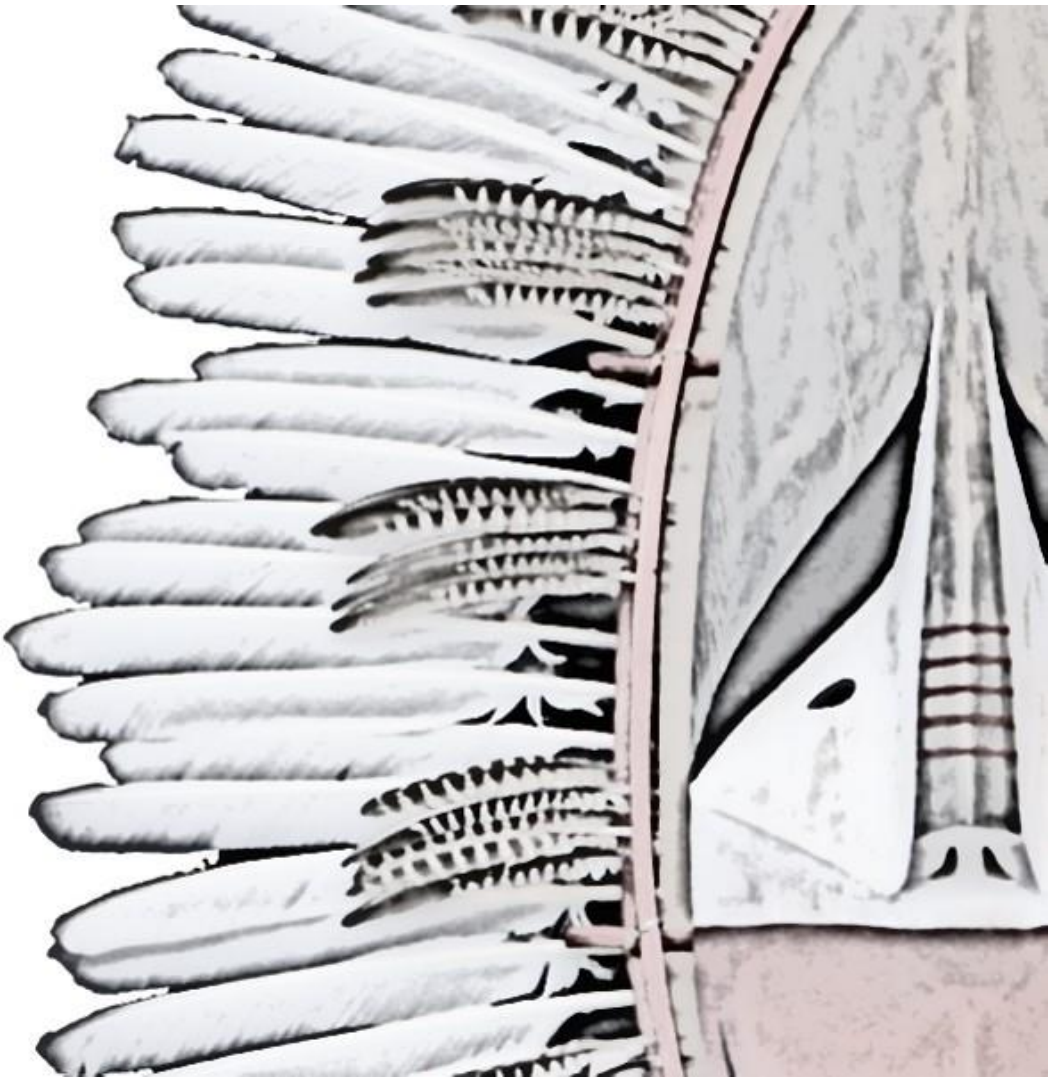
Afognak
Native Corporation



AFOGNAK
CODE OF ETHICS
AND BUSINESS CONDUCT

Last Revised May 21, 2021

DISCLAIMER

The Afognak Code of Ethics and Business Conduct (the "Code") has been adopted by Afognak Native Corporation (the "Company" or "Afognak"). The Code applies to all employees of Afognak, its direct and indirect subsidiaries at any level, and any joint ventures or other business enterprises of those companies. For each of those companies or entities, the terms "Afognak Native Corporation," "Company," and "employer" also refer to them, and the terms "employee" and "employees" refer to their employees.

MESSAGE FROM THE BOARD CHAIR AND THE PRESIDENT/ CEO

Dear colleague:

We are pleased to present the Afognak Code of Ethics and Business Conduct. Afognak's Board of Directors and President/CEO work diligently to set the tone of ethical compliance from the top for the Company and its employees. We ask for your support and participation in this endeavor. It has our strongest commitment.

As an Alaska Native Corporation that desires to remain true to the values and traditions of the Alutiiq people, and as one of the premier government contractors, we have unique responsibilities that set us apart from other businesses. The Code summarizes the virtues and principles that guide the actions of the Company and its employees. We encourage our agents, consultants, contractors, subcontractors, representatives, suppliers, and other business partners to be guided by it as well.

You are expected to read and be familiar with the Code, which is revised annually to ensure it addresses the ethical issues we face and meets industry standards. We strive to apply common sense and judgment in the manner in which we conduct ourselves in our daily work, and we urge you to do the same.

If you have any questions or concerns about the topics addressed in the Code, please use the contact information on pages 38 and 39. All concerns are treated confidentially to the greatest extent possible, and you may make inquiries and report your concerns anonymously and without fear of retaliation.

Thank you for your hard work and dedication.

Kristy Clement
Board Chair

Greg Hambright
President/CEO

COMPANY PURPOSE, VISION, AND BUSINESS MISSION

PURPOSE

Afognak Native Corporation exists so that its shareholders (the "Shareholders") have a perpetual source of land use and shared financial and cultural wealth.

VISION

To be the best Native organization in Alaska for our Shareholders, supporting the traditions and preserving the Alutiiq culture through careful and progressive land stewardship, development and management of financial assets.

BUSINESS MISSION

The Company is dedicated to delivering cost-effective, quality services and solutions to our customers. Placing our customers' interests first, we strive for trusting, long-term relationships that are mutually beneficial.

We are committed to attracting and retaining a world-class workforce that is guided by our traditional Alutiiq values, which are:

- Harmony
- Appreciation & Respect
- Efficiency
- Communication
- Trust
- Elder Knowledge
- Heritage & Culture
- Commitment to Community

We are dedicated to providing them with the tools and resources needed to exceed our customers' expectations. We create a team atmosphere where innovative solutions are encouraged.

Execution of this mission will ensure the long-term success of the Company and, in turn, ensure that the Alutiiq people of Afognak will thrive in perpetuity.

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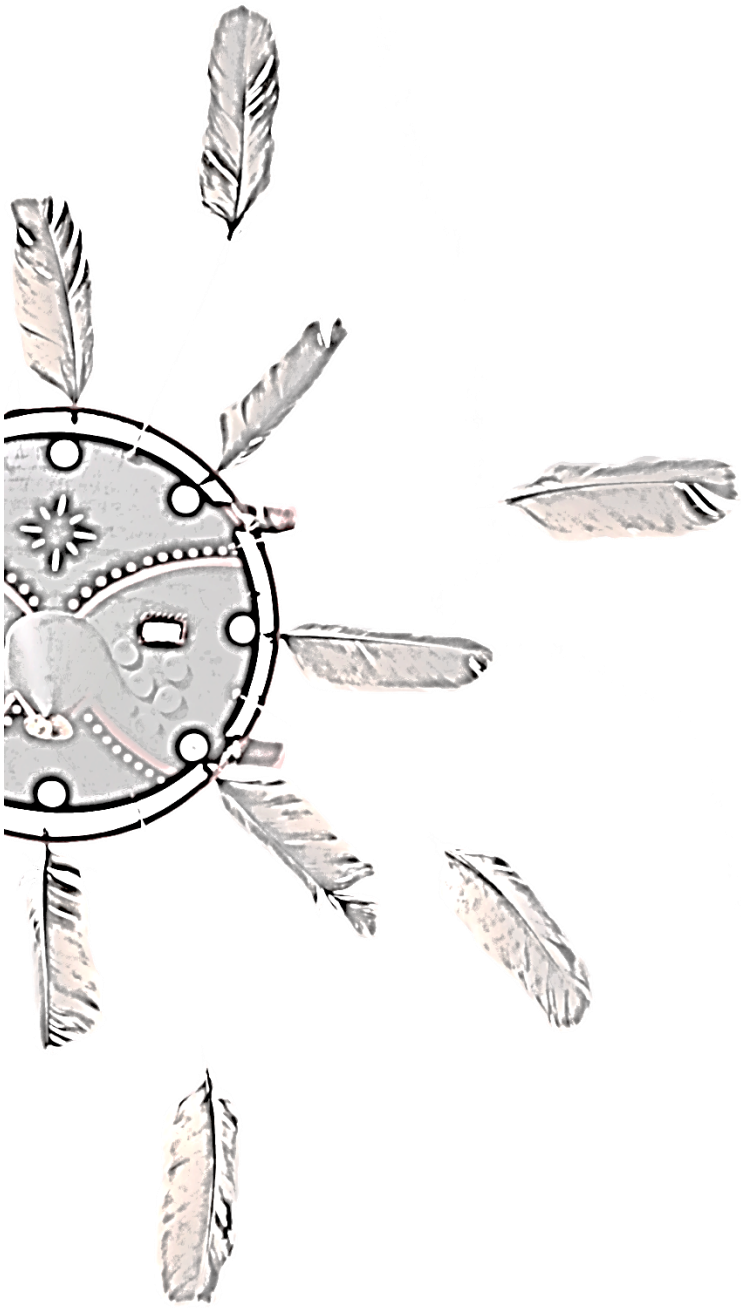


GENERAL PRINCIPLES

GENERAL PRINCIPLES

A / PERSONAL CONDUCT

The Company expects its employees to follow rules of conduct that protect the interests and safety of all employees and the Company. The following are examples of unacceptable workplace behavior, which may result in disciplinary action. In some cases, specific Company policies provide additional or superseding information.

- Theft, inappropriate removal, or unauthorized use of Company property
- Falsification of documents (e.g., employment application, timesheets, work product, corporate records)
- False statements made during the employment application process or during the individual's employment with the Company
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating a vehicle or equipment
- Fighting or threatening violence in the workplace
- Negligence or improper conduct that leads to damage of property
- Failure to comply with or disregard for a lawful management directive
- Violation of safety or health rules
- Smoking in prohibited areas
- Sexual harassment or other harassment or discrimination
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Unsatisfactory attendance including absenteeism, tardiness and early departures
- Unsatisfactory performance or conduct
- Unauthorized presence in a Company facility at any time
- Violation of Company policies

Employment with the Company is at-will at the mutual consent of the Company and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice, unless otherwise provided for in a written employment contract signed by the Company as authorized by the President/CEO or the VP Human Resources, or in a collective bargaining agreement, or applicable law.

B / FAIR EMPLOYMENT & WORKPLACE PRACTICES

The Company is committed to the fair treatment of its employees. An individual's qualifications, skills, achievements, and the Company's employment preference for qualified Shareholders are the only factors upon which decisions concerning hiring, promotion, and other employment-related decisions may be based. These decisions must be made without regard to any characteristic protected by applicable federal, state or local laws ("protected status"). Protected status is defined in the Company's Employee Handbook. The Company is also committed to a hiring preference for its Shareholders, a preference explicitly permitted under federal law.

It is also Company policy to provide all employees with a work environment free of harassment. The Company prohibits and will not tolerate harassment in any form, including actions, words, jokes, pranks, signs, intimidation, physical contact, violence, or comments based on any protected status. Sexual harassment, which is defined in the Employee Handbook, is a form of employee misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited.

YOUR RESPONSIBILITIES

- Do not discriminate on the basis of any protected status, and do not make or tolerate jokes, comments, or remarks based on any protected status.
- Never engage in or tolerate harassment in any form, and foster a work environment in which such conduct is not tolerated.
- Notify your supervisor, Human Resources, the Legal Department, the Chief Compliance Officer, or the Employee Hotline if you are subject to or if you see or suspect any illegal discrimination or harassing behavior. The Company will not allow retaliation against individuals who raise concerns in good faith.
- Honor and support the Company's employment preference for qualified Shareholders.

C / CONFLICTS OF INTEREST

A conflict of interest exists when the personal financial interests (for example, outside employment or financial investments) or personal activities of an employee or an employee's family member compete with, influence, or appear to influence, that employee's judgment or ability to act in the Company's best interests. In other words, when these separate interests commingle, it appears the employee has shared loyalties. These personal interests and activities can include, for example:

- An outside business ownership interest;
- Outside employment such as a second job or self-employment; and
- An outside business position (other than charitable, educational or religious) such as a board or advisory position.

Employees are prohibited from taking any actions that would create a conflict of interest, and they should avoid even the appearance of a conflict. You must notify your supervisor of any actual or potential conflict before acting so your supervisor can determine whether you can continue involvement in that matter on the Company's behalf. If you face an actual conflict of interest, supervisors are advised to work with the Legal Department to determine how best to resolve the conflict.

As an employee, you cannot:

- Hold a position with, or a financial interest in, an entity that competes with the Company without the prior written approval of: (i) your supervisor; (ii) your subsidiary President or department head; (iii) the Alutiiq, LLC Chief Operating Officer in the case of employees of Alutiiq or Alutiiq's subsidiaries, and the Afognak Commercial Group, LLC ("ACG") Chief Operating Officer in the case of employees of ACG or ACG's subsidiaries; and (iv) Afognak's CEO/President. This restriction includes situations in which your spouse or domestic partner is employed by or holds an ownership interest in a competitor of the Company, and in no event may you or your spouse or domestic partner hold a 5% or greater ownership interest in a business that competes with the Company. For purposes of this section, "competitor" refers to an Alaska Native Corporation ("ANC") that is engaged in federal contracting (regardless of the industries in which the ANC is engaged), a non-ANC entity that is engaged in federal contracting in one or more of the industries in which a Company subsidiary is engaged, or any individual or entity engaged in commercial security guard work, the provision of bid and proposal consulting services, the provision of contracts and procurement consulting services, the man camp leasing industry, or the alcoholic beverage industry.
- Work simultaneously as a Company employee and as a vendor or subcontractor of the Company without the Afognak President/CEO's prior written approval. This restriction includes situations in which your spouse, domestic partner, or minor child is the owner or employee of the vendor or subcontractor.
- Engage in business on behalf of the Company with any of your family members without the prior written approval of your supervisor and the Legal Department.
- Engage in any outside work (including volunteer work) that would be performed during work hours, that would involve the use of the Company's name or resources, or that would involve the use of the Company's employees during those employees' Company work hours, without the prior written approval of your supervisor and the Legal Department.

C / CONFLICTS OF INTEREST (CONTINUED)

- Engage in any outside employment or hold a 5% or greater ownership interest in an outside business without notifying your supervisor.
- Hold any position with a business that interferes with your Company duties and responsibilities.
- Receive income or material gain from anyone outside the Company for materials produced or services rendered while performing Company duties and responsibilities.

Employees must not accept payment, gifts, entertainment, or other favors that could be regarded as placing themselves under some obligation to an existing or potential subcontractor, supplier, vendor, consultant, customer, or other person or entity dealing with or desiring to deal with the Company. Please consult the Company's Gifts Policy for specific guidance regarding the giving and accepting of gifts.

Employees must not solicit or coerce anything of value in exchange for Company business, and Employees must at all times act consistently with the Company's policies concerning gifts, bribery, and anti-corruption laws and regulations.

An employee's primary work obligation is to the Company. Outside activities, such as a second job, self-employment, or other outside business position, must be kept completely separate from employment with the Company. Equally important, any activities or personal financial interests that could adversely affect the independence or objectivity of an employee's judgment or ability to act in the Company's best interests must be avoided.

The Company is required to disclose certain conflicts of interest to the government that arise during the performance of government contracts, and the failure to make such disclosures can result in significant consequences for the Company.

YOUR RESPONSIBILITIES

- Understand and comply with the Company's conflicts of interest policies, which are described above and in the Company's Personal Conflicts of Interest Policy.
- Maintain impartiality and high standards of conduct.
- Promptly report any actual or potential conflict of interest or suspected violation of Company policy to your supervisor, the Chief Compliance Officer, Human Resources, the Legal Department or the Employee Hotline.
- Directors, Officers, senior managers and other designated employees have additional disclosure responsibilities.
- There are also additional disclosure requirements for employees who work on contracts in which they're asked to perform acquisition functions closely associated with inherently governmental functions for, or on behalf of, a federal agency or department. If any of these responsibilities apply to you, seek guidance from your subsidiary President or relevant department head, or contact the Legal Department.

D / PROPERTY OF THE COMPANY

Employees must protect Company property from theft, damage and misuse. This duty extends not only to tangible property, such as supplies, equipment (whether owned or leased), physical materials, and real property, but also to intangible property, such as technologies, computer programs, business plans, trade secrets, and other confidential or proprietary information. Employees must also safeguard property of the Company's customers and suppliers, including government-furnished equipment in our possession. For purposes of this section, "Company property" includes third-party and government property.

Generally, Company property may be used only for Company business. Employees can't borrow, give-away, loan, sell, or otherwise dispose of Company property – regardless of its condition – without prior authorization. Any unauthorized use of Company funds or property could be considered theft or embezzlement.

Managers responsible for protecting and maintaining Company property must work with the VP Risk Management to ensure appropriate insurance coverage is in place. Acquisitions of property that exceed $10,000 in value must be reported to the VP Risk Management as soon as practicable to facilitate any mid-year insurance coverage increases to cover new acquisitions.

YOUR RESPONSIBILITIES

- Exercise appropriate care, custody, and control of Company property.
- Do not use Company property for personal use. Personal use includes use for the benefit of family members or other organizations or businesses in which you may be active.
- Do not duplicate Company software for personal use.
- Keep confidential and proprietary information stored in its proper environment when not being used.
- Familiarize yourself with the Company's policies regarding Company property.
- Report any theft, damage, loss or misuse of Company property to your supervisor, the Chief Compliance Officer, Human Resources, the Legal Department, or the Employee Hotline.

E / CONFIDENTIALITY

Employees must safeguard the Company's proprietary and confidential information. Never discuss or disclose such information with people outside of the Company or with persons within the Company who are not required to have the information to perform their work. This obligation continues after the termination of your employment with the Company, and it extends to the protection of such information of our customers, business partners, subcontractors, suppliers, and others with whom we do business.

Proprietary and confidential information includes all information, whether written, oral, electronic, website-based, or other form, or whether received visually, which is (1) owned by, originated by or otherwise peculiarly within the Company's knowledge, and (2) currently protected by the Company against unrestricted disclosure to others. It includes, but is not limited to, trade secrets, tax and financial information, product and roadmap information, marketing plans, financial/pricing information, customer and vendor-related data, services/support, business and contractual relationships, business forecasts, other business information, staffing information, cost and pricing information, strategies, products, processes, methods, ideas, concepts, discoveries, designs, drawings, plans, notes, works of authorship, specifications, techniques, practices, models, samples, diagrams, source code and other code, software, programs, know-how, technical data, research and development, charts, readings, logs interpretations, extractions, mapping and integrations, production data, test data, log data, images, plots and formulae, inventions, and patent disclosures.

The Company's confidentiality agreements are not intended to limit or prohibit an individual's ability to (1) report fraud, waste, abuse or safety concerns to third parties, including government officials, (2) cooperate fully in a government audit, review or investigation, or (3) make any disclosure protected by law or regulation. Also, under the federal Defend Trade Secrets Act of 2016, an individual shall not be held criminally or civilly liable under any trade secret law for the disclosure of a trade secret that: (a) is made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made to the individual's attorney in relation to a lawsuit for retaliation against the individual for reporting a suspected violation of law; or (c) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Every subsidiary of Afognak Native Corporation and Alutiiq, LLC, as well as every department, is responsible for identifying and implementing appropriate security measures to protect confidential and proprietary information within their areas. If you have access to confidential information, you may be required to sign a separate confidentiality agreement. More information is available in the Employee Handbook.

E / CONFIDENTIALITY (CONTINUED)

YOUR RESPONSIBILITIES

- Be alert to and take precautions to prevent the inadvertent disclosure of confidential and proprietary information that can occur in social conversations, in business relations with business partners or customers, and in non-work locations.
- Do not accept the confidential or proprietary information of other persons or entities except pursuant to a written confidentiality or non-disclosure agreement.
- If you are approached with any offer of confidential or proprietary information that you have reason to believe may have been obtained improperly, immediately discuss the matter with your supervisor or the Legal Department.
- Familiarize yourself with the Company's policies regarding confidentiality.

F / ANTITRUST

Federal antitrust laws protect consumers from illegal competitive actions such as price fixing and division of markets. The Company requires compliance with state and federal antitrust laws, which prohibit employees from entering into any agreement or understanding (even oral or informal) with a competitor regarding prices, territories, limitations on products or services, market share, or any action that would affect, limit, or restrict competition.

Unlawful agreements do not require a written and executed document. If competitors make a conscious commitment to a common course of anticompetitive action, they could be in violation of antitrust laws.

We are free, acting independently, to price our products and services as we choose, but in doing so we may not maintain or expand our market share through illegal or restrictive practices.

YOUR RESPONSIBILITIES

- Never agree with competitors to fix prices or divide markets, and exercise care in communicating with representatives of competitors to avoid the appearance of wrongdoing.
- Never attend meetings or social gatherings with competitors where prices, costs, sales, profits, market shares, or other competitive subjects are discussed. If you are present at a trade association meeting or other gathering and competitive matters enter into the discussion, stop the discussion or leave the meeting or gathering.
- Unless approved by the Legal Department:
    - Do not enter into any written or oral understanding with a customer that could restrict the customer's discretion to use or resell one of the Company's products and/or condition the sale of a product or service on the customer's purchase of another product or service from the Company.
    - Do not enter into any written or oral understanding with a competitor that restricts either party's discretion to manufacture any products or provide any service, or that limits selling to, or buying from, a third party.
- Contact your supervisor or the Chief Compliance Officer before taking any actions that could cast doubt on the Company's compliance with antitrust laws.
- Report any activities by associates or competitors that appear to violate antitrust laws to your supervisor, the Chief Compliance Officer, Human Resources, the Legal Department, or the Employee Hotline.

G / ENVIRONMENT

The Alutiiq culture is strongly identified with and tied to the land. Therefore, we have a corporate culture that is focused on preserving and protecting the land, its resources, and the environment.

We are committed to conducting our business operations in a way that avoids or minimizes any adverse impact on the environment. We are also dedicated to complying with environmental laws and regulations, including providing truthful and accurate information to government permitting authorities.

H / FINANCIAL RECORDS

Various laws and policies require the Company to record, preserve, and report financial information to its government customers and other government agencies. Employees must record financial information accurately, completely, and timely in accordance with Generally Accepted Accounting Principles and Company policies and procedures. The laws prohibit entries that intentionally conceal or disguise the true nature of any Company transaction. Financial information must be kept confidential and released only with proper authorization.

YOUR RESPONSIBILITIES

- Do not make any inaccurate, false, or misleading entry in Company books or records. Doing so could result in criminal conviction, jail time, and the assessment of significant penalties against the employee and the Company.
- Do not make or approve payments without adequate supporting documentation or where any part of the payment is to be used for a purpose other than that described in the supporting documentation.
- If you participate in the preparation of the Company's financial reports, know and follow Company policies and procedures.
- Immediately report any inaccurate, false, or misleading record to your supervisor, the Chief Financial Officer, the Chief Compliance Officer, the Legal Department, or the Employee Hotline.

GENERAL PRINCIPLES

I / UPHOLDING OUR INTEGRITY WORLDWIDE

As we have extended our business operations into other countries, we are challenged to hold true to the Alutiiq cultural values while also respecting the practices of other cultures. We are prohibited from participating in dishonest business practices, even if they are commonplace or accepted in certain cultures abroad. We cannot offer or accept any bribe, kickback, or dishonest gift of any kind to or from a foreign civil, religious, government or military official. Employees and Company representatives must comply with the Foreign Corrupt Practices Act ("FCPA").

The FCPA prohibits payments, or offers of payment, of anything of value to foreign officials, political parties or candidates for foreign political office in order to secure any advantage for the Company including obtaining, keeping, or directing business. Indirect payments made through an intermediary are also illegal. For example, no employee may give anything of value to a foreign official directly or indirectly:

- To prevent governmental action, such as the imposition of a large tax or fine, or the cancellation of an existing government contract or contractual obligation.
- To obtain a license or other authorization from a government (such as the right to import goods and equipment) where issuance involves the foreign official's or his/her government's discretion.
- To obtain confidential or proprietary information about business opportunities, bids, or competitors' activities.
- To obtain the right to open an office, secure a zoning ruling or influence the award of a government contract.
- To obtain relief from government controls.
- To resolve a governmental dispute (e.g., resolution of tax deficiencies or a dispute over duties payable).
- To resolve commercial litigation in foreign courts.
- To influence the rate of taxes or other regulations that affect the Company's business.
- To affect the nature of foreign regulation or the application of regulatory provisions.
- To secure any improper advantage.

While the Company does not fall under the accounting provisions of the FCPA, maintenance of proper books and records and internal controls are important to ensuring compliance with the FCPA. And remember, there is no Company indemnification for fines imposed on employees under the FCPA.

I / UPHOLDING OUR INTEGRITY WORLDWIDE (CONTINUED)

YOUR RESPONSIBILITIES

- Do not sign or submit, or permit others to sign or submit, on behalf of the Company, any document or statement that you know or have reason to believe is false or misleading.
- Conduct due diligence on the Company's agents, intermediaries and third parties to determine whether they are engaged in any, or have a history of engaging in any, activities that could violate the FCPA or that could cause the Company to be in violation of the FCPA.
- Do not use Company assets for any unlawful or improper purpose, and do not create or maintain a secret or unrecorded fund or asset for any purpose.
- Do not make any false or misleading entries in Company books and records, or make any payment on behalf of the Company that lacks adequate supporting documentation, or record any transaction in an untimely or inaccurate manner.
- Comply with the Company's FCPA policy, and report suspected violations of the FCPA or the Company's financial and accounting policies to your supervisor, the Chief Financial Officer, the Legal Department, or the Employee Hotline.

J / HEALTH AND SAFETY

Providing and maintaining a safe and healthy work environment is a primary concern of the Company. Each of us is responsible for knowing and complying with all health and safety regulations and policies that apply to our jobs, including the Occupational Safety and Health Act ("OSHA"). Following these requirements helps ensure not only your safety, but the safety of your colleagues and other persons.

Managers are responsible for safety on their job site. Supervisors, Program Managers, Presidents and other Company executives must know, understand, and demand compliance with the safety laws and regulations that apply to their areas of responsibility. Managers must respond immediately to a report or notification of work hazards and/or any perceived deficiency in employee training, experience or knowledge in the safe operation of equipment or in the safe performance of assigned work activities, or if an injury, accident, or incident occurs on their job site.

YOUR RESPONSIBILITIES

- Review and comply with the Company's health and safety and OSHA compliance policies and procedures.
- Always take appropriate safety precautions, including wearing personal protective equipment ("PPE") when required by the task, using safety equipment properly, and using seatbelts while driving or riding in Company vehicles.
- Never compromise safety rules or procedures to increase productivity or output.
- Never instruct another employee to disregard safety procedures.
- Suggest ways to improve Company health and safety procedures.
- Notify your supervisor of any hazardous conditions or another employee's failure to use safety equipment or follow safety procedures.
- Report any injuries, accidents, incidents, near misses, or property damage immediately.
- Cooperate in the event of a workplace inspection.
- Be cognizant of workplace violence concerns and report any reasonable suspicions. If you face an immediate threat, call the Police.
- For safety-related questions, email the Risk Management Team at safety@alutiiq.com.

K / RECORDS MANAGEMENT

Records management is utilized by the Company to systematically direct and control the classification, maintenance, retention, retrieval, protection, and preservation of Company records from creation to final disposition. Records are defined in the Company's records management policies and include hand-written or printed documents, recorded spoken words, videos, email, and electronic data or information. Department managers and subsidiary Presidents are responsible for managing all onsite and archived records within their department and subsidiary. The management of records starts when the record is created and continues until its retention is no longer legally required, at which time it can be destroyed in accordance with the Company's records management policies.

When dealing with Company records, it is important not to remove records from the operational facility. If records in your possession have been placed on "litigation hold" or "legal hold" due to outstanding legal or financial issues, you must not destroy, remove or alter those records.

YOUR RESPONSIBILITIES

- Do not remove records from the operational facility.
- Comply with litigation holds and legal holds. All pertinent records must be retained and not altered, deleted, concealed or destroyed.
- Understand how to manage all records in your control and follow your manager's requirements regarding records management.
- Report any questions or concerns to your supervisor, the Records and Information Management Program, or the Legal Department.

L / POLITICAL CONTRIBUTIONS AND ACTIVITIES

PERSONAL POLITICAL CONTRIBUTIONS AND ACTIVITIES

You are encouraged, as individuals, to engage in political activities, such as voting in federal, state, and local elections, and to make personal contributions in support of candidates or parties of your choice. You are also encouraged to express your views on government, legislation, and other matters of local and national interest. These activities and contributions must be undertaken on your own time and at your own expense. No employee may use any Company property or facilities, or the Company time of any employees, for any personal political contributions or activities. The Company will not direct an employee to support a specific political party or view, and an employee will not be compensated or reimbursed for personal political contributions or be given or denied employment or a promotion because of making, or failing to make, a political contribution.

CORPORATE POLITICAL ACTIVITY

Federal, state and local laws govern the conduct of individuals who communicate with legislative or regulatory officials on behalf of the Company with the intent to persuade them to support the interests of the Company. Although those communications (often called "lobbying") are permitted, lobbyists may be subject to registration, reporting, and financial disclosure requirements. Employees must consult the Legal Department prior to engaging in any lobbying activity.

Federal and state laws also strictly regulate corporate political activity such as lobbying, endorsing political candidates, and corporate political contributions. The Company's business interests warrant closely scrutinizing our corporate political activity to ensure it remains consistent with our Alutiiq values, our business objectives and the law. As such, Company positions on political issues, including endorsing political candidates and making any legally permissible political contributions, are determined only by the Afognak Native Corporation – Alutiiq Political Action Committee as authorized by the Afognak Native Corporation Board of Directors and the Afognak Native Corporation President/CEO.

PERSONAL RELATIONSHIPS WITH LEGISLATIVE AND EXECUTIVE BRANCH OFFICERS, EMPLOYEES, AND ELECTED OFFICIALS

The Company recognizes our employees may have long-established personal relationships with legislative and executive branch officers, employees, elected officials, or their immediate family members. If you have such a personal relationship, you must vet your situation with the Legal Department. It isn't enough that you document reciprocity in your relationship to deter any potential questions of inappropriate behavior. To err on the side of caution, assume any gifts exchanged in such relationships require approval.

YOUR RESPONSIBILITIES

- Obey legal restrictions on corporate participation in politics, make clear the political views you express are your own, and do not utilize Company time or resources for political purposes.
- Do not provide a gift to any legislative or executive branch officer, employee, or elected official without the prior approval of the Legal Department.

M / CHARITABLE CONTRIBUTIONS AND ACTIVITIES

PERSONAL CHARITABLE CONTRIBUTIONS AND ACTIVITIES

You are encouraged, as individuals, to engage in charitable activities and to make personal donations in support of charitable organizations of your choice. These activities and contributions must be undertaken on your own time and at your own expense. No employee may use any Company property or facilities, or the Company time of any employees, for any personal charitable contributions or activities. The Company will not direct an employee to support a specific charitable organization, and an employee will not be compensated or reimbursed for any personal charitable activity or contribution or be given or denied employment or a promotion because of making, or failing to make, such a contribution or engaging, or failing to engage, in such an activity.

CORPORATE CHARITABLE ACTIVITIES AND CONTRIBUTIONS

The Company's decision to engage in charitable activities and make charitable contributions must remain consistent with our Alutiiq values, our business objectives, and the law. Therefore, Company decisions to engage in such activities and make such contributions on the Company's behalf are determined only by the Afognak President/CEO and must be consistent with the budget set by the Afognak Board and with corporate policy. The Afognak President/CEO has delegated authority to make such decisions to the following individuals, each of whom must consult with and obtain the approval of the Afognak President/CEO prior to engaging in charitable activities or making a charitable contribution on the Company's behalf: the Afognak EVP, the Afognak Commercial Group COO, the Alutiiq COO, the Afognak, CLO, the Afognak CFO, the Afognak SVP IT, and the Afognak SVP Community Investments. No other employees are permitted to make charitable contributions on the Company's behalf.

N / GIFTS

We are committed to conducting business with integrity and ensuring our relationships with suppliers and customers are honorable and reputable. Therefore, the following rules must be used in accepting and bestowing gifts and gratuities. Employees must avoid situations in which the giving or accepting of a business courtesy could harm the Company's reputation. These policies apply equally to the Company's agents and representatives, and they also apply when a gift is given or received by an employee's family member or friend with the intent or appearance that it is done so on the employee's behalf.

GIFTS TO AND FROM NON-GOVERNMENT PERSONNEL

The exchange of gifts and gratuities with commercial, non-government clients and suppliers can result in conflicts between your duty of loyalty to the Company and your personal interests. A "gift" includes any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item of monetary value. It includes services and gifts of training, transportation, travel, lodging and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement. Employees may provide or accept gifts of reasonable value to or from non-government persons in support of Company activities, provided:

- The practice does not violate any law, regulation or the standards of conduct of the Company or the non-government person's organization. It is your responsibility to inquire about prohibitions or limitations of the Company and the concerned organization before offering or accepting any gift;
- The employee is not involved either directly or indirectly in making procurement decisions on behalf of the Company (Note: If you are involved in any way in making procurement decisions on behalf of the Company, you cannot give or accept any gift from a current or potential subcontractor or vendor, regardless of the gift's value. In those situations, you must refuse the gift and advise the gift giver of the Company's policy prohibiting such acceptance.); and
- The gift must be consistent with marketplace practices, not lavish or extravagant in value or number, infrequent, and not offered in exchange for favorable consideration or treatment. It is difficult to define "lavish or extravagant" by means of a specific dollar amount, but employees should use common sense and good judgment. A gift should not be given if it would create the appearance of impropriety.

It is not the Company's desire to appear unfriendly or unsociable, but employees must avoid any action that could cast doubt on their integrity or motivation. Public disclosure of the facts surrounding the giving and acceptance of gifts should not embarrass the Company or those giving or receiving the gifts.

GIFTS TO GOVERNMENT PERSONNEL

Government personnel are governed by laws and regulations that severely restrict the acceptance of anything of value from businesses and persons with whom the government does business or over whom the government has regulatory authority. A gratuity is a reward for a current or former public official's future act or past act. Failure to abide by the strict laws and regulations governing gifts and gratuities may result in legal and financial consequences for the Company and the employee. Therefore, Company policy prohibits employees from offering, giving, or promising to give anything of value to U.S. government personnel without the prior written approval of the Chief Compliance Officer.

If you have questions, contact your supervisor, the CCO, or Legal before acting, and review the "Upholding Our Integrity Worldwide" section of the Code and the Company's Gifts Policy.

U.S GOVERNMENT CONTRACTING

U.S GOVERNMENT CONTRACTING

A / CONTRACT COMPLIANCE

When an Alutiiq, LLC subsidiary or joint venture wins a government contract, we must comply with the contract's requirements. Deviations may be prohibited unless approved in accordance with government procedures, and unauthorized deviations from contract terms and conditions could amount to criminal acts. An example is failing to deliver materials paid for under the contract or providing goods that:

- Are made from lower-quality materials than required;
- Have not been tested and approved as required; or
- Contain foreign-made materials when the contract requires domestic materials.

Another example is performing labor services on a contract that contains specific education and/or experience criteria for personnel with individuals who do not meet those requirements.

Some of the Company's contracts are awarded through participation in the Small Business Administration's programs for small and disadvantaged businesses. These contracts have specific requirements that limit the extent to which the Company (as the prime contractor) may utilize subcontractors for work under the contract. Compliance with these limitations on subcontracting requirements and other applicable laws and regulations is required.

YOUR RESPONSIBILITIES

- Familiarize yourself with and adhere to all contract terms and requirements. The relevant subsidiary President can provide access to a certain contract upon request, and your Project or Program Manager, as well as your subsidiary President, can answer any questions about what a contract requires.
- Never substitute material or change testing and quality control requirements unless you follow authorized government procedures.
- Never certify inaccurate test results or certify that a test has been performed if it hasn't been.
- Ensure all personnel performing labor services under the contract meet or exceed any education and/or experience requirements stated in the contract for performance of those duties.
- Monitor and comply with the contract's limitations on subcontracting requirements.
- Report any known or suspected unauthorized contract deviations to your supervisor, your subsidiary President, your contract administrator, the Sr. Dir. of Contracts & Procurement, the Chief Compliance Officer, the Legal Department or the Employee Hotline.

B / EXPENSE REPORTS

Employees seeking repayment for business-related expenses must fill out an expense report. Expenses must be reported accurately and completely, and the reports must include only expenditures that are proper and incurred in performing Company business.

With rare exception, your labor hours and your business-related expenses must be charged to the same project. As an example, if you incur expenses in order to visit project site XYZ, your time charges for that period must reflect that your labor was performed for project XYZ.

Falsely reporting expenses could lead to termination of employment, criminal penalties, and debarment from government contracting.

YOUR RESPONSIBILITIES

- Prepare your expense report accurately and completely, and submit it by the deadline. Note that the IRS requires all expenses as part of an Accountable Plan to be reported within 30 days of the incurred expense.
- Only include expenditures that are proper and incurred in performing Company business.
- Separate and identify those costs that are specifically unallowable for government contracts. If you have any questions about whether a cost is unallowable, contact the Finance Department.
- If you have any questions about expense reports, consult the Company's policy on expense reports or talk to your supervisor.

C / BYRD AMENDENT

From time to time, the Company may engage in proper activities that influence, or are intended to influence, the award of a government contract. The Byrd Amendment prohibits the Company from charging the costs associated with such activities to a government contract. Activities that "influence the award" of a government contract cover a broad range, including most discussions with government personnel about a procurement.

However, there are some exceptions to this prohibition. These "permitted" activities (which include most routine marketing and contract administration functions) are allowable under government contracts.

This law is complex, and it is important for employees who deal with government officials concerning solicitations or other marketing or lobbying activities to be familiar with, and comply with, the regulations. If this applies to you, work with the VP of Finance and the Legal Department to ensure compliance.

D / ANTI-KICKBACK ACT

The Anti-Kickback Act prohibits subcontractors and potential subcontractors under Federal contracts from offering or giving kickbacks to prime contractors or their employees or to higher-tiered subcontractors or their employees. The Act also prohibits the acceptance of kickbacks by prime contractors or subcontractors or their employees. The Act imposes criminal penalties for individuals who knowingly and willfully violate its provisions, as well as the recovery of civil penalties by the United States, and other administrative action.

A "kickback" is money, a fee, commission, credit, a gift or gratuity, a thing of value, or compensation of any kind that is either directly or indirectly provided to any prime contractor, prime contractor employee, subcontractor, or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or a subcontract that relates to a prime contract.

Favorable treatment does not have to be something you think of as dishonest, and, under different circumstances, it might be considered an innocent act. Favorable treatment could include activities such as:

- Awarding a subcontract or purchase order;
- Reducing contract requirements;
- Putting a supplier on the bidder's list; and
- Paying an invoice earlier than the Company would normally pay it.

When favorable treatment is bought, it is unlawful. The Act prohibits an employee from:

- Providing, attempting to provide, or offering to provide any kickback;
- Soliciting, accepting, or attempting to accept a kickback; and
- Including, either directly or indirectly, the amount of any kickback in the contract price charged by a subcontractor to a prime contractor or a higher-tier subcontractor or in the contract price charged by a prime contractor to the United States.

YOUR RESPONSIBILITIES

- Familiarize yourself with and comply with the Company's Anti-Kickback Policy.
- Immediately report any suspected violations of the law or policy to your supervisor, the Chief Compliance Officer, or the Legal Department.

E / PROCUREMENT INTEGRITY

Procurement integrity rules encourage contractors to compete fairly for governments contracts and prohibit unethical conduct. The laws prohibit government contractors from:

- Offering or discussing employment or business opportunities with government procurement officials;
- Offering, giving, or promising to give money, gratuities, or anything of value to such officials;
- Asking or obtaining from a government employee any proprietary information or source selection information related to an ongoing government procurement; and
- Disclosing proprietary or source selection information to anyone who is not on the government's list of approved persons.

Proprietary information is information owned by a company that the company tries to protect from disclosure, marks as proprietary, and believes would cause business injury if it became known to its competitors. Source selection information is information the government has developed to use in conducting a particular procurement, the release of which could jeopardize the competitive integrity of the procurement. Examples include bid prices submitted in proposals, source selection plans, technical evaluations, and competitive range determinations.

YOUR RESPONSIBILITIES

- Do not offer, give, or promise to give gifts, money or anything of value to a procurement official.
- Do not ask for a contractor's proprietary information or source selection information that is related to a procurement or solicitation.
- If for any reason you come across source selection or proprietary information related to an ongoing procurement, do not look at it or allow unauthorized access to it. Report it to your supervisor, your contract administrator, the Chief Compliance Officer or the Legal Department.

F / PROPOSAL PREPARATION

The Truthful Cost or Pricing Data statute, formerly known as the Truth in Negotiations Act ("TINA"), and other laws require that Company employees who prepare contract proposals, negotiate contracts with the U.S. government, or provide information for those who do must make sure all statements and communications are truthful, clear, complete, and presented in an easy-to-understand manner.

The Company must disclose cost and pricing data – an extensive body of information – in order to negotiate price. Cost and pricing data includes all facts prudent buyers and sellers would reasonably expect to affect price negotiations. It includes factual information and data such as:

- Subcontracted items;
- Direct labor hours and dollars;
- Indirect expenses;
- Information on management decisions that could have a significant bearing on costs;
- Vendor quotations; and
- Historical data upon which estimates are based.

YOUR RESPONSIBILITIES

- Ensure cost and pricing data are current, accurate, and complete.
- Correct any information provided to the government that is not current, accurate and complete.
- Immediately submit updated information if it is received before the parties reach price agreement.
- Talk to your supervisor, Program Manager, or subsidiary President if you have any questions about the scope of disclosures or the accuracy of any information you are providing.

G / TIME-CHARGING AND RECORDING COSTS

Contracts with the U.S. government require that direct costs be charged in a manner that most closely assigns them to the benefiting contract or job order. Costs that are not directly associated with a contract or job order must be charged to the appropriate G&A, overhead, or other non-direct charge code.

Intentionally mischarging time and costs can be a criminal offense. Examples of mischarging include:

- Charging labor to one contract when it is actually spent on another;
- Not properly recording unallowable costs;
- Charging overhead expenses to a direct charge account;
- Charging costs to a government contract when the contract provisions do not permit it;
- Inaccurately recording time as "on the clock" when you are not actually working; and
- Charging time or material to an improper cost code with the intention of correcting it later.

We charge our customers for the work we do based on the information supplied by the time-charging and cost-recording systems, so that information must be correct. Our customers scrutinize this information because, if it is wrong, they are charged incorrectly. The improper charging of costs to a government contract may result in serious criminal and civil penalties to both the Company and the employees involved.

YOUR RESPONSIBILITIES

- Always charge time and material to the proper cost codes. Time that isn't identified with a specific contract must be charged to overhead.
- Timely complete and submit your timesheet in accordance with Company policies.
- Never make charge decisions based on the status of the project budget.
- Never charge time or material to an improper cost code with the intention of correcting it later. Report it right the first time. Check with your supervisor if you're in doubt about a charge. Management is responsible for ensuring labor and material charges used by employees under their supervision represent the appropriate charge.
- Contact your supervisor, the Legal Department, Human Resources, or the Employee Hotline if you are asked to record time you didn't work or to record time to a contract on which you didn't work.

H / GOVERNMENT INVESTIGATIONS

The Company is committed to full cooperation with any government agencies responsible for investigation or corrective actions, and it expects its employees to share this commitment. Employees must be truthful and accurate in all statements made and information given to regulatory and law enforcement officials. The Company is committed to compliance with all disclosure requirements concerning possible violations of criminal law, the civil False Claims Act, or knowledge of any significant overpayments.

Employees may be approached at home or at work by government officials investigating the Company, its operations, and/or its business practices. If this happens to you, you can insist that any interview take place at your office or other location away from your home. Also, no government official can require a person to give information without the opportunity to consult with the Legal Department or with the employee's personal legal counsel.

The decision whether to cooperate with government officials and answer their questions regarding the Company, its operations, and/or business practices is a personal one for the employee, as is the decision whether to seek legal counsel. However, the Legal Department must be informed of such contacts in all instances – either directly or through the employee's supervisor – and Legal should be advised prior to supplying information about the Company to the authorities. Do not discuss or release any Company documents without the Legal Department's approval. When notifying the Legal Department, report the name(s) of the officials and their government agency, along with the information they are requesting and, if given, the nature of the investigation. However, the Legal Department should be notified even if those facts are not known or, in the excitement of the moment, have been forgotten.

The government also conducts routine audits. The terms and conditions of our government contracts permit the government to review certain Company documents and records related to those contracts. Should a government contract be audited, cooperate with the government representatives in a timely and efficient manner and seek Company approval prior to releasing any records or data to the government.

This policy does not apply to any investigation conducted by the National Labor Relations Board, and it is not intended to affect or impede any rights under relevant laws concerning whistleblower protections.

U.S GOVERNMENT CONTRACTING

I / INDUSTRIAL SECURITY

As a defense contractor cleared under the National Industrial Security Program, we must abide by regulations aimed to protect national security information. We have executed a security agreement with the U.S. government to safeguard classified information in our possession. Failure to comply with this agreement could jeopardize our facility clearances and, in turn, our ability to perform on classified contracts with our government customers.

The safeguarding of classified information, as well as protecting unclassified sensitive information, requires dedication on the part of every employee and is a key element of an effective security program. Allowing improper access to, or unauthorized disclosure of, classified information, as well as sensitive unclassified information, whether intentionally or through carelessness, is punishable under federal criminal law. This can be damaging to the individual, the Company, and our nation's security.

YOUR RESPONSIBILITIES

- Know and comply with all Company and customer security requirements. Contact your supervisor or the Company's Facility Security Officer ("FSO") for the applicable security requirements for your contract or location.
- Never share classified information with anyone (including a co-worker) who does not have the required personnel security clearance ("PCL") and a need-to-know. Heed all security markings and distribution limitations.
- After accessing classified information, ensure it is locked in an approved storage place. And do not take classified information home.
- Never disclose classified information via the Employee Hotline. If your concern about a possible violation of the Code, Employee Handbook, or Company policy involves classified information, report your concern to Industrial Security or a manager or HR representative who maintains the appropriate clearance, or otherwise rephrase your concerns via the Hotline in such a way that does not require the disclosure of classified information.
- Immediately report the unauthorized release, loss, or destruction of classified information to your supervisor or your FSO.
- Be alert for suspicious activity that could suggest a security breach. An example is an unauthorized individual inquiring about controlled information. In that situation, obtain as much information as possible about the individual (e.g., name, phone number, physical description) and immediately contact your FSO.
- Do not advertise or market that the Company is in possession of a facility clearance.
- Immediately report adverse information regarding an employee to your FSO.

J / ENDING TRAFFICKING IN PERSONS

The U.S. government has a zero-tolerance policy against human trafficking and trafficking-related activities. This prohibition applies to all severe forms of trafficking in persons, commercial sex acts, and the use of forced labor. "Severe forms of trafficking in persons" is defined in the Trafficking Victims Protection Act of 2000, as amended ("TVPA"), to include:

- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery; and
- Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.

The Company is committed to compliance with all anti-trafficking laws and regulations including the TVPA; the Child Soldier Prevention Act of 2008, as amended; E.O. 13627 (Strengthening Protections Against Trafficking in Persons in Federal Contracts); FAR 52.222-50 (Ending Trafficking in Persons); DFARS: Further Implementation of Trafficking in Persons Policy (48 C.F.R. Parts 203, 204, 212, 222, and 252); and other applicable law. It is Company policy that trafficking in persons will not be facilitated in any way by or through Company activities, its employees, agents, or subcontractors.

In accordance with FAR 52.222-50(c), employees, subcontractors and agents are prohibited from:

- Engaging in severe forms of trafficking in persons during the period of performance of a federal contract;
- Procuring commercial sex acts during the period of performance of a federal contract;
- Using forced labor in the performance of a federal contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if the Company, subcontractor or agent provided or arranged it), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;

J / ENDING TRAFFICKING IN PERSONS (CONTINUED)

- Failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a federal contract or subcontract (for portions of contracts performed outside the U.S.);
- Providing or arranging housing that fails to meet the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document must be in a language the employee understands. If the employee must relocate to perform the work, the work document must be provided to the employee at least five days prior to the employee relocating and must include the contents specified in FAR 52.222-50(b)(9).

Violation of these prohibitions or other applicable law could result in disciplinary action, including but not limited to removal from the contract, reduction in benefits, or termination of employment. In the case of violations by a subcontractor, the Company may take all actions available under the subcontract including termination of the subcontract.

The Company's Ending Trafficking in Persons Compliance Plan sets forth the steps the Company has taken and will continue to take in order to maintain compliance with the anti-trafficking rules.

Employees must report suspected violations of the anti-trafficking rules immediately. There is never a penalty for using any of the available reporting resources in good faith, and the Company will not tolerate retaliation against anyone for such reporting or for cooperating with an internal or governmental investigation of such report. Employees may use the resources listed at the end of this Code, or they may contact the following:

- The Global Human Trafficking Hotline via phone at 1-844-888-FREE or via email at help@befree.org.
- U.S. Department of Defense Inspector General Hotline via phone at 1-800-424-9098 (toll free), 703-604-8799 (commercial), 664-8799 (DSN), or their website at http://www.dodig.mil/hotline/.

Additional information regarding the U.S. government's anti-trafficking program and policies can be found at www.state.gov/j/tip and http://ctip.defense.gov. Contact the Legal Department for questions about the Company's anti-trafficking policy.

K / EXPORT CONTROL RESTRICTIONS

The Company and all employees must comply with the export control restrictions established by the U.S. State Department, the U.S. Department of Commerce's Bureau of Industry and Security, and other authorities.

Restrictions on exports were established to prevent sensitive goods, information, technology and software from being used contrary to U.S. foreign policy and national security goals. "Export" for purposes of these control restrictions is broadly defined as any method of conveying data to foreign individuals or companies, including sales, training and consulting, product promotion and casual conversation, even if these activities occur in the United States. Exports can easily occur in the course of doing business when export-controlled products or services are involved and employees are not aware of export controls.

Examples of exports that could arise in Company operations include:

- Conversations with a foreign-owned company regarding entering into a subcontract with them to perform work on military installations;
- Presenting a paper containing technical data at an industry-wide conference where foreign nationals are present;
- Sending defense parts to U.S. military installations abroad as part of a task to complete work on the installations; and
- Emailing export-controlled information unencrypted via the internet.

Exporting requires a license or must be exempted, so contact the Legal Department prior to the possible export of information, goods, products or services to foreign countries or foreign individuals to determine whether a license or exemption must be obtained. The license process can take a significant amount of time, so contact the Legal Department as soon as possible.

YOUR RESPONSIBILITIES

- Read and comply with the Company's Export Compliance Manual.
- If appropriate to your position, complete U.S. International Traffic in Arms Regulations ("ITAR") training.
- Know your customer and your product, and know who your audience is when sharing export-controlled information.
- Report any suspected export violations to the Legal Department or the Company's Empowered Export Official.

L / REVOLVING DOOR RULES

The Company may be approached by current and former employees of the U.S. government's executive branch who are seeking employment with the Company. The Company is committed to complying with the so-called "Revolving Door Rules," which are a collection of criminal and civil laws and regulations that apply to those employees during and after their federal employment. The rules essentially prohibit those employees from "switching sides," meaning if the individual was involved in an Alutiiq, LLC subsidiary contract or other matter while he/she worked for the federal government, he/she may be prohibited from being involved in that contract or other matter as a Company employee.

An individual who worked as a Program Manager, Deputy Program Manager, Project Manager, Contracting Officer, Senior Acquisition Specialist, Procurement Analyst, Source Selection Authority or member of a source selection evaluation board or a financial or technical evaluation team during his/her government service is especially likely to face a conflict under the Revolving Door Rules. The same is true for an individual who awarded a contract, subcontract, modification, or task or delivery order valued in excess of $10,000,000 to the Company or who established overhead or other rates or approved payments or paid or settled claims regarding those contracts.

These restrictions apply throughout the individual's employment with the Company, so consider these restrictions in both internal and external hiring and placement decisions. Enlisted personnel have some exemptions from these restrictions, and other exceptions to these rules could also apply.

YOUR RESPONSIBILITIES

- If you think you or another current employee or an applicant for Company employment could be facing a conflict under the Revolving Door Rules, talk to your supervisor, Human Resources, the Legal Department, or the Chief Compliance Officer.
- When hiring, ask the applicant for his/her "ethics letter" from his/her former federal employer. This letter will describe how the Revolving Door Rules apply to that individual's specific situation.

M / CYBERSECURITY

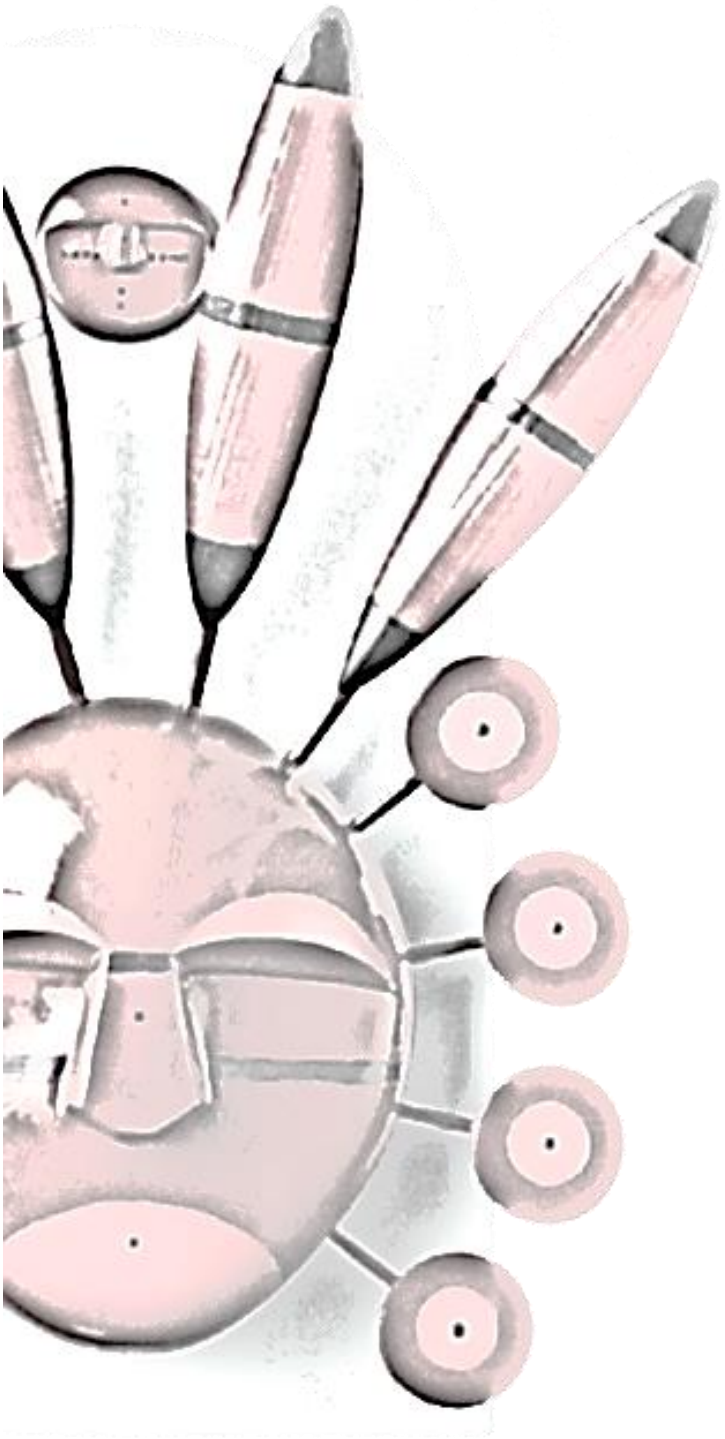
Information is vitally important to the Company's business operations and long-term viability. The Company must ensure its information assets are protected in a manner that is cost-effective and reduces the risk of unauthorized information disclosure, modification, or destruction, whether accidental or intentional. The Company's Information Security Program takes a risk management approach to Information Security that requires the identification, assessment, and appropriate mitigation of vulnerabilities and threats that can adversely impact Company information assets.

Keeping Company and personal information safe is a shared responsibility between all of us. The vast majority of current threats to our data target people. The bad actors try to get you to reveal information or launch a malicious file for them by clicking on a link or going to an infected website. As government contractors, we need to be especially aware of threats to the information we have regarding the contracts we support. Not only the government's data, but anything we create in the process of bidding or performing work on contracts, is a target.

New regulations have expanded the required protections we have in place, and we must also ensure subcontractors meet those standards.

YOUR RESPONSIBILITIES

- Never disclose your network password information via email or on non-company webpages. Hackers are motivated by stealing money or sensitive data.
- Use passphrases to increase complexity and decrease storing them on post-it notes. Encryption is available for email and storage devices.
- Use only company-approved software.
- Security-aware coworkers are our first line of defense against targeted attacks. Be aware of cyber threats and know how to report them.
- Be aware of your surroundings when discussing business and use caution in posting information on social media.
- Immediately report suspicious emails to abuse@alutiiq.com, and report other cybersecurity concerns to the IT Security Team at ITSecurity@alutiiq.com.



CONTACT INFORMATION

CONTACT INFORMATION

SPEAK UP. WE'RE LISTENING.

Throughout this Code, you've been encouraged to reach out if you have any questions and to speak up if you suspect a violation of the Code, the Employee Handbook, Company policy, or the law. These corporate resources and more can be found on the My Policies page of My.Alutiiq. Familiarize yourself with these policies and when you have a question, ask your supervisor. It is his/her responsibility to find the answer and get back to you. If you do not feel comfortable talking with your supervisor, you may contact your local HR manager or any of the resources listed below. The Company is committed to providing a workplace conducive to open discussion of its business practices. When you report a concern:

- You will be treated with dignity and respect.
- Your communication will be kept confidential to the greatest extent possible.
- Your concern will be taken seriously and fully addressed and, if not resolved at the time you call, you will be informed of the outcome (subject to confidentiality limitations).
- You need not identify yourself. However, you should provide sufficient information to allow the Company to conduct an appropriate investigation.

Chief Compliance Officer	(907) 222-9500 3909 Arctic Blvd., Ste. 500 Anchorage, AK 99503
Ethics Listserv	ethics@alutiiq.com compliance@alutiiq.com
Employee Hotline	1-800-829-8547 http://afognak.alertline.com

Calls and emails to the Employee Hotline are kept confidential and may be made anonymously. The identity of the person submitting a concern will not be given to anyone except as required by law or as needed for investigative purposes. Any employee who retaliates against another employee, customer, or supplier for submitting a report regarding a suspected violation will face disciplinary action.

In addition to the above resources, you always have the right to report any suspected wrongdoing on a federal contract to various government officials such as the applicable Contracting Officer, agency Inspector General or other federal employee with contract oversight or management responsibility; a member of Congress or congressional committee representative; the U.S. Government Accountability Office; any authorized law enforcement agency or the U.S. Department of Justice; a court or grand jury; or a management official or other employee of the Company or the subcontractor who has responsibility to investigate or address misconduct.

CONTACT INFORMATION (CONTINUED)

It is Company policy for anyone aware of a possible violation of the Code, our policies and procedures, or any legal requirement, to report it. There is never a penalty for using any of the available resources in good faith. The Company will not tolerate retaliation against anyone for such reporting. It is Company policy to comply with all laws that protect employees against unlawful discrimination and retaliation as a result of their lawfully and truthfully reporting information regarding, or their participating in, investigations involving allegations of corporate fraud or other violations by the Company.

Pursuant to DFARS subpart 203.9, as a Company employee, you cannot be discharged, demoted, or otherwise discriminated against as reprisal for disclosing information that you reasonably believe is evidence of gross mismanagement of a U.S. Department of Defense ("DoD") contract, a gross waste of DoD funds, an abuse of authority related to a DoD contract, a violation of law, rule, or regulation related to a DoD contract (including the competition for or negotiation of a contract), or a substantial and specific danger to public health or safety. You're afforded these protections when you disclose the information to:

- A Member of Congress or a representative of a committee of Congress;
- An Inspector General that receives funding from or has oversight over contracts awarded for or on behalf of DoD;
- The Government Accountability Office;
- A DoD employee responsible for contract oversight or management;
- An authorized official of the Department of Justice or other law enforcement agency;
- A court or grand jury; or
- A management official or other company employee who has the responsibility to investigate, discover, or address misconduct.

DFARS subpart 203.9 and the Employee Handbook discuss these protections further. The Company's whistleblower and non-retaliation policies can also be found in the Employee Handbook. These protections do not give you any right to disclose classified information not otherwise provided by law.

Thank you for sharing the Company's commitment to the highest standards of business ethics.