



Frontera Consulting Equal Opportunity Employer Policy

Within this document "the Company" refers to Frontera Consulting LLC, Frontera Consulting Ltd. And Frontera Consulting HK Limited. All provisions of this policy are subject to the law in your country and apply to the extent permitted by that law.

POLICY STATEMENT

Frontera Consulting's equal opportunity employer policy reflects our commitment to ensure equality and promote diversity in our workforce. We value diversity in our workforce, as well as our customers, suppliers and others.

Frontera provides equal opportunity for all applicants and employees and we do not discriminate on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, veteran or military status, disability or any other characteristic protected by applicable law.

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Frontera and its employees, including: recruitment, employment, promotion, transfer, training, working conditions, wages and salary administration, employee benefits and application of policies.

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working with us who are employed by temporary agencies and any other persons or firms doing business for or with Frontera Consulting.

Harassment is a form of unlawful discrimination and violates Frontera's policy. Prohibited sexual harassment, for example, is defined as unwelcome sexual advances, request for sexual favors and other verbal or physical conduct of a sexual nature when: 1) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment. 2) Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment also includes unwelcome conduct that is based on race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. Harassment becomes unlawful where: 1) Enduring the offensive conduct becomes a condition of continued employment, or 2) The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

We encourage employees to report all incidents of harassment to a member of management or HR. Frontera investigates all complaints of harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop the harassment and prevent it from recurring.

No hardship, loss of benefits, nor penalty may be imposed on an employee as punishment for filing a good faith complaint of discrimination or responding to a complaint of discrimination, appearing as a witness in the investigation of a complaint, service as an investigator or otherwise cooperating in a workplace investigation. Retaliation or attempted retaliation is a violation of this Policy and anyone who engages in retaliatory behavior may be subject to discipline as set forth below.

If you have a concern that you may have violated this policy, or you have a good faith suspicion that another Frontera employee is in violation of this policy, you should report this to your manager, leader, or another trusted manager, HR or Frontera partner, who shall refer the



report for investigation and resolution. Any employee who fails to comply with this policy may be subject to discipline, up to and including termination.