



Sealaska Code of Ethics:
Executive Summary



Anthony Mallott,
Sealaska President and CEO



MESSAGE FROM THE CEO

Sealaska and our companies are shaped by our cultural heritage and core cultural values.

- **Haa Aani** | *Íitl' Tlagáa* | *Na Yuubm* (Our Land) leads us to strive for sustainable communities and a sustainable relationship with our lands.
- **Wooch.Yax** | *Gu dlúu* | *Ama Mackshm* (Balance, Reciprocity and Respect) guides us to highly value partnerships and to be balanced and fair in our dealings with others.
- **Haa Shuká** | *Íitl' Kuniisii* | *Na Hlagigyadm* (Our Past, Present and Future) inspires us to learn from our past and take the long-term approach in everything we do.
- **Haa Latseen** | *Íitl' Dagwiigáay* | *Na Yugyetga'nm* (Our Strength, Leadership) drives us to be responsible for continuous improvement and accountable to the people who rely on us.

Sealaska's purpose is to strengthen our people, culture and homelands. To achieve this purpose and create positive experiences for our stakeholders, all of us must perform at the highest level — from the field office to the office of the CEO. However, performance alone is not enough. We also need solid ethics, accountability and open communication.

Ethics are the foundation of excellent business practices. If we are to serve our shareholders, our employees and our communities, how we work matters as much as how we perform. We will only achieve Sealaska's vision of being an Alaska Native enterprise of excellence built on our cultural values by deepening our strong commitment to ethics.

As CEO, I hold myself personally accountable for setting the standard for excellence and for promoting a culture of zero tolerance for unethical business practices. Striving for continuous improvement and centering our companies on ethical practices are among our many responsibilities to our shareholders, employees, customers and communities. These standards must be demonstrated at the top.

The Sealaska Code of Ethics provides clear standards for all of us and lays out what we can expect from company leadership and from our coworkers. By following it within our daily duties and within all our decision making, we will do work that matters and we will do it in the right way. By combining business excellence and ethics, as employees we will thrive, as businesses we will provide our customers world-class service and value, and as a Native organization we will create social and financial benefits for current and future generations. I look forward to working with you to achieve our vision.

Sincerely,

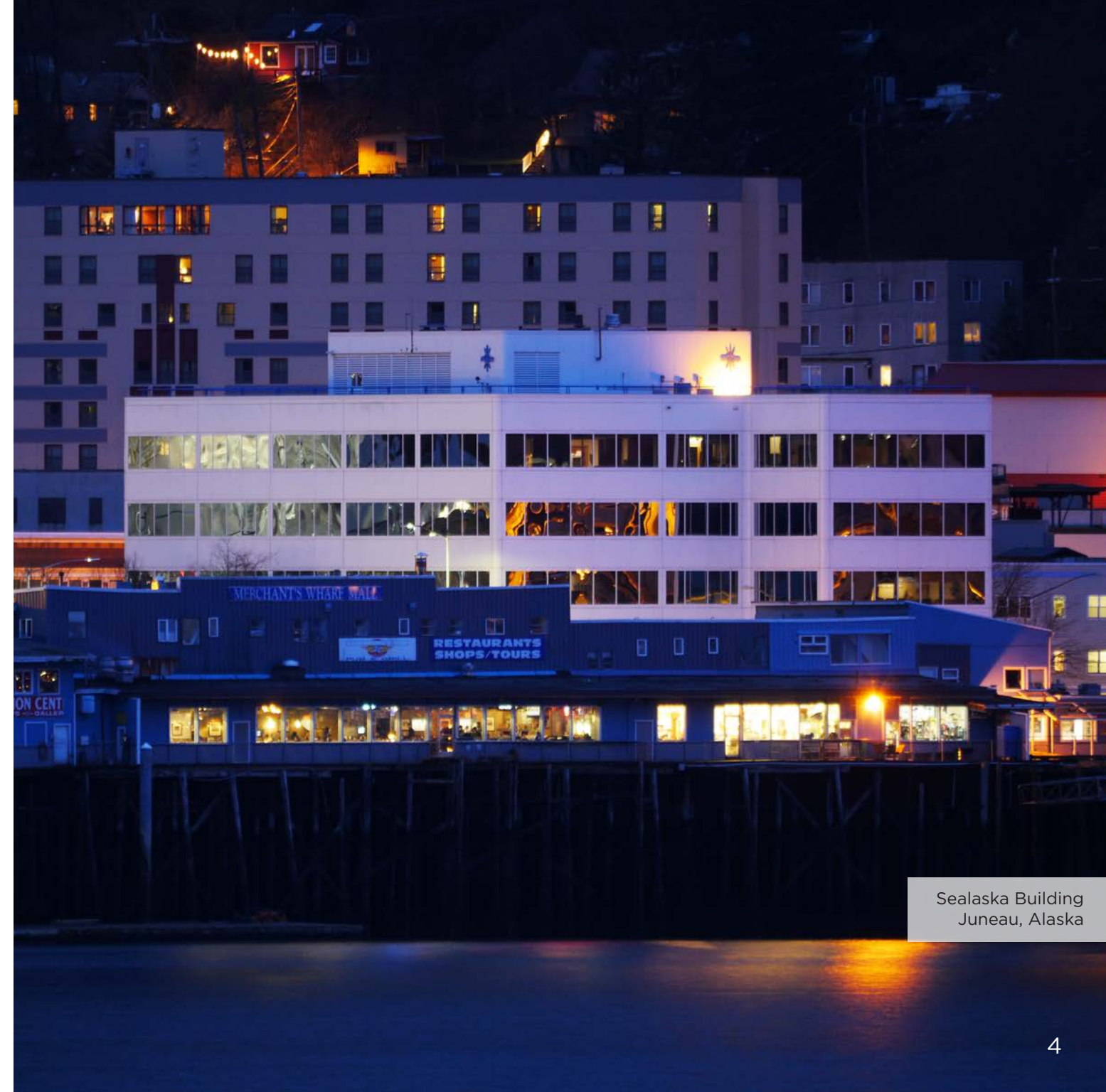
A handwritten signature in black ink that reads "Anthony Mallott".

Anthony Mallott



The Sealaska Code of Ethics (Code) describes our standards, clarifying how we do business with partners, customers and communities. It is a guidebook to deter wrongdoing and promote:

- A culture of zero tolerance for unethical business practices
- Honest conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Fair, accurate, and timely disclosure in our financial reporting and in our other public communications
- Compliance with applicable laws, rules and regulations
- Prompt internal reporting of violations of this Code
- Accountability for adherence to this Code



Sealaska Building
Juneau, Alaska

Joseph Nelson, Sealaska Board Chair
Anthony Mallott, Sealaska President and CEO



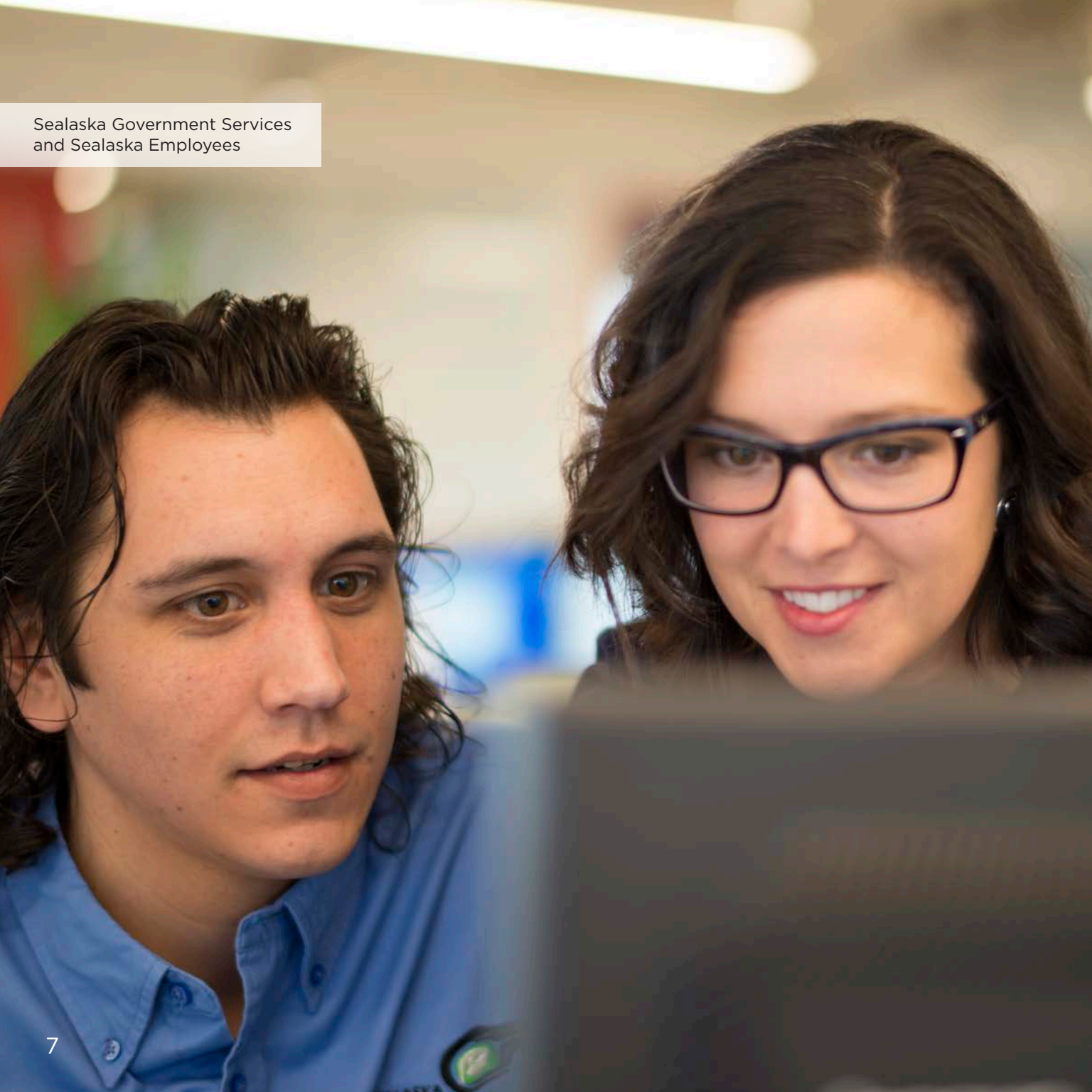
Our Responsibility to Do the Right Thing

Our commitment to ethics and compliance is a team effort—a commitment that has clear expectations for employees. As Sealaska team members, we adhere to the highest ethical standards.

Our Responsibilities

- Read and become familiar with our Code
- Follow the letter and spirit of our Code and our company policies
- Complete required ethics and compliance activities, including periodic training
- Get advice from management when we are not sure about how to apply the standards in our Code to a specific situation
- Report any known or suspected violations of our Code, applicable laws or regulations, or company policy
- Use good judgment

By doing the right thing and by deepening our strong commitment to ethics, we will achieve Sealaska’s vision of an Alaska Native enterprise of excellence built on our cultural values.



Doing the Right Thing for Employees

Sealaska recognizes that effective relationships are based on celebrating the value and worth of each individual. We are committed to providing a working environment that supports the success and well-being of all our employees. We value the opinion of employees and respect their diverse backgrounds.

Our Responsibilities

- Respect the lives and the health of others
- Keep our workplace free from all forms of violence and harassment
- Report harassing behavior, threats or acts of violence
- Observe all health and safety rules and practices that apply to our work
- Report injuries, accidents or unsafe practices to supervisors



Sealaska Environmental Services Employees

Doing the Right Thing for Customers

By accurately representing Sealaska and its services to customers and partners, we can build trusting relationships that will help us in the future.

Our Responsibilities

- Be fair and honest with customers
- Deliver services that meet all contract requirements and give our customers the highest degree of confidence in our work
- Maintain confidentiality
- Disclose only the information that is necessary for the business activity we are conducting
- Be careful when interacting with any employees or representatives of Sealaska's competitors and avoid the appearance of wrongdoing



Totem Raising
Southeast Alaska

Doing the Right Thing for Communities

We conduct our business activities in a way that protects the environment and the health and safety of our employees, their families and our communities.

Sealaska is committed to upholding fundamental human rights. We believe that all human beings should be treated with dignity, fairness and respect.

Our Responsibilities

- Do not use or condone the use of slave labor or human trafficking
- Preserve and protect the environment
- Comply with all environmental laws
- Only engage suppliers and contractors who comply with human rights laws and demonstrate commitment to worker health and safety



Celebration 2014
Juneau, Alaska

Doing the Right Thing for Shareholders

Sealaska was formed under the Alaska Native Claims Settlement Act (ANCSA) of 1971. Because of ANCSA, Sealaska has a unique relationship with our shareholders that is based on their collective heritage and collective ownership of Sealaska. We strive to create social and financial benefits for current and future generations.

Our Responsibilities

- Avoid and/or disclose conflicts of interest
- Make accurate and true entries in company books and records
- Do not use company assets for unlawful or improper purposes
- Understand how to manage all records in your control
- Do not destroy records prior to their scheduled destruction date



Doing the Right Thing for Government

Our government creates laws and regulations to address problems or potential problems. We respect our government and obey the law.

Our Responsibilities

- Promptly report:
 - a. Requests to make, authorize or agree to any offer or payment which is contrary to our Code or the law
 - b. Concerns about whether an employee or vendor is violating, or has violated, the law, the Code, or company policies
- Do not give gifts or money to procurement officials
- Ask the Legal Department about licensing requirements before “exporting” information, goods, products or services to foreign countries
- Obey the laws that regulate corporate participation in politics



Near Boyscout Beach
Juneau, Alaska

Making Ethical Decisions

In most work situations, the right course of action will be clear. But at times, you might be unsure about what you should do.

When in doubt, ask yourself...

- Is this action legal, ethical and socially responsible?
- Does this action comply with both the spirit and the letter of our Code of Ethics?
- Will this action appear appropriate?
- Is it clear that our company would not be embarrassed or compromised if this action were to become known within our company or publicly?
- Would I want everyone to know I took this action?

If you answer “no” to any of those questions, **don’t do it!**



Cannon Beach
Yakutat, Alaska

Getting Answers to Your Questions or Reporting a Concern

If you have a question, or become aware of a situation that conflicts or appears to conflict with our Code, Sealaska policy or the law, you must report your concern immediately.

It is often best to first speak with your manager or a representative from the Compliance, HR, or Legal departments. They are best suited to respond to your issue directly and may already be familiar with your concern.

But, if you wish to remain anonymous, you have other options. Sealaska has established an independent third-party information gathering service with a dedicated telephone number and website that is available 24 hours a day, seven days a week.

Contact Information:

- Via the anonymous Ethics Call Center: **1.855.449.0542**
- Via the anonymous Online Website: **sealaska.ethicaladvocate.com**

Note: This Executive Summary does not replace the Sealaska Code of Ethics. Please refer to the full Sealaska Code of Ethics for more information about Sealaska's policies.



VALUES IN ACTION

SEALASKA