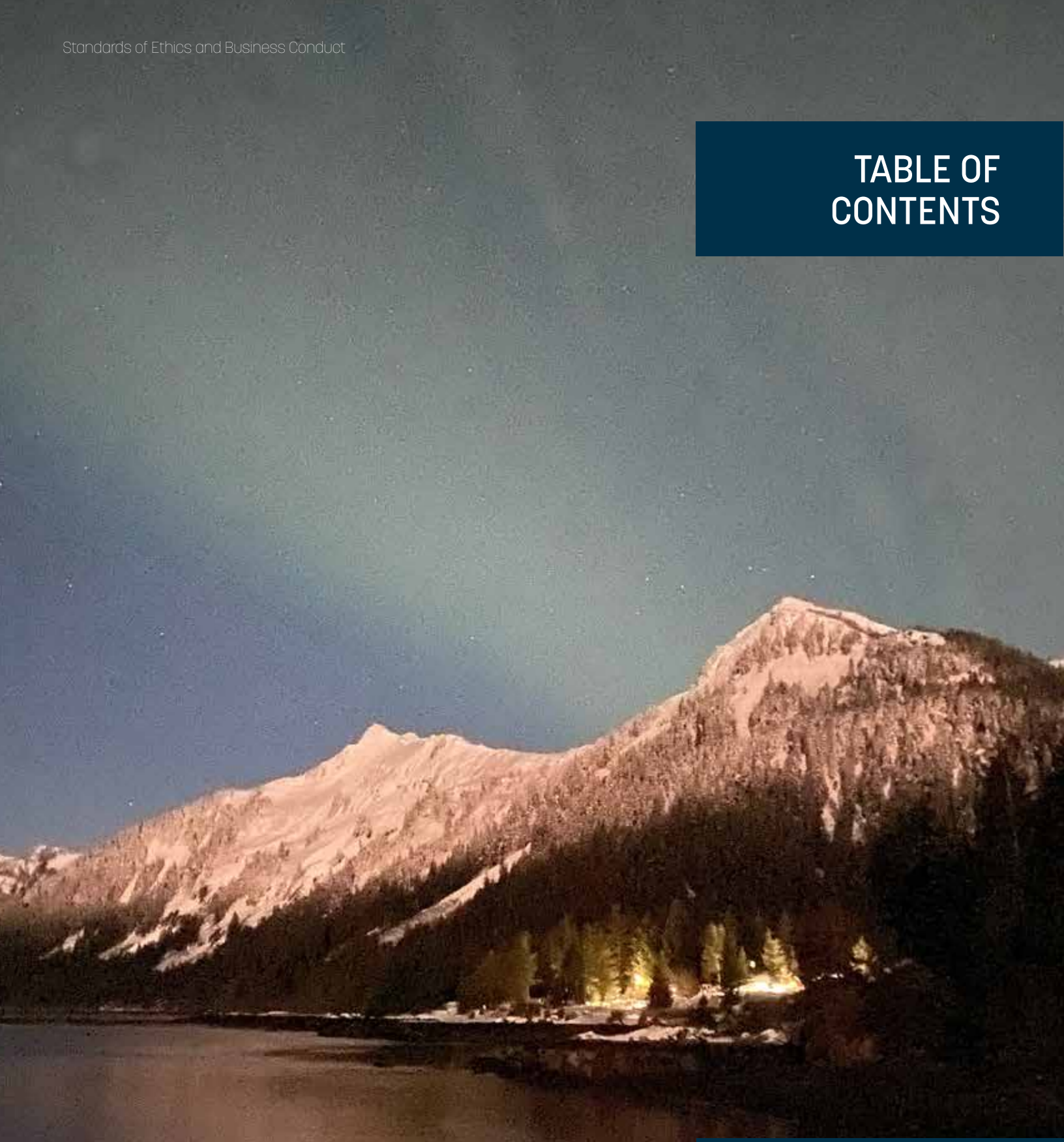
CHENEGA® CORPORATION

STANDARDS OF *ethics* AND *business conduct*



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LETTER FROM THE CEO



The Russian Orthodox Church in Chenega, the Nativity of Theotokos, is a prominent landmark in the village.

Chenega Employees:



Chenega Corporation has a long-standing history of commitment to quality and excellence, and continuously strives to improve this on behalf of our shareholders, customers, workforce, and partners. We work steadfastly to:

- Deliver value and return on investment to shareholders
- Preserve and protect our lands, and the rights, livelihood, and cultural heritage of our Native people
- Meet or exceed the expectations of customers in cost, schedule, and performance
- Attract, develop, compensate, safeguard, and retain a world-class workforce
- Ethically and responsibly engage in business with our employees, customers, and partners

To further our commitment to ethical conduct, and as required by the federal government and enforced by the board of directors, current employees must complete training on an annual basis. New employees are required to complete ethics training within the first 30 days upon being hired. Employees who fail to complete the training as required will be identified and reported to management.

As a Chenega employee, you play a vital role in the high standards we hold for ourselves and the success of our company. Please read this document carefully and if you have any questions, contact your supervisor, human resources department or the ethics and compliance officer – all contact information is listed at the end of this document.

Sincerely,

Charles W. Totemoff
President & CEO

Our Standards of Ethics and Business Conduct are issued under the authority and approval of the Chenega Corporation Board of Directors



Charles W. Totemoff
President & CEO



Lloyd Kompkoff
Vice President



LaVon Gall
Secretary/Treasurer



Joyce Kompkoff Peterson
Board Member



Paul T. Selanoff
Board Member

MISSION, VALUES & PRINCIPLES

MISSION

Achieve sustainable growth in our businesses to support shareholders in their journey to self-sufficiency, actively manage our lands, and uphold our cultural traditions and values.

VALUES

- **Trust:** Be trustworthy. Deliver on your word.
- **Integrity:** Demonstrate integrity in every decision and action. Do the right thing.
- **Respect:** Respect Elders. Respect our cultural values. Respect one another. Respect yourself.
- **Innovation:** Be a problem solver. Think creatively and find solutions to matters of corporate importance.
- **Commitment:** Actively demonstrate commitment to all stakeholders, including the Board of Directors, shareholders, employees, and customers.

CORE PRINCIPLES

- Deliver operational excellence, provide high-quality, cost-effective services, and create lasting value for all customers.
- Be profitable to provide consistent distributions for shareholders in perpetuity.
- Embrace our quality program, which defines how we manage the business to remain ethical, compliant, and operationally efficient.
- Strengthen our strategic partnerships to become a "partner of choice" for the long term.
- Manage our lands for future generations.
- Preserve and celebrate our cultural heritage.
- Provide services that will further shareholders and their families' self-sufficiency.
- Engage in responsible business in a visionary, innovative, competitive, and progressive manner.
- Attract, develop, compensate, reward, and retain a world-class workforce.
- Acknowledge and celebrate successes.
- Assist and promote the broader family of Native and disadvantaged small businesses.
- Be good citizens within our communities and contribute to meaningful causes.

COMMITMENT TO NATIONAL SECURITY

Chenega's commitment to the security of our nation is unwavering. Our position of trust and leadership in supporting our national security brings an enhanced obligation to protect these interests and, by extension, our own interests.

Information Security Awareness



The Chief Information Officer is responsible for the information security awareness program, training, education, and awareness communication for the corporation. The program includes an enhanced understanding and appreciation of information risks; services that Chenega IT provides; information about the threats, techniques, and consequences to Chenega Corporation; information on reporting incidents; and guidance and resources to protect information and devices at work and at home.

Controlled Unclassified Information (CUI)

Management of CUI follows a process that includes:

- **TRAINING:** Annually, complete and acknowledge CUI Awareness Training.
- **IDENTIFICATION:** Learn to identify CUI when received from the customer or generated by Chenega.
- **NOTIFICATION:** Contact the IT department via a helpdesk ticket to obtain assistance in the proper marking and storage of CUI.
- **MARKING:** Mark all documented information containing CUI. If received from the customer, label the same level as marked.
- **PROTECTION/STORAGE:** Protect all CUI data utilized, processed, or stored while under the responsibility of Chenega.
- **CONTROL:** Review CUI monthly access reports provided by Chenega IT to confirm appropriate access.

Ask Yourself These Questions for the Best Outcome



Is it Legal?



Does this comply with Chenega policy?



Does this reflect Chenega's values and culture?



Is this action favorable for our stakeholders?



Would this represent Chenega in a positive light in a news headline?

For help, contact any of these resources: **Your Manager | HR | Legal | ethics@chenega.com**



If you answer **Yes** to each of these questions it's likely appropriate to move forward. If the response is **No** to any of these questions, stop and reconsider. Remember, it is always appropriate to **ask for help** to avoid serious consequences.

Insider Threat Program (ITP)

Chenega will maintain an ITP to deter, detect, and mitigate insider threats. The ITP shall be managed by the Designated Insider Threat Program Senior Official (ITPSO) and shall be consistent with Executive Order 13526 and Presidential Memorandum -- National Insider Threat Policy and Minimum Standards for Executive Branch Insider Threat Programs. The ITP shall be designed to deter employees from becoming insider threats; detect insiders who pose a risk; and mitigate risks through appropriate insider threat training and response actions.

Chenega shall employ risk management principles, tailored to meet the distinct needs and mission of Chenega and will ensure that legal, civil and privacy rights are safeguarded under the ITP.

Cyber Security Incident Response

The Computer Security Incident Response Team (CSIRT) detects and investigates security events to determine whether an incident has occurred, and the extent, cause and damage of incidents. The CSIRT directs the recovery, containment and remediation of security incidents and may authorize and expedite changes to information systems as necessary. The CSIRT coordinates responses with external parties when appropriate. During the conduct of security incident investigations, the CSIRT is authorized to monitor relevant Chenega IT resources and retrieve communications and other relevant records of specific users of Chenega IT resources, including login session data and the content of individual communications without notice or further approval.

Export Compliance

Chenega is committed to protecting the products and technologies subject to U.S. export control laws from unauthorized disclosure, including to foreign persons. Chenega employees are required to use the utmost care in understanding and complying with the company's Export Compliance Policy, Program, Manual and Procedures (collectively "the Program"). Violations of the Program can result in disciplinary action, up to and including termination of employment.

Traveling and Working Abroad

Chenega strives to keep its employees safe in work environments at home and abroad. International travel bears special challenges in the areas of safety, security, privacy, and export compliance. Review the requirements prior to discussions of a foreign opportunity. Planning is of the essence when preparing communications and eventually traveling and working outside the United States. Likewise, employee travel between foreign countries, (including return to the U.S.), requires special consideration and planning.



Shareholders/Descendants try out a qayaq (kayak) while visiting the Old Chenega Village. Float planes and boats (not pictured) were used for transportation to the village as it does not have road access.

COMMITMENT TO OUR CUSTOMERS

Chenega is committed to maintaining accurate and complete records. Transactions between Chenega and outside individuals and organizations must be properly and accurately entered in our record books in accordance with generally accepted accounting principles (GAAP). No one should ever misrepresent facts or falsify records. It is illegal, will not be tolerated, and will result in disciplinary action. We must meet or exceed all applicable U.S. federal regulatory requirements, with special emphasis on the following requirements:

Reporting Expenses

Chenega reimburses employees for authorized business expenses, including travel-related expenses, that are both necessary and reasonable to accomplish our mission. Business expenses are closely scrutinized by government auditors and therefore must be in conformance with government rules and regulations, Chenega policies and procedures, and contract limitations.

Truthful Cost or Pricing Data



We must comply with the laws and regulations that govern the acquisition of goods and services by our customers. We will compete fairly and ethically for all business opportunities. In circumstances where there is reason to believe that the release or receipt of non-public information is unauthorized, do not attempt to obtain and do not accept such information from any source.

If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements, and clauses.

If more than one Chenega company is involved in a specific procurement solicitation, be extremely cautious that pricing information is not shared.

Procurement Integrity and Antitrust



Chenega must compete fairly and ethically for all business opportunities. Antitrust is a blanket term for strict federal and state laws that protect the free enterprise system. The laws deal with agreements and practice "in restraint of trade" such as price fixing and boycotting suppliers or customers, for example. They also bar pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery; and kickbacks. Possession or use of a competitor's rates, a competitor's sensitive/proprietary information or the government's source selection information can compromise the integrity of the procurement process and violate the law.



Antitrust laws are vigorously enforced. Violations may result in severe penalties such as forced sales of parts of businesses and significant fines. There may also be sanctions against individual employees including substantial fines and prison sentences. These laws also apply to international operations and transactions related to imports into and exports from the United States. Employees involved in any dealings with competitors are expected to know that U.S. and foreign antitrust laws may apply to their activities and to consult with Chenega legal counsel prior to negotiating with or entering any arrangements with a competitor.

Organizational Conflict of Interest

Organizational conflict of interest (OCI), is a situation in which:

- A government contractor, because of other activities or relationships, is unable or potentially unable to render impartial assistance or advice to the government.
- The contractor's objectivity in performing contract work is or might be otherwise impaired.
- The contractor, through its contract work, could acquire an unfair competitive advantage in the pursuit of a future government business opportunity.

The government can prevent a contractor from competing for, receiving or performing a contract award or task order when interest or involvement in other contracts could impair the contractor's objectivity or give the contractor an unfair competitive advantage. Early identification of potential and actual conflicts is critically important to Chenega's ability to properly assess and mitigate a potential conflict and protect its eligibility to compete for government contracts.



Shareholders and their families at a Chenega Memorial Day service, honoring the lives lost in the 1964 tsunami that devastated the original village.

Timesheet Reporting

Timesheets are a critical source document to identify direct and indirect labor costs. Each employee is personally responsible to accurately account for and document daily **all hours worked** and all compensated non-work hours (e.g., holiday, PTO) on their timesheet using the appropriate charge code(s). Proper time reporting is a requirement of both our internal policies and compliance with federal contract law. It is the responsibility of the employee to obtain proper charge codes from their supervisor, manager or designee and to reasonably assure compliance.

It is the responsibility of the supervisor, manager or designee to reasonably assure all hours worked and all compensated non-work hours are accurately recorded prior to approval. It is also to reasonably assure accurate charge codes are used when approving timesheets and to reasonably assure compliance.



Antibribery

Chenega requires all applicable stakeholders to comply with any and all applicable anti-bribery laws at Chenega's various worldwide locations. In general, these laws prohibit bribery of foreign government officials and/or bribery of private individuals to obtain a business advantage. Such bribery is prohibited irrespective of the role held by the applicable stakeholder.

Personally Identifiable Information and Protected Health Information

Chenega will protect Personally Identifiable Information (PII) as well as Protected Health Information (PHI) entrusted to us by our employees, consultants and customers. Access, use, transmission and storage of PII/PHI should be limited to authorized business activities and disposal or return of this information should take place in accordance with statutory and contractual requirements. Protect PII/PHI in accordance with our policies and procedures and customer agreements. Immediately report any potential data breach to management and Chenega's Chief Information Officer.



Offering Gifts and Entertainment

Government employees are governed by laws concerning acceptance of entertainment, meals, gifts, gratuities, and other things of value from those with whom they do business. Permissible exceptions are offering company advertising or promotional items of nominal value such as a coffee mug, calendar, or similar item displaying the Chenega logo, and providing modest refreshments on an occasional basis in connection with business activities.

Hiring Current and Former Government Employees

Various federal laws and regulations restrict the post-government employment activities of former government officers and employees and place conditions upon current government employees who engage in discussions regarding post-government employment. If you are a former government officer or employee or hired while on terminal leave from the military, contact your human resources representative for additional guidance.

Combatting Trafficking in Persons

Chenega fully adopts the U.S. government policy of zero tolerance on human trafficking, including trafficking in persons, commercial sex acts or the use of forced labor. This prohibition extends to Chenega employees, activities, subcontractors and consultants.

We expect our vendors to ensure illegal child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Chenega has developed an anti-trafficking compliance policy to be implemented for each U.S. government contract or subcontract for services to be performed outside the U.S. The intent is to ensure employees, agents, and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

COMMITMENT TO OUR EMPLOYEES

Employee Assistance Program

Chenega offers comprehensive professional services to support employees at work and home. Chenega's employee assistance program (EAP) provides a variety of benefits and professional services to employees and family members. EAP benefits are confidential.

EEO, Non-Discrimination and Harassment

Chenega Corporation is an Equal Employment Opportunity employer. All qualified applicants will receive consideration for employment without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

Drug-Free Workplace

Chenega is dedicated to maintaining a workplace free from illegal use, possession, sale, or distribution of controlled substances. Our employees must also abide by customer and/or location specific guidelines.

Additionally, employees are protected from any type of retaliation for the reporting of an employee or employees that may be involved in the distribution, dispensing, manufacturing, possession, purchase, sale, transfer, or use of an illegal drug or alcohol to other employees or in the work place.

Workplace Violence

Chenega does not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities. All employees, contractors and visitors are always treated with courtesy and respect. Employees are expected to refrain from fighting, engaging in horseplay, or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited on all Chenega worksites. Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public will not be tolerated.

Social Media

Employees of Chenega may be engaged in social media for Chenega-related communication job functions (see the Recruiter Social Media Policy). These employees are afforded special access to social media sites and other specific social media authorities, as part of their professional role. Chenega employees outside of these special provisions are not authorized to misrepresent themselves as an authorized Chenega spokesperson.

Chenega respects the right of employees to use social media sites for personal purposes, such as self-expression and public conversation. Chenega does not discriminate against employees who use social media for personal interests and affiliations or other lawful purposes. Employees are expected to follow the guidelines provided in the Employee Social Media Policy.

Employees are cautioned that they should have no expectation of privacy while using the Internet or Chenega equipment or facilities for any purpose, including authorized and unauthorized social media activity.

Communicating with External Parties

All formal communications about or on behalf of Chenega Corporation are subject to review and approval by the designated department executive, prior to dissemination. This includes but is not limited to, newsletters, marketing collateral, corporate and subsidiary logos, substantive website content modifications, and the annual Shareholders' report. Presentations, bid proposals and related collateral materials developed by the authority of the Executive Vice President & Chief Operation Officer or Chenega Corporation Strategic Business Unit President, including, but not limited to, new business development proposals and presentations to support government relations or contracting initiatives and other collateral documents are not included in this approval process.

The media plays an important role in shaping public opinion and defining the image of Chenega Corporation. Therefore, it is important that media relations be conducted in a coordinated, professional manner to ensure specific information is presented clearly and consistently. As part of this policy, Chenega's Corporate Communications Department coordinates all media relations responses on behalf of the company.

Data Security and Confidentiality

We expect our vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Chenega Corporation. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the vendor, individuals whose personal information may be implicated, and for Chenega Corporation. In addition, vendors must comply with all applicable privacy/data protection and information security laws and regulations. Vendors will immediately notify Chenega Corporation of any known or suspected data security breaches and will work with Chenega Corporation and, if applicable, law enforcement to contain the breach and determine a root cause.

As an employee or representative of Chenega Corporation, if you or an employee of your organization are approached by the media to make a statement on behalf of the company:

- Notify your direct supervisor and your subsidiary president.
- Politely decline requests for an interview or comment.
- Do not answer questions or provide any personal, company or client information, including printed information or materials.
- Avoid being photographed or filmed.
- Avoid stating, "No comment", instead reply as follows:

"Inquiries of this nature are handled by our Corporate Communications Team."

You may provide the following general contact information:
Carley Lawrence
VP Corporate Communications
at (907) 277-5706.

Immediately notify Carley Lawrence, VP Corporate Communications, via email (or cell phone if more urgent) regarding the media inquiry.
C: 907-441-9146
E: carley.lawrence@chenega.com



Information Technology Use

Chenega employees are permitted to use technology and information assets that are required to perform work duties, including access to certain computer systems, servers, software and databases, phone and voice mail systems, cloud services and access to the internet in accordance with the ITISR Acceptable Use Policy. You have a reasonable expectation of privacy and of protection from abuse and intrusion by others sharing these resources.

You are responsible for exercising good judgment in adherence to the statements in our policy regarding the use of the Chenega technology and information resources. Just because an action is technically possible does not mean that it is appropriate or permitted.

Prohibition Against Retaliation

Adverse action of any kind (including, for example, harassment) for raising a good faith concern about improper business conduct will not be tolerated. Additionally, no one shall be adversely affected based on the individual's refusal to carry out an instruction that would constitute fraud or be a violation of federal or state laws or this Code.



Any individual who believes they are being retaliated against for making a report must immediately contact the Ethics and Compliance Officer, their supervisor, a human resources representative, or the reporting hotline. All contact information is listed at the end of this document.

While Chenega will not tolerate retaliation for reporting, an individual is not entitled to immunity from any discipline up to and including termination, for any improper conduct or personal wrongdoing.

COMMITMENT TO OUR TEAMMATES & VENDORS

Procurement Integrity



Both commercial and government procurements must rely on fair and equal competition. When involved in proposals, bid preparation or contract negotiations, our vendors must ensure that all statements, communications and representations to prospective customers and vendors are accurate and truthful. Our vendors are guided by their acceptance of the Chenega Vendor Code of Conduct.

If our vendors are involved in U.S. government procurement, the provisions of the Procurement Integrity Act apply. Our vendors must not ask for or accept any unauthorized contractor bid, proposal information or source selection information that is not available to all competitors.

Receipt of Gifts and Entertainment

Chenega employees may accept gifts, meals, refreshments, or entertainment of nominal value from individuals, companies or representatives of companies having or seeking business relationships with Chenega.

It is the personal responsibility of each employee to ensure his or her acceptance of such meals, refreshments or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

Our vendors must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions (see the Chenega Vendor Code of Conduct). Chenega employees are not permitted to accept funds in any form or amount.



May I Accept this Gift?

Ask yourself, is it:

- Infrequent;
- Unsolicited;
- Of nominal value or of an advertising or promotional nature;
- Received or offered without any intent or prospect of improperly influencing your business decision-making;
- Given openly and transparently without any appearance of impropriety;
- Provided in a manner that would not result in embarrassment to Chenega if publicly disclosed; and
- Permissible under all applicable laws, regulations, and rules.

Unauthorized Use of Copyrighted Material

Chenega employees obtaining access to other companies' or individual's materials must respect all copyrights and may not copy, retrieve, modify or forward copyrighted materials, except with written permission of the owner or as allowed in the terms and conditions of the property owner/creator. Prohibitions include, but are not limited to:

- Making copies of licensed software;
- Transmitting (to include peer-to-peer file sharing technology) copyrighted materials on the Company's network; and
- Distribution of copyrighted or licensed material (movies, music, software, games).

Personal Conflict of Interest



Chenega employees are expected to exercise of good judgment, common sense, and sound discretion in situations of actual or potential conflicts, including developing a reasonable means for resolving any identified or perceived conflicts of interest.

Playing favorites or having conflicts of interest, in practice or in appearance, runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. When in doubt, share the facts of the situation with your supervisor or the Chenega's Ethics and Compliance Officer.

Common examples of personal conflict of interest situations include:

- personal workplace relationships (e.g., hiring or supervising a closely-related person);
- external mandates (e.g., serving on the board of directors or scientific advisory board of a Chenega competitor); It is important to understand one's legal responsibilities and avoid affiliations that carry the potential for distraction and/or conflict of interest. Board membership policy proves additional guidance for executives;
- outside employment (e.g., having a second job with a current or potential Chenega customer, supplier, or competitor);
- promoting personal financial interests (e.g., owning a substantial share of a Chenega supplier while in a position to steer Chenega business towards it); and
- receiving fees, commissions, discounts, gifts, entertainment, or services (e.g., receiving cash from a Chenega business partner).

Financial Records and Compliance with Internal Controls

Entering into transactions can create legally binding obligations and affect Chenega's financial control environment. Chenega promotes appropriate internal controls and utilizes accepted best practices for specifying the persons who are authorized to approve a transaction, the criteria for delegating approval authority, and the limitations on approval authority. All transactions must be approved by an authorized person in accordance with the Approval and Delegation of Authority Policy.

COMMITMENT TO OUR SHAREHOLDERS

When making decisions, ask yourself: does this strengthen or harm Chenega's reputation with our shareholders, customers, and the public?

Our shareholders must have confidence that we will create value for them in a responsible and thoughtful way. Earn their trust by protecting our assets and information, accurately stating where we are headed as a company, and honestly communicating with them and with the public.

- Keep accurate record and contracts.
- Communicate accurately to the public and our customers.
- Safeguard Chenega's resources.
- Protect confidential information & intellectual property.



Retention of Books and Records

Chenega will reasonably assure all records are identified, collected, stored, protected, retrieved, retained and disposed as appropriate. As a Federal Government contractor Chenega complies with the record retention requirements of Federal Acquisition Regulations (FAR) Part 4.7, Contractor Records Retention.

Political Contributions and Lobbying

In accordance with federal law, Chenega prohibits the donation of corporate funds, goods, or services (including employees' work time) – directly or indirectly – to candidates for federal offices. As a matter of policy, we will not make political contributions in foreign countries.

Sustainability and the Environment

As part of Chenega's heritage and mission, the corporation is committed to preserving our shareholders' subsistence traditions and way of life so they can be passed on for future generations. This includes managing our lands with a long-term sustainable view. It also means valuing our corporate social responsibility and being a good corporate citizen that cares about the communities we work in.

IMPLEMENTATION OF OUR STANDARDS

Employee Responsibilities



All Chenega leaders must show a commitment to our values through their actions. They also must promote an environment where compliance is expected and ethical behavior is the norm. All Chenega employees must comply with the company's values and principles. No one should ask Chenega employees to break the law, or go against the company's values, policies and procedures.

Report Suspected Wrongdoing

Chenega employees are expected to report suspected wrongdoing. The company has provided an anonymous hotline for reporting improper activity. Please use the contact list at the end of this document for resources available.

Vendor Code of Conduct

We expect our vendors to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the U.S., vendors must comply with local laws and regulations. We expect vendors to create and maintain accurate records, and to not alter any record to misrepresent the underlying transaction. (See the Chenega Vendor Code of Conduct.)

WARNING SIGNS
You're on Thin Ethical Ice When You Hear...

- "Well, maybe just this once..."
- "No one will ever know..."
- "It doesn't matter how it gets done, if it gets done..."
- "It sounds too good to be true..."
- "Everyone does it..."
- "Shred that document..."
- "We can hide it..."
- "No one will get hurt..."
- "What's in it for me?"
- "This will destroy the competition..."
- "We didn't have this conversation..."

You can probably think of many more phrases that raise warning flags.



Role of Managers

As a leader, you have a special responsibility for setting the culture and the work environment on your team. The way you make decisions, and handle concerns, different opinions, and even bad news, will set the foundation for trust with your teams, customers, and stakeholders. Your success and the success of your team depends on the trust you build together.

Take These Simple Steps To Build A Culture Of Trust and Integrity On Your Team:

- Talk to your team about ethics and integrity and be clear that you expect work to be done ethically.
- Lead by example, by modeling ethical decision-making.
- Ensure your team knows that for results to matter, they must be achieved the right way. Then, satisfy yourself that results have been achieved the right way.
- Make sure your team knows you will listen, even if they have something difficult to say.

What is Your Role?

You should not hesitate to ask questions about whether any conduct may violate the code, voice concerns, or clarify gray areas. In addition, you should be alert to possible violations of the code by others and report suspected violations, without fear of any form of retaliation.

Violations of the code will not be tolerated. Any employee who violates the standards in the code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

There are numerous resources available to assist you in meeting the challenge of performing your duties and responsibilities regarding Chenega's Ethics & Business Code of Conduct. The code cannot/does not explicitly cover all conceivable situations or circumstances.



What should I do if...

I have questions or **need guidance**.

I observe, experience or suspect an **unethical violation.**

There is a problem that puts Chenega, the team or our reputation in jeopardy.

Chenega does not tolerate retaliation of any kind, against someone who reports a concern in good faith.



Voice a concern, ask a question, or report a violation

TALK to your leader or Human Resources Representative.

VISIT www.lighthouse-services.com/Chenega

CALL Ethics Compliance Officer 907-677-4905
Integrity Hotline, 844-440-0075 anonymous option available in the U.S.: 1-800-541-6838
India: 000-800-100-1657
Other non-U.S. locations: place a collect call to the U.S. at: 1-470-219-7116

EMAIL ethics@chenega.com

WRITE Corporate Compliance & Ethics Chenega Corporation
3000 C Street, Suite 301
Anchorage, AK 99503



What happens when you contact Ethics?

The ethics team or third party hotline representative creates a report on your concern.

We engage only the necessary partners to evaluate any reported matter.

We keep all information, including your identity, confidential. We do not notify your management of your message.

If your report is substantiated, Chenega will act promptly and appropriately. The outcome may be kept confidential.



3000 C Street • Suite 301 • Anchorage, AK 99503