainability in the telecom industry. As we continue to upgrade our copper network to more energy-efficient fiber technology, we'll significantly reduce our greenhouse gas (GHG) footprint. And although our technology is designed to reduce environmental impact, all internet companies still consume vast amounts of electricity. So we're committed to reducing our own consumption, too.

[Learn more about how we are helping to protect our planet](#)



**RED  
LOVES  
GREEN**



# HOW

## The Frontier Way

We earn customer loyalty



We get it done together



We do what we say we will do



We create the future

### THE HOW: THE FRONTIER WAY

As part of our commitment to Building Gigabit America, we work together to earn and maintain customer loyalty. We do what we say we'll do. And we create a better future for everyone. It's the Frontier Way.



### Living proof: Meet a few of our teammates doing it the Frontier Way

#### We earn customer loyalty

##### SPOTLIGHT

#### When Customers are Treated Right, Loyalty Follows

There's customer loyalty, and then there's customer loyalty on steroids. It's what you get when you treat customers right. Natoya Lee, an escalation specialist in Allen, Texas, delivered just that when she continually followed up with a customer after the initial service call to ensure that the repair ticket had been acted upon and that the issues had been remedied. The customer was so pleased with Natoya that she wrote the following to our CEO:

"Natoya was amazing," Ms. Clark wrote. "The best tech I've ever spoken with at Frontier, and I've spoken with many. She was personable yet very professional also. She's a keeper."

Natoya's supervisor agreed, adding that she is an absolute joy to have on the team and a true asset to Frontier. She noted the passion that Natoya has demonstrated for mastering her craft and the genuine love she has for Frontier and her desire to create that same feeling in our customers.



## **We get it done together**

### **SPOTLIGHT**

#### **A Lot of Moving Parts and “Flawless Execution” in 20 Hours**

When fire destroyed the historic administration building of West Virginia’s Schools for the Deaf and Blind in Romney, the governor’s office called Frontier with an urgent request to get the campus’ technology service back online. The damage was extensive: the administration building housed servers powering the campus technology, including internet, telephones, security equipment and other utilities.

Within hours, we had a team working with the state’s technical team to restore some of the services. The equipment was installed on Sunday, the fiber was connected, and the techs worked with our Commercial Customer Support Center to test and turn up the circuit. The circuit was handed off to the customer by 10:25 a.m.

All work was performed within about 20 hours.

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## **We do what we say we’ll do**

### **SPOTLIGHT**

#### **He Doesn’t Understand the Word Can’t**

When we asked local managers across the company to let us know about their standout techs, it only took 11 minutes for Jeff Ariola to tell us about Steven McMillan, a customer service tech in Sherman, Texas.

According to Jeff, Steven doesn’t understand the word “can’t,” because “there is nothing Steve can’t do. When tasked with a difficult job, Steve always finds a way. He is the first to volunteer to do things.”

His teammates say the same thing: “In one instance, a coworker and I were working late and had an aerial drop to run through a jungle of trees. We were dreading running a new drop through said jungle, but once we spoke with the customer, she told us another tech already ran the line. We didn’t believe her, but to our surprise Steven ran the drop the previous day.”

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## **We create the future**

### **SPOTLIGHT**

#### **An Idea Best Expressed as 2 for 1**

Jon Lawrence, a network engineer in Newtown, Conn., had an idea with the potential to change the future of how we build our fiber network.

Jon recently received Patent No. 11,239,936 for a High-Capacity Resilient Optical Network Design from the U.S. Patent and Trademark Office. Jon’s design would allow us to serve two, instead of only one, fiber customers on a single strand of fiber. Hubs traditionally have fibers going out in one direction. Jon’s idea had a hub at the “end” of the fiber cable, after its individual strands had been split off to their maximum amount. This would send signal in the reverse direction, thereby doubling the fiber’s capacity.

Jon’s idea reduces fiber placement, fiber and hub costs, test and turn-up, and maintenance costs by augmenting network resiliency and reliability.

# OUR COMMITMENT TO ESG

Our commitment to ESG is reflected in our purpose: Building Gigabit America. Under the direction of our new Board and executive management team, we are dedicated to demonstrating our commitment to sustainability and corporate responsibility.

## DEFINING OUR MATERIAL ISSUES

In 2021, we identified the ESG priorities most material to our business success, reflecting the topics of highest priority to us and to our stakeholders. This prioritization guides our ESG efforts as we evolve our sustainability strategy and disclosure priorities.

**We identified the following five material issues, which we address in this report:**

- 1. Diversity, equity, and inclusion**
- 2. Greenhouse gas (GHG) emissions and energy**
- 3. Talent engagement**
- 4. Workplace health and safety**
- 5. Data security and privacy**

We also identified seven important issues, listed in alphabetical order, that are foundational to our business. Although these issues do not reach the same level of materiality, they play an important role in the success of our business and our impact on society, and we will continue to address them in our ESG efforts.

These issues include:

- Community engagement and economic opportunity
- Competitive behavior
- Corporate governance
- Human rights and labor
- Network reliability
- Product end-of-life and recycling
- Systemic risk management



Frontier continues to invest in ESG goals because it's the right thing to do. We aim to meet the needs of stakeholders while setting a foundation for the future.

# ENVIRONMENT



## We want to be good stewards of the environment.

Making a positive impact is at the core of Building Gigabit America. We are focused on building and selling products that connect communities and enable breakthrough innovations in high-need areas such as remote learning, connected healthcare and the dynamic, evolving workplace — all while reducing environmental impact.

As we grow, we will hold ourselves to a higher standard of stewardship in areas where we have the greatest impact and influence. We will use space thoughtfully, consume resources responsibly, reduce waste and limit our greenhouse gas (GHG) footprint.

Our current strategy focuses on reducing our GHG emissions, electrifying operations and ultimately decarbonizing our value chain. We are also focused on reducing waste. We will deliver on our environmental commitments through our product offerings and more sustainable operations, including:

**Building fiber networks**, which use less energy than broadband alternatives — and help our customers reduce their environmental footprint, too

**Establishing Frontier Green Initiatives** to decrease energy consumption and reduce waste within our operations

**Greening our fleet**, using new technologies and purchasing electric vehicles (EVs) to reduce energy use and GHG emissions

**Managing our carbon footprint** and meeting rising regulatory and stakeholder expectations

# BUILDING ENERGY-EFFICIENT FIBER NETWORKS

We recognize our responsibility as stewards of the environment and our opportunity to lead on sustainability in the telecom industry. As we continue to upgrade our copper network to more energy-efficient fiber technology, we're confident we'll be able to significantly reduce our GHG footprint.

While our fiber network is known to require less energy than historic telecommunication infrastructure, we are not stopping there. We are working to increase the energy efficiency of our service switches and reduce the overall space needed to house this equipment. Both efforts have led to decreases in overall energy requirements.

In today's world, where connectivity is key, our bandwidth enables Americans to cut emissions, as they avoid unnecessary air travel and car time, download large files digitally and connect virtually with friends, family, and colleagues. This is a perfect example of how we bring Building Gigabit America to life: we enable connection while minimizing the environmental impact.

During the first year of the pandemic, Frontier saw an increase in upload traffic greater than the prior five years combined. These numbers proved the importance of at-home broadband — and stressed the critical role of resiliency and addressed energy usage as demand continues to rise. As part of our planning efforts, we continue to assess how climate-related issues or risks might impact our facilities so we can plan ahead for climate resiliency, too.



# REDUCING ENERGY USE AND ESTABLISHING GREEN INITIATIVES

We use resources wisely. This translates into actions that are good for the earth and good for business via reduced costs and better financial performance.

Sustainability starts at home, so managing our real estate is one way to reduce energy use and ultimately our GHG emissions. We are always looking at our overall footprint to understand opportunities to reduce space we no longer need because of our hybrid and work-from-home policies. We are also looking for opportunities to make our buildings more sustainable.

In 2021, we installed smart temperature controls, continued replacing traditional lightbulbs with more energy-efficient LED lighting, and upgraded several of our HVAC systems to be more efficient. Up next: more solar solutions and partnerships with clean energy providers. A few examples from 2021 include:

- Reducing the energy consumed by service switches while also reducing the space needed for this equipment. Service switches are network equipment used to offer our communication service to customers.
- Installing smart thermostat technology has helped reduce the total amount of electricity required to maintain suitable temperature ranges in our office buildings.
- Replacing incandescent lightbulbs with LED lights across our operations. LED lights consume less energy and thus lower our overall consumption footprint across all facilities.





We also continue to find ways to manage our daily operations in ways that will help us reduce our energy use and produce less waste. Here are some ways we are doing that:

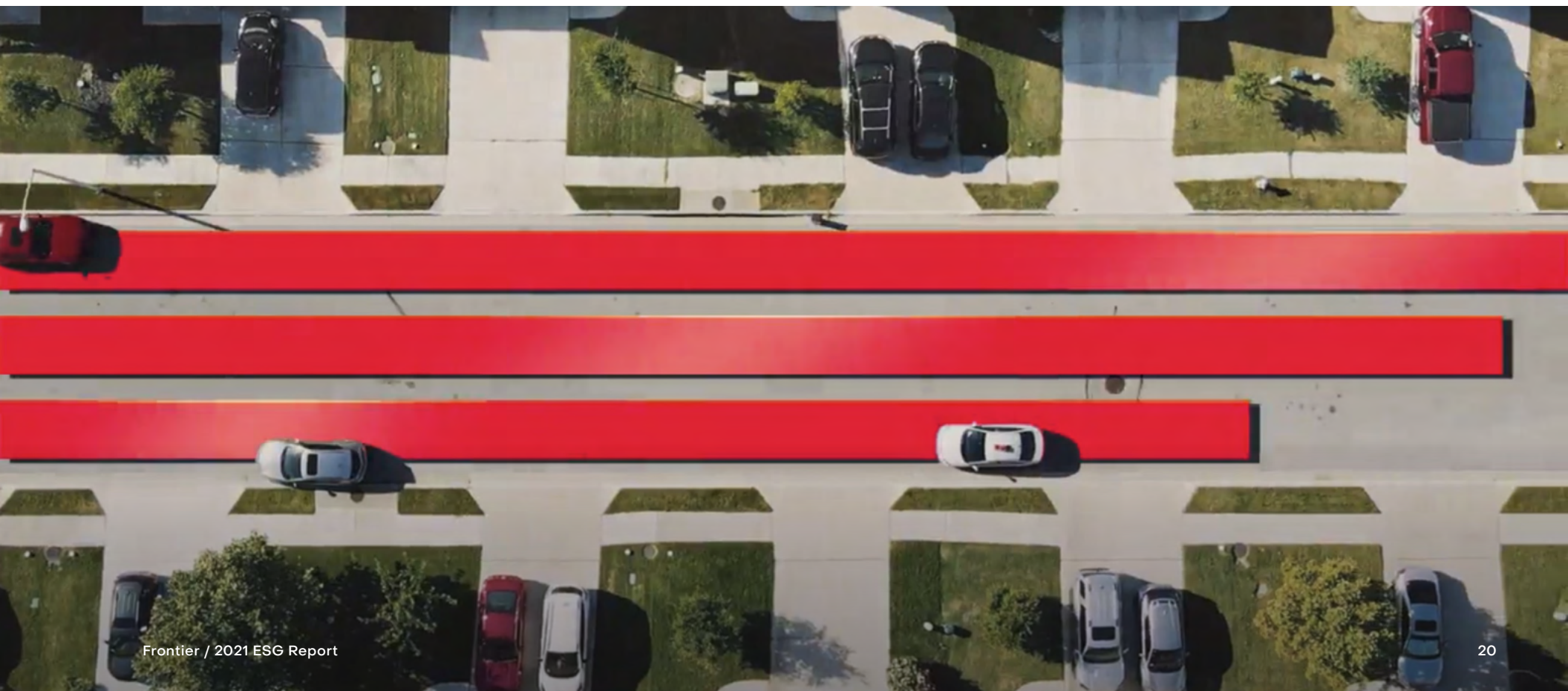
- Virtual meetings and our Work-at-Home program for qualified Call Center representatives and office workers reduce travel-related GHG emissions.
- Mass Transit Flexible Spending Accounts help employees pay for bus, train, or other forms of shared transportation with pre-tax dollars.

- Electronic deposits allow employees to receive paperless paychecks. All employees can also receive electronic W-2s.

- Online bills and payment options for customers reduce paper use, decrease the environmental impact of mail, preserve resources, minimize landfill waste, and lessen expenses.

Combining our goals for reduced environmental impact and lessons learned working through COVID-19, we have transitioned to a hybrid work model. It's just one more way we are bringing our purpose to life.

[Learn more about our Green Initiatives](#)



# GREENING OUR FLEET

Much of our carbon footprint comes from sources of the rolling variety. That's why we are focusing on opportunities to green our vehicle fleet, which is a main contributor to our direct emissions.

Frontier is focused on expanding our use of EVs and hybrid power while optimizing fuel efficiency, employee safety, and productivity. Focusing on these downstream elements of our operations aligns with our ESG goals and Building Gigabit America.

For example, to reduce fuel use among our fleet of 5,000 vehicles, Frontier partnered with several telematics companies to use driver data to maximize vehicle efficiency and safety. These efforts led to the customization of each vehicle's remote telematics system to reduce idle RPM, limit vehicle speed, improve shift points and torque utilization. Implementing these types of solutions across our entire fleet could save nearly \$2 million in fuel costs and reduce our use of six million gallons of fuel annually.

Idle time isn't great for productivity, or in the case of vehicles, for the environment. Frontier's light aerial bucket trucks feature a 48-volt battery system and electric motor, eliminating the need to run combustion engines while completing aerial repairs, which saves fuel and reduces associated emissions.



## By the numbers

**1,500+**  
vehicles replaced  
with a focus on electric or  
hybrid vehicles in 2021

**1,500+**  
additional planned  
in 2022



To capture the benefits of a greener fleet at scale, we are expanding our use of EVs and hybrid-powered vehicles. The immediate goal is a three-year catch-up cycle designed to replace vehicles over their useful lives, which can range from 10 to 15 years, depending on the vehicle type.

In 2021, we ordered more than 1,500 vehicles, with a focus on vehicle fuel efficiency, EV options and the development of hybrid power options for our unique worksite equipment. This included EV transit vans, giving us an opportunity to evaluate upfits and plan a charging infrastructure.

We plan to order another 1,500 vehicles in 2022 with a continued focus on implementing EV and hybrid options.

We'll be watching the evolution of energy-efficient vehicles that improve safety and productivity while reducing emissions from idling.

Fleet replacement is not a luxury — it's a necessity. We want our fleet to reflect a tech company, with advanced safety technologies, better fuel savings, more satisfied drivers and minimized repair and maintenance costs. Regular fleet replacement is a win all around.





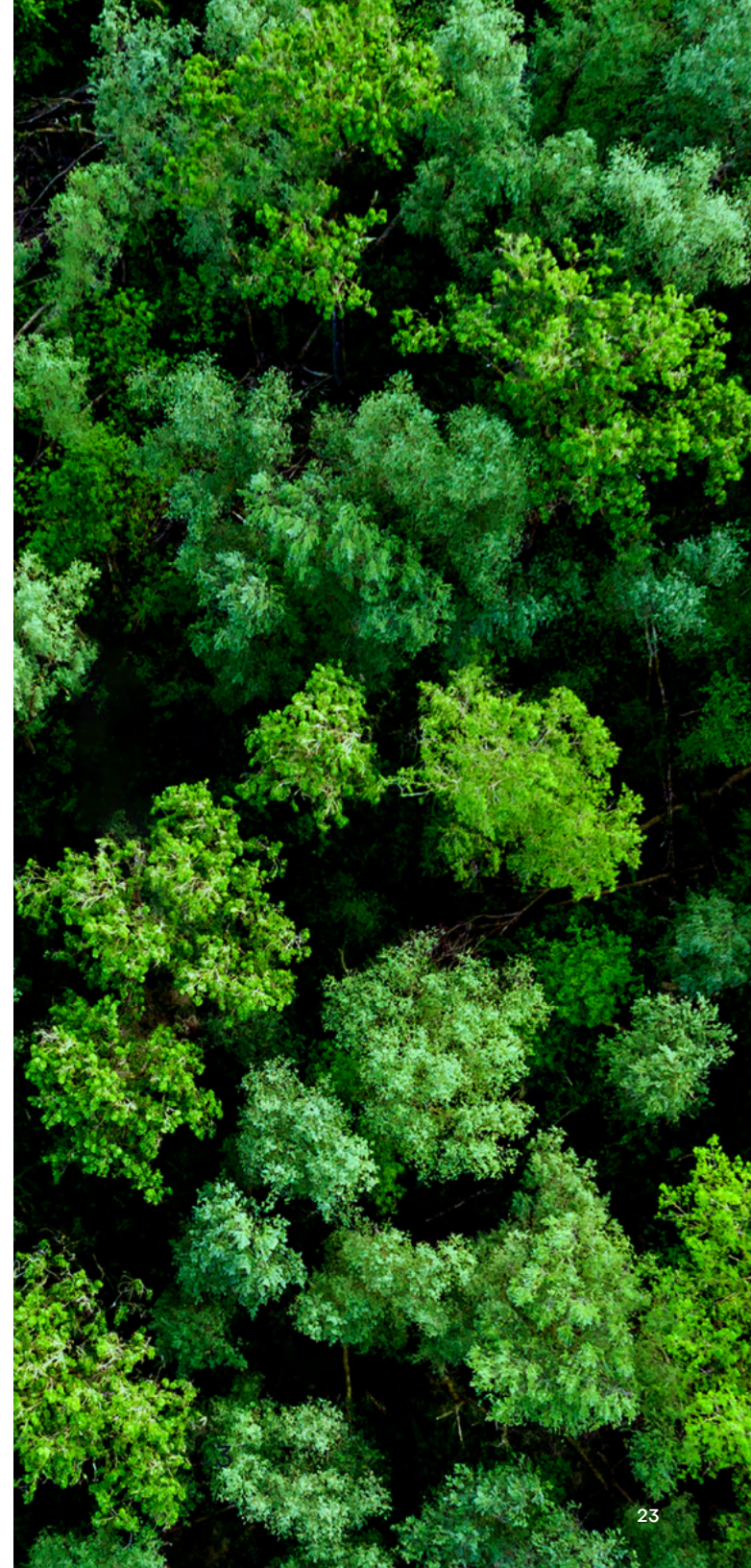
# REDUCING OUR GHG FOOTPRINT

Focusing on our environmental impact across our entire value chain is a core belief in our purpose. From deploying energy-efficient equipment to provide service to our customers to lowering the power requirements of our physical footprint and exploring renewable energy sources, we are implementing solutions to save energy and decarbonize.

We are also finding new ways to cut down on business travel through strict guidelines and to refine our work-from-home policies to promote our purpose and ESG goals.

We are also looking to other channels to reduce the remaining emissions. These include the use of Power Purchase Agreements (PPAs) and a more robust renewable-energy strategy. We are purchasing energy from a wind farm in Texas, and our procurement team is actively sourcing more renewable-energy options.

In 2022, we will continue to pursue these objectives while working with the Science Based Targets initiative to set GHG emission-reduction goals. To keep us accountable on our progress over the coming years, we also plan to identify ambitious science-based targets and pursue them strategically in the years ahead.



**SOCIAL:  
OUR  
PEOPLE**

# BUILDING A GREAT PLACE TO WORK

## ATTRACTING AND RETAINING DIVERSE, TOP TALENT

Innovation demands a healthy influx of new talent and varied perspectives. Our new hiring initiatives target diverse talent to help us build a workplace that more accurately mirrors our communities.

We're also enhancing our hiring process to match the quality and convenience we provide our customers. Our goal is for each candidate to feel valued, engaged, informed, and inspired from the very start. Once employees join the Frontier team, we work hard to keep them. We offer training and development opportunities that support their growth and increase their satisfaction. Together, these efforts advance our larger mission of transitioning Frontier into a premier tech company at the leading edge of communications.



We invest in developing lifelong leaders who inspire others to succeed. We recognize and reward work done well. We empower teams at every level to realize their potential, achieve meaningful results — and have plenty of fun along the way.

## COMPENSATION AND BENEFITS

We recognize that our compensation and benefits packages affect our ability to attract, engage and retain our people. To that end, we offer market-based pay for new hires and a comprehensive benefits package. Employees enjoy health and welfare benefits that extend to domestic partners, along with paid time off policies, parental leave and 401(k) matching programs. Benefits for our unionized employees are determined by their respective collective bargaining agreement. In general, those benefits are similar to those described on this page.

### Overview of benefits

Nothing is more important to our success than the people driving it. This is why we offer an array of career advantages, including competitive pay and comprehensive benefits.

### [Read more about our benefits package](#)

### Health and Welfare

- Day One medical, dental and vision plans
- Day One prescription drug plan
- Life insurance options
- Short & long-term disability coverage
- Critical illness insurance
- Accident insurance
- A credit toward obtaining an annual physical exam
- Benefits coverage for your children up to age 26

### Financial

- 401(k) match of 50% on 6% of eligible compensation
- Financial advisory services offered through 401K administrator
- Health Savings Accounts (HSAs)
- Flexible spending accounts
- Commuter accounts

### Lifestyle

- 20 PTO days plus 10 holidays
- Same-sex spouse or domestic partner benefits coverage
- Employee-assistance programs
- Home & auto insurance discounts
- Legal assistance
- Tobacco-cessation plan & support
- Paid parental leave
- Paid caregiver leave
- Adoption program assistance



## ENGAGING EMPLOYEES

We are transforming our company from the inside out, which means culture change is a top priority. Building Gigabit America introduced a sense of ambition. It rallies us around a greater sense of purpose by clearly defining why what we do matters, bonds us to a common set of values, and guides how we treat each other and our customers.

### Listen Live

Our CEO, Nick Jeffery, started on March 3, 2021, and one week later he held his first Listen Live, an interactive all-employee call, to share our purpose and begin an open dialogue with our employees. He hosts Listen Live every few weeks with other leaders so that employees can hear what's going on in our business and we can answer tough questions in real time.



### All-employee survey

Employee participation is critical to creating a culture of improvement. To tap into their ideas, we launched our first all-employee survey in 2021. The responses gave us a roadmap to improve how we do business, how we can better serve our customers, and how to make employees' jobs more satisfying. The People Pulse survey asked employees to submit and rate actionable ideas on how to improve the new Frontier. We received more than 8,000 submissions from more than 50% of our employee base covering all aspects of the business.

We are taking action and sharing with employees what we changed based on their feedback. We're moving on many fronts, and more are underway.

Just a few highlights include:

- Our new FUEL Digital Training Program on the FUEL Learning Portal. To date, 675 team members have enrolled.
- A program that reminds managers to recognize team members' anniversaries.
- A celebration campaign around our culture of inclusivity aligned with nationally recognized celebrations, such as Hispanic Heritage Month, Veterans Day, and Women's History Month celebrations.
- A new-hire mentorship program and Mentoring Circles to provide guidance and encouragement.

## Eliminating Dumb Policies

Companies put new policies in place all the time for good reason. But as times change, often these policies do not, yet rarely are they removed

Dumb policies are everywhere. Some only exist because of inertia. CEO Nick Jeffery set out to change all that in 2021. His new program, aptly named Eliminate Dumb Policies, asked every Frontier employee to identify policies that slow down or complicate work.

It struck a chord! In the first week alone, employees submitted 900+ suggestions for removing or changing policies across the business to better achieve our collective goals. And now we are rapidly eliminating all the policies that distract us from what really matters — Building Gigabit America.



## Frontier 20

If you want to save money, you ask the people who know how to do it. We asked our employees, because they see things that waste money — things we shouldn't be doing and should therefore stop doing. That's why we launched the Frontier 20 initiative in June 2021, asking our 16,000 employees for ideas to help us save \$20 million.

The response was amazing. Within a week, we had nearly 2,000 ideas, and within a month, we reached our first savings milestone of \$5 million.

The employees' suggestions clearly showed that we had set our target too low. So, we raised the goal to \$50 million and changed Frontier 20 to Frontier 50.

One of the earliest ideas was to "stop mowing the dirt." A Pennsylvania employee saw mowing occurring even when grass wasn't growing. He suggested renegotiating our lawncare and snowplowing agreements. His team reduced those costs by \$440,000 a year by renegotiating his markets' agreements. We carried that throughout our footprint.

Other ideas focused on:

- Facility consolidation and maintenance
- Energy reduction
- Dispatch efficiency
- Vendor consolidation

By August, we reached the \$10 million milestone. Ideas kept coming from every corner of the company, including a major one from a dispatch clerk in Irving, Texas. She suggested looking at the process requiring customers to ship back routers.

We did and found that most of the 16 router types didn't need to come back at all. Customers could recycle them. For the other routers, we made it easier for customers to send them back. All of this saved \$4 million a year in shipping costs.

By the end of 2021, we received nearly 3,300 ideas with a value exceeding \$50 million. That's a success story in anyone's book, proving once again that our employees are our most valuable asset.



## **PROVIDING ROOM TO GROW:**

### **EMPLOYEE DEVELOPMENT AND TALENT MANAGEMENT**

Learning is a path to professional growth. As a company with an ambitious purpose built on technology, helping our people stay sharp is front and center to how we manage talent.

Frontier provides employees with access to a wide variety of functional areas, with opportunities to pursue new pathways of interest. These opportunities coincide with Frontier's increasing efforts around workforce planning strategies that will prepare our workforce to meet the future demands of a fiber-first organization.

Just a few of our major upskilling initiatives include Fiber to the Home (FTTH) Expansion classes, Fiber Product Training for Technical Support Organization (TSO) agents and our Leadership Development Academy.

Training grows the knowledge, skills and abilities of our people and leaders for the roles they perform in support of Building Gigabit America. Technical training includes new-hire technicians, strategic initiatives (such as FTTH), as well as technical upskilling based on the unique needs of our regional decentralized workforce.

New-hire Customer Care and TSO training provides employees with the ability to deliver the ideal customer experience by building skills in, for example, problem resolution, service issues and product needs to better connect them in today's digital society.

Leadership development provides our leaders with the needed skills to better lead themselves, others, and the organization. Leading the self focuses on self-development, personal accountability and adaptability, and resiliency. Leading others focuses on leading people, collaborating, and influencing, and building people capability. Leading the business focuses on strategic thinking, leading change and delivering results.



## SPOTLIGHT

### Dipping a toe to grow

Matt Freeman started his career as a tech 19 years ago in West Virginia. He'd still be a tech, but for two things: aspirations and the absence of roadblocks.

In 2007, Matt earned a promotion to supervisor in the Service Assurance Network Operations Center. In 2015, he became a manager there, and he was promoted to senior manager two years later.

Today, Matt carries the title of Director of Network Operations, where he and his team handle everything in a wholesale and enterprise environment for commercial-customer circuits. He had the desire to progress above that first-level technician. He said he's learned by "sticking his foot into different areas" and just talking with other people, asking, How do we do this? How can we make this better?

**"All of my career, my direct management was always very helpful. If I'd sit down and talk to them and say, 'Hey, I want to be a supervisor, I want to be a manager, or I want to be a director,' they were always very helpful in getting me either the tools that I needed or the training they felt I needed."**

**Matt Freeman**  
Director of Network Operations





# FOCUSING ON WORKER SAFETY

Frontier is going through a phase of rapid expansion and progression — one that onboards more new employees and offers an opportunity to revisit its safety commitments.

For us, that means implementing best practices for protecting those leading our fiber-build in the field. It also means providing resources to our non-technical workforce, the majority of whom now work at home instead of call centers. In short, our safety manual is going to look quite different in 2022.

## OCCUPATIONAL SAFETY AND HEALTH PROGRAM

Our employees are our most valuable asset. The Occupational Safety & Health Program (“OSH”) is designed primarily to protect employees’ well-being on the job, as well as help them to develop good habits when they are away from work.

Our OSH program is designed to keep employees both safe and productive while contributing to customer satisfaction. The OSH program also includes a focus on protecting the environment, such as driving efficiently to reduce emissions and minimizing the generation of waste.

Our program has two goals: compliance with federal, state, and local regulations and the development and implementation of our own policies to keep our employees safe and healthy. Our internal program policies are based on risks to employees that are identified through job hazard analyses, observations of task performance, and metrics that identify injury rates, types of injuries and root causes.



In our industry, most high-risk activities are performed off site, typically at a customer's location. Our approach to safety is primarily behavior-based. Our safety training focuses on not only safe techniques but also awareness and behaviors to protect employees. We are also implementing an employee recognition program to identify employees who are following good safety behaviors, giving them an incentive to perform in a positive manner.

To track the effectiveness of our efforts, we have developed an extensive monthly scorecard that includes a breakdown of incidents, including by type, cause, geographic location, management group (all levels, from EVP to the front-line local supervisor), objects involved (e.g., tools, ladders, or motor vehicles), and whether an injury involves lost time.

We compare our performance over time and against the Bureau of Labor Statistics for our industry category. Where available, our results are compared to similar industries. In 2021, Frontier had a decrease in its occupational injuries and illnesses over the previous year.

Communication is a critical component of our program. We actively engage with stakeholders to help inform our strategy decisions and increase the efficiency of program rollout. Members of the Executive Committee, including the Chief People Officer, report the monthly results to the entire Committee. Members of the Safety Team meet frequently with Senior Vice Presidents, front-line Directors, and Supervisors to discuss root causes, and ways to improve field behavior.



We provide health and safety development and evaluation through multiple channels, including the many Safety Committees throughout the company, the pilot programs used to test the efficacy of new processes, tools and procedures, and regular contact with the safety managers, who are available to our employees 24/7 through a Frontier-staffed hotline.

### **Wellness in motion**

Sprains and other body mechanics issues are common in an aging workforce. In 2021, Frontier brought in kinesiologists and other experts to identify tasks most likely to cause these types of injuries, recommending safer ways to work along with warm-ups and recovery exercises to minimize injury risks. This program applies to every employee, including technicians and those working at home.

**SPOTLIGHT****From the CEO to the field:  
Getting employees home safely**

Floyd Williams sees his job as making sure Frontier's employees stay safe and get to go home.

As Senior Manager of Environmental, Health & Safety, the job calls on Floyd to use his 25-plus years of

safety experience to help employees in 18 of our 25 states. It keeps him busy.

Ultimately, the well-being of every employee is a bottom-line issue touching on productivity, costs, morale, and reputation. Floyd's job isn't just reactive. He and his teammates are proactive in educating employees, using weekly communications on safety topics, training, ergonomic assessments of workstations and more.

The safety team focuses on the well-being of the whole person — mental, emotional, and physical. Floyd is trained to recognize issues and to relate to people at every level. That's his job. But, as Floyd recounts, everyone at Frontier is encouraged to promote safety by keeping an eye out for each other's welfare.

**“Safety applies 100% to everybody in the company, from the CEO to the tech out in the field.”**

**Floyd Williams**

Senior Manager, Environmental, Health & Safety

**TRAINING TECHNICIANS**

With more in-field workers joining our team than ever before, we have expanded our technical safety programs. On average, each new Frontier technician receives 160 hours of training, minimum.

Highlights of our safety training include:

- Monthly safety training lessons covering a specific topic.
- Quarterly Critical Skills Safety Training. This includes a review of a high-risk area of safety by the employee each quarter, and a demonstration to their supervisor that they can execute the skill safely.
- Weekly safety shorts, which briefly cover a focused safety topic and tip. The topics are chosen specifically to address trends in the field.
- Safety Alerts sent out on an as-needed basis, in response to a particular situation, for example, natural disasters or accidents.
- All employees operating a Frontier motor vehicle are required to take the National Safety Council's Defensive Driving course every 3 years.
- The outside technical workforce gets recertified in First Aid/CPR/Blood Borne Pathogens every 2 years.

Completion of the safety training is tracked through Cornerstone (our learning management system) or our internal file-sharing system.



### Technician training program

Our technician training program includes more than 160 hours of training in the following areas:

- 20+ hours of web-based instruction covering safety and installation topics
- 40+ hours of instructor-led pole climbing and ladder safety
- 60+ hours of role-specific training on Frontier fiber-optic service methods and procedures (e.g., installation, line construction and splicing)
- 40+ hours (minimum) of on-the-job training related to the new work role

### Building a roadmap for driver safety

Using data collected from GPS technology and on-board diagnostics, we're monitoring driver performance to improve the safety of crews on the road. This technology allows our vehicles to become more fuel-efficient, our drivers safer and our maintenance programs more efficient. We've already seen positive results from our pilot telematic program, and we are planning to integrate this technology into more of our fleet in the fall of 2022.

[Learn more about health and safety at Frontier in our Environmental Health and Safety Manual](#)





# VALUING DIVERSITY, EQUITY, AND INCLUSION

Like our customers and our communities, Frontier employees and partners represent the mosaic of race, gender, age, sexual orientation, religion, ethnicity, education, and experience that defines America. We proudly embrace diversity because it makes us undeniably stronger, more innovative, and more intentional in our growth.

## PROMOTING CHANGE FROM THE TOP

The new Frontier emerged in 2021 with a deliberate strategy to diversify the organization, beginning with our leadership. Our board of directors and executive leadership team now feature more gender and racial diversity than ever before.

In fact, Frontier has created the only all-female audit committee of a Fortune 500, and 40% of its leadership team is female – a rarity for any industry.



[Read Charlon's  
perspectives  
on how diversity  
and inclusion  
made us stronger](#)

## SPOTLIGHT

### Charlon McIntosh reflects on diversity and inclusion

"Today, a statement about a company's commitment to DE&I is expected throughout the business community. But at too many companies, it's still just words. That's not the case at Frontier. I came to Frontier because the new management team and board are committed to making DE&I part of the company's DNA.

Diversity gives us creative problem-solving because problems are viewed from different perspectives. I believe inclusion is as important as diversity. An organization can be diverse without being inclusive.

Inclusion involves creating an environment where everybody can bring their whole self to work, and where everyone can be who they are and that's OK. What's not OK would be having a diverse workforce but somehow forcing everybody into the same box.

At Frontier, we want you to come and do your best work because you are not hesitating for one moment to be your authentic self. It's worked for me, and it can work for you."

Charlon is Executive Vice President and Chief Customer Operations Officer, leading Frontier's enterprise-wide customer operations.

## RECRUITING AND DEVELOPING DIVERSE TALENT

Our AI-based recruiting tool, Eightfold, is well recognized for its use of billions of data points to match candidates and skills. In so doing, it cuts down on many of the unconscious biases that all too often can creep into recruiting.

We are expanding our sources of talent to make sure we are casting the widest net we can. In 2022, Frontier is developing new internship programs to recruit candidates from diverse populations.

We are also looking to expand mentorship and other development opportunities for our diverse employees, including our female mentorship program to support women as they move into leadership roles.

## CELEBRATING CULTURES

Our Employee Celebration Campaign seeks to strengthen Frontier's corporate culture with a steady cadence of D&I communication that educates, inspires, and reflects our workforce while making us attractive to the talent we need to build the next generation of Frontier. Frontier's newly formed leadership team also focuses on celebrating the many diverse cultures that represent Frontier's workforce.

In 2022, Frontier will allow time off for observance of Juneteenth as a national holiday commemorating the official end of slavery in the U.S.

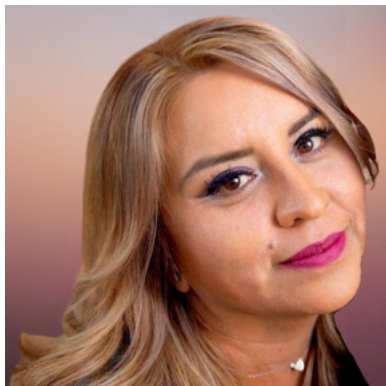
## SPOTLIGHT

### Let's Chat

In 2021, to close our Women's History Month, we launched a new series called "Let's Chat," focused on connecting women at the company virtually.



The women on the executive committee hosted 184 female teammates, mainly managers and above, for a live webcast discussion focused on the challenges and opportunities of women in leadership. A roundtable discussion followed by Q&A led to lively discussions that continued well past the session.

**SPOTLIGHT****Meet Hilda**

As part of Hispanic Heritage Month (Sept. 15–Oct. 15), we asked a few teammates to share their perspectives on their Hispanic heritage and how it has influenced their lives and their careers.

Hilda Zepeda-Figueroa,  
Director of Engineering,

helps lead the OPCEN organization, which provides support to Installation and Construction teams, including vendors, across all 25 states. Her team's role in working cross-functionally to support network deployments is instrumental to our goal to accelerate fiber to the home initiative, and ultimately to Building Gigabit America.

Hilda reflected on how a sense of belonging born of family bonds, values, and traditions, all tied to a heritage of resiliency and adaptation to life's demands, has helped her turn challenges into opportunities. That's especially true in her professional career, which took her from an internship in 2002 to her current position.

When she was 8 years old, her parents moved to the United States from Guadalajara, Mexico. She didn't speak English and knew nothing about the country that would become home. But she adapted, became the first in her family to graduate high school, then went on to obtain both undergraduate and graduate degrees.

She sees her heritage as playing a role in her path from past to present.

**Recognizing veterans**

We count more than 1,800 self-identified veterans among our employees. These employees made enormous sacrifices when they put on the uniform and served in the Army, Navy, Air Force, Marine Corps, Coast Guard or National Guard. They came home and became our reps and techs, our managers, specialists and leaders — still serving with the same sense of duty and commitment as when they were in uniform.

In 2021, in honor of our veterans, we made donations to three of the best non-profit organizations, according to the Charity Watch for Veterans: The Wounded Warrior Project, K9s for Warriors and The Gary Sinise Foundation.

To continue our support for veterans, we're also starting a military internship program and restarting a veteran-hiring program.





## **SUPPORTING DIVERSE SUPPLIERS**

We know we are at our best when we promote diversity and inclusion, not only within our organization but also across our supply chain. Working with diverse-owned businesses is one way we walk the talk on diversity, equity and inclusion while expanding our ability to deliver innovative, competitive telecommunications services to millions of Frontier customers.

We continually seek new opportunities to work with business owners who identify as women or are from the BIPOC, LGBTQ+, differently abled, or veteran communities. As part of our sourcing process, our supplier diversity program identifies and recruits qualified, diverse-owned businesses committed to delivering uncompromising quality and competitive pricing.

Frontier recently launched an online portal and supplier tracking database for easy access to certified diverse supply partners. We also established the Frontier Supplier Diversity Council and offer training sessions for our strategic sourcing teams.

The Frontier supplier base includes organizations with certifications from the following:

- National Minority Diversity Council (NMSDC)
- California Public Utility Commission (CPUC)
- Women's Business Enterprise National Council (WEBENC)
- US Small Business Administration (SBA)
- National Gay & Lesbian Chamber of Commerce (NGLCC)

[\*\*Learn more about our Supplier Diversity program\*\*](#)



# GOVERNANCE

# LEADING WITH INTEGRITY

**We consider good governance essential to driving our success and building long-term sustainable value for our stakeholders.**

A few highlights of our governance include:

- Diverse board representation
- Board oversight of material ESG issues, including human capital management and our environmental impact
- Comprehensive compliance and ethics programs
- Robust Code of Conduct and practices, including data privacy and security

## **CORPORATE GOVERNANCE**

Our strong and experienced Board and senior leadership team are laser focused on our purpose and continue to forge Frontier's path forward.

Frontier is committed to strong corporate governance, which promotes the long-term interest of stockholders, enhances management and Board accountability, and builds stakeholder trust. The Board's principal role is to promote the best interests of Frontier and its stockholders by overseeing the management of the business and the affairs of the company. The Board has four standing committees: Audit Committee; Compensation and Human Capital Committee; Nominating and Corporate Governance Committee and Operations Committee. These committees operate under written charters and are responsible (together with the full Board, as appropriate) for overseeing the management of the organization's business and operations, including impacts on the economy, environment, and people.

We are committed to maintaining a culture of integrity, honesty, and accountability in dealings with our customers, business partners, stockholders and each other.











The Board works collaboratively with senior management, meeting regularly and spending significant time engaging in discussions to understand the strategic challenges and opportunities for Frontier. The senior management team evaluates and implements broad strategic, operational and cultural changes, and our directors provide valuable insight and risk oversight that help guide management's strategic thinking and decision-making.

We continually review these governance practices, regulatory obligations, the rules and listing standards of the NASDAQ Exchange and SEC regulations, as well as best practices suggested by recognized governance authorities.

### By the numbers

- **7 of 9 directors are independent**
- **4 of 9 directors are women**
- **100% standing committees are composed exclusively of independent directors**

[Learn more about our Board](#)

Technology	Finance	Operations	Legal & Regulatory	Telcom Industry	Talent			
 <p><b>John Stratton, Chairman</b> Former EVP, President of Verizon Global Operations</p>	 <p><b>Kevin Beebe</b> Co-Founder, Astra Capital Management Former Group President of Operations, ALLTEL Corp.</p>	 <p><b>Lisa Chang</b> Chief People Officer, Coca-Cola Company</p>	 <p><b>Pamela Coe</b> Former Deputy General Counsel and Corporate Secretary of Liberty Media Corporation</p>	 <p><b>Nick Jeffery, CEO</b> Former CEO of Vodafone UK</p>	 <p><b>Stephen Pusey</b> Former Global Chief Technology Officer, Vodafone Group PLC</p>	 <p><b>Margaret "Peggy" Smyth</b> Former CFO, National Grid USA</p>	 <p><b>Maryann Turcke</b> Former Chief Operating Officer, National Football League</p>	 <p><b>Pratabkumar "Prat" Vemana</b> Chief Digital Officer, Kaiser Foundation Health Plans and Hospitals (Kaiser Permanente)</p>

## ESG AND RISK MANAGEMENT

Our Board recognizes that operating responsibly is fundamental to the long-term success of our company. The Nominating and Corporate Governance Committee has primary oversight of ESG matters. This includes reviewing and monitoring the development and implementation of the material policies and goals Frontier may establish from time to time with respect to ESG and sustainability matters.

As ESG encompasses a broad set of potential risks and opportunities, multiple committees play a role in ESG-related matters. For example, the Compensation and Human Capital Committee reviews and discusses with management risks related to human capital management, including the company's compensation policies and practices. The Operations Committee oversees cyber security related risks and business continuity planning.

As part of good governance and board effectiveness, continuing education and briefs on key topics are periodically provided to the Board. The Board works with senior management to identify appropriate key topics to be briefed on, including those related to ESG and other sustainable development initiatives.

Management is responsible for Frontier's risk management activities, including the annual enterprise risk management (ERM) process, which is jointly administered by the Chief Financial Officer and the Senior Vice President, Internal Audit. ESG risks are also included as part of the ERM process. Each member of senior management and his or her direct reports participate in an annual identification, assessment, and evaluation of enterprise-level risks. For each such risk, one or more mitigation strategies are developed and implemented to minimize or manage that risk.



## MEET OUR LEADERSHIP TEAM



**NICK  
JEFFERY**

President and Chief  
Executive Officer



**SCOTT  
BEASLEY**

EVP, Chief Financial  
Officer



**VERONICA  
BLOODWORTH**

EVP, Chief Network  
Officer



**ALAN  
GARDNER**

EVP, Chief People  
Officer



**JOHN  
HARROBIN**

EVP, Consumer



**ERIN  
KURTZ**

EVP, Chief  
Communications  
Officer



**CHARLON  
MCINTOSH**

EVP, Chief Customer  
Operations Officer



**MARK  
NIELSEN**

EVP, Chief Legal &  
Regulatory Officer



**MELISSA  
PINT**

EVP, Chief Digital  
Information Officer



**MICHAEL  
SHIPPEY**

EVP, Business &  
Wholesale

[Learn more about our leadership team](#)

[Learn more about our corporate governance practices](#)

[Learn more about our governance and Board in our proxy statement](#)



# DOING BUSINESS THE RIGHT WAY

Frontier leaders, managers and executives strive to operate our business in accordance with the highest standards of ethics and integrity. They lead by example, establishing a strong “tone at the top,” and foster a workplace where employees feel comfortable discussing concerns and reporting issues.

The three pillars of Frontier’s Compliance program are our Code of Ethics, frequent Training, and our Ethics Hotline.

## CODE OF ETHICS

The Code of Ethics is the foundational policy for ethics and integrity at Frontier. It explains in clear and easily understandable terms how employees should operate on a day-to-day basis. The Code helps readers to understand our policies, the laws and regulations that affect our operations and how to make sound business decisions in complex situations. The 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.

We expect all Frontier employees to adhere to this Code and follow applicable policies, laws, and regulations. Directors, officers, executives, managers, employees, and business partners are expected to abide by our commitment to ethical behavior, as are subsidiaries, affiliates, agents, vendors, representatives, contractors, and consultants.

[Read our Code of Ethics](#)

## By the numbers

**100%**  
of employees are  
expected to sign our  
Code of Ethics

**100%**  
of employees participate  
in ethics and compliance  
training

## **ETHICS TRAINING**

Ethics training is done annually by all employees, and completion is required for access to our network. Training modules are updated annually, and topics covered include IT security awareness, anti-harassment, and appropriate social media use.

## **REPORTING POTENTIAL ETHICS VIOLATIONS**

Employees are expected and encouraged to speak up with any questions or concerns related to possible illegal or unethical conduct, including violations of the Code of Ethics. Raising concerns promptly helps the company respond quickly, avoid escalation of an undesirable situation, prevent such behavior in the future and protect our reputation for integrity. Frontier maintains a third-party managed Ethics Hotline that permits the reporting of potential violations of our Code of Ethics or other concerns and is available 24 hours a day, 7 days a week. Employees can report anonymously via the Hotline if desired.

Hotline submissions are reviewed and investigated as appropriate, and the results of all such investigations are reported to senior management and in certain cases, the Audit Committee.

Anyone can report good faith concerns about misconduct or potential violations of law and/or participate in internal investigations without fear of retaliation.

## **ENSURING COMPETITIVE BEHAVIOR**

Frontier succeeds by competing vigorously in the marketplace. We follow all competition laws (also called antitrust laws). We aim to outperform our competitors fairly through hard work, superior service, and great products. To underscore this commitment, we expect employees to be honest, lawful, and respectful when interacting with competitors.

## **SUPPORTING HUMAN RIGHTS AND LABOR**

We are committed to human rights. As a matter of policy, Frontier provides reasonable working hours and fair wages for those who work on our behalf and respects the rights of workers to join or not join labor unions. We have a zero-tolerance policy for the use of forced labor or human trafficking practices and never knowingly do business with subcontractors, business partners and suppliers who violate these policies.

We are also committed to creating and maintaining a diverse and inclusive work environment that emphasizes treating all with dignity and respect and work to ensure equal opportunities for success in all aspects of employment. Supporting policies include Frontier's Diversity Policy, Equal Employment Opportunity Policy, Accommodations and Non-Harassment Policy, Reasonable Accommodations, Harassment in the Workplace and Safe Environment. Approximately 70% of our workforce is covered by collective bargaining agreements.

## **DATA SECURITY AND PRIVACY: ENHANCING OUR DIGITAL RESPONSIBILITY**

Expanding digital access has never been more critical. And protecting the privacy and security of data is fundamental to ensuring our customers benefit from digital access and inclusion that is foundational to Building Gigabit America. We've made and continue to make investments in our data security and privacy team and technology to evolve our systems and build customer trust.

Data privacy and security are also top of mind for our Board. The Operations Committee has primary responsibility for overseeing Frontier's risk management program relating to data privacy and security and also monitors our compliance in the areas of data and privacy protection.

Our Chief Digital Information Officer leads an annual review and discussion with the full Board dedicated to Frontier's cyber risks and threats and cyber protections and provides updates throughout the year as needed.

We have created a 24-hour monitoring system for anomalies that might negatively impact the network. We remain both proactive and vigilant in our detection of emerging threats that could impact the security of our systems or customer data privacy.

In addition to mitigating the potential impact of a data breach, our security program contributes directly to both customer retention and new customer attraction while solidifying our position as a leader in the telecommunications industry.

### **Data privacy**

Our [privacy policy](#) informs customers about how we collect, use, share and protect their information in relation to our services. It also governs the information we collect from website visitors and describes choices we provide customers regarding the use of their information.

One of the most difficult tasks for any organization is to identify where sensitive data resides within the enterprise. Frontier has invested in technology to develop that knowledge, is in the process of cataloging structured data within our databases and is continually reviewing existing controls to ensure they are adequate to protect data privacy. Any new or emerging security risks to data privacy are reviewed and escalated through leadership to ensure appropriate mitigation is developed and applied.

### **Bolstering information and network security**

As an internet-focused company, expectations of our information security practices are high. Our information security program reflects the National Institute of Standards and Technology (NIST) framework, with particular focus on protecting sensitive and restricted data, our network infrastructure and the systems that help it run. This framework was developed with input from more than 1,000 different entities, including government and academic organizations, and reflects the leading cyber security practices of the telecommunications industry. As part of continuing to improve our overall information security capabilities, we focus on addressing all areas of the NIST framework: Identify, Detect, Protect, Respond and Recover.



We provide highly automated, end-to-end security for ourselves and our partners. We currently have several programs and policies in place for:

- Penetration testing and remediation
- Aligning engineering security with other business units
- Cyber security training for all employees
- Installing web application firewalls for cloud applications
- Instituting mobile device management and bring-your-own-device safeguards
- Monitoring cloud configurations, access, and use
- Classifying and restricting access to data

### **Securing work-from-home**

Throughout 2021, many teams and customers continued to work primarily from home. This shows no signs of stopping. In fact, we launched our own hybrid work model and are focused on securing the work-from-home environment.

Efforts we have introduced include perimeter scanning against external attacks and multifactor authentication across all our remote access points. Our team is also working to add additional customer security features, especially around denial-of-service (DOS) attacks.

### **24/7 Cyber Security Operations Center (DETECT)**

Our customers rely on the security of our systems. To meet their expectations, we maintain a 24x7 Cyber Security Operations Center (CSOC) focused on threat intelligence and environment monitoring.

The CSOC consists of multiple teams providing 24x7 monitoring of Frontier's network and systems. The CSOC activities are both reactive to events such as phishing emails received by users and virus alerts as well as proactive measures using intelligence information. Their monitoring includes network anomalies, attacks on the perimeter, including exploit attempts and distributed denial-of-service (DDOS) attacks and monitoring of the next generation Endpoint Detection and Response (EDR) detection agents, which are installed on servers and workstations across the enterprise.

The team monitors intelligence from public intelligence sources, "finished" intelligence obtained from government sources and commercial intelligence resources. The CSOC uses this intelligence to proactively conduct regular "Threat Hunting" missions within the Frontier enterprise. Threat hunts consist of using "Indicators of Compromise" (IOCs) as well as reported "Tools, Techniques, and Processes" (TTPs) to search for evidence of potential footprints of attacker activity within the network.

### **Making employees allies in data protection**

We take cybersecurity very seriously. That's why we work continuously to protect our network and systems and our customer, company, and employee data. For example, we expanded firewalls and anti-virus technology on all our PCs, laptops, and servers. We deployed email security tools, such as the "Report Phish" button, and a new sophisticated CSOC gathers intelligence and monitors our environment 24x7.

With all of this in place, we realize that employees remain our best line of defense.

For example, phishing and email-based ransomware attacks are damaging, costly and increasing in frequency. They start with human error.

To help employees protect themselves and Frontier, we offer training, tips and phishing exercises that stress the importance of data privacy and raise awareness of warning signs. Our goal is to educate our employees on suspicious activities and to provide them with the knowledge to protect themselves in case of attack. With phishing and malware attacks on the rise, we are committed to keeping our employees, customers, and company data safe.



### **Cyber Awareness Month**

In 2021, we expanded phishing tests and training, beginning during Cyber Awareness Month. Our new phishing policy outlined consequences for failing phishing tests, which could include follow up or additional training. Phishing tests and training are just one way we continue to be diligent, evolve our systems and training and raise awareness of new ways to protect our business.

Frontier has taken an aggressive stance regarding cybersecurity awareness. In addition to regular cyber security training required of all employees, the training program conducts regular phishing simulations with all employees multiple times throughout the year and provides additional training when users fail the simulation. Employees receive focused training on phishing identification and how to report phishing emails. Frontier maintains a policy that provides for termination of employees who frequently fail phishing simulation tests. Frontier has two annual cyber security awareness months in March and October to further emphasize cyber security awareness.

## **100% of employees participate in cyber security awareness exercises and training**

We are also rolling out new security software for company-owned mobile devices and personal devices to protect our data. The software is restricted to Microsoft Outlook and Microsoft Teams — so work email, calendar and apps will be protected.

# DATA & REPORTING



# GLOBAL REPORTING INITIATIVE INDEX

FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
GENERAL DISCLOSURES			
1. The organization and its reporting practices			
2-1	Organizational details	<p><u><a href="#">A New Frontier</a></u></p> <p>Frontier Communications (Frontier)</p> <p>Frontier is a publicly traded American telecommunications company headquartered in Norwalk, Conn., and incorporated in the state of Delaware.</p> <p>Frontier is a provider of communications services in the United States, with approximately 3.2 million consumer customers, 2.8 million broadband customers and 15,600 employees operating in 25 states.</p>	6
2-2	Entities included in the organization's sustainability reporting	The entities included in sustainability reporting are the same as those in our financial reporting.	
2-3	Reporting period, frequency, and contact point	January 1, 2021 to December 31, 2021; Annual Erin Kurtz, Chief Communications Officer, <u><a href="mailto:Erin.Kurtz@FTR.com">Erin.Kurtz@FTR.com</a></u>	
2-4	Restatements of information	None	
2-5	External assurance	This report is not externally assured.	

FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
GENERAL DISCLOSURES			
2. Activities and workers			
2-6	Sector, activities, value chain and other business relationships	Telecommunications; Internet Service Provider <a href="#">2021 Frontier Communications 10-K Item 1. Business</a>	
2-7	Employees	<a href="#">ESG Performance Data Table</a>	61
2-8	Workers who are not employees	<a href="#">ESG Performance Data Table</a>	61
3. Governance			
2-9	Governance structure and composition	<a href="#">Leading with Integrity</a>	40-41
2-10	Nomination and selection of the highest governance body	<a href="#">2022 Frontier Communications Proxy Statement</a>	
2-11	Chair of the highest governance body	<a href="#">Leading with Integrity</a>	40-41
2-12	Role of the highest governance body in overseeing the management of impacts	<a href="#">Leading with Integrity</a>	40-41
2-13	Delegation of responsibility for managing impacts	<a href="#">Leading with Integrity</a>	40-41
2-14	Role of the highest governance body in sustainability reporting	<a href="#">Leading with Integrity</a>	40
2-15	Conflicts of interest	<a href="#">Doing Business the Right Way</a> <a href="#">Nominating and Corporate Governance Committee Charter</a> <a href="#">Corporate Governance Guidelines</a> <a href="#">Supplemental Provisions of Code of Business Conduct and Ethics</a>	44-45
2-16	Communication of critical concerns	<a href="#">Leading with Integrity</a>	44-45
2-17	Collective knowledge of the highest governance body	<a href="#">Leading with Integrity</a>	40-42

FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
GENERAL DISCLOSURES			
2-18	Evaluation of the performance of the highest governance body	The annual Board evaluation process is designed and overseen by the Nominating and Corporate Governance Committee and the Executive Chairman. The evaluations are designed to elicit candid input and discussion and to generate actionable enhancements to Board and Committee functions.	
2-19	Remuneration policies	<a href="#">2022 Frontier Communications Proxy Statement</a>	
2-20	Process to determine remuneration	<a href="#">2022 Frontier Communications Proxy Statement</a>	
2-21	Annual total compensation ratio	For 2021, the ratio of our annual total CEO compensation to the median annual total compensation of all our employees (other than our CEO, Nicholas S. Jeffery) as described below, commonly referred to as the “CEO” was 261 to 1. We determined that the 2021 median annual total compensation of all our employees who were employed as of December 31, 2021, other than our CEO, was \$80,800. As permitted by the applicable SEC rules, we aggregated the applicable summary compensation table compensation for our former CEO and current CEO. Our disclosed pay ratio is calculated in a manner consistent with S-K item 402(u).	
4. Strategy, policies, and practices			
2-22	Statement on sustainable development strategy	<a href="#">A Letter From Our CEO</a>	4
2-23	Policy commitments	<a href="#">Leading with Integrity</a> <a href="#">Corporate Governance Guidelines</a> <a href="#">Environmental Health and Safety Manual</a>	43-46
2-24	Embedding policy commitments	<a href="#">Leading with Integrity</a>	44-46
2-25	Processes to remediate negative impacts	<a href="#">Environment</a> <a href="#">Leading with Integrity</a>	17-23 44-46
2-26	Mechanisms for seeking advice and raising concerns	<a href="#">Building a Great Place to Work</a> <a href="#">Leading with Integrity</a>	27-28 45



FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
GENERAL DISCLOSURES			
2-27	Compliance with laws and regulations	<u>Leading with Integrity</u> Frontier closely monitors compliance with laws and regulations and takes affirmative steps to maintain compliance to the fullest extent possible. Frontier does not believe there were any significant instances of non-compliance with laws or regulations in 2021 or that any fines had a material financial impact.	44
2-28	Membership associations	Association memberships include USTelecom; Fiber Broadband Association; Global Women's Innovation Network; Telecommunications Association of the Southeast; Iowa Communications Association; RLEC Industry Association; New Mexico Exchange Carriers Group; Nevada Telecommunications Association; Ohio Telecommunications Association; Pennsylvania Telephone Association and Wisconsin State Telecommunications Association	
5. Stakeholder engagement			
2-29	Approach to stakeholder engagement	Frontier engages with all stakeholders through different channels and with varying frequency. Regular channels for engaging with stakeholder groups include surveys, written communication, and interviews.	15
2-30	Collective bargaining agreements	Approximately 70% of Frontier's workforce is covered by collective bargaining agreements.	45
MATERIAL TOPICS			
3-1	Process to determine material topics	<u>Our ESG Priorities</u>	15
3-2	List of material topics	<u>Our ESG Priorities</u>	15
Energy and Greenhouse Gas (GHG) Emissions			
3-3	Management of material topics	<u>Environment</u>	12, 15, 17-23
302-4	Reduction in energy consumption	<u>Environment</u> We plan to begin reporting our energy consumption next year.	17-20
302-5	Reduction in energy requirements of products and services	<u>Environment</u> We plan to begin reporting our energy consumption next year.	17-21

FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
MATERIAL TOPICS			
305-5	Reduction in GHG emissions	<a href="#">Environment</a> We plan to begin reporting our GHG emissions next year.	17, 19-23
Diversity, Equity, and Inclusion			
3-3	Management of material topics	<a href="#">Valuing Diversity &amp; Inclusion</a>	15, 35-38
405-1	Diversity of governance bodies and employees	<a href="#">Diversity Performance Data Table</a>	61
Talent Management			
3-3	Management of material topics	<a href="#">Building a Great Place to Work</a>	15, 25-27, 29
401-1	New employee hires and employee turnover	<a href="#">Workforce Performance Data Table</a>	61
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">Building a Great Place to Work</a>	26
401-3	Parental leave	<a href="#">Building a Great Place to Work</a>	26
404-1	Average hours of training per year per employee	<a href="#">Workforce Performance Data Table</a>	61
404-2	Programs for upgrading employee skills and transition assistance programs	<a href="#">Building a Great Place to Work</a>	25, 29
404-3	Percentage of employees receiving regular performance and career development reviews	<a href="#">Workforce Performance Data Table</a>	61

FRONTIER GRI INDEX			
GRI Standard / Other Source		Location or Comment	Page
MATERIAL TOPICS			
Employee Health & Safety			
3-3	Management of material topics	<a href="#">Focusing on Worker Safety</a>	51, 31-34
403-1	Occupational health and safety management systems	<a href="#">Focusing on Worker Safety</a>	31-32
403-3	Occupational health services	<a href="#">Focusing on Worker Safety</a>	31-34
403-5	Worker training on occupational health and safety	<a href="#">Focusing on Worker Safety</a>	33
403-6	Promotion of worker health	<a href="#">Building a Great Place to Work</a> <a href="#">Focusing on Worker Safety</a>	26 32-34
403-7	Prevention and mitigation of occupational health and safety impacts linked by business relationships	<a href="#">Focusing on Worker Safety</a>	31-34
Data Security and Privacy			
3-3	Management of material topics	<a href="#">Doing Business the Right Way</a>	15, 46-48
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<a href="#">Doing Business the Right Way</a>  If any breaches were detected that were material, they would be disclosed in our most recent 10-K.	46-48



# SUSTAINABILITY ACCOUNTING STANDARDS BOARD INDEX

SASB SUSTAINABILITY ACCOUNTING STANDARDS 2018*				
SASB Code	Accounting or Activity Metric	Location	Page(s)	Comments
TELECOMMUNICATION SERVICES				
Environmental Footprint of Operations				
TC-TL-130a.1	(1) Total energy consumed (2) Percentage grid electricity (3) Percentage renewable			We plan to begin reporting our energy consumption next year.
Data Privacy				
TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	<u>Leading with Integrity</u>	46	<p>Frontier updates customer data pertaining to our footprint on a monthly basis. That data include basic demographic information for prospect (non-customer) households as well as customers. Frontier also receives behavioral data that provide more socio-economic information as well as the attitudes and usage of media and telecommunications products.</p> <p>Frontier also uses audiences within advertising platforms such as Google and Facebook to be able to provide differentiated, creative messaging and offers, though those audiences are not typically driven by Frontier's first party data.</p>

\* Frontier's 2021 ESG Report applies the 2018 version of the SASB Standards; "2018" refers to the Standards issue date, not the date of information presented in this report.

SASB SUSTAINABILITY ACCOUNTING STANDARDS 2018*				
SASB Code	Accounting or Activity Metric	Location	Page(s)	Comments
TELECOMMUNICATION SERVICES				
Data Privacy				
TC-TL-220a.2	Number of customers whose information is used for secondary purposes			Frontier utilizes anonymized customer data, no personally identifiable information (PII), in several ways. These anonymized video viewership data are sold to partners to be used for viewership planning tools and attribution studies. Anonymized IP data are also internally and externally used for retargeting for digital advertising. For our household addressable video advertising, we use anonymized customer IDs to identify specific target segments by a third party (e.g., Experian and Liveramp), and through our advertising management system, we input that segment file and display a specific commercial in the target segment household when the STB is on and tuned to a specific network. For our geographic zone video advertising, we use ZIP codes of video customers to build specific geographic zones for local ad insertion, running the same commercial over the entire geographic target.
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy			Frontier had zero monetary losses associated with customer privacy proceedings in 2021.
TC-TL-220a.4	(1) Number of law enforcement requests for customer information (2) Number of customers whose information was requested (3) Percentage resulting in disclosure			In 2021, Frontier received 3,612 requests from law enforcement for information associated with 9,134 accounts. Frontier provided the requested information for all accounts for which we had data.

\* Frontier's 2021 ESG Report applies the 2018 version of the SASB Standards; "2018" refers to the Standards issue date, not the date of information presented in this report.

SASB SUSTAINABILITY ACCOUNTING STANDARDS 2018*				
SASB Code	Accounting or Activity Metric	Location	Page(s)	Comments
TELECOMMUNICATION SERVICES				
Data Security				
TC-TL-230a.1	(1) Number of data breaches (2) Percentage involving personally identifiable information (PII) (3) Number of customers affected			Frontier has not experienced any data breaches over the past 12 months related to PII.
TC-TL-230a.2	Description of the approach to identifying and addressing data security risks, including the use of third-party cybersecurity standards	<b>Leading with Integrity</b>	46-48	Frontier maintains a risk and compliance unit within the cyber security program that reviews and approves data security risks. This process includes reviews of exception request to our security policy and reviews and approvals of privilege access requests. Additional risk assessments are performed on new projects. Frontier aligns with the NIST cyber security framework and uses a questionnaire drawn from the framework to highlight potential risks with new vendors and SOW/MSA contracts where customer data may be exposed or received for processing by the prospective vendor.

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SASB SUSTAINABILITY ACCOUNTING STANDARDS 2018*				
SASB Code	Accounting or Activity Metric	Location	Page(s)	Comments
TELECOMMUNICATION SERVICES				
Product End-of-life Management				
TC-TL-440a.1	(1) Materials recovered through take back programs; percentage of recovered materials that were (2) Reused (3) Recycled (4) Landfilled			We plan to begin reporting our product end-of-life programs next year.
Competitive Behavior & Open Internet				
TC-TL-520a.1	Total monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	<u>Leading with Integrity</u>	45	Frontier closely monitors the potential anti-competitive behavior of its competitors and takes affirmative legal or regulatory action to challenge or mitigate the impact of such activity on its business. Frontier does not believe anti-competitive behavior had a material financial impact on the company in 2021.
TC-TL-520a.2	Average actual sustained download speed of: (1) owned and commercially associated content (2) non-associated content			Frontier participates in the Federal Communications Commission (FCC) Measuring Broadband America Fixed Broadband Report and has speed test results published in the report. The report can be found on the <a href="#">FCC website</a> .
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices			The largest risks pertaining to the listed practices are those resulting from changes in the political administration and the FCC. Changes in either organization can create regulatory uncertainty, which can potentially result in policymakers considering more aggressive regulatory requirements related to Internet service, net neutrality and related policies.

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SASB SUSTAINABILITY ACCOUNTING STANDARDS 2018*				
SASB Code	Accounting or Activity Metric	Location	Page(s)	Comments
TELECOMMUNICATION SERVICES				
Managing Systemic Risks from Technology Disruptions				
TC-TL-550a.1	(1) System average interruption frequency (2) Customer average interruption duration			Frontier tracks customer outage hours, which in 2021 averaged approximately 2.9M per month. Frequency data may not seem to be relevant given the hundreds of thousands of network elements, some of which may only service a small number of customers.
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	<u>Environ- ment</u>	18	Frontier operates in thousands of locations with power originating from generators, batteries, and utility connections. We have installed power redundancy features at all sites that serve more than 10,000 customers as well as a large number of those below the 10,000-customer threshold. We have dozens if not hundreds of projects each year focused on adding or enhancing our network diversity and resiliency. Through these programs, we are constantly evaluating our network to be both performance and cost optimized.
Telecommunication Services Activity Metrics				
TC-TL-000.A	Number of wireless subscribers			Frontier does not have wireless subscribers.
TC-TL-000.B	Number of wireline subscribers			As of Dec. 31, 2021, via Spotfire Activity and Units Report: 3,028,630
TC-TL-000.C	Number of broadband subscribers			As of December 31, 2021, via Spotfire Activity and Units Report: Copper Broadband: 1,387,764, Fiber Broadband: 1,437,136, Fixed Wireless Broadband: 2,981 and Wi-Fi Hotspot: 46,991 for a total of 2,874,872
TC-TL-000.D	Network traffic			Frontier does not manage network traffic as a metric of total cumulative traffic. Because we are not a mobile wireless operator, we are not managing spectrum availability and consumption. Instead, our fixed network is measured for peak usage rate. The total peak usage rate of the Frontier network is approximately 11 Terabits per second, growing at >25% CAGR.

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# FRONTIER PERFORMANCE DATA

ECONOMIC PERFORMANCE <sup>1</sup>	
	2021
FINANCIAL PERFORMANCE (IN MILLIONS, USD)	
Revenue	
Total revenue	\$6,411
Net income	
Operating income (loss)	\$1,113
Net income (loss) <sup>2</sup>	\$4,955
Operating expenses	
<b>Total operating expenses</b>	<b>\$5,298</b>
Cost of Service	\$2,362
Selling, general, and administrative	\$1,668
Depreciation and amortization	\$1,240
Restructuring costs and other changes	\$28

<sup>1</sup>For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup>For 2021, data represents a combination of the Predecessor and Successor companies.

WORKFORCE PERFORMANCE	
WORKFORCE BREAKDOWN <sup>1</sup>	
	2021
Total Employment	
Employee Count <sup>2</sup>	15,864
WORKFORCE BREAKDOWN BY GENDER <sup>1</sup>	
Employment level	
<b>Management<sup>3</sup></b>	<b>4,895</b>
Male	3,016
Female	1,879
<b>Non-management<sup>4</sup></b>	<b>10,969</b>
Male	8,776
Female	2,193
EMPLOYEE TURNOVER RATE <sup>1</sup>	
<b>Employee Turnover Rate</b>	<b>10%</b>
NEW EMPLOYEE HIRES <sup>1</sup>	
<b>Total new hires (absolute)<sup>2</sup></b>	<b>984</b>

<sup>1</sup>For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup>Data represents all Frontier full-time employees (FTEs)

<sup>3</sup>Data applies to people leaders

<sup>4</sup>Data applies to non-people leaders

DIVERSITY PERFORMANCE	
	2021
<b>COMPOSITION OF WORKFORCE<sup>1</sup></b>	
<b>Gender breakdown of workforce (%)</b>	
<b>Total Workforce<sup>2</sup></b>	
Male	74.3%
Female	25.7%
<b>Racial/ethnic breakdown of workforce (%)</b>	
<b>Total Workforce</b>	
Ethnically or racially diverse <sup>3</sup>	28.6%
Non-diverse <sup>4</sup>	71.4%
<b>Gender breakdown of management (%)<sup>4</sup></b>	
<b>Total % of workforce in management positions</b>	
Percent of managers, male	61.6%
Percent of managers, female	38.4%
<b>Racial/ethnic breakdown of management (%)</b>	
<b>Total % of workforce in management positions</b>	
Percent of managers, ethnically or racially diverse <sup>3</sup>	28.4%
Percent of managers, non-diverse <sup>5</sup>	71.6%

<sup>1</sup>For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup>Data represents all Frontier full-time employees (FTEs)

<sup>3</sup>Data is based on the hired individuals' self-identification. Includes individuals who identified as American Indian/Alaska Native, Asian, Black/African, Hispanic/Latino, Native Hawaiian/ Other Pacific Islander, & Two or more races.

<sup>4</sup>Data applied to people leaders.

<sup>5</sup>Data is based on the hired individuals' self-identification. Includes individuals who identified as Caucasian.

TRAINING AND DEVELOPMENT PERFORMANCE	
	2021
<b>TRAINING<sup>1</sup></b>	
<b>Employee category</b>	
Average hours of training per year for management <sup>2</sup>	7.15
Average hours of training per year for non-management <sup>3</sup>	13.80
<b>DEVELOPMENT<sup>1</sup></b>	
Percentage of employees receiving regular performance and career development reviews <sup>4</sup>	N/A

<sup>1</sup>For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup>Data applies to people leaders

<sup>3</sup>Data applies to non-people leaders

<sup>4</sup>Career development reviews are not currently tracked. Union workforce reviews are dictated by CBA. No Performance Reviews in 2021 due to bankruptcy.



FRONTIER