

Alaska Communications Vendor Compliance Manual

1. Prevention of Sexual Harassment

Alaska Communications is committed to providing a work environment that is free of all forms of unlawful discrimination and harassment. We do not tolerate the harassment of Alaska Communications' employees by anyone - supervisors, coworkers, customers, contractors, or vendors.

Sexual Harassment exists when unwelcome sexual advances, requests for sexual favors, or other verbal or physical actions of a sexual nature are made and (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

A harasser's conduct does not have to be offensive to everyone. If it has any of the above impacts on even a single person, it is considered sexual harassment.

You shall not engage in activity of any kind which may be construed as sexual harassment including:

- Displaying materials containing sexual or other offensive content even if it is confined to your workstation.
- Emailing, text messaging, or sending photos of inappropriate material (i.e., material of a sexual or offensive nature).
- Engaging in jokes, teasing, and innuendoes whether spoken or in print.
- Engaging in personal conversations which, if overheard by another person, may be found to be offensive.

As an Alaska Communications' contractor, you are required to abide by the Harassment Free Workplace Policy.

2. Alcohol and Drug Free Workplace

Alaska Communications is committed to providing an alcohol and drug-free work environment. This policy and each of its rules apply whenever you are on or in Alaska Communications' property, surrounding grounds and parking lots, leased or rented space, on, in any vehicle used on Company business, and in other circumstances (such as customer premises and when representing the Company).

"Drugs and controlled substances" include legal and illegal drugs and controlled substances such as marijuana, cocaine, heroin, peyote, opium, amphetamines, designer drugs, and "controlled substances" (as defined in Schedules 1-V of Section 202 of the Controlled Substances Act and the applicable regulations), as well as drugs which have been obtained or used illegally (for example using prescription drugs for improper purposes or using drugs prescribed for someone else).

Alaska Communications' policy prohibits the use of illegal drugs and the misuse of controlled substances and alcohol. Alaska Communications reserves the right to terminate the Contractor Agreement for any contractor who tests positive for controlled substances, uses illegal drugs, or who fails a breath alcohol test.

3. Conflicts of Interest

Conflicts of Interest occur when your personal interests and relationships appear to interfere with performance of your duties or the best interests of the company. These conflicts include outside activities or interests (significant financial interest in a competitor); relationships with customers, vendors, competitors and other employees; and business courtesies (accepting extravagant gifts or gratuities).

While it is not possible to describe all the circumstances and conditions which might develop, the following are some examples:

- You may not give credit, negotiate nor incur expense with any individual or company with whom you have a personal or family financial interest.
- You must immediately disclose any financial interest you or any member of your family has in any company whose business is similar in nature to that of Alaska Communications, or does business with Alaska Communications other than ordinary consumer services.
- You may not access, nor perform work on any personal account you have, or any account your family or friends have for Alaska Communications consumer services. Accessing customer information for any personal reason is strictly prohibited and may result in dismissal.

Related Party Transactions

Related Party Transactions occur when you have more than a de minimis interest (or a spouse or family member has such as interest) in a third-party entity that is doing business with Alaska Communications other than ordinary voice or data service.

You should not engage in any conduct that creates either the appearance of impropriety or a conflict of interest with your status as a contractor with the Company. A conflict of interest is any interest or activity that is incompatible or creates the appearance of a conflict with your responsibilities to the Company. Your conduct creates the appearance of impropriety whenever it would lead a reasonable observer to conclude that you are acting in a manner that may be dishonest, misleading, unethical, illegal, or otherwise not in furtherance of the Company's interests.

Conflicts of interest may include relationships with employees, customers, competitors, regulators, directors or affiliates of the Company that affect your ability to exercise your independent judgment to choose what is best for the Company or preserve business opportunities for the Company's consideration. You should always perform your job duties based primarily upon what is in the best interest of the Company and in compliance with any applicable law or regulation, rather than upon personal considerations or personal or business relationships.

Business Opportunities

In the event that you become aware of a possible business or investment opportunity (including business with vendors or new customers) in an industry or jurisdiction in which the Company (i) currently operates or has an investment, (ii) previously operated or invested or (iii) has considered operating or investing, you should consider such opportunities strictly for the Company's benefit and not your own personal benefit. This also includes business opportunities that may arise outside of the Company's industry, but within a jurisdiction or geography in which the Company has, may have had or may be considering investing or participating in. For example, while the Company is not in the real estate business, your purchase of property (or investment in a Company that purchases such property) in a location in which the Company may want to open a retail store may be deemed a conflict of interest. You must seek advice from the Corporate Compliance/Ethics Officer as to whether pursuing any of these types of opportunities other than through the Company would present a conflict of interest before engaging in such an opportunity.

Non-Compete or Confidentiality Agreements

If you have previously entered into a non-compete or confidentiality agreement with a previous employer, it is your responsibility to inform the Company if you believe you may be in violation of any of its terms. It is your responsibility to ensure that you are in full compliance with the non-compete agreement.

4. Insider Trading

Insider trading is defined as buying or selling securities at a time you know material information about that company which has not been released to the general public. Trading Alaska Communications' stock on the basis of material non-public information is improper during open trading periods. Material Information includes information about revenues, earnings results, dividends, or changes in key personnel, as well as tips you give to others based on your knowledge, even if you do not profit from the trade. It is your responsibility to understand and abide by the Company's Insider Trading Policy.

5. Records Retention

A business record is any recorded information created for any business purpose. All business records are considered confidential and proprietary to Alaska Communications unless approved for release by an Alaska Communications executive. You are responsible for truthfully and accurately recording required information, within the recommended timeframe, and for retaining company records according to guidelines.

You must ensure that company records in your control are properly managed, which means to be properly stored (to protect confidential and proprietary information), updated, retained for required time periods and destroyed according to Alaska Communications' Records Retention Policy and, when requested, preserved in such manner as stipulated by the Legal Department.