



# CODE OF CONDUCT



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*The village of Chenega – which means  
"beneath the mountain" in the  
Native dialect of Suqestun.*

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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 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 performance (including quality, cost, schedule, and compliance)

Attract, develop, 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 Chief Ethics and Compliance Officer (CECO) – all contact information is listed at the end of this document.

Sincerely,

A handwritten signature in black ink that appears to read "Charles W. Totemoff".

Charles W. Totemoff  
President & CEO

*Our Code of Conduct is 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

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.

# COMMITMENT TO NATIONAL SECURITY

## Controlled Unclassified Information (CUI)

Management of CUI follows a process that includes:

- **TRAINING:** Annually, complete and acknowledge CUI Awareness Training.
- **ACCESS:** Enclave access is provisioned only to those who may receive, generate, or store CUI/ITAR Enclave data.
- **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.
- **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](mailto: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 and shall be consistent with [Executive Order 13526](#) and [Presidential Memo-Randum -- 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 Incident Response

The Cyber Incident Response Team (CIRT) detects and investigates security events to determine whether an incident has occurred, and the extent, cause, and damage of incidents. The CIRT directs the recovery, containment, and remediation of security incidents and may authorize and expedite changes to information systems as necessary. The CIRT coordinates responses with external parties when appropriate. During the conduct of security incident investigations, the CIRT 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 unwavering in its commitment to avoiding unauthorized disclosure of technology, data, or equipment subject to U.S. export control laws (including to foreign persons within the U.S.). Chenega employees bear the responsibility of understanding and adhering to the company's Export Compliance Policy, Program, Manual and Procedures (collectively "the Program"). Violation of the Program may lead to disciplinary action, up to and including termination of employment.

## Traveling and Working Abroad

Chenega's commitment to safety and security extends beyond the U.S. borders. Apply these guidelines for effective border crossings by people, technology, data, or equipment to ensure:

- Safety and Security: Inform the Facility Security Officer and obtain advance trip approval. Research visa requirements, health protocols, local laws, and cultural norms.
- Export Control Compliance: The export team will assist you to comply with export regulations, and to consider variable international data privacy regulations that may require loaner equipment.
- Emergency Preparations: Maintain frequent contact with your team; carry information about emergency procedures, and local support/contact information.

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.

# COMMITMENT TO OUR CUSTOMERS



## 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 practices "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.

## 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

- 1) reasonably assure all hours worked and all compensated non-work hours are accurately recorded prior to approval and
- 2) reasonably assure accurate charge codes are used when approving timesheets.

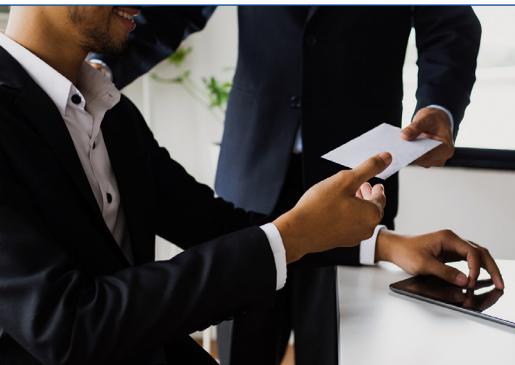


## Anti-bribery

Chenega requires all applicable stakeholders to comply with any and all applicable anti-bribery laws at Chenega's various worldwide locations. 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. 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.

## **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 (including pregnancy, gender identity or expression, and sexual orientation), parental status, national origin, age, military service, ancestry, marital status, genetic information (including family medical history), or mental or physical disability (so long as the essential functions of the job can be competently performed with or without reasonable accommodation), or other non-merit-based factors.

## **Drug-Free Workplace**

Chenega prohibits involvement with illegal drugs, including use, possession, distribution, purchase, sale, offer for sale, or manufacture while on Chenega premises, on company time, or when conducting or travelling on company business. The abusive use of controlled substances, including prescription drugs or alcohol, is also prohibited. Our employees must also abide by customer and / or location specific testing requirements and guidelines.

## **Workplace Violence**

Chenega does not tolerate any type of workplace violence committed by or against employees. We expect all employees, contractors, and visitors to treat everyone 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. 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.

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.

*If you or any member of your team is approached by the media seeking a statement on behalf of Chenega, please follow these guidelines:*

■ **Respond professionally**

with: "All media inquiries are managed by our Corporate Communications team."

■ **Immediately notify** your direct supervisor, the subsidiary president, and the Vice President of Corporate Communications upon being contacted.

■ **Politely decline** any requests for interviews or comments.

■ **Refrain** from answering questions or providing any personal, company, or client information, and avoid distributing printed materials.

■ **Avoid** being photographed or filmed.

■ **Do not use** the phrase "no comment." Instead, use the provided response to ensure a consistent and professional message.

For further assistance or to redirect inquiries, please contact:

***Miriam Aarons***

Vice President,  
Corporate Communications  
Chenega  
C: (907) 290-9745  
E: [Miriam.aarons@chenega.com](mailto:Miriam.aarons@chenega.com)

## 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.

## 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. Access to and the use of Artificial Intelligence tools require advance approval by Chenega's IT department to ensure appropriate review. You are responsible for exercising good judgment in adherence to the statements in our policy regarding the permitted use of the Chenega technology and information resources.



## Prohibition Against Retaliation

Adverse action of any kind will not be tolerated against an employee for raising to Chenega management or through the Helpline, a good faith concern about improper business conduct.

Any individual who believes they are being retaliated against for making a report must immediately contact the CECO, their supervisor, a humanresources representative, or the Helpline. All contact information is listed at the end of this document.



# COMMITMENT TO OUR TEAMMATES & VENDORS

## Gifts and Entertainment - Receipt and Giving



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. Chenega employees are not permitted to accept funds in any form or amount. 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 as an attempt to secure favorable treatment.

Chenega, and our direct and indirect vendors that operate on our behalf outside the United States, 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 foreign customers, foreign government officials, foreign political parties, candidates for foreign public office, charities, or other parties to improperly influence business decisions (see the [Chenega Vendor Code of Conduct](#)).

## How do I know if the value of a gift is "reasonable and customary" and therefore acceptable?

Ask yourself both whether the gift is significant to you personally and whether it would appear significant to others. Cash or cash equivalents of any value are never acceptable. Consult the chart below for guidance, and contact the Chief Compliance Officer (COO) whenever in doubt.



### Reasonable and Customary



Gifts from vendors, suppliers, or customers such as: baskets of fruit, candy or snacks to be shared, small flower arrangements.



Vendor offers you tickets to a sporting or cultural event and the vendor is attending.



Mugs, plastic cups, water bottles, badge holders, pens, key rings, post-its, totes, small stuffed animals, small inexpensive picture frames, and folding umbrellas with the supplier's logo.



Gifts cards or gift certificates.



Vendor offers you tickets to a sporting or cultural event but the vendor is not attending.



iPads, cash, a personal gift such as a piece of fine jewelry or crystal.

### Unauthorized Use of Copyrighted Material

Chenega employees obtaining access to another company's or individual's materials must respect all copyrights and may not copy, retrieve, modify, or internally share / forward copyrighted materials, except with written permission of the owner or as allowed in the terms and conditions set by the property owner/creator. Materials subject to these prohibitions include software, movies, music, and games.



# COMMITMENT TO OUR SHAREHOLDERS

## Personal Conflict of Interest



Showing favoritism or having conflicts of interest, in practice or in appearance, runs counter to the fair treatment to which we are all committed. Chenega employees are expected to exercise good judgment, common sense, and sound discretion in situations

of actual or potential conflicts, including advance resolution of any identified or perceived conflicts of interest.

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. Raise potential conflicts (such as outside employment or board membership, personal financial interests, receipt of gifts or valuable items from Chenega vendors, and personal workplace relationships) with your supervisor.

## Financial Records and Compliance with Internal Controls

Chenega promotes appropriate internal controls and utilizes accepted best practices for the limits on and criteria for delegating approval authority for transactions with external parties. All transactions must be approved by the role identified in the Approval Authority Matrix.



## Political Contributions and Lobbying

Chenega prohibits the donation of corporate funds, goods, or services (including employees' work time) – directly or indirectly – to i) candidates for US federal offices, and ii) candidates for any foreign political office.

## ***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 internally, with customers, and with the public.

- **Keep accurate records and contracts.**
- **Follow standards and procedures established by Chenega.**
- **Safeguard Chenega's resources.**
- **Protect confidential information and intellectual property.**

## **Sustainability and the Environment**

As part of Chenega's heritage and mission, we are committed to sustainable management of our lands, and preservation of our Shareholders' subsistence traditions and way of life for future generations. We work with business partners and suppliers to



strengthen environmental stewardship and responsibility while respecting the global communities where we do business. We endeavor to continuously improve our environmental footprint through resource conservation, waste minimization, water and energy efficiency, and the effective use and reuse of products and raw materials.

# IMPLEMENTATION OF OUR STANDARDS

## Employee Responsibilities

All Chenega employees must:

- uphold the company's values and principles by reading, understanding, and complying with the Code of Conduct, company policies, and applicable laws and regulations pertaining to your particular responsibilities;
- complete all required training on time and keep up-to-date on current standards and expectations; and
- report concerns, clarify grey areas, and ask questions about whether conduct may violate the Code, company policy, or applicable laws or regulations.



*Additionally, all Chenega Supervisors and Managers must:*

- Talk to your team about ethics and integrity. Make sure they know you will listen, how to use the Code and how to seek help.
- Be clear that you expect work to be done in compliance with this Code, policies and applicable laws and regulations.
- Lead by example, by modeling ethical decision-making and respond effectively to concerns raised without retaliation.
- 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.

The Code cannot and does not explicitly cover all conceivable situations or circumstances. However, there are numerous resources available to assist you in meeting the challenge of performing your duties and responsibilities regarding Chenega's Code of Conduct.

## Report Suspected Wrongdoing

Chenega employees are expected to raise questions regarding improper activity and to report suspected wrongdoing. The company has provided an anonymous helpline for such reporting. Please use the contact list in the footer for resources available.

You can report suspected ethical violations in confidence and without fear of retaliation. Chenega will not tolerate any retaliation against an employee who, in good faith, asks questions, reports possible violations of the Code, policy, or law, or participates in an investigation.

## Examples of phrases that lead employees to seek advice through the Helpline

- "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..."

Reporting "in good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

When violations of the Code, company policies or applicable laws and regulations occur, as a government contractor we are obligated to consider appropriate disciplinary action. Chenega cooperates with authorities as to audits, investigations, corrective actions, and legal proceedings.

## Vendor Code of Conduct

We expect our vendors (direct and indirect) to maintain full compliance with all laws and regulations applicable to their business. When conducting business outside the U.S., or if a vendor's place of business is outside the U.S., vendors must comply with applicable US laws as well as 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](#)).



## 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 team, 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 up 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 Code of Conduct. The Code cannot and 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.



## What happens when you contact Ethics?

A report is created capturing  
your concern.

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

Your confidentiality will be  
maintained to the extent  
reasonably possible.

Chenega  
will act promptly and  
appropriately to investigate  
all reports.



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