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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 and Promote
BBNC's Culture of [i]ntegrity**

Creating a Culture of [i]ntegrity

Each and every BBNC employee is a champion for our corporation and its 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). Our mission is “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 2021, 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 one of our most valuable resources 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 and expectations for conducting business.

The Code provides specific guidance to all directors, officers, employees, whether employed by BBNC corporate or a BBNC subsidiary, and agents. While the Code is comprehensive, 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 black 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 and sustaining 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
- ✓ Meaningful Collaboration

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.

HOW TO USE THE BBNC CODE



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, company's General Manager/Program Manager, or Department Head.

[i]ntegrity



Operating with [i]ntegrity

The legal and ethical principles that comprise this Code guide our behaviors and conduct. This Code is broadly stated and not intended to replace BBNC and BBNC companies' policies and procedures.

Rather, it provides an overview and a common understanding of BBNC's values and ideals to which we aspire in the conduct of our business activities.

OVERVIEW & EXPECTATIONS

BBNC is proud of our businesses 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 of BBNC: BBNC and its subsidiaries, directors, officers, employees, consultants, agents, and to all business activities conducted by the corporation. When the Code talks about "BBNC" or the "corporation," it is intended to include BBNC corporate employees as well as those of its subsidiaries.

This Code will be incorporated in all consultant contracts, and each such contract will expressly provide for termination in the event the consultant violates this Code.

Consult your contracting department regarding contract obligations. This Code sets out the standards that we expect all of our employees to follow. 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 since we expect that you will understand and follow it. 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 Code is updated periodically to reflect changes in regulations and written standards (policies, procedures, guidelines, etc.). The most current and authoritative version of the Code is available at: bbnc.net and info.bbnc.net.

INTEGRITY WITH COMPLIANCE & ETHICS

COMPLIANCE & ETHICS PROGRAMS

The BBNC Compliance & Ethics Program safeguards BBNC's reputation, business interests, and standard for excellence in the workplace. It creates a framework to support employees in doing the right thing. The BBNC Compliance & Ethics Program's framework is supplemented by each BBNC subsidiary to ensure BBNC creates and maintains right-sized, industry-tailored resources to support the unique circumstances of every employee.

As a BBNC employee, you are the first line of defense and you set the tone and expectations for your everyday interactions in your workplace. We expect you to uphold our Culture of Integrity.

Your Responsibilities

- ✓ Read, understand, and comply with this Code and your company's policies.
- ✓ Contact your company personnel if you have questions or concerns.
- ✓ Complete the Annual Compliance & Ethics Training and any company required training.
- ✓ Support our Culture of Integrity. If you are a supervisor, maintain an open-door policy and address workplace concerns appropriately.

- ✓ Report workplace concerns to the appropriate personnel or reporting channel.
- ✓ Promote and celebrate ethical behavior.

SPEAK UP, SPEAK OUT

Reporting a concern

BBNC is committed to maintaining a Culture of Integrity in everything we do because it is the right thing to do - for our employees and our customers.



When an employee has a concern about something that may contradict our Code 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 in good faith 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. Anyone engaging in retaliatory behavior is subject to disciplinary action, up to 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.

ETHICS HOTLINE: HOW TO FILE A REPORT

BBNC employs a third-party hotline service called Ethical Advocate. It is available to employees, vendors and clients.

You may create a secure login

managed by Ethical Advocate to file a report online or via telephone. The login allows you to access communications, including requests for additional information, related to the report.

All reports will be reviewed and assigned to HR, Compliance, and/or Legal, as appropriate. If warranted, an investigation will be undertaken.

Once the review or investigation is complete, the report will be closed. While we cannot share the results of a review or investigation, we will share information to the extent possible with relevant parties.

REVIEW & INVESTIGATIONS

BBNC recognizes the importance of a standardized method to detect, prevent, and correct incidents, allegations, reports and suspicions (collectively 'incidents') of potential misconduct and violations of law, regulations, or written standards.

Incidents of potential misconduct and violations of law, regulations, or written standards must be reported, triaged, investigated, where warranted, and resolved by qualified and trained investigators. BBNC is committed to full cooperation with any government agencies conducting a review or


investigation of an incident of potential misconduct or violations of law, regulations, or written standards.


INTERFERENCE WITH AN AUDIT

BBNC is regularly audited in a number of areas. You are expected to fully cooperate with any audit and readily provide information requested by auditors. All information provided must be unaltered and accurate.

BBNC COMPLIANCE DEPARTMENT

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

 info.bbnc.net

INTEGRITY
WITH EACH OTHER



[i]ntegrity

With each other

FAIR & EQUITABLE WORKPLACE PRACTICES

BBNC is committed to the fair and equitable treatment of its employees. An employee's qualifications, skills, job performance, and achievements are the only factors upon which decisions concerning hiring and promotions should be based, subject to the BBNC Shareholder Hire Preference Policy.

Hiring and promotion decisions must be merit-based 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.
- ✓ Create an environment where all employees feel safe and are respectful of each other.

Operating with [i]ntegrity Shareholder Hire

Shareholder Hire Preference 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.

BBNC and its subsidiaries grant an employment preference first to its shareholders, their spouses or descendants and second, to other Alaska Native applicants who meet the qualifications of the position.

BBNC encourages and supports Shareholder Hire in all companies.

HARASSMENT

BBNC strives to provide all employees with a work environment free from 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 sexual advances, requests for sexual favors, or verbal or physical conduct of a sexual nature. Unwelcomed conduct also 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 harassment, against themselves or another employee.

Your Responsibilities

- ✓ Never make a sexual advance toward a co-worker.
- ✓ Do NOT make or tolerate sexual jokes, comments about persons' bodies, graphic statements about sexual matters, or 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

Discrimination is strictly forbidden and will not be tolerated. Employees should immediately report any conduct that they believe to be discrimination, against themselves or another employee. 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 or romantic partners. Generally, any arrangement of this nature should be avoided.


It is always best to avoid even the appearance of a conflict of interest. In all circumstances, the employee must disclose the actual or potential conflict to his or her supervisor. Any actual or potential conflict of interest must be

reported to the BBNC Compliance Department.

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 situation turns out not to be a conflict.

Your Responsibilities

- ✓ 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.
- ✓ Do not conduct business with a spouse, relative, significant other, or a romantic interest unless it is disclosed to and approved by your supervisor and the BBNC Compliance Department.



"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



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.
- ✓ Do NOT use any intoxicating substance while on the job.
- ✓ Report any co-worker you reasonably suspect may be under the influence at work.

COMPANY ASSETS

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 ASSETS

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.

INTEGRITY IN IT



[i]ntegrity

In IT

DEVICES & 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

- ✓ Use BBNC's systems for work purposes.
- ✓ Understand that you have no privacy for or ownership of anything you do on BBNC's systems.

DATA PRIVACY & SECURITY

We live in a digital age. BBNC recognizes the value of our data and BBNC's systems that store and transmit that data. For our business purposes, we all have a role in protecting that data and our IT systems.

BBNC categorizes its 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 cybersecurity training.
- ✓ Understand the daily threat to the security of our data and your role in protecting our data.
- ✓ Read and understand your company's cybersecurity policies.



SOCIAL MEDIA

BBNC's Culture of Integrity depends on you being an ethical employee. As the online landscape continues to mature, the opportunities for employees to communicate with each other and the world are evolving. While social media creates new opportunities for personal expression, it also creates new responsibilities.

As a BBNC employee, you are viewed by our customers, business partners, and other outside parties as a representative of BBNC. Whether or not you specifically reference or discuss your work, your participation on social media platforms (such as Facebook, Instagram, Snapchat, LinkedIn, Twitter, and YouTube) is a reflection on BBNC.

Ultimately, you are solely responsible for what you post online. Before creating

online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects customers, suppliers, and employees who work on behalf of BBNC or BBNC's legitimate business interests may result in disciplinary action, including termination.

Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action, including termination. Keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or supervisor than by posting concerns to a social media outlet.

Your Responsibilities

- ✓ Keep in mind that social media is not contained to geographic boundaries and content that may be acceptable in some regions may be offensive in others.
- ✓ Do not share our confidential company data.
- ✓ If you make an error or accidentally post inaccurate information, be up front about your mistake, correct it quickly, and remove.
- ✓ Express only your personal opinions. Never represent yourself as a spokesperson for BBNC. If BBNC is a subject of the content you are creating, be clear and open about the fact that you do not represent BBNC.
- ✓ Do not make comments that are racist, sexist or otherwise discriminatory or that create a hostile work environment.
- ✓ Do not make threats of violence or remarks that are obscene, malicious, vulgar, defamatory, threatening, harassing, abusive or bullying.

Operating with [i]ntegrity

BBNC encourages all employees to explore and engage in social media communities at a level at which they feel comfortable. Have fun, but be smart. The best advice is to approach online worlds in the same way we do the physical one - by using sound judgment and common sense, by adhering to our culture and values, and by following this Code and all applicable company policies.

**INTEGRITY WITH HEALTH,
SAFETY & ENVIRONMENTAL**



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.

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

In addition, all supervisors 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.

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.

Your Responsibilities

- ✓ Know and adhere to any applicable environmental laws and regulations that apply to your area of responsibility.
- ✓ Immediately report any discharge or spill of any hazardous or dangerous substance.

INTEGRITY IN RECORDS & INFORMATION MANAGEMENT



RECORDS AND INFORMATION MANAGEMENT

Business records created and received by BBNC must be managed, controlled, monitored and secured in compliance with laws, regulations, and company policies.

The maintenance, retention, retrieval, protection, and preservation of records from creation to final disposition or preservation 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 or maintained indefinitely.

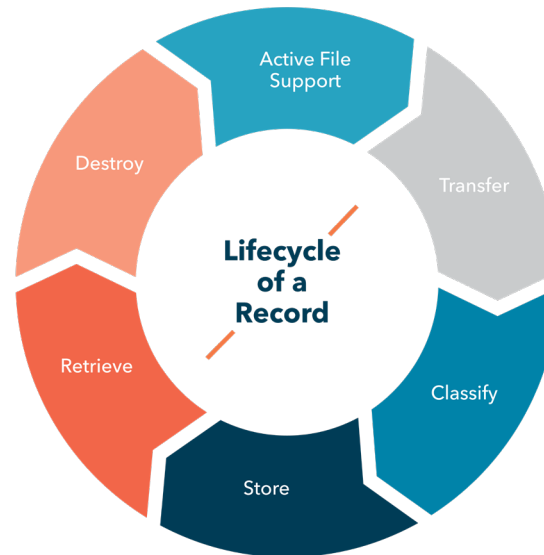
Records are maintained only for the recommended retention period and are destroyed in accordance with the BBNC Record Retention Schedule.

If you have questions about business records, please contact the RIM Department, consult the BBNC

Corporate RIM Policy, and review the BBNC Enterprise-Wide Record Retention Schedule.

Your Responsibilities

- ✓ Only authorized individuals may manage or destroy records.
- ✓ Do NOT destroy any records prior to their destruction date.
- ✓ Retain any records subject to a records hold. Records may be held or retained for investigation, litigation, or other appropriate business purposes.

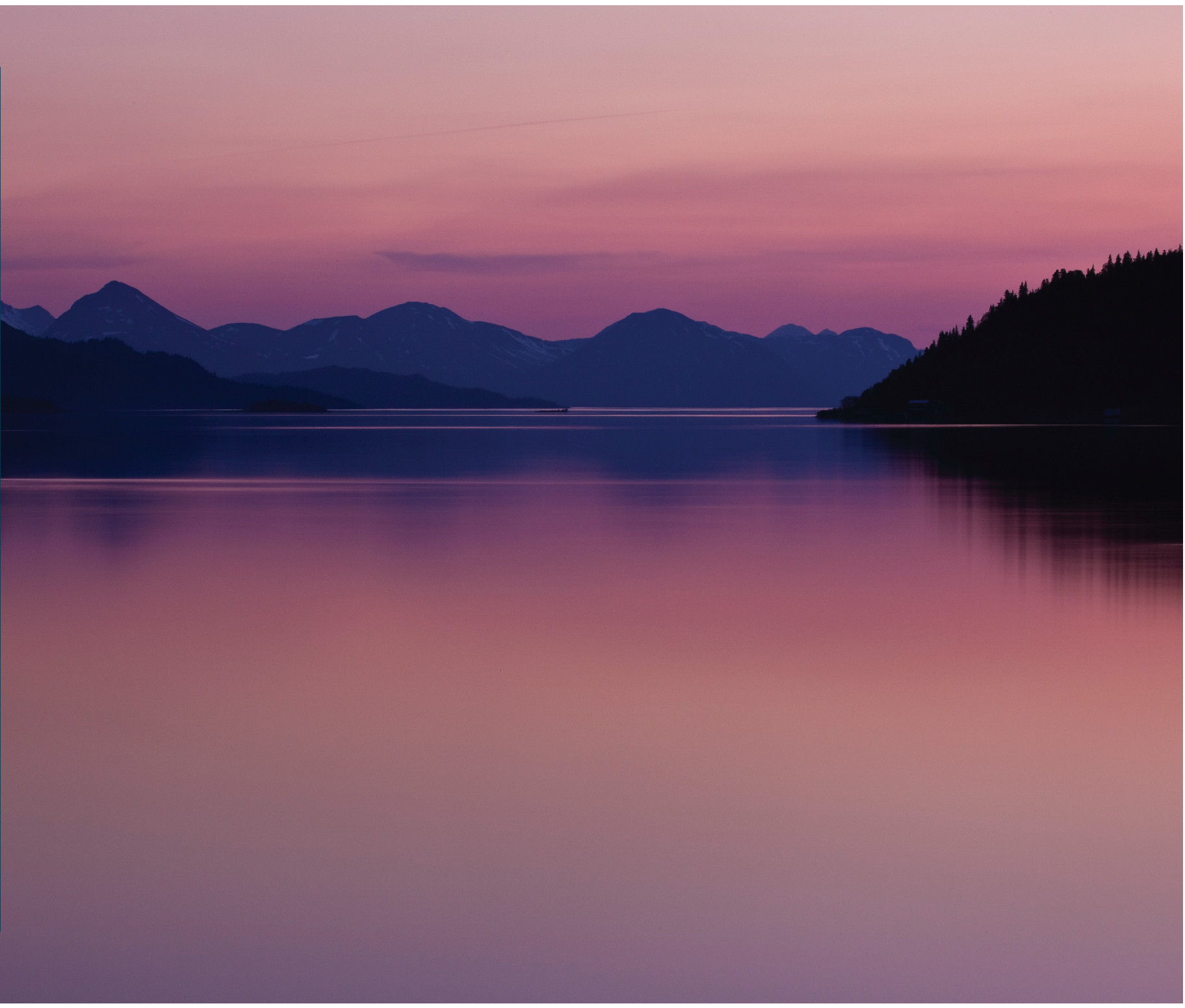


CONFIDENTIAL BUSINESS INFORMATION & NON-DISCLOSURE

You 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, 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 ceases.

INTEGRITY WITH POLITICAL ACTIVITY



POLITICAL CONTRIBUTIONS & ACTIVITIES

Personal Political Contributions & 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 political 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 may determine BBNC's position on political issues, including endorsement of political candidates and making any allowable corporate 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 or performance 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 & Executive Branch Officers, Employees, & 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 the circumstances to your supervisor and 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.



**INTEGRITY IN
FINANCIAL PRACTICES**

FINANCIAL RECORDS

Employees must record financial information accurately, completely, and timely in accordance with Generally Accepted Accounting Principles (GAAP) and applicable company policies and procedures. 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.

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 procedures.

TIME CHARGING & RECORDING COSTS

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.
- ✓ Timely submit accurate records of your time by recording the actual number of hours you worked and 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.

INTEGRITY BUSINESS DEALINGS

CONTRACT COMPLIANCE

Once BBNC is awarded a contract, we have a responsibility to strictly comply with its requirements. Deviations from the requirements may be prohibited unless they are approved by the respective parties. Some unauthorized deviations can be considered a criminal act, such as failing to deliver materials paid under contract or providing goods that:

- ✓ **Are made from lower quality materials than specified;**
- ✓ **Have not been tested and approved as required;**
- ✓ **Contain foreign-made materials when the contract requires domestic materials.**
- ✓ **Never substitute material or change testing and quality control requirements unless you follow authorized procedures and receive prior approval.**

PROPOSAL COMPLIANCE

The Truthful Cost or Pricing Data 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.





ANTI-KICKBACK ACT

The Anti-Kickback Act prohibits subcontractors and potential subcontractors 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 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 to your supervisor and the BBNC Compliance Department.
- ✓ 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 to your supervisor and the BBNC Compliance Department.

GRATUITIES, GIFTS & 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.

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.

ANTITRUST & COMPETITION

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 discuss or 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.



**[I]NTEGRITY WITH BUSINESS
DEALINGS & THE FEDERAL
GOVERNMENT**

[i]ntegrity

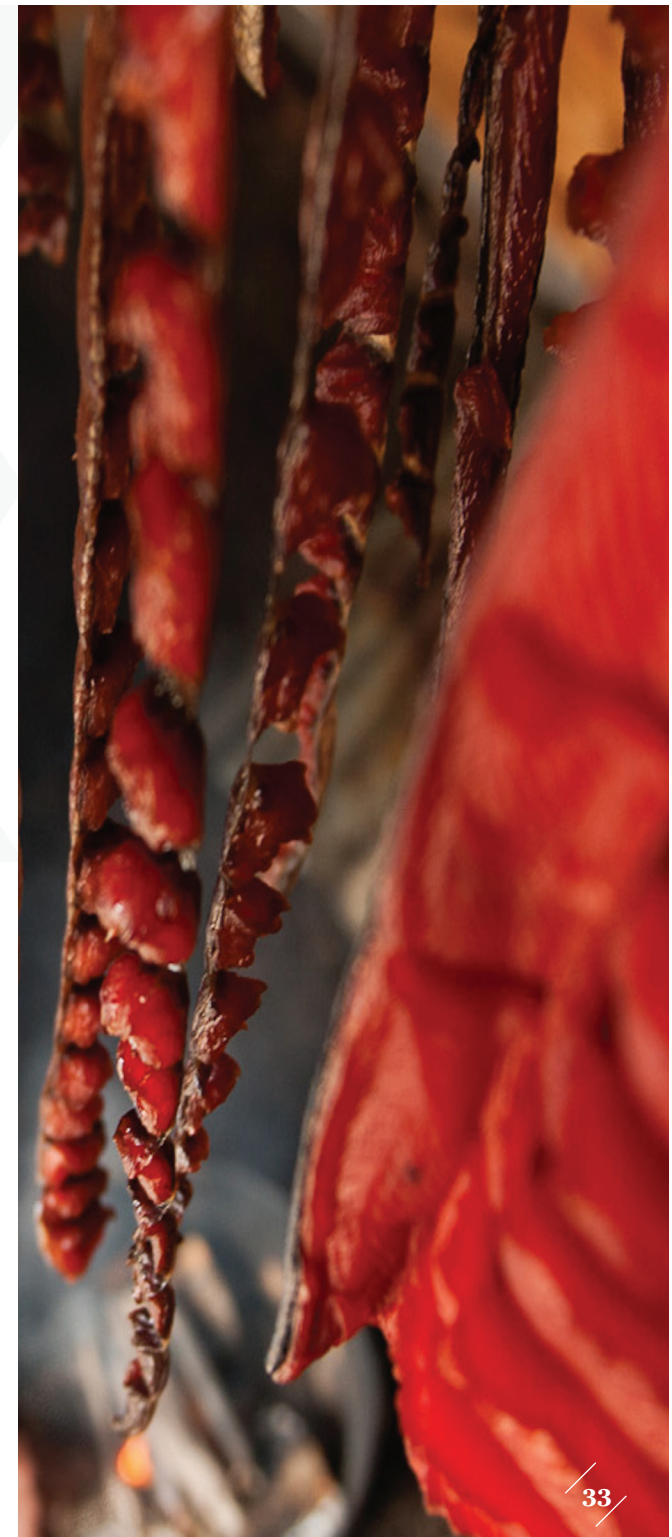
Business Dealings & the Federal Government

When BBNC does business with the Federal 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.



CONTRACT COMPLIANCE

Under set-aside contract awards, small business prime contractors are required to self-perform certain levels of work on 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. 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.

Your Responsibilities

- ✓ Read your respective contracts and familiarize yourself with the contract terms and conditions.
- ✓ Adhere to all terms and conditions of the contract.
- ✓ Actively monitor and comply with the contract performance of work requirements.

PROCUREMENT COMPLIANCE

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.

GRATUITIES, GIFTS & TIPS

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.



HIRING OF GOVERNMENT & 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 in which they were personally and substantially involved or that involved agencies where they had held senior positions.

BBNC will not discuss potential employment or business opportunities with any procurement official connected to a contract for which a bid has been submitted or a 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.

Written 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 the 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 or knowingly contract 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 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 applicable employees.

CLASSIFIED DATA PRIVACY & SECURITY

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 such information 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 employee, to BBNC, and to our nation's security.

Classified information violations 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 review and 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.

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

- ✓ 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.

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 your supervisor and 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 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 BUSINESS
DEALINGS AROUND THE
WORLD



ANTI-BRIBERY

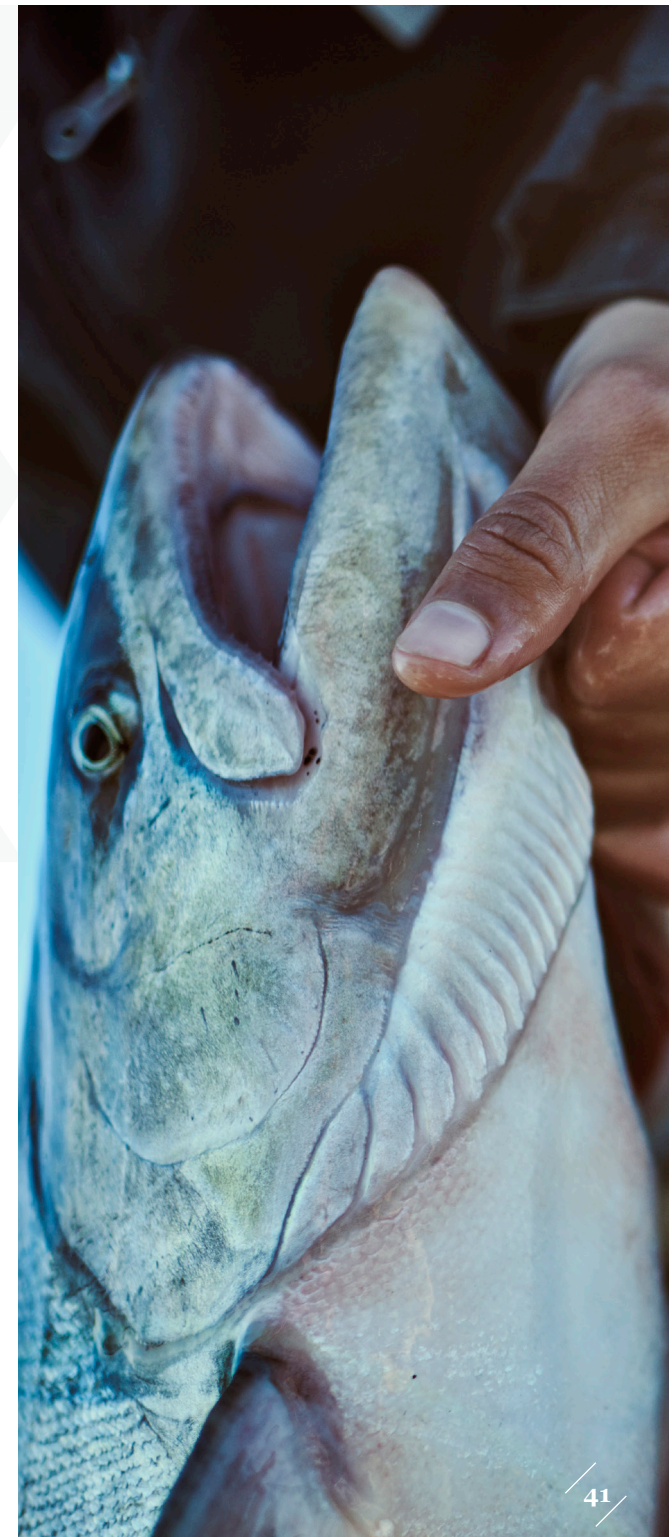
The offer or receipt of bribes is strictly prohibited. While bribes may be commonplace in many countries, they remain illegal, illicit or prohibited in most, and they are not permitted by BBNC. It is unfortunate that in some countries you may be confronted by a situation in which such a payment is extorted and you are forced to make the payment under duress or because you face a reasonable belief that your safety is threatened. If you find yourself in this extraordinary situation please contact your supervisor and the BBNC Compliance Department immediately.

Your Responsibilities

- ✓ Do not, directly or indirectly, offer, give, accept or demand a bribe in order to obtain or retain business.
- ✓ Do not offer, or give in to demands, to make illicit or illegal payments to agents, public officials, the employees of business partners or anybody else with whom we do business.
- ✓ Take appropriate steps to ensure that your interactions with business partners align with BBNC's Culture of Integrity.

ANTI-BOYCOTT LAWS

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, or support unsanctioned foreign boycotts.



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 it conducts 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, employees, 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.

EXPORT COMPLAINT

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.

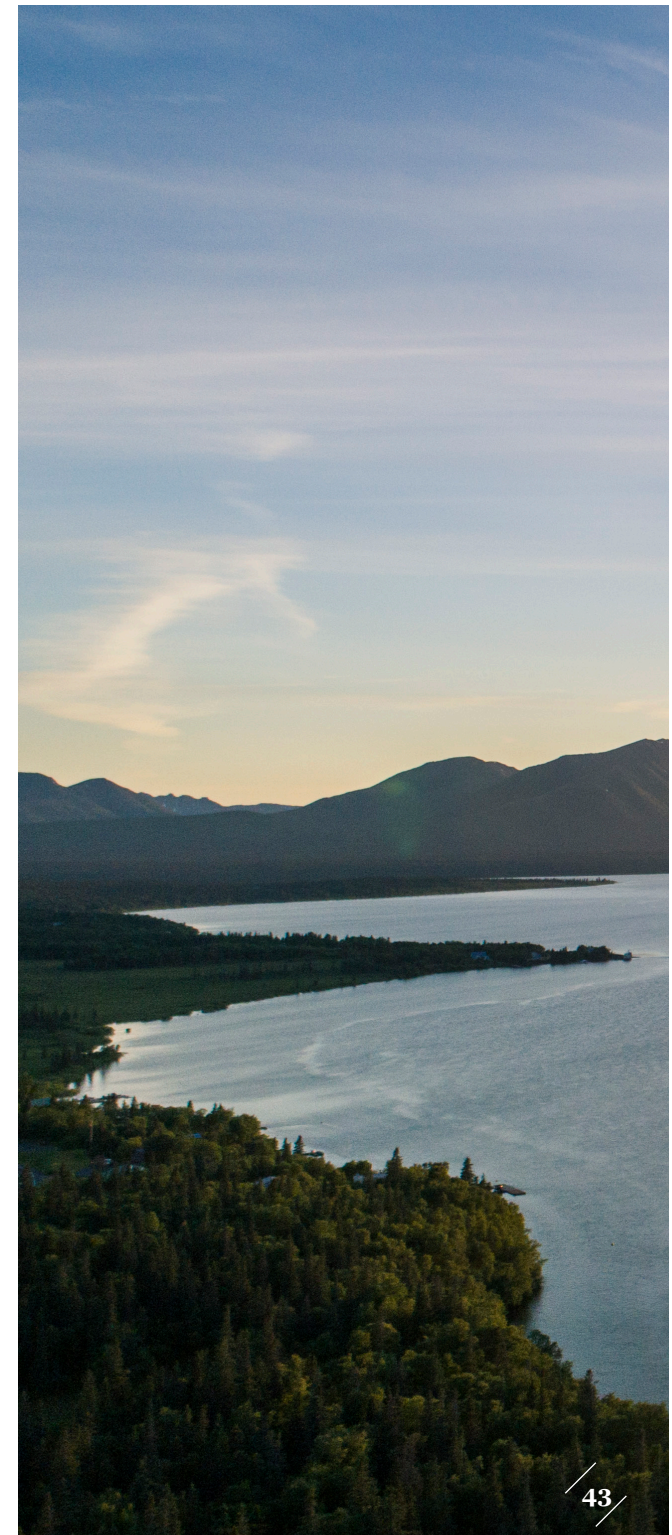
Examples of "exports" that might arise include:

- ✓ **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

- ✓ Read the BBNC Export Compliance Policy.
- ✓ Contact the BBNC Compliance Department and BBNC's Empowered Official 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.



KEY TAKEAWAYS

The BBNC Compliance and Ethics Program and BBNC Code of Ethics and Business Conduct protect BBNC's reputation for maintaining high standards by:

- ✓ **Maintaining secret or unrecorded funds or assets;**
- ✓ **Falsifying records**
- ✓ **Promoting BBNC's commitment to creating a Culture of Integrity.**
- ✓ **Emphasizing the importance of compliance, ethics, and leadership built on responsibility, accountability, open communication, and trust.**
- ✓ **Minimizing disruptions to business objectives, investments, and operations by reducing liability for violations of laws, regulations, and written standards.**
- ✓ **Ensuring that employees, business partners, and third-party vendors understand and comply with applicable laws, regulations, and written standards.**
- ✓ **Responding to and addressing reports of potential misconduct and violations of laws, regulations, and written standards.**
- ✓ **Monitoring existing elements of the BBNC Compliance and Ethics Program to ensure they align with best practices.**

We trust our leadership to make the right decisions when faced with difficult or challenging circumstances. If you need assistance related to a workplace concern, remember you have several BBNC corporate and subsidiary resources available to you. We are here to ensure you have the best workplace experience.

Thank you for being a BBNC leader.



[i]ntegrity Checklist

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

- ✓ *What does the Code or company policies say?*
- ✓ *Did I consult with my company personnel?*
- ✓ *Have I completed or requested training to better understand the issue?*
- ✓ *Would this reflect poorly on our Culture of Integrity?*
- ✓ *Have I reported this issue to the appropriate personnel and reporting channels?*

