

	POLICY	No.	HR-022
	Standards of Conduct	Effective Date	10/01/2013
		Revision Letter	A
		Final Approver	CEO

1.0 Purpose

The purpose of this policy is to ensure that employees exercise good judgment and discretion, conduct themselves with the highest standards of ethical conduct in performing the Company's business, and abide by Company policies and work rules of general conduct and performance at all times.

2.0 Scope

This policy applies to all employees of Koniag, Inc. (hereafter referred to as "the Company").

3.0 Policy

- 3.1 When acting on Company business, the Company expects employees to exercise good judgment and discretion, to carry out their roles with the highest standards of ethical conduct and to abide by Company policies and work rules of general conduct and performance at all times.
- 3.2 Generally, there are three types of transgressions that constitute a violation of Company's Standards of Conduct: 1) policy and procedure violations, 2) performance issues, and 3) behavior and conduct issues.
- 3.3 These actions and/or behaviors may occur simultaneously and they may be addressed individually or collectively by supervisors. Any resulting corrective action is dependent on the nature and severity of the offense(s). Corrective action may include a verbal warning or written warning, administrative leave or suspension up to and including termination of employment. (Refer to the Performance Improvement and Corrective Action Policy for procedures for corrective action.)
- 3.4 It is not reasonable to list every action that could be deemed to be unacceptable conduct, however the following list provides some guidance and examples:
 - 3.4.1. Violation of safety and/or health policies (including smoking in non-smoking sites)
 - 3.4.2. Possession of dangerous or unauthorized materials such as explosives or firearms
 - 3.4.3. Possession, distribution, sale, transfer or use/influence of alcohol or illegal drugs in the workplace while working or on Company premises or with Company assets (including vehicles)
 - 3.4.4. Hostile and/or disrespectful behavior including bullying, disruptive activity, fighting or threatening violence

- 3.4.5. Behavior that is counterproductive or fails to effect teamwork and collaboration with fellow employees
- 3.4.6. Conduct that leads to damage of Company-or customer-owned property or assets
- 3.4.7. Insubordination
- 3.4.8. Violation of personnel policies
- 3.4.9. Unsatisfactory performance or behavior
- 3.4.10. Unauthorized use or theft of Company property or assets (e.g. employer-owned equipment, company funds, office supplies)
- 3.4.11. Discriminating and harassing behavior toward fellow employee(s) or other persons based on race, gender, age, religion, sex, sexual orientation, national origin, disability or other criteria not related to professional capability or performance
- 3.4.12. Disclosure of confidential information
- 3.4.13. Unprofessional or unethical conduct, or conduct that reflects poorly on Koniag's corporate image or reputation
- 3.4.14. Unexcused and/or excessive absences or tardiness
- 3.4.15. Falsification of application or employment records including time reports, business expenses, and employee benefit enrollment forms
- 3.5 Employees who question whether an action is ethical or proper should discuss the matter openly with their supervisor. If necessary, Human Resources is available for advice and consultation.

4.0 Definitions

N/A

5.0 Responsibilities

- 5.1 The CEO shall ensure compliance to this policy/procedure document.
- 5.2 It is the responsibility of every supervisor to ensure they read, understand, and carry out their work responsibilities consistent with the spirit and intent of this policy.
- 5.3 It is the responsibility of every employee to ensure they read, understand, and carry out their work responsibilities consistent with the spirit and intent of this policy.
- 5.4 It is the responsibility of Human Resources to ensure this policy is updated and that employees are informed of this policy and any updates.

6.0 Document Approvals

Role	Position	Approved	Date Approved
Owner	EVP/General Counsel	Yes	09/26/2013
Review Committee	Executive Team	Yes	09/26/2013

Role	Position	Approved	Date Approved
Final Approver	CEO	Yes	09/26/2013

7.0 Revision History

Effective Date	Rev Letter	Document Author	Description of Change
10/01/2013	A	Human Resources	Initial Release.