




OPERATING WITH [i]ntegrity

Code of Ethics and Business Conduct





**As a BBNC employee,
[i] will...**

- ✓ **Operate with [i]ntegrity**
- ✓ **Be honest**
- ✓ **Respect those around me**
- ✓ **Comply with the law**
- ✓ **Support BBNC's Culture of Integrity**

Creating a Culture of [i]ntegrity

Each BBNC employee is a champion for our corporation and values. BBNC's success, and that of its subsidiaries, depends not only on high-quality products and services, but on each and every employee's dedication to ethical behavior.

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Message from **Jason Metrokin**

Bristol Bay Native Corporation (BBNC) was established by the Alaska Native Claims Settlement Act (ANCSA) of 1971 with the mission: Enriching Our Native Way of Life. With headquarters in Anchorage, Alaska, BBNC has worked to deliver value to the Native people of Southwest Alaska through economic development, cultural enhancement and preservation, stewardship of our lands and educational scholarships. These benefits are made possible by the hard work and dedication of our subsidiaries and employees.

As of 2019, BBNC employs approximately 4,500 employees in subsidiaries throughout Alaska and beyond. Alaska will always be our home, but today we are a global company, with diversified and successful business operations around the world.

As an Alaska Native Corporation, no matter where we work or how large we grow, our values are at the core of our operations and actions. They shape how we treat each other as well as how we conduct our business around the world. These values have been our foundation, and they are also our future.

While BBNC's success depends on these values, along with delivery of high-quality products and services, our employees are our most valuable resource as a company. We rely on each of you to ensure that BBNC's Culture of Integrity is infused into daily activities and operations.

BBNC is committed to integrity in everything we do – and we believe that is a shared responsibility. Each BBNC

employee is a champion for our corporation and our values.

I ask that you take the time to closely review the BBNC Code of Ethics and Business Conduct (Code). The Code sets out BBNC's standards for conducting business and our expectations for all.

This Code provides specific guidance applicable to all BBNC subsidiaries, directors, officers, employees and agents and to all business activities conducted by the corporation. While it is as comprehensive as possible, it is not possible to include answers to every question. If you are faced with a situation that is not clearly addressed by this Code, or if you have questions of any kind, please reach out to your supervisor, company leader or use the other resources available to you, including the BBNC Compliance Department, or the BBNC Ethics Hotline.

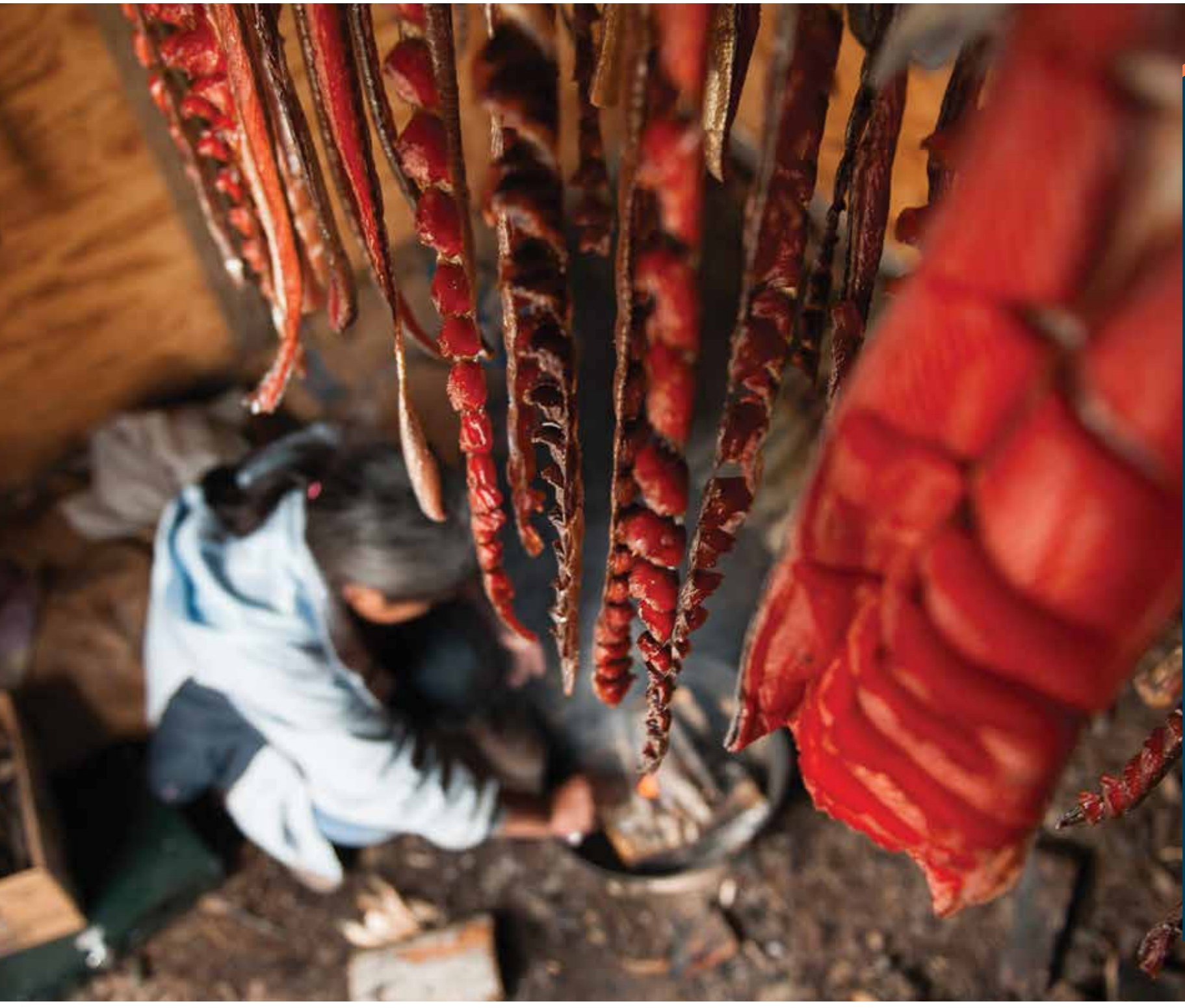
I am proud to work for BBNC and to represent the values and integrity that BBNC is associated with in our communities. Thank you for all that you do, and for being a BBNC leader.

Best Regards,

A handwritten signature in dark ink, appearing to read "Jason Metrokin". The signature is fluid and cursive, with a large initial "J" and "M".

Jason Metrokin
BBNC President & CEO

OUR CULTURE & VALUES



Our Culture & Values

When we think about how we achieve our mission, it all depends on building trust with people and organizations around the globe. Our goals are only possible when people trust BBNC and our subsidiaries.

How do we earn and build that trust? It starts by applying our culture and values to build lasting relationships inside and outside of BBNC. Our culture is our operating framework—who we are and how we behave. Our values are the enduring principles that we use to do business with integrity and win trust every day.

Our Culture

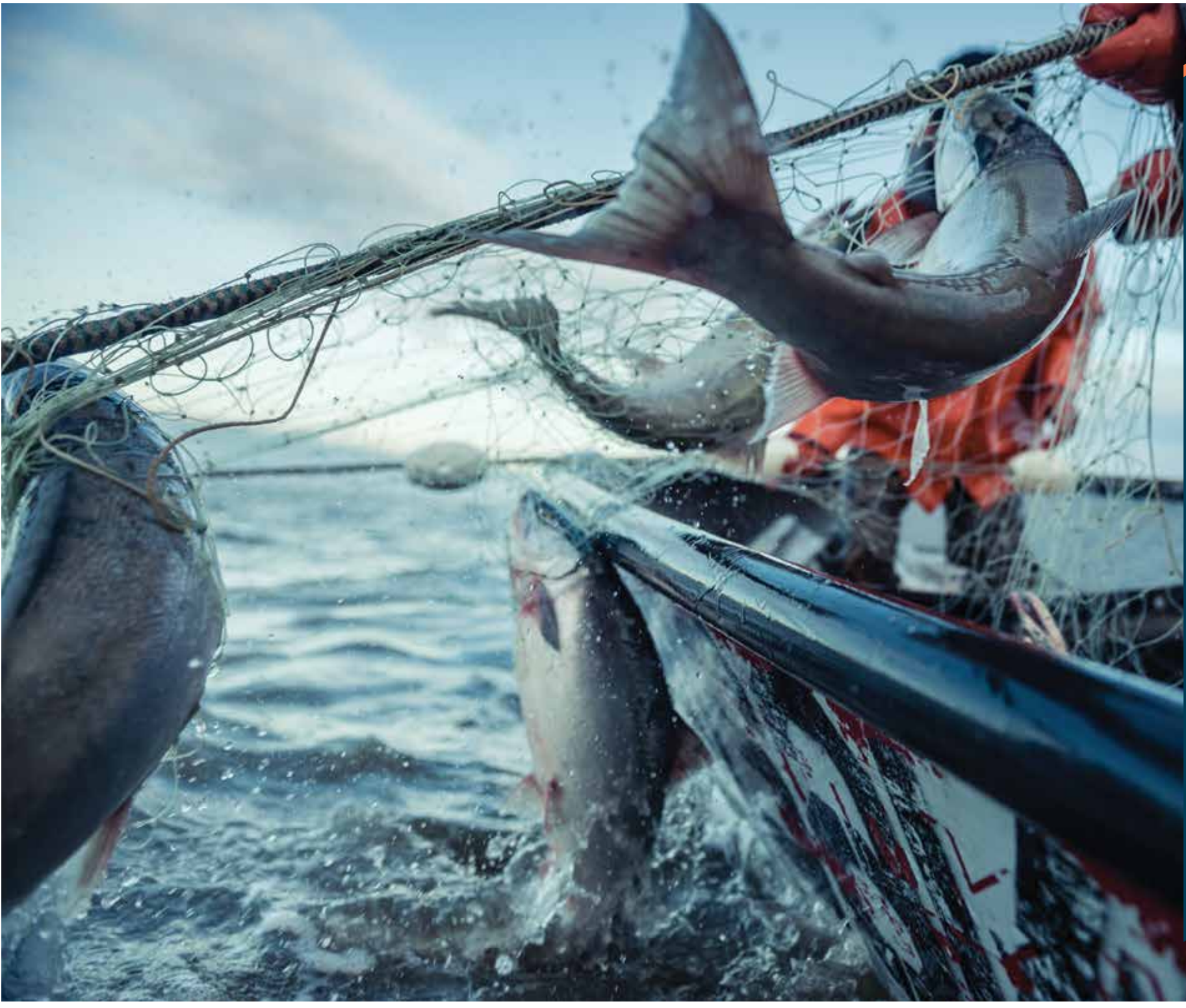
- ✓ Customer Focused
- ✓ One BBNC
- ✓ Diverse and Inclusive
- ✓ Make a Difference

Our Values

- ✓ **[i]NTEGRITY**
- ✓ Ethical Behavior
- ✓ Open & Respectful Workplace
- ✓ Accountability & Responsibility
- ✓ Clear Communication

Operating with **[i]ntegrity** The Code

BBNC's Code will show you how we use our culture and values to build and preserve trust with our shareholders, customers, partners, representatives, governments and each other, so we can achieve more together.



USE THE CODE TO MAKE
GOOD DECISIONS




How to Use The Code

To make good decisions

Making good decisions and ethical choices builds trust between each of us and the people we interact with every day. Not all situations you encounter are straightforward – how do you make the best choice when facing difficult or unclear circumstances? How do you navigate ethical dilemmas?

While this Code will not tell you exactly what to do in every situation, it serves as a guide to help you make good decisions and navigate complex situations where the answer might not always be clear.

When faced with a difficult decision or situation follow these steps:

-  **1. Pause.** Does a situation make you uneasy? Are your instincts telling you something is not quite right? Pause before you act and consider how to approach the situation.
-  **2. Think.** Is your approach consistent with BBNC's culture and values? Does it build or maintain trust? Never sacrifice long-term reputation and trust for a short-term benefit.
-  **3. Ask.** There are numerous resources available to you. We encourage to start with your supervisor or company's General Manager.



Operating with [i]ntegrity

The legal and ethical principles that comprise this Code must guide our behaviors and conduct. This Code is broadly stated and not intended to replace BBNC and BBNC companies' policies and procedures. Rather, it has been developed to provide a common understanding of BBNC's values and ideals to which we aspire in the conduct of BBNC's business activities.

PURPOSE & APPLICABILITY

BBNC is proud of our subsidiaries and employees. We take pride in the work that we perform every day. We expect ethical and honorable behavior of ourselves, those who work for us, and those we work with – our business partners, vendors, and clients. We set our performance standards high and we expect to be judged by the quality of our work. We want to work with companies and individuals that share our values.

This Code applies to all directors, officers, employees and agents of BBNC and BBNC subsidiaries. When the Code talks about “BBNC” or the “company,” it is intended to include BBNC corporate employees as well as that of its subsidiaries.

BBNC is committed to ethical behavior, integrity, honesty, and compliance with

the law. This Code is designed to set out the standards that we expect all of our employees to follow.

Please take time to read and understand this Code. We expect all BBNC employees to read, understand, and follow this Code. If there is something in the Code that you do not understand or you would like further guidance, please ask questions!

Updates and Revisions to the Code of Ethics and Business Conduct

This document is updated periodically to reflect changes in laws, policies, and procedures. The most current and authoritative version of the Code is available at: www.bbnc.net and www.info.bbnc.net.

SPEAK UP, SPEAK OUT

ETHICS HOTLINE: HOW TO FILE A REPORT

Ethical Advocate provides a confidential, anonymous method of reporting concerns through a secure third-party website and toll-free number. It is available to employees, vendors and clients.

You create a secure login managed by Ethical Advocate to file a complaint. The login allows you to sign back in to receive communications on the matter. We will post an acknowledgment that BBNC has received the complaint, and the matter is immediately assigned to be investigated and facts gathered. Once the investigation is complete, notice will be posted that the complaint was either substantiated or not.

We cannot share the results of the investigation or corrective action involving an individual. However, we will share information to the extent possible with the reporting party.



Speak up, Speak out

Reporting a concern

BBNC is committed to Operating with Integrity in everything we do because it is the right thing to do – for our employees and our customers.

When employees, contractors, vendors or partners observe, or have concerns about something that contradicts our Code, or our Commitment to Operating with Integrity, we encourage them to **speak up, speak out, and report it**. BBNC maintains an **open door policy** for employees to ask questions or raise concerns regarding BBNC's policies, subsidiary policies, the law, or ethical conduct. Persons who speak up to protect our companies will be protected in return.

BBNC's non-retaliation policy reinforces our long-standing commitment to a safe reporting environment that is free of fear, bullying and other negative consequences. BBNC has zero tolerance for retaliation and activities that impact good-faith reporting – and anyone engaging in retaliatory behavior is subject to disciplinary action, up to possible termination.

If you have a question or concern, our open door policy provides multiple channels for employees, who are acting in good faith, to report concerns without fear of retaliation.

Each of us can be the [i] in [i]ntegrity!

BBNC Ethics Hotline:
1-866-513-7078

BBNC Ethics Reporting Website:

bbnc.ethicaladvocate.com

[i]InfoNet Employee Resource:

www.info.bbnc.net

INTEGRITY
WITH EACH OTHER



[i]ntegrity

With each other

FAIR EMPLOYMENT PRACTICES

BBNC is committed to the fair and equitable treatment of its employees. An employee's qualifications, skills, and achievements are the only factors upon which decisions concerning hiring and promotions should be based, subject to the BBNC Shareholder Preference Hire Policy. Hiring and promotion decisions must be arrived at without regard to age, race, color, gender, sexual orientation, national origin, religion, disability, marital or family status, or any other category protected by law. BBNC does not tolerate discrimination.

Your Responsibilities

- ✓ Treat your fellow employees with respect as you would like to be treated. Do NOT treat your fellow employees differently for any reason.
- ✓ Do no harm. The work environment at BBNC should be safe and welcoming. Do NOT make or tolerate jokes, comments, or remarks based on a person's race, color, gender, sexual orientation, national origin, age, religion, disability, marital or family status, or other illegal consideration.

Operating with [i]ntegrity Shareholder Hire

Shareholder Preference Hire Policy

BBNC was formed pursuant to the Alaska Native Claims Settlement Act of 1971 (ANCSA), passed by Congress to address aboriginal land claims and promote the welfare of Alaska Natives.

In furtherance of its goal and pursuant to Title VII Civil Rights Act, 43 USC 1626 (g), BBNC is committed to providing benefits to its shareholders through training and employment opportunities.

BBNC encourages and supports Shareholder Hire in all companies.

SEXUAL HARASSMENT

BBNC strives to provide all employees with a work environment free from unsolicited and unwelcomed sexual overtones. Conduct with sexual overtones that interferes with work performance or creates an intimidating, hostile, or offensive work environment is not tolerated.

Decisions of employment shall not be based on submission to or rejection of unwelcomed sexual advances, requests for sexual favors, or verbal or physical conduct of a sexual nature.

Watch out for each other. Do not tolerate bad behavior. Create an environment where all employees feel safe and are respectful of each other.

Your Responsibilities

- ✓ Never make an unwelcomed sexual advance toward a co-worker.
- ✓ Do NOT make or tolerate sexual jokes, comments about persons' bodies, graphic statements about sexual matters, or engage in offensive behavior of a sexual nature. Remember that people react differently, and someone may not feel comfortable telling you that they are offended. It is better not to put them in such a position.

- ✓ Do NOT display sexually suggestive objects or pictures at work.
- ✓ Never suggest or imply that an employee's job, benefits, pay, advancement, or work environment will be affected by his or her response to a sexual advance.

If you hear, witness or experience sexual harassment, discrimination, or bullying, do NOT stay silent. Report any inappropriate behavior.

DISCRIMINATION, HARASSMENT OR BULLYING

Discrimination, harassment or bullying is strictly forbidden and will not be tolerated. Unwelcomed conduct that impairs an employee's ability to perform his or her job or creates an intimidating, hostile, or offensive environment is strictly prohibited. Employees should immediately report any conduct that they believe to be discrimination, against themselves or another employee to their supervisor.

Your Responsibilities

- ✓ Do NOT use the basis of a person's race, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status to evaluate an employee's employment opportunities, work conditions, or performance.
- ✓ Do NOT make comments that are unwelcome or offensive.
- ✓ Do NOT coerce or intimidate an employee to do something inappropriate.

CONFLICTS OF INTEREST

Conflicts of interest arise when the personal interests of an employee influence, or appear to influence, that employee's judgment or ability to act in BBNC's best interest.

While you are at work, your time and loyalty should be dedicated to BBNC. Any outside activities, such as a second job or self-employment, must be kept entirely separate from your employment with BBNC. Any activities or personal financial interest that could adversely affect the independence or objectivity of your judgment should be disclosed and avoided.

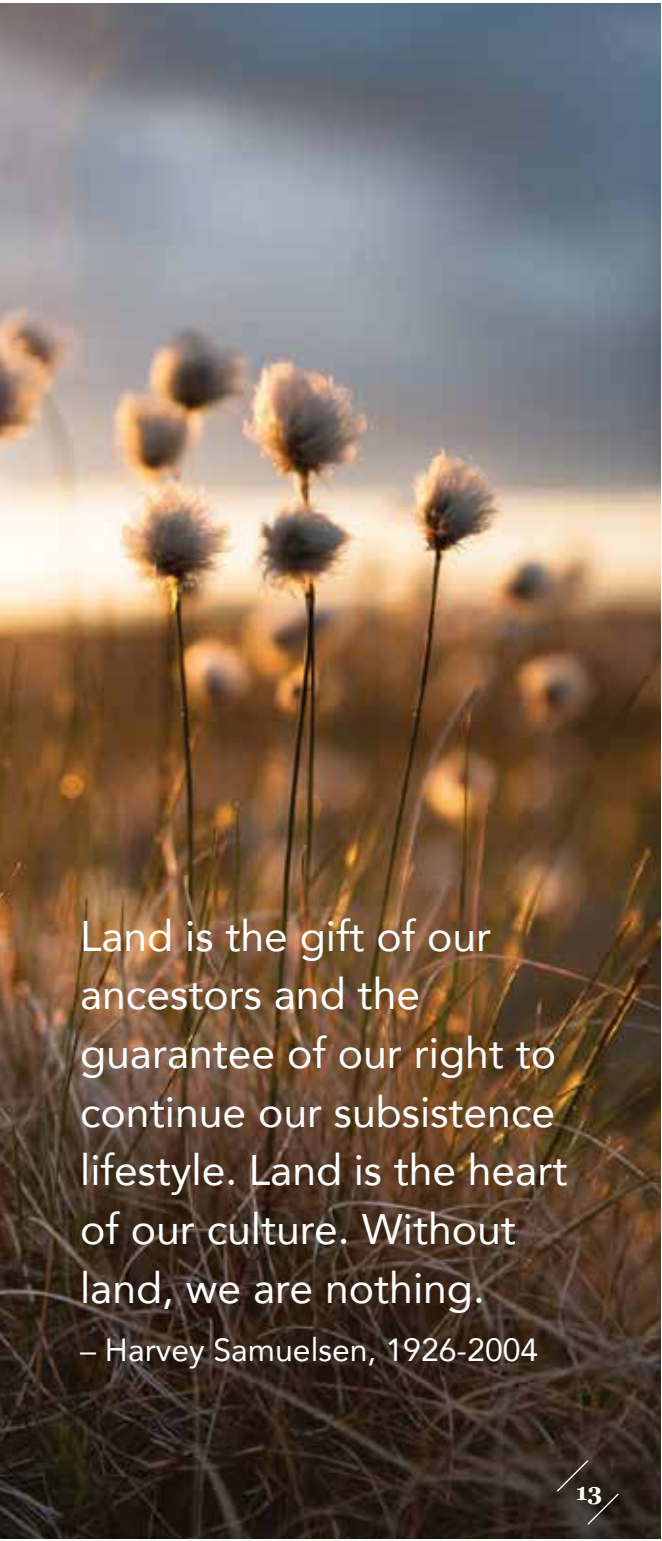
Be careful of outside business interests that may present a personal conflict of interest or the appearance of shared loyalties. These situations may directly involve the employee or the employee's family members. Generally, any arrangement of this nature should be avoided.

In all circumstances, the employee must disclose the actual or potential conflict to his or her supervisor. In some instances, a conflict of interest should be reported to the BBNC Compliance Department for additional guidance.

It is always best to avoid even the appearance of a conflict of interest. If you have questions whether an action would create a conflict of interest ask for guidance. Disclosure and transparency are integral to our culture of integrity, even if action turns out not to be a conflict.

Your Responsibilities

- ✓ Remember, your behavior reflects on BBNC. Refrain from personal conduct that might reflect adversely on BBNC's image and reputation.
- ✓ Do not conduct corporate business with a significant other, spouse or relative unless it is disclosed to your supervisor. Supervisors are advised to escalate conflict disclosures.
- ✓ While working for BBNC you may not work for any other business that competes with, or interferes with, the duties or responsibilities that you have to BBNC.



Land is the gift of our ancestors and the guarantee of our right to continue our subsistence lifestyle. Land is the heart of our culture. Without land, we are nothing.

– Harvey Samuelsen, 1926-2004

INTEGRITY IN THE COMPANY



[i]ntegrity

In the company

DRUG & ALCOHOL-FREE WORKPLACE

BBNC highly values safe and socially responsible conduct toward others. We are deeply committed to a 100% drug and alcohol-free workplace for everyone's safety and protection. You should not possess, distribute, use or be under the influence of drugs, alcohol or other intoxicants while on the job.

Your Responsibilities

- ✓ Read and understand your company's Employee Handbook.

PROPERTY OF THE COMPANY

Generally, BBNC property must not be used for any business other than corporate purposes. Employees must not borrow, give away, loan, sell, or otherwise dispose of corporate property, regardless of the condition, without specific authorization. If you have questions, ask your supervisor. BBNC takes any unauthorized use of BBNC funds or property seriously, and this type of use can be considered embezzlement. Be careful to protect corporate property from theft, damage, or misuse.

BBNC has the responsibility of protecting company property and equipment, as well as leased equipment. Property includes tangible assets, such as money, physical materials, and real property, and also intangible property, such as technology, computer programs, business plans, trade secrets, and other confidential or proprietary information.

GOVERNMENT FURNISHED PROPERTY

Employees and consultants are responsible for appropriate use, maintenance, accounting for, and, when necessary, disposal of government property in compliance with government mandated policies and procedures. Failure to properly handle government property may result in disciplinary action, including termination, and may expose a wrongdoer to criminal penalties.

Your Responsibilities

- ✓ Take care of any equipment that belongs to your company. Take equal care of the equipment that belongs to our customers.
- ✓ Keep any property that has been entrusted to you safe and keep track of it. This includes supplies, equipment, facilities, files, documents, films, and electronically recorded data or images.
- ✓ Do not use company equipment, property, or assets for excessive personal use.

FINANCIAL RECORDS

A variety of laws and policies require BBNC to record, preserve, and report financial information to our auditors, financial institutions, and government customers and agencies. Employees must record financial information accurately, completely, and timely in accordance with Generally Accepted Accounting Principles (GAAP) and applicable corporate policies and procedures.

Your Responsibilities

- ✓ Make only accurate and true entries in company books and records. Laws prohibit misleading entries that intentionally conceal or disguise the true nature of any transaction. Financial information must be kept confidential and only released with proper authorization.
- ✓ Only make or approve payments with adequate supporting information or for the purpose described in the supporting documentation.
- ✓ If you participate in the preparation of financial reports, know and follow company finance policies and internal control procedures.

TIME CHARGING & RECORDING COSTS

Charge costs appropriately. BBNC expects that all charges will be fairly assigned to the benefiting contract or job order. Costs, which are not directly associated with a contract or job order, such as general administrative expense, should be charged to appropriate overhead accounts.

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

- ✓ **Charging labor, materials or equipment costs to a contract where the labor, materials or equipment were not performed or used.**
- ✓ **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 them.**
- ✓ **Inaccurately recording time "on the clock" when you are not actually working.**

We charge our customers for work based on the information supplied by the time-charging and cost-recording systems. Our customers scrutinize this

information because if it is wrong, they are charged incorrectly. The improper charging of labor or equipment costs to a government or commercial contract may result in serious criminal and civil penalties to BBNC.

Your Responsibilities

- ✓ Always charge time and materials to the proper job cost codes. Time that is not identified with a specific contract should be charged to an overhead account.
- ✓ Be accurate. Do NOT make cost/time allocations decisions based on the status of the budget.
- ✓ Submit, in a timely manner, the actual number of hours you have worked in accordance with the actual number of hours you worked or were absent from your job.
- ✓ Do it right the first time. Do NOT charge time or material to an improper cost code with intentions of correcting it later. Check with your supervisor if in doubt about a charge. Management is responsible for ensuring that labor and material charges used by employees under their supervision represent the appropriate charge.

RECORDS MANAGEMENT

The maintenance, retention, retrieval, protection, and preservation of records from creation to final disposition is a critical component to business. BBNC defines a record as any information, regardless of format, that has legal or business retention requirements. In many cases, records will be documents. This includes, but is not limited to, hand written or printed documents, recorded spoken words, videos, email, electronic data or information. The management of records starts when the record is created and continues until it is no longer legally required.

Records are maintained only for the recommended retention period. Records no longer required for business or legal purposes are discarded or destroyed in accordance with the BBNC Record Retention Schedule.

If records in your possession have been placed on a "hold" due to outstanding compliance, legal or financial issues, you have a duty NOT to destroy, remove, or alter those records until you receive a directive from the BBNC Legal Department.

Your Responsibilities

- ✓ Only authorized individuals may manage or destroy records.
- ✓ Do NOT destroy any records prior to their destruction date.
- ✓ Retain any records related to a litigation or an investigation.



HEALTH & SAFETY

Providing and maintaining a safe and healthy work environment is a primary concern of everyone at BBNC. Each of us is responsible for knowing and complying with all safety policies, regulations, and rules that apply to our job. Following these requirements, helps ensure not only your safety, but also the safety of your colleagues and other persons.

All supervisory employees must know, understand, and demand compliance with the safety laws and regulations that apply to their areas of responsibility, and comply with all applicable state health and safety laws and regulations including the Occupational Safety and Health Act (OSHA).

In addition, all supervisory employees 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.

Your Responsibilities

- ✓ Take care of yourself. Wear and use safety equipment.
- ✓ Do NOT take shortcuts. Take the time to do the job safely and right.
- ✓ Never tell another employee that safety does not matter or to disregard safety procedures.
- ✓ Notify your supervisor of any hazardous conditions or another employee's failure to use safety equipment or follow safety procedures.
- ✓ Cooperate in the event of a workplace inspection.

CONFIDENTIAL BUSINESS INFORMATION AND NON-DISCLOSURE

BBNC should protect confidential business information and only disclose such information when it is authorized by BBNC or legally required. Confidential business information includes, among other things, any non-public information concerning BBNC, including its business dealings, potential partnerships or acquisitions, products, services, and financial information.

Confidential business information also includes any non-public information obtained from third parties, including current and potential business associates or competitors. The obligation to safeguard confidential information continues even after your employment with BBNC.

ANTITRUST

BBNC complies with all applicable state and federal antitrust laws. Federal antitrust laws protect consumers from illegal competitive actions such as price fixing and division of markets. Non-compliance with applicable laws can result in civil violations up to \$100 million and criminal penalties may include jail time.

Antitrust laws prohibit employees from entering into any kind of agreement or understanding (even oral or informal) with a competitor on:

- ✓ **Prices;**
- ✓ **Territories;**
- ✓ **Limitations on products or services;**
- ✓ **market share;**
- ✓ **The wages or other benefits paid to employees, or regarding which workers each company will or will not hire;**
- ✓ **Any action, which affects, limits, or restricts competition.**

Unlawful agreements do not require a written document signed by the parties involved. If competitors make a conscious commitment to a common course of anticompetitive action, they

could be in violation of antitrust laws.

BBNC is free 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.
- ✓ NEVER attend meetings or social gatherings with competitors where prices, costs, sales, profits, market shares, or other competitive subjects are discussed.
- ✓ Be careful when speaking with competitors. Avoid the appearance of wrongdoing.
- ✓ DO NOT enter into any understanding with a competitor that restricts either parties' discretion to manufacture or sell any products or provide any service, or which limits selling to, or buying from, a third party.
- ✓ DO NOT share competitively sensitive information such as prices, wages, or costs with a competitor.

ENVIRONMENT

BBNC is expected to conduct all business operations in a way that avoids or minimizes any possible adverse impact on the environment. We will comply with all environmental laws and regulations, including providing truthful and accurate information to government permitting authorities.

INTEGRITY IN TECHNOLOGY



DATA SECURITY

BBNC recognizes the vital role data and information plays in its business operations and the importance of taking steps to protect information in all forms. BBNC must comply with all local, state and federal laws and regulations that apply to collecting, retaining, storing, sharing and handling different types and categories of data.

BBNC will categorize their respective data according to the impact that unauthorized access, loss of integrity, or interruption in the availability of the data would cause, the security measures needed to protect that particular category of data and the laws governing the treatment of that particular category of data.

If you have questions about data security or believe that data has been lost, stolen, miscategorized, mishandled or used improperly, contact your IT Department or the BBNC Compliance Department.

Your Responsibilities

- ✓ Identify and protect company business data and information.
- ✓ Ask questions about the proper way to safeguard data and information.
- ✓ Participate in data security training.

Government Contracting

Data security is particularly important for companies engaged in government contracting. If you are working on a government contract, carefully review all applicable data security laws and regulations, including guidance on data security protection outlined in the FAR and DFAR. If you have questions, contact your IT Department or the BBNC Compliance Department.





SOCIAL MEDIA POLICY

Social media (including personal and professional websites, blogs, chat rooms and bulletin boards; social networks, such as Facebook, Instagram, Snapchat, LinkedIn, Twitter; video-sharing sites such as YouTube; and e-mail) is a common means of communication and self-expression. BBNC respects the right to use blogs and social networking sites as a medium of self-expression and public conversation and does not discriminate against those who use these media for personal interests and affiliations or other lawful purposes.

Your responsibilities

- ✓ Always be fair and courteous to co-workers, clients, or others associated with BBNC.
- ✓ Represent yourself in a professional and respectful manner, and exercise good judgment and reasonable care.
- ✓ Be clear that you are not speaking on behalf of BBNC or its subsidiaries, and avoid using BBNC trademarks, graphics or images.
- ✓ Be careful not to disclose any non-public or confidential information.

COMPUTERS AND INFORMATION TECHNOLOGY

BBNC's computer, phone, email, voicemail, internet and information technology systems (BBNC's systems) are to be used for company business purposes. Employees and others should be aware that they have no expectation of privacy when using BBNC's systems.

Your responsibilities

- ✓ Read and understand your company's acceptable network use policy.

INTEGRITY DEALING WITH OTHERS



[i]ntegrity

Dealing with others

INTERFERENCE WITH AN AUDIT

BBNC must refrain from taking any action that misleads, impedes, or otherwise disrupts the work of either the internal auditors or independent outside auditors, including any action to fraudulently induce, coerce, manipulate, hinder, or mislead any auditor in any respect.



The integrity of our relationships depends on high quality products delivered in a timely and efficient manner. We are committed to maintaining valuable relationships and cooperating with the terms and conditions of those relationships.

POLITICAL CONTRIBUTIONS & ACTIVITIES

Personal Political Contributions and Activities

BBNC employees are strongly encouraged, as individuals, to engage in political activities, such as voting or making personal contributions in support of candidates or parties of your choice. You are also encouraged to express your views on government, legislation, or other matters of local and national interest. These activities, however, must be undertaken on your own time and at your own expense.

BBNC will not attempt to dictate to any employee which political party or view to support. Under no circumstances will any employee be compensated, reimbursed, given or denied employment or promotion, as a result of making, or failing to make, a political contribution.

Corporate Political Activity

Federal and state laws strictly regulate corporate political activity. BBNC's growth and business interests make it necessary to closely scrutinize our political activity, ensuring it is consistent with our culture, values, business objectives, and the law.

Only the BBNC Board of Directors and the BBNC President and CEO will determine BBNC's position on political issues, including endorsement of political candidates and making any political contributions.

Lobbying

BBNC is prohibited from using federal funds to pay persons such as lobbyists or consultants to influence or attempt to influence executive or legislative decision making in connection with the award of any contract.

We are also required to furnish a certification that no federal funds have been paid or will be paid in violation of this prohibition. In addition, BBNC is required to report to the government any payments to lobbyists or consultants paid with non-federal funds for such purposes.

Personal Relationships with Legislative and Executive Branch Officers, Employees, and Elected Officials

BBNC recognizes that employees may have long established personal relationships with legislative and

executive branch officers, employees, elected officials or their immediate family members. If you have an established personal relationship you should disclose your situation to your supervisor or the BBNC Compliance Department.

Your Responsibilities

- ✓ Obey restrictions imposed by law upon company participation in politics.
- ✓ Make clear that the political views you express are your own.
- ✓ Do not utilize company resources for political purposes.

CONTRACT COMPLIANCE

Once BBNC is awarded a contract, we have a responsibility to comply with its requirements. Deviations from the requirements may be prohibited unless they are approved in accordance with government procedures. It is possible that unauthorized deviations can be considered a criminal act. Examples of deviations include failing to deliver materials paid for under contract and providing goods that:

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

There are additional regulations dealing with government contracting programs for small businesses (set-aside contract awards). As government contractors, we must comply with labor standards statutes (i.e. Service Contract Act, Contract Work Hours, Safety Standards Act, Davis Bacon, etc.) as well as many other statutes specific to government contracting.

Under set-aside contract awards, small business prime contractors are required to self-perform certain levels of work on a government contracts. BBNC government contractors must comply with these regulations known as prime contractor's limitations on subcontracting. BBNC's contract compliance efforts explicitly include compliance with all the terms and conditions of a contract, including performance requirements.

Your Responsibilities

- ✓ Read your respective contracts and familiarize yourself with the contract terms and conditions.
- ✓ Adhere to all terms and conditions of the contract.
- ✓ Never substitute material or change testing and quality control requirements unless you follow authorized procedures.
- ✓ Actively monitor and comply with the contract performance of work requirements.

GRATUITIES, GIFTS AND TIPS

BBNC is committed to fostering quality relationships with suppliers, customers, our community, and each other. To ensure that our relationships are honorable and reputable, the following guidelines should be used in giving and accepting gifts, tips and gratuities.

Business Courtesies to Non-Government Personnel

BBNC employees may provide or accept meals, refreshments, entertainment, and other business courtesies of reasonable value to or from non-government persons in support of business activities, provided:

- ✓ The practice does not violate any law, regulation, or standard of conduct of the recipient's organization; and
- ✓ The business courtesy must be consistent with marketplace practices, infrequent in nature, and not lavish or extravagant. Use common sense and good judgment in this area.

Business Courtesies to Government Personnel

Government personnel are subject to a different standard. Under both federal and state law, government personnel are generally prohibited from accepting entertainment, meals, gifts, gratuities, and other things of value from businesses and persons with whom they do business or over whom they have regulatory authority.

- ✓ Employees of the executive branch are permitted to accept unsolicited business gifts (except cash or investment interests) of up to \$20 in market value per occasion (the entire visit).
- ✓ The sum of these gifts cannot exceed \$50 from one company per calendar year.
- ✓ Offering or giving gifts in excess of these amounts may be a criminal offense, regardless of intent and regardless of whether paid with BBNC or personal funds.

ANTI-KICKBACK ACT

The Anti-Kickback Act prohibits subcontractors and potential subcontractors under government contracts from giving kickbacks to prime contractors or their employees or to higher-tiered subcontractors or their employees. The Act also prohibits the acceptance of such kickbacks.

“Kickbacks” can be in the form of money, fees, commissions, credits, gifts, gratuities, or anything of value, which is either directly or indirectly provided in return for obtaining favorable treatment. Favorable treatment does NOT have to be something that you would think of as dishonest, but under different circumstances, might be considered an innocent act. It could include such activities as:

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

When the favorable treatment is “bought,” then it becomes unlawful. The Act prohibits any employee from:

- ✓ Providing, attempting to provide, or offering to provide any kickback;
- ✓ Soliciting, accepting, or attempting to accept a kickback;
- ✓ Including, either directly or indirectly, the amount of any kickback in the contract price charged to our customers.

Your Responsibilities

- ✓ Immediately report any requests to make, authorize, or agree to any offer or payment which is contrary to this Code.
- ✓ Immediately report any information that makes you suspect that an employee or vendor is engaging in, or has engaged in, conduct prohibited by this Code.

AVOIDANCE OF RESTRICTIONS ON TRADE

BBNC will not enter into a subcontract or teaming agreement that unreasonably restricts sales by the other company directly to the U.S. Government of items made or supplied by the other company and will not otherwise act to restrict unreasonably the ability of any other company to sell directly to the U.S. Government. Conversely, BBNC will not enter into agreements where, as a subcontractor or teaming partner, we are subject to any unreasonable restriction to sell our products or services directly to the U.S. Government.

Other wrongful business practices, such as bid rigging, are equally unacceptable and prohibited under various federal statutes, including the Federal Procurement Policy Act, 41 U.S.C.A. § 401 et seq.; the Procurement Integrity Act, 41 U.S.C.A. § 423, and various federal procurement regulations, including FAR 52.215.

Your Responsibilities

- ✓ Do NOT talk to competitors about fixing or controlling prices or terms of sale, allocating/apportioning products, markets, territory or customers, or

boycotting certain customers or suppliers.

- ✓ Do NOT require our customers, subcontractors, or suppliers, as a condition of doing business, to buy from BBNC before BBNC agrees to buy from them.
- ✓ Do NOT agree to establish or fix prices or other terms or conditions of sale.
- ✓ We play fair. Our employees are expected to refrain from knowingly obtaining “contractor bid or proposal information” and “source selection information” before the award of a federal contract to which the information relates.
- ✓ Refrain from bid-rigging or any similar wrongful conduct designed to undermine the competitive nature and integrity of the government’s procurement process.

CONSULTANT COMPLIANCE WITH CODE OF ETHICS & BUSINESS CONDUCT

This Code will be incorporated in all consultant contracts, and each such contract will expressly provide for termination in the event the consultant violates the laws regulations or, this Code, BBNC policies and procedures, or respective subsidiary policies and procedures.

Your Responsibilities

- ✓ Consult your contracting department regarding contract obligations and responsibilities.

PROPOSAL PREPARATION

The Truth in Negotiations Act (TINA) generally requires that company personnel 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.

Cost and pricing data include all facts that prudent buyers and sellers would reasonably expect to affect price negotiations. It includes factual information or data such as:

- ✓ **Subcontracted items;**
- ✓ **Direct labor hours and dollars;**
- ✓ **Indirect expenses;**
- ✓ **Information on management decisions that could have significant bearing on costs;**
- ✓ **Vendor quotations;**
- ✓ **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.



INTEGRITY AROUND THE GLOBE



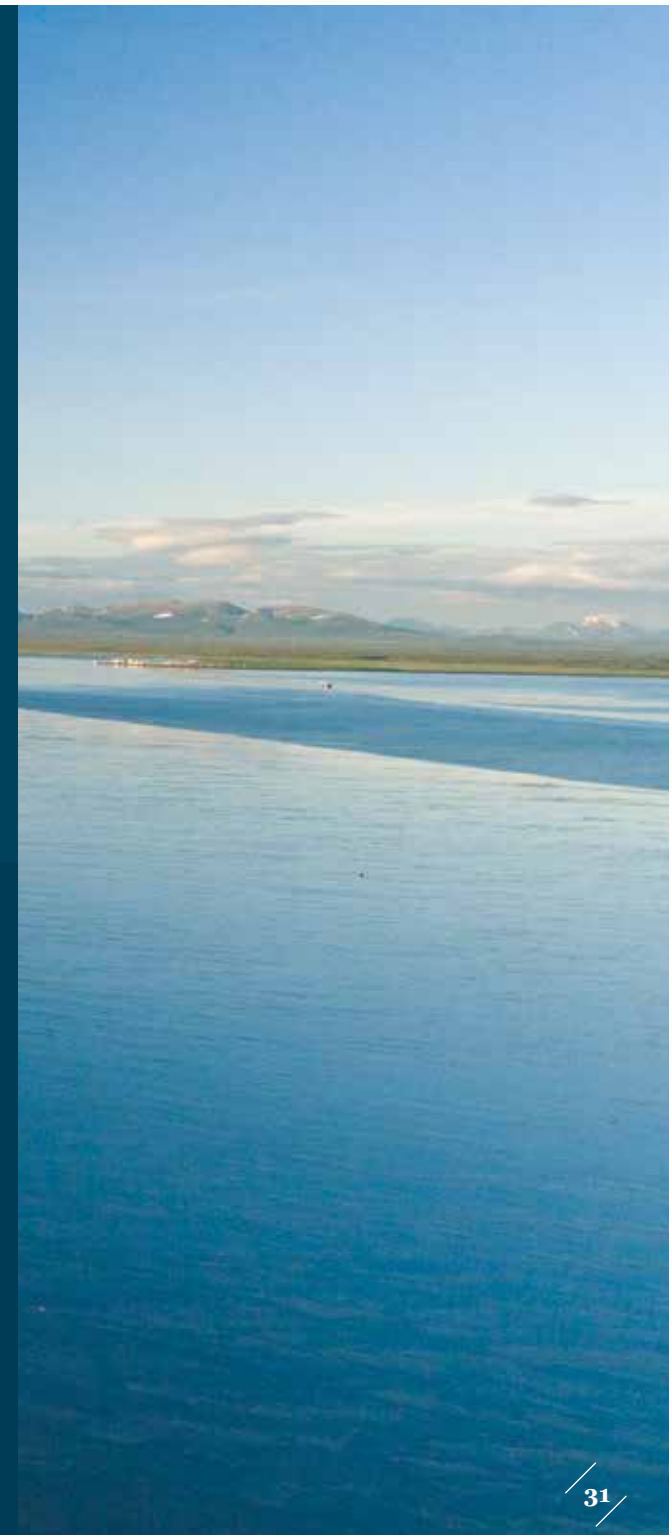
[i]ntegrity

Around the globe

UPHOLDING OUR INTEGRITY WORLDWIDE

As we have grown and extended our business operations not only throughout the nation, but also throughout the world, we are continually challenged to hold true to BBNC's culture and values while respecting the different practices of other cultures or geographic locations. Our sense of honesty, integrity, and leadership does not allow us to participate in dishonest business practices even when they may be commonplace or accepted customs in

certain industries or cultures elsewhere. We will never offer or accept any bribe, kickback, or dishonest gift, of any kind or nature, to or from local or foreign civil, religious, government, or military official. In locations where standards of business differ from those in the United States, we will maintain compliance with the provisions of the U.S. Foreign Corrupt Practices Act as well as the laws of the jurisdiction in which we are doing business.





FOREIGN CORRUPT PRACTICES ACT

The Foreign Corrupt Practices Act (FCPA) prohibits payments, offers, or promises to give money, gifts or anything of value to foreign officials, political parties, or candidates for foreign political office in order to obtain, keep, or direct business to any person or company.

Examples of situations that may constitute improper payments to government officials include giving gifts of more than minimal value, providing entertainment, sponsoring government travel, or paying tips or other fees not required by law.

Indirect payments of this nature made through an intermediary are also illegal. BBNC must comply with the FCPA as well as anti-corruption laws in all jurisdictions where they conduct business. The following activities are prohibited:

- ✓ **Maintaining secret or unrecorded funds or assets;**
- ✓ **Falsifying records;**
- ✓ **Providing misleading or incomplete financial information to an auditor.**

Your Responsibilities

- ✓ Comply with the law and the highest ethical standards of the United States and the foreign country in which BBNC is doing business.
- ✓ Do NOT make any payment, regardless of amount, to foreign government officials or personnel.
- ✓ Do NOT use BBNC assets for any unlawful or improper use.
- ✓ Do NOT create or maintain a secret or unrecorded fund or asset for any purpose.

COMBATING HUMAN TRAFFICKING

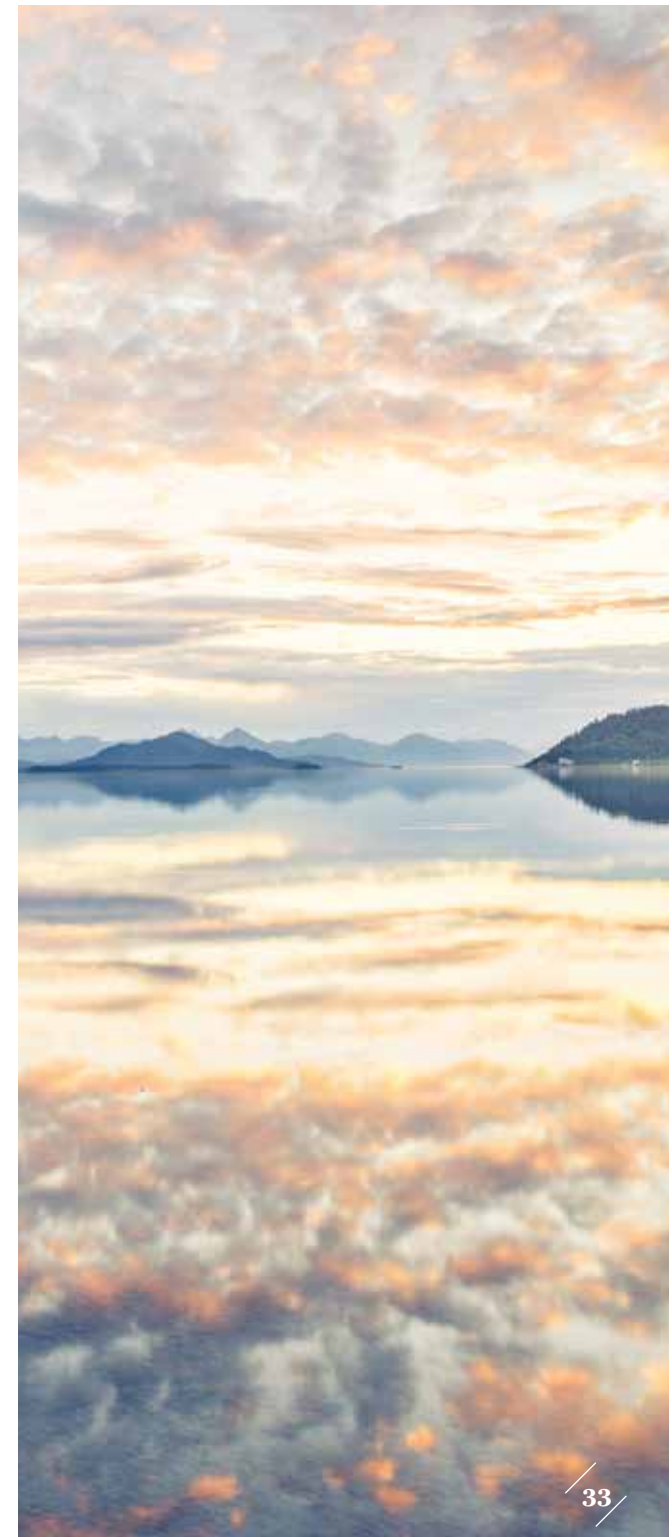
The U.S. Government has established a “Zero-Tolerance” Policy on human ‘trafficking in persons’ (TIP) which addresses all forms of compelled services as described in the Trafficking Victims Protection Act (TVPA) including but not limited to:

- / **Forced Labor**
- / **Sex Trafficking**
- / **Bonded Labor**
- / **Debt Bondage Among Migrant Laborers**
- / **Involuntary Domestic Servitude**
- / **Forced Child Labor**
- / **Child Soldiers**
- / **Child Sex Trafficking**

BBNC will take all necessary steps to remain in compliance with this law. TIP will not be facilitated in any way by or through BBNC’s activities, personnel, or subcontractors.

Employees are required to report violations, including violations by subcontractors. In compliance with FAR (Federal Acquisition Regulation) 52.222-50, BBNC will cooperate with all federal agencies in the event of a TIP investigation pertaining to BBNC.

If you have a question about human trafficking, contact the BBNC Compliance Department or immediately report violations to the Department of Justice TIP and Worker Exploitation Task Force.



EXPORT CONTROL RESTRICTIONS

BBNC must comply with export control restrictions established by the U.S. State Department and U.S. Commerce Department's Bureau of Industry and Security, established to prevent sensitive goods, information, technology, and software from being used contrary to the foreign policy and national security goals of the United States.

"Export" is broadly defined and includes any method of conveying or transferring data to foreign individuals, companies, or locations including sales, training and consulting, product promotion and casual conversation, even if these activities occur in the United States.

Examples of "exports" that might arise 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 United States military installations abroad

as part of a task order to complete work on the installations.

Your Responsibilities

- ✓ Contact the BBNC Compliance Department prior to the possible "export" of information, goods, products or services to foreign countries or foreign individuals to determine if a license or exemption for license should be obtained.

ANTI-BOYCOTT LAWS

United States anti-boycott laws and regulations discourage and, in some cases, prohibit U.S. companies from furthering or supporting foreign boycotts that the United States does not sanction. This has particular application to dealing with Arab countries and others who may participate in a boycott of Israel. U.S. companies are required to report requests they have received to take actions to comply with, further, or support unsanctioned foreign boycotts.

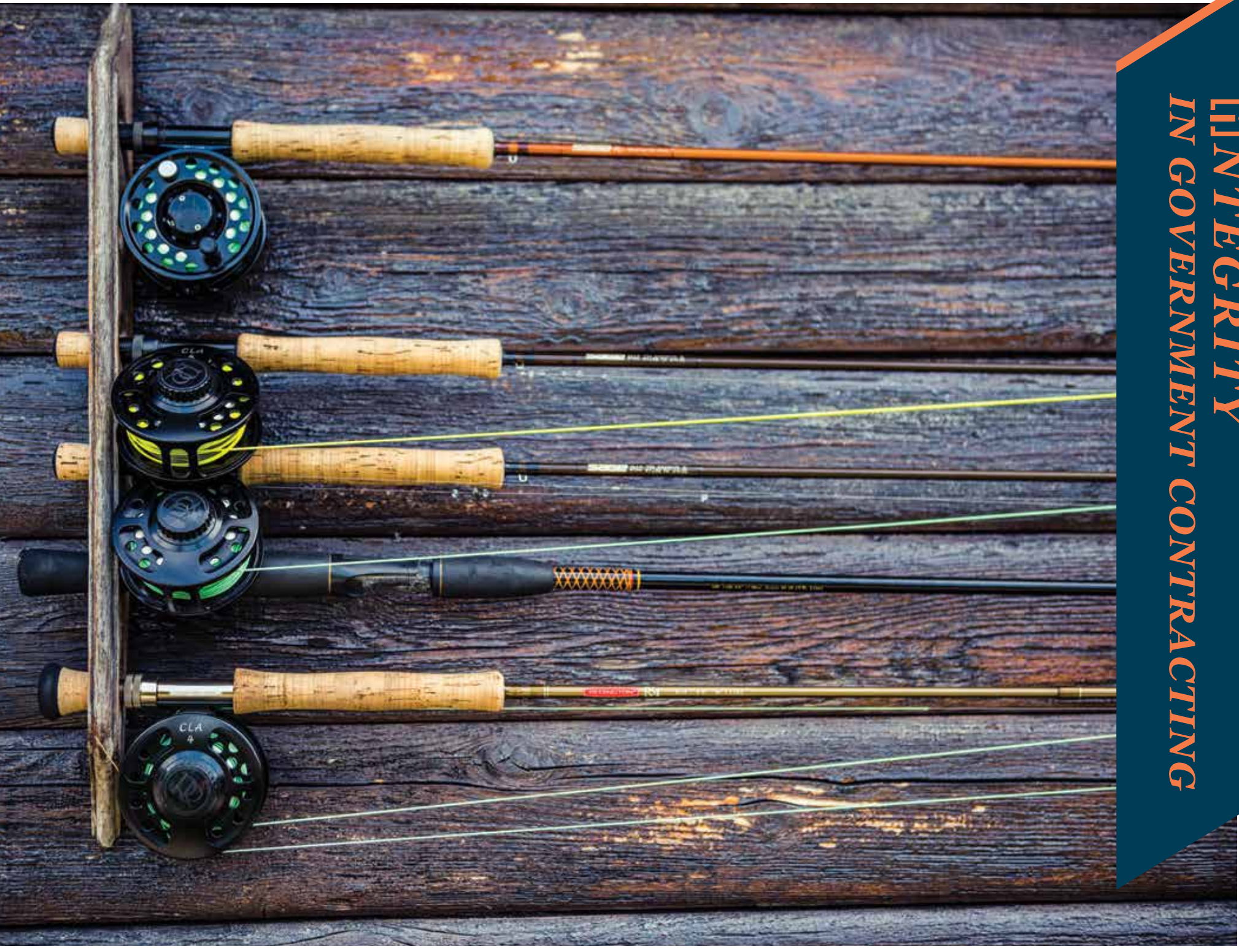
Operating with [i]ntegrity Export Controls

Q: My subsidiary recently obtained a contract where we are responsible for transporting electronic records to the Middle East. Do I need to seek guidance from the Compliance Department?

A: Yes, an export occurs when there is a transfer to any location outside of the United States or to a non-U.S. person, whether within or outside of the U.S., of controlled commodities, including technology by physical, electronic, oral, or visual means.

BBNC subsidiaries that engage in the export of controlled commodities, including technology, must seek guidance from the BBNC Compliance Department to ensure that the proper license or exemptions are obtained.

INTEGRITY IN GOVERNMENT CONTRACTING



[i]ntegrity

In government contracting

When BBNC does business with the U.S. Government, special laws and rules apply that are considerably stricter than those applicable to commercial clients.

Any BBNC employee working on government contracts must know and abide by applicable federal laws and rules. BBNC will only select subcontractors, temporary workers,

consultants, agents, suppliers, and other third-party providers who agree to follow this Code.

All BBNC employees or consultants working on federal contracts or subcontracts should familiarize themselves with those aspects of federal procurement laws and regulations that pertain to their respective projects.





PROCUREMENT INTEGRITY

Procurement integrity regulations encourage contractors to compete fairly for government contracts and prohibits unethical conduct on the part of both contractors and government procurement officials. 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.**
- ✓ **Disclosing proprietary or source selection information to anyone who is not on the government's list of approved persons.**

In general, proprietary information is information that is owned by a company and 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 which the government has developed to use in conducting a particular procurement and 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 give gifts or money to procurement officials.
- ✓ Prior to award, do NOT ask for a competing contractor's proprietary information or source selection information.
- ✓ If you realize that you have source selection or proprietary information related to an ongoing procurement, do NOT look at it or allow unauthorized access to the information.
- ✓ If you have inadvertently received or seen source selection or proprietary information related to an ongoing procurement, contact the BBNC Compliance Department.

HIRING OF GOVERNMENT AND FORMER GOVERNMENT EMPLOYEES

Special restrictions apply to hiring or retaining a government or former government employee as an employee or consultant. In addition, various laws create post-employment restrictions that may limit the type of work that the government employee can perform for certain periods of time, particularly for matters that they were personally and substantially involved or that involved agencies where they had held senior positions.

BBNC will not conduct any discussions regarding potential employment or business opportunities to any procurement official connected to a contract for which a bid has been submitted or contract awarded. In order to be sure that you do not run afoul of restrictions in this area, before discussing potential BBNC employment with any government employee, contact the BBNC Compliance Department.

Authorization from the BBNC Compliance Department must be obtained before even mentioning proposed employment to current or recently separated government employees, and only after they have

publicly announced that they are leaving government service. In addition, any plans to employ retired military officers of general or flag rank, or civilian officials having the rank of Deputy Assistant Secretary or above, must be approved by the BBNC President and CEO or the respective subsidiary company group President and CEO prior to an offer of employment.

Operating with [i]ntegrity Hiring Government Employees

Q: I would like to hire a current or former government employee. What precautions should I take before discussing potential employment with a current or former government employee?

A: The first step is to contact BBNC Compliance Department to discuss what you can and cannot do depending on the specific facts and circumstances. There are restrictions on even discussing possible employment with certain current government employees.

Current and former government employees are also banned from disclosing certain information that they learned during their government employment, and further safeguards/firewalls may need to be put in place so as to avoid BBNC or its subsidiaries from potentially being disqualified from competing for future contracting opportunities.

Some government employees have post-employment or revolving door restrictions on the type of work they can do for specified periods of time after leaving the government.

PROHIBITED CONTRACTUAL RELATIONSHIPS

BBNC shall not knowingly engage in any unlicensed transaction with any individual or entity located in a country subject to U.S. embargo sanctions (i.e., the Crimea Region of Ukraine, Cuba, Iran, North Korea, and Syria), or identified on the Office of Foreign Assets Control's (OFAC) "Specially Designated Nationals and Blocked Persons" list.

BBNC may not knowingly employ an individual who has been convicted of an offense related to government contracting.

BBNC will not knowingly contract with an individual or entity identified on the Office of Foreign Asset Control's (OFAC) "Specifically Designated" list of nationals or persons who are subject to trade restrictions.

BBNC will immediately sever all business connection with any former employee and/or consultant of BBNC whose conduct violates applicable laws, regulations, or basic tenets of business integrity and honesty. Appropriate notices specifically identifying such individuals will be provided to employees or posted on BBNC bulletin boards.

INDUSTRIAL SECURITY & CLASSIFIED INFORMATION

Some BBNC employees work on a day-to-day basis with information that has a government security classification. Access to this information is restricted to those employees who have the appropriate security clearance and are shared on a need-to-know basis.

Allowing improper access to, or unauthorized disclosure of, classified information, whether intentional or through carelessness, is punishable under federal criminal laws. This can be damaging to the individual, to BBNC, and to our nation's security.

Classified information should not be reported via the Ethics Hotline and Website. If you need to report a concern about a violation of law or of this Code and you feel that reporting such a concern may require disclosure of classified information, report your concern via your established chain of command. If you are uncomfortable doing so, or if after doing so, you still feel that further action is necessary, then you should report to the Ethics Hotline or Website that you have a concern involving classified information. Do NOT disclose the classified information until a proper investigation is conducted.

Your Responsibilities

- ✓ Never share classified information with anyone (including a co-worker) who does not have both the required security clearance and need-to-know status.
- ✓ After accessing classified information, ensure that such material is locked in an approved storage place. Do NOT take classified documents home.
- ✓ Report unauthorized release, loss, or destruction of classified material to the BBNC Compliance Department.
- ✓ Government rules and regulations governing the processing, storing and transmission of Controlled Unclassified Information (CUI) and Unclassified Controlled Technical Information (UCTI) are constantly changing. If you have a question, contact your IT department or the BBNC Compliance Department.



BYRD AMENDMENT

BBNC may engage in proper activities that influence, or are intended to influence, the award of a government contract.

The Byrd Amendment prohibits BBNC from charging costs associated with such activities to a government contract. Activities which “influence the award” of a government contract cover a broad range, including most discussions with government personnel about 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 area of 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 to comply with, the applicable laws and regulations.

If this applies to you, you are expected to work with the BBNC Compliance Department to ensure full compliance.

FALSE CLAIMS / FALSE STATEMENTS

It is a felony to knowingly make a false claim or false statement to the federal government. Do NOT lie. Do NOT lie to yourself, your fellow employees, your supervisor, or the customers or suppliers. It is wrong. It is dangerous and it can be against the law.

BBNC will not tolerate conduct such as charging labor or material costs improperly or to the wrong account or charging direct contract effort to an overhead or indirect account.

Bad conduct, false time cards, and improper charges may subject both BBNC and individual employees to civil and criminal sanctions including fines, debarment or suspension, and prison sentences. Such violations also can expose an employee to discipline up to and including termination of employment.

Your Responsibilities

Be fair and honest with your customers. Treat the government as a valued client. Take the time to be accurate and provide good information. It is not possible to list all contract-related dealings with the government that present the risk of false statements, false claims, or other violations.

- ✓ Charge all labor, equipment and material costs accurately, to the appropriate account, regardless of the status of the budget for that account.
- ✓ Fully disclose complete and accurate cost and pricing data that is current, up to the date of agreement on price. Remember that the definition of data that must be disclosed is very broad and includes facts as well as management decisions, estimates (based on verifiable data), and other information that a reasonable person would expect to affect the negotiations.

- ✓ Do NOT submit proposals for reimbursement of indirect costs to the government that contain expressly unallowable costs such as for advertising, donations, lobbying, entertainment, fines and penalties, defense of fraud proceedings, and goodwill. Only request reimbursement for those indirect costs that are reasonable in amount and for those costs that you believe in good faith are allowable.
- ✓ Deliver goods and services that meet all contract requirements and give the customer the highest degree of confidence in our work. Improprieties, such as failure to conduct required testing, or manipulation or falsification of test procedures or data, will not be tolerated.

**INTEGRITY
WITH INVESTIGATIONS**



[i]ntegrity

With investigations

GOVERNMENT INVESTIGATIONS

BBNC is committed to full cooperation with any government agencies responsible for either investigation or corrective actions and expects its employees to share this commitment to cooperation. It is extremely important that, in all instances, employees be truthful and accurate in all statements made and information given to regulatory and law enforcement officials.

BBNC may be asked for information from government agencies or may be the subject of governmental audits, inspections, or investigations. All such inquiries should be referred to the BBNC Compliance Department. BBNC will never lie or make misleading statements, attempt to cause another employee to fail to provide accurate information and/or obstruct, mislead, or unnecessarily delay the communication of information or records related to a possible violation of the law. During such investigation, the BBNC Compliance Department will work to assure our responses are timely, complete, and factual.

INVESTIGATIONS OF MISCONDUCT

BBNC reserves the right to use any lawful method of investigation, which it deems necessary, to determine whether any person has engaged in conduct, which in its view interferes with or adversely affects its business or violates this Code.

Every employee and consultant are expected to cooperate fully with any investigation of any violation of law, this Code, BBNC policies and procedures, or respective subsidiary policies and procedures.

Operating with [i]ntegrity Investigations Compliance

Whether you report anonymously or not, you should provide as many details as possible so the issue can be addressed thoroughly and promptly.

If you become involved in an investigation, cooperate fully and answer all questions completely and honestly.

Resources

POLICIES

This Code does not address all workplace conduct and interaction. Your company may maintain additional policies, procedures and guidelines that may provide further guidance on

matters in this Code or address conduct not covered by this Code. Employees are expected to abide by applicable BBNC policies and procedures, and subsidiaries' policies and procedures.

TRAINING


BBNC encourages all employees to have training on BBNC's Code of Ethics and Business Conduct, Cybersecurity Awareness, and Sexual Harassment and Discrimination Avoidance.

Your company may offer other training as well. Please reach out to your supervisor to learn what additional training may be available.


BBNC COMPLIANCE DEPARTMENT


The BBNC Compliance Department is here to help. We are available to answer any questions or concerns you may have about the Code or a suspected violation of the Code.

To contact the BBNC Compliance Department:

 907.278.3602

 Compliance@bbnc.net

 111 W. 16th Avenue, Suite 400
Anchorage, Alaska 99501

 1.866.513.7078

 www.info.bbnc.net



Operating with [i]ntegrity

**When In Doubt, Stop
And Think. Ask Yourself:**

- ／ *Is there a law or regulation?*
- ／ *What does the Code say?*
- ／ *How do our values apply?*
- ／ *Is this addressed in any BBNC policies and procedures?*
- ／ *Could this reflect badly on me or BBNC?*



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