



ALUTIIQ, LLC

CODE OF ETHICS AND BUSINESS CONDUCT

Alutiiq aims to set the standard of ethical business conduct. We will achieve this through the traditional Alutiiq values of:

<i>Harmony</i>	<i>Trust</i>
<i>Efficiency</i>	<i>Communication</i>
<i>Appreciation and Respect</i>	<i>Heritage and Culture</i>

Alutiiq's Code of Conduct is available on the Alutiiq website (www.alutiiq.com), from Human Resources, or from your corporate supervisor. The Code outlines written policies in the following areas:

Personal Conduct

Fair Employment Practices

Workplace Harassment

Conflicts of Interest

Drug & Alcohol Free Workplace

Property of the Company

Confidentiality

US Government Contracting

Time Charging & Recording Costs

Expense Reports

Gratuities

Anti-Kickback Act

Procurement Integrity

Export Control Restrictions

Contract Compliance

Government Investigations

Proposal Preparation

Byrd Amendment

Industrial Security

Combating Trafficking in Persons

General Principles

Upholding our Worldwide Integrity

Environment

Financial Records

Antitrust

Health & Safety

Political Contributions & Activities

Records Management

Alutiiq has established a variety of Ethics and Compliance Resources so you can:

- **Review** the Code of Ethics and Business Conduct. It is available on the Alutiiq, LLC website at www.alutiiq.com
- **Talk** with your supervisor.
- **Call** the Employee Ethics and Compliance Hotline at 1-800-829-8547. Calls may be made anonymously.
- **Call** Jessica Graham, Chief Compliance Officer, or Pamela Keeler, Risk Manager at (907) 222-9500.
- **Contact** your local Human Resources representative.
- **E-mail** Ethics@alutiiq.com or Compliance@alutiiq.com
- **Write** the Chief Compliance Officer, 3909 Arctic Blvd. Suite 400, Anchorage, Alaska 99503