

Afognak Native Corporation

CODE OF ETHICS & BUSINESS CONDUCT

August 2026

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Afognak, Alaska



Afognak Native Corporation
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MESSAGE FROM OUR BOARD CHAIR & CEO



On behalf of the Board of Directors of Afognak Native Corporation, I am proud to share this Code of Ethics and Business Conduct with you. It reflects who we are: a company built by and for the Afognak Alutiiq people and guided every day by the values passed down from our Elders.

This Code is more than a set of rules. It is a promise to our Shareholders, employees, business partners, customers, and communities that we will always choose the harder right over the easier wrong path. Every decision we make should reflect the Alutiiq values that guide who we are and how we work.

I encourage you to read this Code closely, keep it on hand, and speak up whenever something does not feel right. Thank you for the integrity and dedication you bring to our corporation every day.

Alisha Susana *Agisaq* Drabek, PhD
Board Chair



Our success has always depended on trust: the trust our Shareholders place in us, the trust our customers and partners place in us, and the trust we have in one another. This year we revamped the Code to increase alignment with our Alutiiq values and to streamline the information for ease of use and understanding. This Code provides a framework for making ethical decisions and conducting business with integrity.

I believe strongly that how we do business matters just as much as the results we deliver. I ask every employee, at every level, to uphold the standards in this Code, ask questions when unsure, and speak up when something doesn't seem right. 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. By doing so, we protect not only our Company, but also the Alutiiq people and communities we were built to serve.

Thank you for living our values every day.

Dan Corbett
CEO



Afognak, Alaska

OUR COMPANY

PURPOSE, VISION, MISSION, & VALUES

Afognak Purpose: Shareholders will have a perpetual source of land use, shared financial and cultural wealth to the maximum extent possible. The Corporation may provide social, cultural, and economic benefits to Shareholders by building a sustainable, transparent, growing enterprise.

Afognak Vision: Grow sustainably to provide benefits today and invest in our future.

Business Mission: We are committed to attracting and retaining a world-class workforce that is guided by our traditional Alutiiq values: **Harmony, Appreciation & Respect, Efficiency, Communication, Trust, Elder Knowledge, Heritage & Culture, and Commitment to Community**. We give our people the tools and resources they need to exceed our customers' expectations, and we build a team atmosphere where new ideas are welcome.

Living this mission ensures our long-term success and, in turn, ensures the Alutiiq people of Afognak will thrive in perpetuity.

Afognak Values: Afognak integrates honored Alutiiq cultural values into our corporate philosophy, using these traits as touchstones for all aspects of how our company operates. These values are foundational to our everyday decision-making and our long-term corporate planning.

HOW THIS CODE REFLECTS OUR VALUES

The Company is built on a foundation of Alutiiq cultural values. We use them as touchstones for our everyday decisions and our long-term planning. While our values show up in many parts of life, not just at work, this Code focuses on what they look like in our business: how we treat each other and our business partners in the workplace, serve our customers, Shareholders and communities. Every section that follows sits under one of our eight values. When you follow this Code, you are living those values.

Failure to comply with this Code and/or Company policies or violations of law may result in corrective action, up to and including termination of employment.

In this Code of Ethics and Business Conduct ("Code"), "Company" means Afognak Native Corporation and, to the extent this Code applies, its direct and indirect subsidiaries, affiliates, partnerships and joint ventures. "Employee" means an employee of the Company.

CORPORATE VALUES

HARMONY

Our Corporation accomplishes goals in the spirit of teamwork, strength, and unity while supporting each other.

APPRECIATION & RESPECT

Our Corporation will take only what we need and leave some for the next generation.

EFFICIENCY

Our Corporation will expend only what is needed to accomplish tasks at hand.

COMMUNICATION

Communication within our Corporation is truthful, positive, open, and fair.

TRUST

We earn the trust of our Shareholders while we build trust throughout the Corporation by honoring commitments, honesty, and full disclosure.

ELDER KNOWLEDGE

Our Corporation is built on the ingenuity and resiliency of our Elders, while guided by their traditional knowledge and lifeways in our modern times.

HERITAGE & CULTURE

Our Corporation will honor our heritage and culture through a lifetime of learning.

COMMITMENT TO COMMUNITY

We celebrate Shareholders and employees by contributing to our villages and the communities in which we do business.



Afognak, Alaska

Respect, Fairness, & Safety: The Company is committed to a respectful, fair, and safe workplace for everyone. The breadth of perspectives across our workforce, rooted in our Alutiiq heritage and strengthened by the communities we serve, makes us a stronger team. People also do their best work when they feel safe. That means being free from discrimination and harassment. It also means staying protected on the job by complying with health and safety laws.

Our Responsibilities:

- We treat each other with respect.
- We do not allow discrimination or harassment of any kind, including anything based on a trait that the law or Company policy protects. We honor our ANCSA-based hiring preference for qualified Shareholders, a right recognized under federal law.
- We follow all federal, state, and local laws that apply to our work.
- We know and follow our safety policies. We speak up when we have safety concerns.
- We maintain a drug-free and alcohol-free workplace consistent with Company policies and applicable law.

Q: I made a mistake that could have caused an incident, but no one was hurt and nobody noticed. Do I still need to report it?

A: Yes. Reporting mistakes and near misses helps identify hazards before someone gets hurt. Being honest protects both you and your coworkers.

Resources: *Employee Handbook, Health, Safety, Environmental, & Training (HSET) Manual, Non-DOT Drug & Alcohol Policy Manual, OSHA & Other Government Agency Safety or Environmental Inspection & Reporting Policy*

Personal Conflicts of Interest: Harmony depends on trust between coworkers. That trust starts with being honest about your own interests when they are in play. We are dedicated to making all business decisions with integrity and in the Company's best interests. Special care is required when it comes to relationships with vendors, business partners or competitors. Using the *Outside Activities Disclosure Form* on *My.Alutiiq*, we promptly disclose any outside activity, financial interest or relationship that could affect our independence or objectivity. Directors, officers, senior managers, and other designated employees have additional disclosure responsibilities.

Our Responsibilities:

- We make every business decision with fairness, honesty, and openness.
- We make timely disclosures of potential conflicts of interest and act with integrity.

Resources: *Conflict of Interest Disclosure Form, Personal Conflicts of Interest Policy,Gifts Policy, Employee Handbook*

Gifts: Harmony grows when relationships are built on trust and respect, not favors. Good judgment is important when exchanging gifts, making sure they always reflect integrity and comply with our Gifts Policy and applicable laws. A gift must never influence, or appear to influence, a business decision. Heightened standards apply to government interactions: we must never offer, promise or provide anything of value to government employees unless expressly permitted by law and Company policy.

Our Responsibilities:

- We give and receive gifts that are permitted by Company policy and permissible under law.
- We consult the Legal Department before offering or accepting any gift connected to government business.
- We disclose certain gifts through the *Gifts from Third Parties Form* on *my.Alutiiq*, as detailed in our Gifts Policy.

Q: I received a bottle from a vendor for the holidays. Can I keep it?

A: If the wine is of reasonable value, does not violate this Code and complies with our Gifts Policy, you may accept the gift, if it is a one-time, modest gesture meant to build goodwill and not to influence a decision. If you are involved in procurement decisions for federal contracts, however, do not accept it.

Resources: *Gifts Policy, Anti-Kickback Policy, Bribery & Extortion Policy*

Ending Trafficking in Persons: We have zero tolerance for human trafficking or trafficking-related activities in any form. We will never allow trafficking in persons, in any way, through our operations, our employees, agents, or subcontractors.

Our Ending Trafficking in Persons Compliance Plan sets out our commitments and is provided to all employees annually.

Our Responsibilities:

- We do not engage in human trafficking, and we do not do business with partners or third parties who do.
- We report suspected violations of anti-trafficking rules.

Resources: *Ending Trafficking in Persons Compliance Plan, Employee Handbook*



Danger Bay, Alaska

APPRECIATION & RESPECT

We take only what we need and leave some for the next generation.

Our Environment: Alutiiq culture is deeply tied to the land and its sustainability in perpetuity. Our Company culture reflects that same commitment: we plan our work and use natural resources with the next generation in mind. Protecting the land, its resources, and the environment are ways we live out that value.

Our Responsibilities:

- We conduct our business operations in a way that avoids or minimizes adverse impacts on the environment.
- We comply with environmental laws and regulations.
- We provide truthful and accurate information to government authorities.
- We use natural resources thoughtfully, taking only what we need for our work.

Q: I noticed old equipment leaking fluid near a storm drain at our job site. It does not seem urgent. Should I still say something?

A: Yes. Report it to your supervisor right away, even if it seems small. A quick fix now avoids bigger environmental and legal problems later.

Resources: *Employee Handbook*, *HSET Manual*

EFFICIENCY

We expend only what is needed to accomplish the tasks at hand.

Our Property & Recordkeeping: Protecting Company property helps our success and protects our reputation. It also helps us operate efficiently. This means taking care of everyday items, like laptops, cars, tools, and office equipment as well as intangible items such as computer software. Protecting the property of our customers and business partners matters too, including government-furnished equipment.

Our Responsibilities:

- We take good care of all Company property.
- We comply with Company recordkeeping requirements, including litigation and legal holds.
- We report any theft, damage, loss of Company property, or non-compliance with Company recordkeeping policies.

Q: I am cleaning out my desk before I change roles, and I found old project files I do not think we need. Can I just shred them?

A: Before destroying records, review the Company's Records Retention Schedule and contact the data owner. Do not destroy any records until the data owner has confirmed they are eligible for disposal. If you are unsure how to classify the records or cannot identify the appropriate record type, please contact your supervisor or contract administrator for assistance.

Resources: *Government Property Control Procedures, Records & Information Management Manual, Record Retention Schedule*

COMMUNICATION

Our communications are truthful, positive, open, and fair.

Speak Up: We have built a culture where asking questions is welcome and speaking up is expected. If you suspect a violation of this Code, the Employee Handbook, Company policy, or the law, you are required to speak up.

Start with your supervisor. Part of a supervisor's job is to help find answers. If that does not feel right, or your concern involves your supervisor, reach out to HR, the Legal Department, or use the resources on the Contact Information page at the end of this Code, including our confidential third-party hotline. Retaliation against anyone who reports in good faith is never tolerated. Federal law, including DFARS Subpart 203.9, provides additional protections for employees who report misconduct on government contracts.

If your concern involves classified information, please do not share it through the third-party hotline. Report it in person to the Director of Industrial Security, or to a manager or HR representative who holds the right clearance.

Our Responsibilities:

- We ask questions when we are unsure and speak up if we suspect a violation of this Code, the Employee Handbook, Company policy, or the law.
- We do not retaliate against anyone who reports a concern in good faith, and we report retaliation if we see it.

Resources: *Employee Handbook, Afognak Third-Party Hotline Poster*

Confidentiality: Confidentiality is at the heart of trust. We protect sensitive information, including personal information, the Company's confidential information, and information that belongs to our customers, business partners, and other third parties from unauthorized access, use, or disclosure. Keeping this information private protects people, protects our work, and keeps us competitive in the marketplace. A breach of confidentiality errodes trust and can lead to reputational damage, harm, and legal consequences.

Our Responsibilities:

- We comply with the Employee Confidentiality, Non-Disclosure of Company Proprietary Information and Intellectual Property Agreement we signed upon hire, and we do not disclose confidential information without authorization.
- We do not accept a business partner's confidential information except under a written Non-Disclosure Agreement.
- If we discover confidential information that we believe was improperly obtained, we immediately report it to our supervisor, the Legal Department, or the Company's third-party hotline.
- Our duty of confidentiality extends past our employment with the Company.

Resources: *Employee Handbook, Alutiiq Asset & Media Protection Policy, Confidentiality Policy, Afognak Asset & Media Protection Policy*

Financial, Timekeeping, & Business Expense Records: We take pride in our culture of trust, which we build through integrity and full disclosure. Each of us helps live the value of trust by keeping our financial records, timesheets, and expense reports accurate. These records need to follow our contracts, our Company policies, and the law. Doing the right thing, every time, builds our name as a trustworthy partner and helps us continue to succeed.

Our Responsibilities:

- We approach every financial recordkeeping, time charging, and expense reporting task with attention to detail and honesty.
- We always allocate labor and material costs to the correct contract or cost code, and we report unallowable charges appropriately.
- We submit truthful timesheets and expense reports on time, with the right documentation.
- We report any concerns, inaccuracies, or unethical requests to our supervisor, the Legal Department, or the Company's third-party hotline.

Q: My supervisor asked me to charge some of my hours to a different contract because that one has more budget left. Is that okay?

A: No. Always charge your time to the contract cost code

Financial, Timekeeping, & Business Expense Records - Continued

you worked on. If you are asked to do otherwise, report it to HR, the Legal Department, or the Company's third-party hotline.

Resources: *Time Reporting Policy, Employee Handbook*

Cybersecurity: We earn trust every day through maintaining a secure cyber environment. Our Information Security Program takes a risk-based approach to protecting Company, customer, and contract information. Each of us plays a role in keeping our systems secure. By staying alert, we meet federal rules, uphold our security agreements, and protect our Company.

Our Responsibilities:

- We use strong passwords and only Company-approved software.
- We remain vigilant for phishing attempts, malicious links, and suspicious emails.
- We protect Company, customer, and contract information, and we use good judgment discussing business or posting online.
- We report anything suspicious right away to our IT Security Team at *abuse@alutiiq.com*.

Q: I got an email that looks like it is from our IT department asking me to confirm my password. Should I reply?

A: No. Immediately report suspicious emails to abuse@alutiiq.com.

Resources: *Alutiiq Cybersecurity Physical Protection Policy, Afognak Cybersecurity Physical Protection Policy, Information Security Program Charter, Employee Handbook*

Procurement Integrity & Contract Compliance: We build trust through ethical conduct in any procurement activity or on any contract. We aim for excellence on every contract–government or commercial–and we expect every employee to know and follow the contract terms that apply to their work.

Our strength comes from delivering the materials, goods, and services we promise—and doing so with quality that meets or exceeds our contractual requirements.

Our Responsibilities:

- We compete fairly and do not agree with competitors to fix prices, divide markets, or restrict competition. Violations of antitrust and competition laws carry serious consequences.
- We know and follow all applicable contract terms and requirements and report any deviations to your supervisor.

Resources: *Employee Handbook, Afognak Procurement Policy Manual*

Trade Compliance: Trust means keeping our commitments including ensuring compliance with export control restrictions in our government and commercial operations. These restrictions exist to prevent sensitive goods, technology, and software from being used against U.S. foreign policy and national security goals.

Our Responsibilities:

- We comply with the Company's Export Compliance Manual.
- We stay aware of who may receive information governed by export laws and regulations.

Q: What is an "export" under trade compliance laws?

A: It is more than just shipping goods overseas. It can also mean talking with a foreign-owned company about a subcontract on a military site, presenting technical data at an international conference with foreign nationals present, sending defense parts to a U.S. military base abroad, or emailing unencrypted information that export laws protect.

Resources: *Export Compliance Manual, Export Compliance Policy*

Upholding Our Integrity Worldwide: We hold onto our Alutiiq values everywhere we work. Trust is non-negotiable. We follow all local and federal laws, including the Foreign Corrupt Practices Act (FCPA) and are prohibited from offering anything of value, directly or indirectly, to foreign officials, political parties, or candidates to secure an advantage for the Company. We never take part in dishonest ways of doing business, even when they are common elsewhere.

Our Responsibilities:

- We never give anything of value, directly or indirectly, to foreign officials, political parties, or candidates to secure an advantage for the Company.
- We only work with agents, intermediaries, and third parties who will not cause us to violate the FCPA.
- We keep honest, accurate Company books and records, and never make a payment without proper documentation.
- We report any suspected violations of the FCPA or the Company's financial and accounting policies to our supervisor, the Chief Financial Officer, the Legal Department, or the Company's third-party hotline.

Q: The mayor of a town in a foreign country has asked for a payment to her to help us open a local office for the Company. Is this allowed?
A: No. Under the FCPA, we cannot pay a foreign official for an advantage, even if it is framed as help.

Resources: *Bribery & Extortion Policy, Conduct of International Business & Foreign Corrupt Practices Act (FCPA), Policy, Anti-Kickback Policy, Gifts Policy*

Government Contracting Integrity: As a preeminent contractor for the U.S. government, trust guides how we do business. We act honestly, openly, and ethically, and always within the law. What is allowed with a commercial customer may not be legal when working with the government. Getting this wrong carries serious penalties, such as large fines, claims under the False Claims Act, prison time, and losing the right to do business with the government.

We comply with applicable government contracting laws and regulations, including the Procurement Integrity Act, the Truthful Cost or Pricing Data statute, the Anti-Kickback Act, the Byrd Amendment, the National Industrial Security Program, organizational conflict of interest requirements, and revolving door rules to ensure we always act appropriately.

Our Responsibilities:

- We timely report credible evidence of fraud, conflicts of interest, bribery, gratuities, False Claims Act violations, or significant overpayments to the appropriate government Inspector General as required by FAR 52.203-13 and Company policy.
- We do not engage in giving or receiving any form of bribe or kickback and understand that engaging in such behavior is a serious violation of law.
- We comply with Small Business Administration regulations and the subcontracting limits that apply to our government contracts.
- If contacted by a government investigator, we reach out to the Legal Department immediately. An employee may consult counsel before or during any interview.
- We share the Company's commitment to full cooperation with any government agencies responsible for investigation or corrective actions.

Q: I am working on a government contract, and I am not sure if something I am about to do is permitted by law. What should I do?

A: Stop and ask before you act. Talk to your supervisor, Program Manager, or the Legal Department. Government contracting rules are strict and specific, and it is always better to check first than to find out later you made a mistake.

Resources: *Anti-Kickback Act Policy, Bribery & Extortion Policy, Industrial Security, Organizational Conflict of Interest Policy, Investigation & Mandatory Disclosure Policy*


Afognak, Alaska

ELDER KNOWLEDGE

We build on the ingenuity and resiliency of our Elders, while guided by their traditional knowledge and lifeways in our modern times.

Growing & Sharing Knowledge: Our Elders carried the knowledge, the strength, and the ingenuity that enabled the Alutiiq people to thrive for generations. We carry that same duty forward at work. We value experience and we mentor each other. Knowledge is one of our most valuable assets, and it takes all of us to keep it safe.

Our Responsibilities:

- We ask when we are in doubt, and we seek guidance from our supervisor, experienced colleagues, Company policies, or applicable laws.
- We complete required training on time, and we look for chances to grow our knowledge and skills.
- We stay open to learning from others, no matter their title or tenure. We also share what we learn.

Resources: *Employee Handbook*





HERITAGE & CULTURE

We honor our heritage and culture through a lifetime of learning Alutiiq values.

Honoring Our Heritage: The Company was built by and for the Alutiiq people. Our culture and heritage are not just history. By providing benefits to Shareholders and strengthening *Ag'wanermiut*, "our community," the Shareholders are empowered and the culture and heritage of the Alutiiq people is preserved.

Our Responsibilities:

- We help build a workplace where Alutiiq heritage is visible and valued.
- We honor our Heritage & Culture by treating the land and our resources with respect.

Resources: *Employee Handbook*



COMMITMENT TO COMMUNITY

We celebrate Shareholders and employees by contributing to our villages and the communities in which we do business.

Charitable Activities & Contributions: We are committed to contributing to our villages and the communities where we do business. Our success carries a responsibility to support our Shareholders, their communities, our employees, and the people and places we serve. We contribute our time, talents, and resources because thriving communities create opportunities for everyone.

Company charity work and gifts must match our Alutiiq values, our policies, our goals, and the law. Because of this, only certain executive leaders can take part in charity work or give gifts or charitable donations on behalf of the Company. We encourage employees, as individuals, to give their own time and donations to causes of their choice.

Our Responsibilities:

- We do not use Company resources for personal charitable contributions or activities.
- We cannot direct another employee to support a specific charity or cause.
- If we solicit charitable donations on the Company's behalf from suppliers or subcontractors, we make clear the donation is voluntary and unrelated to any existing or future business.

Q: There is a charity event I think would benefit the Company. Could I attend on behalf of the Company?

A: No. While you may attend the event in your personal capacity, only certain members of executive management are authorized to make charitable gifts or attend charitable events for the Company. Please reach out to your supervisor or the Legal Department for additional guidance.

Resources: *Employee Handbook, Donations & Charitable Contributions Program - Standard Operating Procedures, Community Advocacy Policy*

Corporate Political Activity: Federal, state, and local laws govern how we talk with lawmakers or regulators on the Company's behalf. Because of this, we watch our political activity closely to make sure it stays true to our Alutiiq values, our business goals, and the law. Our Afognak Native Corporation--Alutiiq Political Action Committee, as authorized by the Board of Directors, is responsible for determining the Company's position on political issues, including endorsing political candidates and making any legally permissible political contributions.

Our Responsibilities:

- We consult with the Legal Department before engaging in any lobbying activity.
- We recognize that as an employee we cannot make Company decisions on political issues, including backing a candidate or making lawful political contributions.

Resources: *Employee Handbook*

Personal Political Contributions & Activities: We encourage employees to take part in political activities such as voting, giving personal contributions to candidates or parties of their choice, and sharing their own views on government and other issues. These activities must happen on personal time and expense.

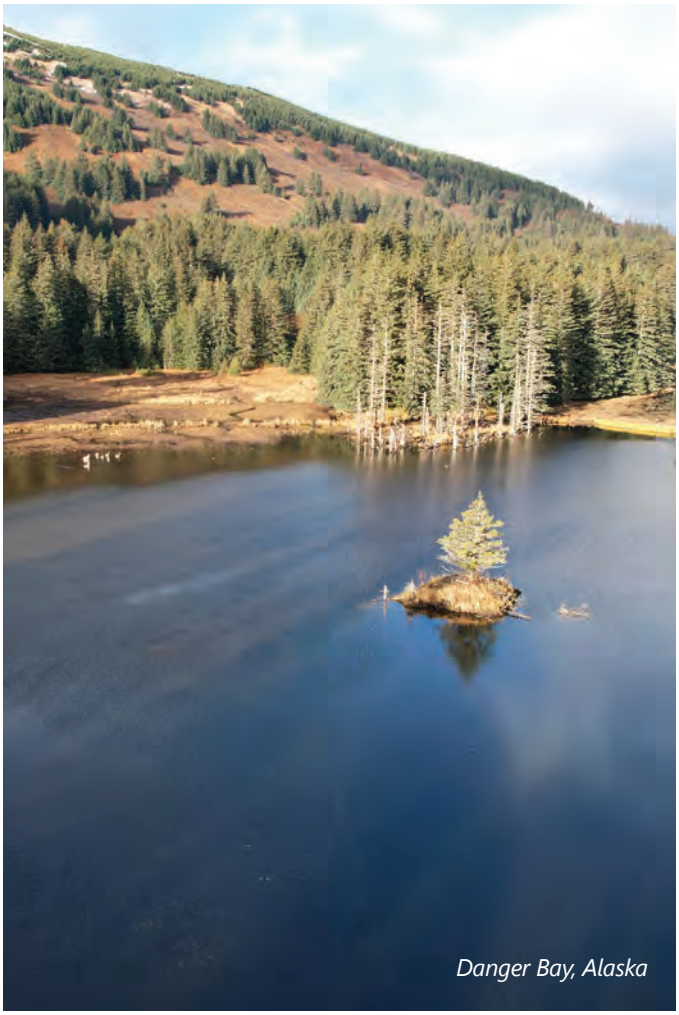
Our Responsibilities:

- We keep our personal political activities separate from Company time and Company resources.
- We do not imply that we speak for the Company when we share our own political views.
- We vet with the Legal Department any personal relationships we may have with legislative or executive branch officers, employees, elected officials, or their immediate family members.

Q: Can I put a campaign sign for a candidate I support in my yard?

A: At home, yes! The Company encourages employees to participate in the political process on personal time.

Resources: *Employee Handbook*



Danger Bay, Alaska

CONTACT INFORMATION

No matter which section of this Code applies, our guidance is the same. If you have a question, are not sure what is right, or suspect a violation of this Code, the Employee Handbook, Company policy, or the law, **speak up**. If you are comfortable, start with your supervisor. If not, or your concern involves your supervisor, use any of the contacts below.

When you report a concern, here is what you can expect:

- We will treat you with dignity and respect.
- We will keep your communication confidential to the greatest extent possible.
- We will take your concern seriously, and address it appropriately.
- You are welcome to report anonymously. The more detail you can share, the easier it is for the Company to look into your concern.
- We will never tolerate retaliation against you for a good faith report.

Speak-Up Resources

Vice President, Compliance - 907-222-9500
General ethics and compliance questions.

Ethics Email

ethics@afognak.com or ethics@alutiiq.com

Third-Party Hotline - 800-829-8547
afognak.ethicspoint.com

Calls and emails are kept confidential to the greatest extent possible 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 an investigation.

For quick access, scan the QR code below to submit a concern through the Company's confidential third-party hotline which is available 24/7.

Specialized Contacts

IT Security Team: *abuse@alutiiq.com*

Cybersecurity concerns, phishing attempts, or suspicious activity.

Risk Management Team:
riskmanagement@afognak.com

Occupational health and safety, environmental compliance, workers' compensation, and insurance claims involving Company property, vehicles, or other covered losses.





Chief Financial Officer: FCPA or financial integrity concerns.

Facility Security Officer (FSO): Classified information and industrial security matters.

Contract Administrator or Subsidiary President: Contract deviations or performance concerns.

Senior Manager of Trade Compliance: Export compliance matters.

Government Contracting Reporting Tools

You always have the right to report suspected wrongdoing on a federal contract to the Contracting Officer, an agency Inspector General, a member of Congress, the U.S. Government Accountability Office, an authorized law enforcement agency, the Department of Justice, or a management official responsible for investigating misconduct.

Whistleblower Protections

Do you work on a Department of Defense contract? If so, under DFARS Subpart 203.9, you have additional protections from retaliation for reporting gross mismanagement, waste, abuse of authority, or violations of law tied to that contract. This applies when you report it through an authorized channel. See the Employee Handbook for more details.

Thank you for sharing our commitment to the highest standards of conduct and business ethics.