



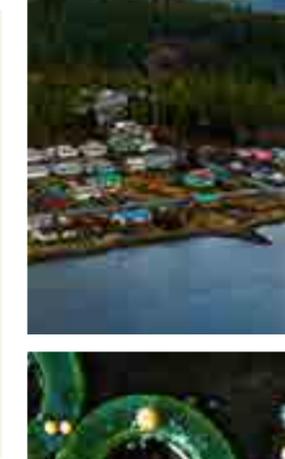
CODE OF *ETHICS*

For Employees, Officers and
Directors of Sealaska Corporation,
Affiliates and Subsidiaries.

Adopted October 24, 2005 | Amended July 31, 2023



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ABOUT SEALASKA

Sealaska was built on a foundation of the values and history of the Tlingit, Haida and Tsimshian peoples. We believe in responsibility and respect, in balance and reciprocity – in creating opportunities for shareholders and employees by growing our business portfolio while protecting and preserving the environment. We build success, through our employees and partners, by committing to [Core Cultural Values](#) that guide our [Workplace Behaviors](#):

Core Cultural Values

- *Haa Aani (Our Land)*
- *Haa Latseen (Our Strength, Leadership)*
- *Haa Shuká (Our Past, Present and Future)*
- *Wooch.Yax (Balance, Reciprocity and Respect)*

Workplace Behaviors

- *Working Together*
- *Insatiable Curiosity*
- *Humility, Respect and Transparency*
- *Creating Value While Maintaining Focus, Clarity and Drive*

Our businesses today are centered on bringing exceptional people together to tackle critical challenges for people and planet – especially those resulting from climate change.

The purpose of our business endeavors is to provide the benefits our shareholders value and follow our deep sense of responsibility to heal and protect our environment. Aligning Sealaska’s businesses with our values is something we strive for every day.

Ethics are the foundation of excellent business practices. If we hope to serve our shareholders, our employees, our communities and our planet, the way we carry out our work holds just as much weight as how well we perform. We believe in a better future—one in which both people and the planet thrive—and we will only achieve this vision by maintaining and strengthening our dedication to an ethical environment.

One of the most vital charges for any organization is to set the standard for excellence and promote a culture of zero tolerance for unethical business practices. We work diligently to support accountability for fostering a climate of integrity at Sealaska.

The Sealaska Code of Ethics provides clear standards for us all, laying out what to expect from company leadership as well as from all employees. These standards must be upheld at every level in order to honor our commitments as a company. By following the Code of Ethics within our daily duties and within all our decision-making, we will do important, world-changing work—and we will do it in the right way.

ABOUT OUR CODE

IN THIS SECTION:

Introduction

Focus on Global Responsibility

Complying with Our Code and the Law

Making Ethical Decisions

Getting Answers to Your Questions or Reporting a Concern

Investigation

Know Your Responsibilities

Know Your Responsibilities as a Manager

Retaliation is Strictly Prohibited

About Our Code



Introduction

The [Sealaska](#) Code of Ethics (the “Code”) is a resource for day-to-day decision making. It applies to everyone at Sealaska including the [Board of Directors](#) (collectively, “Directors,” individually, “Director”) and all [Officers](#) and [Employees](#) of Sealaska and its controlled US [Subsidiaries](#).

Many of the principles described here are general in nature and cannot cover every situation that may arise. So please use common sense and good judgment in applying our Code. If you have any questions, please consult Sealaska policies or seek guidance from your manager or [Legal](#).

Our Code is meant to inform your role, responsibilities and [Workplace Behaviors](#). It is meant to acquaint you with [Sealaska’s](#) rules and methods of operation. This Code is neither a contract nor a promise of employment. It is a summary of the standards by which we operate. We reserve the right to change the Code at any time.

laws, rules and regulations;

- *Prompt internal reporting of violations of this Code; and*
- *Accountability for adherence to this Code.*

Recognizing ethical issues and doing the right thing in all Sealaska business and mission activities is our responsibility. Our personal standards must be consistent with our [Company](#) standards, including our professionalism and commitment to superior results. We are expected to use due care and diligence, and to exercise good judgment in the performance of our duties.

Focus on Global Responsibility

Our Reputation Extends Across Borders

Sealaska is expanding globally. Our success in any international transaction depends on our compliance with country-specific constraints and conditions, and sensitivity to local customs. Sealaska’s international subsidiaries are guided by international laws, regulations and customs that vary from country to country.

WE SEEK TO 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, timely and comprehensible disclosure in our financial reporting and in our other public communications;*
- *Compliance with applicable*

Complying with Our Code and the Law

We follow our Code, Company policies and procedures, and applicable laws and regulations

Failure to abide by any of these, may result in disciplinary action up to and including termination of employment or removal from

About Our Code

the [Board of Directors](#). Violations of laws or regulations may also result in legal proceedings and penalties for [Sealaska](#). They may even result in civil and criminal penalties that could affect you personally.

The provisions in this Code do not waive Sealaska’s right to take appropriate legal action, nor do they substitute for terms of any applicable employment agreement. If there is any conflict between any Sealaska policy and this Code, the Code will override the policy. And, if there is any conflict between the Code and applicable law, the law will override the policy and the Code.



Making Ethical Decisions

In most work situations, the right course of action will be clear. But at times you might be uncertain 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 the Code?*
- *Will this action appear appropriate to others?*
- *Would Sealaska 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.

Getting Answers to Your Questions or Reporting a Concern

[Sealaska](#) values openness and respectful relationships across all levels of the Company. Your input helps us maintain a transparent [Company](#) culture. As a member of the Sealaska team, it’s crucial that you understand and feel comfortable with our workplace.

Please ask questions about issues that are not clear to you. We encourage you to talk openly about any concerns you may have. We also invite your feedback and suggestions about workplace issues.

If you become aware of a situation that conflicts or appears to conflict with company policy, the Code or the law, please share your concern immediately with your manager, [Human Resources](#), [Legal](#), or our third-party, independent reporting service,

About Our Code

Ethical Advocate via phone (855.449.0542) or online at sealaska.ethicaladvocate.com

Your manager may be best-suited to respond to your issue directly and may already be familiar with your concern.

Manager Tip!

What to do after your Employee reports a concern directly to you:

- *Ensure the concern is reported or report it yourself to: [Human Resources](#), [Legal](#), or through [Ethical Advocate](#).*
- *Maintain as much confidentiality as possible.*
- *Refrain from conducting your own investigation.*
- *Be careful not to make representations about the validity of the report or the outcome of the investigation.*
- *Reach out to appropriate resources if you need information and guidance.*

If you are not comfortable reaching out to your manager, you may report your concern anonymously to the extent permitted by law by using Ethical Advocate – online or by phone. Ethical Advocate is 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.

Investigations

[Sealaska](#) will immediately and thoroughly investigate incidents of violence, threats of violence, or other misconduct. Every [Director](#), [Officer](#) and [Employee](#) is responsible for and expected to participate when asked to cooperate with investigations.

Sealaska will:

- *Ensure that concerns are addressed in a timely manner;*
- *Use its best efforts to correct any harm that may have occurred;*
- *Consider ways to prevent the situation from happening again;*
- *Discipline the individual(s) responsible, if appropriate; and*
- *Comply with legal and [Company](#) reporting requirements.*

All good faith complaints will be followed by a fair, timely and thorough investigation that provides all parties with due process. Whether Employee disciplinary or other corrective actions are taken is a management decision that will be made on a case-by-case basis.

For matters involving [Board of Directors](#), the Board or its designated committee will be responsible for investigating violations of the Code, applicable policy or the law, and determine appropriate disciplinary action on its own, or designate others to do so.

About Our Code



Know Your Responsibilities

Our commitment to ethics and compliance is a team effort. Our obligations extend beyond simply knowing what is included in our Code.

Know Your Responsibilities as a Manager

Managers are expected to help [Employees](#) understand the Code and include its principles in daily work. Managers should create an environment in which Employees feel comfortable reporting business risks through the appropriate channels.

We expect every Director, Officer, and Employee to:

- Follow the letter and spirit of our Code and Company policies;
- Complete required ethics and compliance activities, including periodic training;
- Get advice from management any time there is uncertainty about how to apply the standards in our Code to a specific situation or general work environment;
- Report any known or suspected violations of our Code, applicable laws or regulations, or Company policy; and
- Be honest and use good judgment.

You should also be aware that failure to report any violation of the Code, a [Company](#) policy or the law could result in disciplinary action, up to and including termination or removal from the [Board of Directors](#), and in some instances could result in civil or criminal legal consequences for the Company and/or the individual involved.

Manager Tip!

As a manager, you are expected to:

- Lead by example;
- Create an environment that fosters communication and recognizes all work efforts;
- Show ethical leadership through your words and actions;
- Speak with Employees about this Code, Company policies and any applicable department policies and procedures;
- Be proactive — look for opportunities to address ethical and compliance challenges;
- Help Employees feel comfortable asking questions and reporting potential violations of our Code and related policies; and
- Never ask someone to do something that is inconsistent with our Code or Sealaska’s values.

About Our Code



Retaliation is Strictly Prohibited

Sealaska does not tolerate retaliation of any kind against anyone who, in good faith, raises questions or reports wrongdoing. We also do not tolerate retaliation against anyone who assists in the investigation of reported wrongdoing.



“Good faith” means that your concern is honest and accurate to your knowledge, regardless of whether it is later discovered that you were mistaken or that your concern was not warranted. Immediately report any acts of retaliation to your manager, [Human Resources](#), or [Legal](#).

Allegations made maliciously or in bad faith will be subject to disciplinary action, up to and including termination.

Manager Tip!

Never engage in retaliation and prevent retaliation against others. Know the actions that are retaliation and avoid them. Tell your Employees that they can come to you or Human Resources if they suspect that they or someone else is being retaliated against, and that their complaint will be handled appropriately and confidentiality, to the extent possible.

Examples of retaliation include, but are not limited to:

- *Making threats, discriminating against, or harassing someone;*
- *Demoting an Employee without “just cause” or a legitimate business reason;*
- *Providing an unjustified or unsupported negative performance review;*
- *Making derogatory comments to an Employee in front of others - even in attempts at humor;*
- *Setting unrealistic deadlines to cause an Employee to fail;*
- *Ignoring or refusing to meet with the Employee; and*
- *Speaking curtly or rudely or acting in ways that embarrass the Employee.*



Doing the right thing for...

OUR EMPLOYEES

IN THIS SECTION:

Promote Workplace Diversity and Equal Employment Opportunity

Respect Others

Privacy

Promote a Safe Workplace

Communicate with Care

Social Media

Doing the right thing for... Our Employees



Promote Workplace Diversity and Equal Employment Opportunity

[Sealaska](#) welcomes diversity and sees it as a source of strength. We focus on attracting, developing and retaining [Employees](#) with diverse skills, talents, backgrounds, and experiences.

We are committed to providing a diverse and inclusive work environment, free from all forms of unlawful harassment and discrimination, including any type of harassment or discrimination based on race, color, religion, sex, sexual orientation, gender, gender identity or expression, gender transitioning or perceived gender transitioning, age, ancestry, creed, religious creed, disability, national origin, marital or domestic/civil partnership status, changes in marital status, pregnancy, parenthood, medical condition, genetic information, citizenship status, uniformed service member or veteran status, domestic violence victim or any other characteristic protected by law.

We demonstrate our commitment to inclusion and collaboration by acting professionally and treating one another with respect and kindness.

Under federal law, Sealaska may factor in Sealaska shareholder status or a person’s status as an immediate family member of a Sealaska shareholder (defined as a Sealaska shareholder’s spouse or descendent) when making hiring decisions to the extent allowed by law. Sealaska is committed to improving the educational and career success of our shareholders and believes that shareholders pursuing careers at Sealaska are critical to achieving our shareholder development goals. We actively support educational attainment, skill building and career development programs for our shareholders and believe both the growth of Sealaska and the increasing capacity of our shareholders are a key measurement of our success. This does not lessen our commitment to create a diversified employee base with broad perspectives and skills, as we only consider shareholder status when candidates are otherwise evenly matched.

Respect Others

Sealaska strives to offer a work environment where all Employees are respected, heard and able to thrive. This culture encourages us to listen and respond to one another’s ideas and needs. Our openness and courage to embrace different points of view and welcome change cultivates a diverse, inclusive and collaborative place to work.

Everyone deserves to feel safe, so we do not tolerate any behavior that creates an intimidating, offensive, abusive or hostile work environment.

Everyone is expected to help keep our workplace free from all forms of violence and harassment, including sexual harassment. If you witness harassing behavior or threats or acts of violence, you are required to report it using the methods identified in [”Getting Answers to Your Questions or Reporting a Concern”](#) section above.

Doing the right thing for... Our Employees



Harassment can be a type of unlawful discrimination if it is based on a person’s protected personal characteristic, but harassment can also be any unwelcome, offensive or degrading comments or conduct, including any form of bullying or threatening actions. Harassment of any kind is determined by the reasonable perception of your actions by others, regardless of your intention. All forms of harassment violate Sealaska’s Code and may be illegal.

Sealaska’s [Core Values](#) are rooted in living in balance, promoting harmony, and creating value together by respecting everyone. We are dedicated to ensuring that every [Director](#), [Officer](#), and [Employee](#) can contribute their best work by being their authentic selves in the workplace. We do not tolerate workplace behaviors that are counterproductive to a healthy, thriving environment. At Sealaska, we lead with respect, we interact with empathy, and we approach differences with kindness and curiosity. We recognize that our differences make us a stronger Company. We are committed to honoring the diversity that everyone represents. We celebrate people living their truth in a safe, inclusive, equitable, harassment-free workplace.

Learning Aid



We each have a responsibility to make sure our workplace is a welcoming environment, free from harassment. Harassment can come in many forms, and may include, but is not limited to:

- *Comments about a protected characteristic that are unwelcome, offensive, or degrading.*
- *Explicit or degrading remarks about a person’s appearance, background, lifestyle, or other attribute.*
- *Unwanted sexual advances or repeated requests for dates.*
- *Pictures, messages, or jokes that degrade a person or that may be considered offensive based on a personal characteristic.*
- *Unwanted attention, physical contact, or interactions of a personal nature.*
- *Disparaging an individual, whether directly or to others, based on a personal characteristic.*
- *Creating an environment of “us vs them.”*

Refer to [Human Resources](#) or your Employee handbook for more information.

Privacy

Sealaska respects Employee privacy and protects personal information, including shareholder, medical and personnel records.

Learning Aid



Privacy Best Practices:

- *Minimize the collection, sharing, and use of personal information only to what is needed to perform your work.*
- *Send emails that contain personal information in a secure manner to recipients outside of Sealaska.*
- *Share personal information only with approved third parties and only for legitimate business purposes.*

Doing the right thing for... Our Employees



Promote a Safe Workplace

Sealaska strives to provide each [Employee](#) with a healthy and safe work environment. To protect ourselves, our coworkers and our visitors, we:

- *Observe all health and safety rules and practices that apply to our work; and*
- *Report injuries, occupational illnesses or unsafe practices to our manager, the environmental health & safety representative (if applicable) or [Human Resources](#).*
- *Maintain a drug- and alcohol-free workplace and notify a manager if we see a coworker who is impaired*

Employees who sustain work-related injuries or illnesses should inform their managers immediately.

If you have questions or concerns about your workers' compensation coverage, refer to Human Resources or your [Employee](#) handbook.

Communicate with Care

You may be asked about Sealaska's activities or be tempted to comment about them to a news outlet or on social media. To ensure that our stakeholders receive the most accurate information, Employees must speak with one voice.

Unless you have received the corporate message or talking points on an issue, please refer third parties who ask for information regarding Sealaska to the Sealaska Corporation Communications Department.

Do not:

- *Hold yourself out as representing Sealaska's views;*
- *Divulge [Company](#) confidential information; or*
- *Share confidential information with the media or through social media about our business or customers' plans and activities.*

If you are unsure if the information is confidential, ask your manager before you share it. To keep from creating confusion about Sealaska's position when expressing your personal views in public forums (e.g., writing to a newspaper, posting to a blog, etc.), please avoid referencing your title and business address, use your personal email, and use plain paper without Sealaska's logo or letterhead.

Nothing in this section precludes [Employees](#) from discussing the terms and conditions of their employment with other Employees or a third party, including the Equal Employment Opportunity Commission ("EEOC") or any analogous federal, state or location administrative agency if an Employee so chooses.



Doing the right thing for... Our Employees



Social Media

[Sealaska](#) is deeply invested in engaging with its shareholders and the broader public through social media. Social media is also widely used by Employees and [Board](#) members in their personal lives.

Social media tools like blogs, Facebook, Twitter or wikis let us learn from and share information with the public and our stakeholders.

Social media posts are permanent, are easy to share and can affect Sealaska's reputation and business relationships.



SOCIAL MEDIA GUIDELINES:

- **Be transparent.** *If you publish content on social media about Sealaska or its businesses, you should make clear that you are a Sealaska Employee or Board member and that the views you express are your own.*
- **Uphold confidentiality.** *Protect the confidentiality of customer information and the Company's trade secrets and confidential financial and business-related information.*
- **Be respectful.** *Do not post things that reasonably could be viewed as discriminatory, malicious, obscene, threatening, intimidating or that might constitute threats of violence, harassment or bullying. Examples include posts intended to harm or sabotage someone's reputation or that contribute to a hostile work environment on the basis of any status protected by law or Company policy.*
- **Don't disparage** Sealaska or its businesses or Employees, customers, shareholders, Directors, or vendors.
- **Be accurate.** *Consider accuracy before you post. If you make a mistake, you should correct it quickly. Never post information or rumors that you know to be false about Sealaska, Employees, Directors, customers, consumers, suppliers, people working on behalf of Sealaska, or competitors.*



Doing the right thing for...

OUR CUSTOMERS

IN THIS SECTION:

Uphold Confidentiality

Avoid Insider Trading

Antitrust and Fair Competition

Competitive Information Gathering

Truthful Advertising

Third-Party Intellectual Property and Commercial Rights

Gifts and Entertainment

Doing the right thing for... Our Customers



Uphold Confidentiality

In the course of our work, we may acquire business information about [Sealaska](#)'s companies, customers and partners.

Keeping that information confidential helps protect Sealaska's business advantage and shows respect to the people we do business with.

You can help by:

- *Disclosing only the information that is necessary for the business activity you're conducting;*
- *Sharing emails only with those who have a need to know the information;*
- *Refraining from forwarding emails unnecessarily;*
- *Including "CONFIDENTIAL" or "PRIVILEGED" on your document, if appropriate;*
- *Being aware of your surroundings when talking about business on the phone or in person; and*

- *Making sure that there is a confidentiality agreement in place before sending sensitive information outside Sealaska.*

Learning Aid



Should customer information always be kept secret?

Scenario: A potential customer asks you to share the names of other customers who use Sealaska's services. The customer is very high-profile and a deal would most likely result in a significant revenue increase for your Company and a significant bonus for you.

Should you reveal this information to close the deal?

Answer: No. This information is confidential and may also be the subject of a nondisclosure agreement between [Sealaska](#) and the customer whose information the potential customer is requesting. If you feel the information is integral to the deal between Sealaska and the potential customer, contact your manager.

Avoid Insider Trading

Although [Sealaska](#) is not a publicly traded company, insider trading based upon company information can still occur.

Insider trading occurs when a person trades in (i.e., buys or sells) a company's stocks, bonds or other securities using "material inside information" — that is, non-public information about a company's business, financial prospects, regulatory or legal matters, etc., that could reasonably affect a person's decision about whether to buy or sell the securities.

It also occurs when a person gives material inside information to someone else who uses that information to achieve financial gain. Insider trading is a serious violation of the law (refer to "Antitrust and Fair Competition" below for more information). Therefore, we do not use information we learn through our work to trade in any other company's securities, including those of Sealaska customers, vendors, suppliers or other business partners.

Doing the right thing for... Our Customers



Antitrust and Fair Competition

U.S. federal and state antitrust and competition laws ban certain actions that limit competition between companies that otherwise would be competing for business in the marketplace.

TOPICS TO AVOID INCLUDE:

- *Prices or pricing strategy;*
- *Discounts;*
- *Terms of our customer relationships;*
- *Sales policies;*
- *Marketing plans;*
- *Customer selection;*
- *Allocating customers or market areas; or*
- *Contract terms and contracting strategies.*

We must be careful when interacting with any [Employees](#) or representatives of [Sealaska's](#) competitors. Under no circumstances do we

discuss customers, prospects and pricing or other business terms with any Employees or representatives of our competitors.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal or implicit understandings are also violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties.

- *Websites that are open to the public or to which we have bought a license; or*
- *Customers and suppliers who can legally share the information with us.*

Using competitors' proprietary information is not acceptable. It is also unnecessary and puts Sealaska at risk. So, if you come across any information from non-public sources, don't use it.

Competitive Information Gathering

Knowing about our competitors helps us make smart business decisions and stay competitive in the marketplace.

We do quality work and seek to win business on our own merits. So, we only collect information on our competitors from public sources like:

- *News accounts;*
- *Industry surveys;*
- *Competitors' displays at conferences and trade shows;*



Doing the right thing for... Our Customers



Third-Party Intellectual Property and Commercial Rights

We rely on our own creativity or get permission from the rightful owner(s) before using IP in our internal or external communications (e.g., letters, emails, newsletters, social media posts and website or marketing materials).

Intellectual property (IP) refers to creations of the human mind that are protected by law, such as:

- *Copyrights*
- *Trademarks*
- *Brand names*
- *Trade dress*
- *Know-how*
- *Other intangible industrial or commercial property*
- *Patents*
- *Trade secrets*
- *Design rights*
- *Logos*
- *Software*

We value and encourage the protection of Sealaska IP and proprietary information while also simultaneously respecting the valid IP rights of third parties. Use of photos, graphics, software, music and other IP on behalf of Sealaska is typically considered commercial use and, as such, requires certain permissions before use.



Truthful Advertising

We provide clear and accurate information in our sales and marketing materials. By accurately representing [Sealaska](#) and its services to customers and partners, we can build trusting relationships that will help us in the future.

Doing the right thing for... Our Customers



Gifts and Entertainment

A “gift” is any tangible item, or any service or benefit given or received without consideration.

Also included is any favor, benefit or other thing of value that is a result of a transfer to any [Employee](#), either directly or indirectly, from any present or prospective supplier or customer, a shareholder, business partner or affiliate. Gifts do not include reasonable business meals or customary forms of business hospitality.

“Entertainment” includes meals and cultural or sporting events that we attend with a customer or business provider.

Giving and receiving small gifts and entertainment (e.g. tickets to cultural or sporting events) can help build goodwill and strong business relationships. Unless giving or receiving such gifts or entertainment creates an actual or potential [Conflict of Interest](#), giving and receiving small gifts and entertainment is generally acceptable.

Given the complex business and political situations we sometimes encounter, it may be

tempting to use any means available to sway decisions in the [Company](#)’s favor. However, we win business based on the quality of our work and we advocate for just causes. Giving or receiving expensive gifts and providing lavish entertainment to decision-makers or accepting invitations for lavish entertainment degrades our reputation. In many scenarios, it’s also illegal under the [Foreign Corrupt Practices Act](#) and other anti-corruption laws, and only hurts us in the long run. It isn’t needed and isn’t worth it.

If you give or receive a gift or invite someone to or attend an event, make sure it’s something you can justify easily, can talk about without embarrassment, and does not cause an actual or potential Conflict of Interest.

The giving of gifts on behalf of [Sealaska](#), or the receipt of gifts from any person or [Entity](#) that does business with Sealaska (or seeks to do business with Sealaska) with a value of over \$200.00 must be disclosed to the [Corporate Secretary](#) department. Sealaska and each [Subsidiary](#) shall maintain a record of such gifts, which will be available for review by the Sealaska Corporate Secretary’s office. Gifts received could be taxable income to the Employee, and gifts provided may be deductible expenses of

Sealaska. For more information, please refer to the Company gifts and entertainment policy.

If you have any questions about whether giving or receiving a gift or providing or participating in a form of entertainment might not be appropriate, contact [Legal](#).

Learning Aid



Question: I’ve been asked to participate in a local customer-sponsored golf event. May I attend the event?

Answer: This kind of business entertainment is acceptable because it builds your relationship, can generate goodwill and is not lavish. Always consider whether the event would influence or appear to influence a decision about the customer. Also consider whether it has a business purpose, how it appears to Employees and others, and whether attendance benefits our Company. If it requires travel, you need to talk to your manager.

Doing the right thing for...

OUR SHAREHOLDERS

IN THIS SECTION:

Honor Privacy

Avoid Conflicts of Interest

Conflicts of Interest Disclosure

Procurement

Financial Integrity and Reporting

Accurate Records Management

Safeguard Company Assets and Resources

Proper Use and Protection of Our Data

Doing the right thing for... Our Shareholders



[Sealaska](#) was formed under the terms of the Alaska Native Claims Settlement Act of 1971 (ANCSA). Because of ANCSA, we enjoy a unique relationship with our shareholders that is based on their collective heritage and collective ownership of Sealaska.

Our Code, in addition to the ordinary legal relationship between [Officers](#), [Directors](#) and shareholders, reflects this special relationship between Sealaska Employees, Officers, Directors and shareholders.

ANCSA provides for unique relationships and transactions between Sealaska and other Native corporations. Our business activities with all entities, including other Native corporations and shareholder businesses, uniformly reflect fairness and integrity.

Honor Privacy

Keeping Sealaska shareholder information secure and using it appropriately is important to Sealaska.

We use our best efforts to safeguard confidential information shareholders share with us. This includes personal data that can directly or indirectly identify an individual, such as name, contact information, and shareholder status.

TO PREVENT UNAUTHORIZED DISCLOSURES:

- *Provide training to the staff to determine when and what to disclose to whom.*
- *Provide safeguards in the system itself to prevent accidental disclosure.*
- *Collect, use, and process such information only for legitimate business purposes.*
- *Act in accordance with applicable law.*
- *Limit access to information to those who have a legitimate business purpose.*

Avoid Conflicts of Interest

Conflicts of Interest are situations in which our personal interests and activities interfere or appear to interfere, with our ability to be objective or perform our roles at Sealaska. This includes situations where what is in our personal best interest is not in the best interest of Sealaska, our customers, and our shareholders.

These situations can also result from the interests and activities of people close to us, such as our family members, household members and friends.

We have an obligation to make sound business decisions in the best interests of [Sealaska](#) without the influence of personal interests or financial gain. Because both actual and perceived Conflicts of Interest undermine the trust that others place in us, we do our best to avoid them.

Doing the right thing for... Our Shareholders



Conflicts of Interest Disclosure

Directors, Officers and Employees must immediately disclose actual or perceived [Conflicts of Interest](#).

Director and Officer Disclosure:

[Directors](#) and [Officers](#) of Sealaska Corporation and its subsidiaries must disclose such relationships or interests as a potential Conflicts of Interest to the Sealaska Corporate Secretary at COI@sealaska.com. The Corporate Secretary will review the Conflict of Interest and report findings and any recommendations, if appropriate, to the Board Chair and the Chair of the Audit Committee for their recommendations and appropriate action.

Employee Disclosure:

Employees must disclose such relationships or interests as a potential Conflicts of Interest to their manager and seek advice or approval from the Sealaska Corporate Secretary by email at COI@sealaska.com.

All conflicts of interest disclosure statements will be held in the strictest confidence.

We understand that, in some instances, disclosure may be sufficient; however, in other instances, we may need to stop or even reverse our actions. Directors may also need to abstain from a board vote or action.

Directors, Officers & Key Employees Questionnaire

Directors and Officers, including those at the subsidiary level and certain key employees (“Key Employees”) must complete and submit to the office of the Sealaska Corporate Secretary an annual [Directors, Officers & Key Employees Questionnaire](#). Individual employees may be classified as Key Employees by the Sealaska [Corporate Secretary](#)’s office.

The Sealaska Corporate Secretary will review the Directors, Officers & Key Employees Questionnaire and report findings and any recommendations, if appropriate, to the Board Chair and the Chair of the [Audit Committee](#) for their recommendations and appropriate action.

Learning Aid



What are some activities that could represent Conflicts of Interest?

- *Owning, directly or indirectly, a significant financial interest in any [Entity](#) that does business, seeks to do business or competes with Sealaska;*
- *Holding a second job that interferes with your ability to do your regular job;*
- *Employing, consulting or serving on the board of a competitor, customer, supplier or other service provider;*
- *Hiring a supplier, distributor or other agent managed or owned by a relative or close friend;*
- *Soliciting or accepting any cash, gifts, entertainment or benefits that are more than modest in value from any competitor, supplier or customer;*
- *Taking personal advantage of [Company](#) business opportunities; or*
- *Transactions involving [Employee](#)’s personal or immediate family’s interest; see definition of [“Reportable Interests.”](#)*

Doing the right thing for... Our Shareholders



Because it is not possible to describe every potential conflict, please exercise sound judgment and seek advice from your manager, the Sealaska Corporate Secretary, or [Legal](#).

Procurement

[Sealaska](#) awards business to [Third Parties](#) that offer the best value for the required items or services we need. Their prices must be competitive and must factor in Sealaska’s quality and timing requirements.

Sealaska strives to strengthen Native-owned and Native-controlled organizations and directs particular attention to evaluating business opportunities with Southeast Alaska Native corporations and other native organizations, and shareholder-owned businesses.

In addition, Sealaska encourages contracts with [Employee](#) and shareholder-owned businesses when they meet competitive price and quality standards.

When we partner with people and organizations that embrace and demonstrate high principles of ethical behavior, we build trust with our customers and shareholders.

Learning Aid



Question: My brother owns a business and wants to be a Sealaska vendor. May I direct him to a Sealaska manager?

Answer: Yes, you may direct your brother to the person who may be interested in his product or service. However, you should disclose to your manager and the person making the purchasing decision that the potential vendor is your brother. Normal Sealaska procedures for selecting a vendor must be followed to make sure there is no special treatment or appearance of special treatment for your brother.

Financial Integrity and Reporting

Truthful and reliable records are critical to business success. We need them to provide a fair and complete accounting of Sealaska’s finances to our partners and our shareholders.

We keep accurate [Company](#) records and accounts and cooperate fully with outside accountants and agencies in connection with audits or reviews of Sealaska’s financial statements.

If we have reason to believe that any of Sealaska’s books and records are being maintained in a materially inaccurate or incomplete manner, we will report this immediately to your manager, the Chief Financial Officer or [Legal](#).



Doing the right thing for... Our Shareholders



Accurate Records Management

Sealaska’s records provide evidence of its actions and decisions. They contain data and information critical to the continuity of our business and are Sealaska’s “memory.” Records are all forms of information created or received by Sealaska that are relevant to business activities or transactions.

They include:

- Hand-written or printed documents
- Audio recordings
- Email
- Video recordings
- Electronic data or information

We are responsible for following the approved records retention schedule for our [Company](#), department and/or business unit.

All records are the property of the Company and must be retained in accordance with the Company approved records retention schedule and applicable law. However, any information that may be required for a [Legal Hold](#) or an investigation should be preserved.

Learning Aid



Question:

I made a small error on an expense report I just submitted – the amount I input is only slightly more than the actual cost. Do I need to correct the report?

Answer:

Yes. It is important to submit accurate information and avoid any falsification or misrepresentation of corporate accounts or records. If you need to make a change to your expense report, you should contact someone in accounting so that the mistake can be adjusted.

Safeguard Company Assets and Resources

We are responsible stewards of Sealaska’s assets and resources. Theft, carelessness, and waste hurt Sealaska’s profitability. So, we treat Sealaska property with the same care we give our own property, and we only use Company resources to conduct legitimate Company business.

ASSETS INCLUDE:

- Physical assets, such as office furnishings, equipment and supplies;
- Technology assets, such as computer hardware, software, and information systems;
- Financial assets, such as cash, securities, and credit cards;
- The Company name, its brand, and our customer relationships; and
- Information assets, such as intellectual property, including information about products, services, systems, and other data.

Doing the right thing for... Our Shareholders



Proper Use and Protection of Our Data

Our computer systems and electronic data are an essential part of our business. We do our part to safeguard the confidentiality, integrity and availability of our systems and processes by following the applicable [Company](#) information technology policies.

We do not use computers or email in ways that are illegal, disruptive, offensive to others, or harmful to morale (i.e. sexually explicit images, unsolicited mail, gambling, etc.).

It is important to remember that information on [Sealaska](#) equipment (e.g., servers, computers, phones, etc.) belongs to Sealaska. Therefore, there should be no expectation of privacy with regard to normal course workplace communication or any personal property brought onto Sealaska premises or used for Sealaska business.

Any work that a [Director](#), [Officer](#) or [Employee](#) does on behalf of Sealaska is Company property and will always be accessible to appropriate Officers of Sealaska. This property includes all written, printed, electronic, photographic, tangible or intangible material. It shall remain the property of Sealaska, even after the Employee leaves Sealaska.

Sealaska reserves the right to review workplace communications (including but not limited to Internet activity, email, instant messages, social media or other electronic messages, computer storage and voice mail), as well as Employees' workspace at any time.

Cybersecurity is Everyone's Responsibility

Learning Aid



Cybersecurity risks are constantly evolving, and our information systems are probed daily by attackers attempting to maliciously access company resources. Every device

and every user account is a valuable target for attackers that must be defended at all times. Please remember to

- *Use only approved devices to access the Sealaska network and resources.*
- *Never attempt to bypass or disable Anti-virus and other defensive software.*
- *Only install approved software on Sealaska devices.*
- *If something looks suspicious stop and report it immediately to Sealaska IT.*
- *Update devices as soon as possible when security updates are released.*

Remember: The unauthorized transmission of Sealaska data, access to inappropriate Internet sites and the transmission of inappropriate emails are examples of misuse of technology.

Because remote use of Sealaska networks is both a necessity and a privilege, we follow our Company policies, including IT policies, even when we work from home or other locations outside our office.



Doing the right thing for...

OUR COMMUNITIES

IN THIS SECTION:

Environmental Responsibility

Human Rights and Fair Labor

Community Service

Professional Organizations

ANCSA Corporations

Doing the right thing for... Our Communities



Environmental Responsibility

Sealaska's lands and natural resources represent our inheritance from our forebears and our legacy to our descendants.

Sealaska balances conservation of these resources with the use of such resources for the economic benefit of our shareholders. We conduct our business activities in a way that protects the environment and the health and safety of our [Employees](#), their families, and the public.

We believe that protecting and preserving our environment isn't just a moral or cultural imperative; it is smart business. Our businesses follow a formula designed to create both profit and pride:

- *To improve our air and water quality, we sustainably manage our forests;*
- *To protect fisheries, our seafood companies actively support sustainable fishing and seek more value per fish through innovative practices; and*

- *To improve the health of streams and waterways, our environmental services companies are testing water quality and solving complex hydrology challenges.*

And, as a [Company](#), we are committed to evaluating the social, economic, and environmental impact of each of our businesses to ensure alignment with [our values](#) and long-term vision to support future generations.

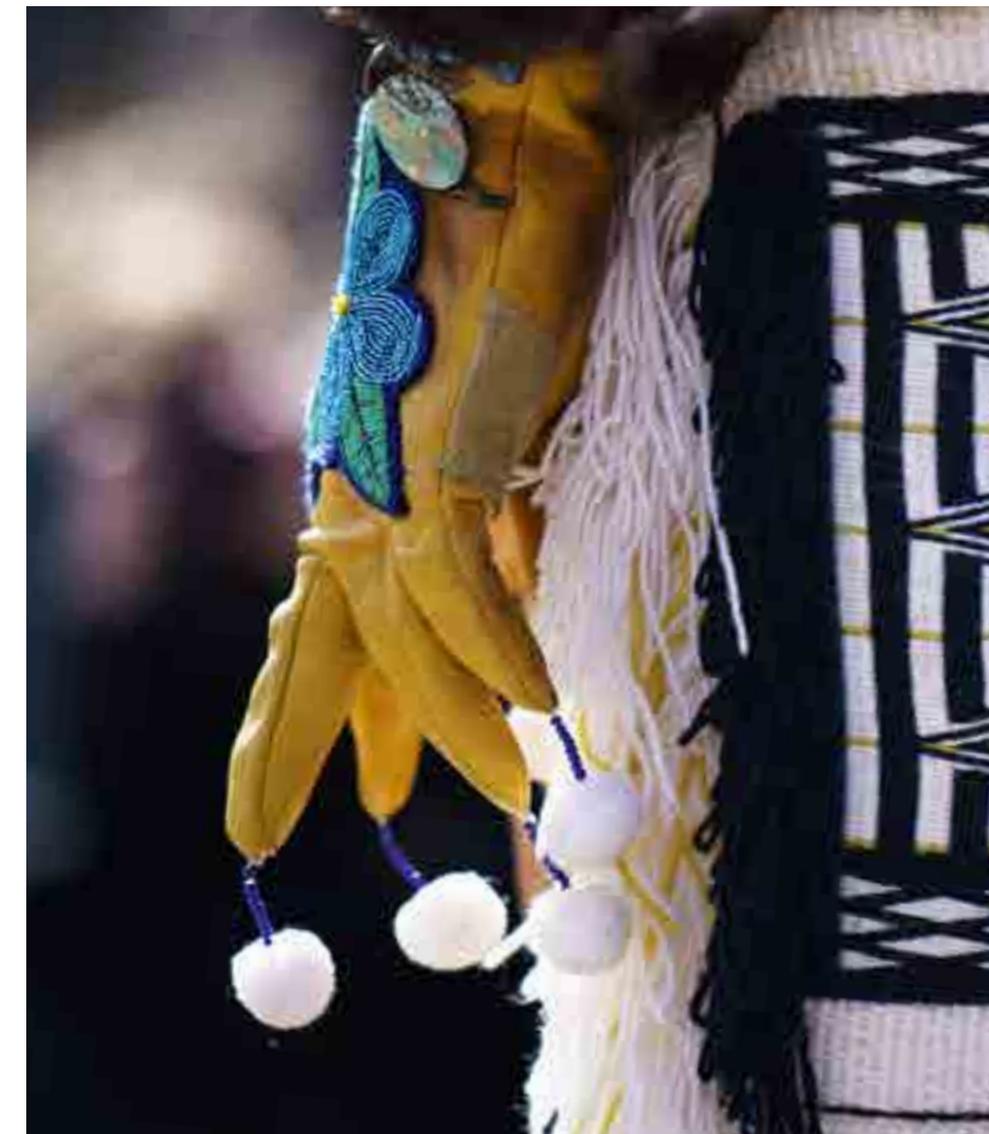
Human Rights and Fair Labor

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

We do not use or condone the use of slave labor or human trafficking, and we denounce degrading treatment of individuals and unsafe working conditions.

Sealaska will engage only those [Third Parties](#) who demonstrate a serious commitment to the

health and safety of their workers and operate in compliance with human rights laws.



Doing the right thing for... Our Communities



Community Service

Involvement in civic and community activities promotes leadership and achievement. It benefits us as individuals and strengthens [Sealaska's](#) relationships in our communities. Sealaska encourages participation in community and charitable activities, whenever possible, consistent with [Company](#) policy.

[Employees](#) may participate in community service events or activities outside of regular working hours, or by using personal time off hours, unless it is a Sealaska sponsored event or attendance is appropriate to their role in the Company.

Professional Organizations

Participating in professional organizations not only helps us learn and broaden our network, it helps us grow professionally and adds to our overall productivity. Participation in outside professional organizations is encouraged so long as participation does not conflict with work for Sealaska.

ANCSA Corporations

[Directors](#) or [Officers](#) may serve as directors and/or officers of other ANCSA

corporations if the service meets the requirements of [Sealaska's](#) bylaws and does not impair any obligation such Director or Officer has to Sealaska.

An Employee or Officer of Sealaska Corporation may become an officer or director of another ANCSA Corporation subject to notification to and approval by the [Audit Committee](#) of Sealaska's [Board of Directors](#).





Doing the right thing for...

THE MARKETPLACE

IN THIS SECTION:

General Compliance with Laws and Regulations

Sarbanes-Oxley Act of 2002 and Related Securities Laws

Anti-Money Laundering

Anti-Boycott, Sanctions and Restricted Countries

Trade Compliance

Government Business Activity

Government Customers/Contracting

Anti-Bribery and Anti-Corruption

Foreign Corrupt Practices Act

Political Involvement

Employee Political Contributions

Company Political Contributions

Doing the right thing for... The Marketplace



General Compliance with Laws and Regulations

We abide by all laws and regulations that may affect our [Company](#).

Sarbanes-Oxley Act of 2002 and Related Securities Laws

Whenever possible we conduct [Sealaska](#)'s business, financial and accounting practices in accordance with Generally Accepted Accounting Principles (GAAP) or other applicable accounting standards.

As an Alaska Native Corporation (or [Subsidiary](#) of an Alaska Native Corporation), we are expressly exempted by law (ANCSA, Section 28(a)) from

the provisions of the Securities Exchange Act of 1934 (SEC Act) and so are not subject to provisions of the Sarbanes-Oxley Act.

As a matter of practice, however, we use these laws to guide our decisions and actions, as far as practicable, without imposing an unreasonable financial or administrative burden on Sealaska.

Anti-Money Laundering

Money laundering is behavior that hides funds acquired through criminal activity. Sealaska does not condone, facilitate or support money laundering.

You should report any:

- *Requests for cash payment, travelers' checks or checks from an unknown third party;*
- *Complex payment patterns;*
- *Unusual transfers to or from countries not related to the transaction;*
- *Customers who seem eager to avoid recordkeeping requirements;*



- *Transactions involving locations previously associated with money laundering or tax evasion; and*
- *Transactions that do not fit with usual business practices or that do not match the customer's or client's normal pattern of activity.*

Doing the right thing for... The Marketplace

If you have questions about Anti-Money Laundering, contact [Legal](#).

Anti-Boycott, Sanctions and Restricted Countries

Occasionally, the United States and other governments use economic sanctions and trade embargoes to advance various foreign policy and national security objectives.

Various governments have enacted laws that prohibit companies from participating in or cooperating with any international boycott that the government does not approve.

Federal law prohibits transactions with certain persons or entities that have violated export-related laws or are believed to pose a threat to national security. Also, doing business with sanctioned persons or countries may result in imposition of additional economic sanctions.

We perform due diligence before entering any transaction that has an international element to determine whether such parties are on the U.S. government's lists of restricted parties.

If you receive a request related to any boycott, do not respond. Instead, contact [Legal](#) immediately.

Trade Compliance

[Sealaska](#) complies with all United States federal import and export laws and regulations.

These laws restrict transfers, "deemed" exports, and sales of products, technical data or other controlled information from the United States to certain prescribed countries and persons. They also restrict re-export and transfer of such items from one non-U.S. location to another. Many countries in which we operate have similar laws and regulations.

The Sealaska Legal Department can help you with evaluating any such transactions.

Government Business Activity

Sealaska and its affiliates may routinely enter business relationships with certain government agencies. Such transactions are subject to specific legal requirements.

When conducting business with federal, state and local governments, do not disclose to any non-Sealaska Officer, Director or Employee whether Sealaska has or will be submitting a proposal or bid for a government contract prior to the award of the proposal or opening of the bid. This restriction does not apply to limited disclosure necessary to solicit quotes from potential subcontractors.

Also do not disclose the process or delivery schedules related to government business to any third party, nor attempt to induce or influence any other person or firm to bid or not to bid on a particular contract or proposed contract.

Doing the right thing for... The Marketplace



[Sealaska](#) complies with various state and federal regulations and laws that prohibit giving or offering gratuities or inducements in any form or amount to government officers and employees with the intent to secure a contract or to secure favorable treatment with respect to any aspect of performance of a government contract.

If this provision is violated, Sealaska’s contract may be terminated and our [Company](#) and anyone involved may be subject to monetary damages or criminal sanctions. For more information, see the Anti-Bribery/Anti-Corruption and the Foreign Corrupt Practices Act sections below.

Government Customers/Contracting

The rules imposed on Sealaska when we sell to the government are often different from the rules that apply to purely commercial transactions.

The rules we must follow are often stricter. As a government contractor, we are committed to compliance with the letter and spirit of all

government contracting laws and regulations.

Please direct specific questions regarding compliance with applicable laws to [Legal](#).

Anti-Bribery and Anti-Corruption

The United States and many other countries have laws that prohibit bribery, kickbacks and other improper payments. No one acting on [Sealaska’s](#) behalf may offer or provide bribes or other improper benefits to gain business or an unfair advantage.

A “bribe” includes the giving or receiving of cash, goods, services, property, things of value or other gifts to a public official or business associate with the intention of influencing the recipient’s conduct or to induce the recipient to take an action for the benefit of the person offering the bribe or to induce or acknowledge performance or omission of an official act. Willful violations of this standard will result in severe

Doing the right thing for... The Marketplace



Learning Aid



Question: What is the difference between a “Bribe” and a “Kickback”?

Answer: A bribe involves a situation where something of value is given to a current or prospective business partner with the intent to obtain business or influence a business decision. Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction. For example, a fee, commission or compensation paid by a supplier or by a subcontractor through a prime contractor, higher-tier subcontractor or one of their employees to secure or acknowledge the award of a contract, subcontract or sale, purchase, order or other benefit or transaction.

disciplinary action, including termination of employment or, for a [Director](#) or [Officer](#), removal from office, and may be subject to civil and/or criminal legal action by appropriate authorities.

Foreign Corrupt Practices Act

A common misperception about the Foreign Corrupt Practices Act (FCPA) is that it only applies to public companies and not private companies, however, this is false.

The FCPA applies to, among others, any corporation with its principal place of business in the United States and to foreign persons who violate FCPA provisions within the United States. The FCPA and other U.S. laws prohibit public and private U.S. companies and individuals from making “corrupt payments,” which include activities like paying bribes to foreign officials in exchange for a business deal, as well as providing non-monetary gifts to foreign officials (for instance, giving their children internships) with the intent to induce the officials’ action or inaction and thereby secure an improper business advantage.

[Sealaska](#) expects every [Director](#), [Officer](#), [Employee](#), agent and independent contractor acting on behalf of Sealaska to strictly obey these laws.

In sum, do not try to help Sealaska obtain or retain business by making or promising to make, either directly or indirectly, any payment of money or object of value to any foreign:

- *Official of a government,*
- *Political party, or*
- *Candidate for political office.*

If you cannot gain a contract without engaging in an activity that would be considered a “corrupt payment”, walk away from the deal. Our reputation is more important than the profit from any contract.



Doing the right thing for... The Marketplace



HERE ARE SOME WAYS YOU CAN IDENTIFY A POSSIBLE FCPA VIOLATION:

- *Someone asks that a commission be paid in cash, be made to another name or be sent to an address in another country;*
- *Large unexplained expenses on a travel & entertainment expense report;*
- *An existing or prospective customer asks you to arrange helicopter sightseeing tours of Alaska’s national parks for foreign officials who will be coming to visit Company facilities;*
- *A customer or foreign official requests that Sealaska ships a quantity of wild-caught salmon to a foreign official’s home or that country’s embassy in the U.S.; or*
- *An agent or salesperson says they are working with a government official to give Sealaska the contract.*

If you become aware of a situation that appears to conflict with Sealaska’s commitment to maintain high ethical standards, or violates the Foreign Corrupt Practices Act, or any other anti-bribery related laws, report it to your manager or [Legal](#).

Political Involvement

If you are interested in public affairs, you may decide to accept an appointed public position or seek public elective office. [Sealaska](#) encourages your involvement and asks that you:

- *Remember that your involvement in public affairs must be as an individual citizen, not as a representative of Sealaska; and*
- *Be aware of Sealaska’s Political Endorsement and Independent Expenditure policy and state and federal laws regarding potential conflicts of interest and campaign contributions.*

If you are appointed or elected to public office or otherwise take part in any form of public service, do not use any Sealaska materials, property or staff assistance.

If you decide to accept a public position or run for public office, let the [Sealaska](#) Corporate Secretary know in writing as soon as possible. Sealaska will avoid any actions that might look like attempts to influence how you carry out your public duties while you work for Sealaska.

Employee Political Contributions

Sealaska encourages you to participate in the political process. We respect your right to participate or not participate as you see fit.

Sealaska asks that you remember these two guidelines for political contributions:

- *If you choose to contribute to a candidate for elective office or a political party, you must use your own funds.*



Doing the right thing for... The Marketplace



- *If you take part in other political activities, you must do it on your own time and use your own resources.*

U.S. federal and state laws as well as the laws of many countries regulate corporate lobbying efforts and do not allow companies to make political contributions. Therefore, your contributions to a candidate for elective office or a political party must not be — nor appear to be — made with or reimbursed by Sealaska funds or assets.

In some cases, Sealaska may encourage you to support or oppose legislative issues that affect its business. But, as a private citizen, you are free to contribute to causes, candidates or political parties of your choice.

No Sealaska [Director](#), [Officer](#) or manager may use their position of authority to make you feel compelled or pressured to:

- *Work for, or on behalf of, any legislation, candidate, political party or committee;*
- *Make contributions for any political purpose; or*
- *Cast a vote one way or the other.*

We encourage you to vote and be an active member in the political process. Please remember that:

- *Sealaska funds may not be donated to any political party, candidate or campaign without approval from the Sealaska [Board](#);*
- *Sealaska property or work time may not be used to assist any political party, candidate or campaign unless done so in compliance with applicable election laws and regulations as independent expenditures authorized by the Board; and*
- *[Employees](#) may not be reimbursed for personal political activity (this does not include time for voting as required under applicable law).*

Company Political Contributions

Sealaska has a responsibility to its customers and shareholders to build an understanding and acceptance of its political position at all levels of government. However, federal and state laws limit how companies may

use [Company](#) funds or resources in elections. These laws also affect how we may communicate our views.

Be aware that communicating Sealaska’s position on issues or matters of policy to government employees or officials can make you and Sealaska subject to lobbying laws. We must comply with those laws.

Sealaska may decide to contribute funds or other resources (“in-kind contributions” like use of Sealaska facilities, supplies, equipment, etc.) to support or help defeat public initiatives that could substantially affect our business. Our [Directors](#), together with the [Corporate Secretary](#), must approve all participation or uses of funds for these purposes.

Sealaska respects the letter and spirit of campaign finance regulations, especially transparency requirements. Therefore, Sealaska is committed to acknowledging (and reporting when necessary) any and all political expenditures.

Sealaska is aware of the laws and regulations related to independent expenditures and ensures compliance with such legal requirements.

ADOPTION AND AMENDMENTS

Our Code of Ethics was adopted by the Sealaska Board of Directors on October 24, 2005. Amendments have been made on the following dates:

Amended: October 24, 2010

Amended: October 29, 2015

Amended: July 31, 2023

GLOSSARY

Audit Committee.

The “Audit Committee” refers to the Sealaska Corporation committee that assists the Board of Directors in fulfillment of its fiduciary responsibilities by overseeing the integrity of Sealaska’s financial statements, financial reporting, and audit processes.

Board of Directors.

The “Board of Directors” or “Board” means the Board of Directors of Sealaska; for any Subsidiary entity, “Board of Directors” means the Board or comparable governing body of that Entity, unless expressly stated otherwise.

Company or the Company.

The term “Company” or “the Company” refers to Sealaska Corporation, and any of its U.S. controlled Subsidiaries.

Conflict of Interest.

A “Conflict of Interest” occurs when our personal interests and activities interfere, or appear to interfere, with our ability to be objective or perform our roles at Sealaska.

Core Cultural Values.

- *Haa Aaní* (Our Land) leads us to strive for sustainable communities and a sustainable relationship with our lands.
- *Wooch.Yax* (Balance, Reciprocity and Respect) guides us to highly value partnerships and to be balanced and fair in our dealings with others.
- *Haa Shuká* (Our Past, Present and Future) inspires us to learn from our past and take the long-term approach in everything we do.
- *Haa Latseen* (Our Strength, Leadership) drives us to be responsible for continuous improvement and accountable to the people who rely on us.

Corporate Secretary.

The “Corporate Secretary” of Sealaska.

Director or Officer.

For purposes of the scope of this Code of Ethics, “Director” or “Officer” includes a Director or Officer of Sealaska or its Subsidiaries, affiliates, partnerships or joint ventures. It also specifically includes those Sealaska Board of Directors who may represent Sealaska as Directors of other companies of which Sealaska owns stock or other interest entitling it to elect a Director or other Officer.

Directors, Officers & Key Employees Questionnaire.

The Directors, Officers & Key Employees Questionnaire is circulated by the Sealaska Corporate Secretary to all Sealaska Directors and Officers, including those at the subsidiary level and Key Employees at the beginning of each year. The information provided in the questionnaire is used in connection with the Sealaska annual proxy statement for the Annual Meeting of Shareholders.

Employee.

An “Employee” or “Employees,” refers to anyone who is regularly engaged by Sealaska, or a Sealaska Subsidiary, on a full- or part-time basis, receives compensation for services from Sealaska and is not an independent contractor or outside consultant or advisor.

Entity.

“Entity” means any corporation, limited liability company, partnership, joint venture, trust, association or other enterprise or person.

Human Resources.

“Human Resources” refers to the department or representative at the Company that can address questions or concerns relating to the administration of Employees.

Legal.

“Legal” means the representative at the Company that can address questions and issues of a legal nature.

Legal Hold.

A process that an organization uses to preserve all forms of potentially relevant information when litigation is pending or reasonably anticipated. A legal hold can be initiated by a notice or communication from General Counsel to the Company Employees that suspends the normal disposition or processing of records.

Reportable Interests.

“Reportable interests” and relationships are those directly or indirectly owned, held or engaged in by the Employee and, to the extent known, any member of the Employee’s immediate family. Specifically included are the following: (1) Any business engaged in that furnishes any property, rights or services to Sealaska; and (2) any other personal or business relationship with any contractor or supplier that may be reasonably regarded as significant. “Immediate family” or “family” as used herein means spouses, children, parents and siblings of the reporting Employee.

Sealaska.

“Sealaska” refers to Sealaska Corporation and its controlled Subsidiaries.

GLOSSARY

Subsidiary or Subsidiaries.

“Subsidiary” or “Subsidiaries” means a US Entity, including nonprofits, in which Sealaska owns more than fifty percent (50%) of the outstanding securities or voting rights representing the right to vote for the election of directors or equivalent position is owned by one or more organizations, in any combination; or any organization in which one or more organizations, in any combination, have the right, pursuant to a written contract with or the bylaws, charter, operating agreement or similar document of such organization, to elect or appoint a majority of the directors or equivalent position of such organization.

Third Party or Third Parties.

“Third Party” or “Third Parties” refers to a Sealaska vendor, supplier, contractor, consultant, advisor or external business partner.

Workplace Behaviors.

- **Working Together** - Sealaska strives to manage its activities according to the traditional value of *Wooch.een*. This word can be roughly translated as “working together”. This value enabled Native people in SE Alaska to survive for 12,000 years. It is exhibited through behaviors that are as critical to success in the modern world as to survival in traditional times for indigenous people.
- **Insatiable Curiosity** - To make good decisions we have to strive to understand how things really are. We must be curious and always looking to learn.
- **Humility, Respect and Transparency** - We value all individuals of all ages and backgrounds. We treat everyone with respect. We treat our shared human heritage with respect. We treat the world around us with respect. We understand that every human being is unique and has unlimited potential.
- **Creating Value While Maintaining Focus, Clarity and Drive** - We have the courage to take action when required even when it may be uncomfortable to do so.

Compliance Statement

We expect each [Employee](#) to read, understand and follow our Code of Ethics as a condition of employment. This compliance statement shall be signed by every [Officer](#) and Employee of [Sealaska](#) and returned to ethics@sealaska.com.

I have received a copy of the Sealaska Code of Ethics. I agree to read and familiarize myself with its contents, abide by its terms, and to seek clarification of any item that I do not understand.

Name (Print)

Position

Company

Signature

Date

Sealaska Corporation Directors' Oath

I, _____, having been duly elected or appointed as a Director of Sealaska Corporation (the "Company"), do hereby pledge and affirm that, during my term in said office and any extension thereof, I shall, to the best of my ability, conduct myself on good faith, exercising due care and judgment exclusively for the best interests of the Company. I will do so according to the laws of the State of Alaska, the Alaska Native Claims Settlement Act, and the bylaws and Code of Ethics of Sealaska Corporation, including any of its affiliates or Subsidiaries of which I am a Director or other fiduciary.

I also agree to comply with the standards and rules outlined in this Oath and agree to complete the annual Sealaska Corporation and its Subsidiaries and Affiliates Key Personnel Questionnaire provided by the Corporate Secretary's office.

Use and Disclosure of Confidential or Proprietary Information Prohibited.

I acknowledge that I may acquire Confidential and/or Proprietary Information ("Confidential Information") in the course of, or incident to my term on the Board of Directors of the Company. Such information includes that which is a trade secret or information that the Company wishes to keep from the public purview unless otherwise excluded by applicable law. Confidential Information can include secret formulas, processes, marketing plans, salary structure, customer lists, contacts and information technology. This list is not exhaustive and the nature and circumstances of information that a Director acquires may often determine whether the information is confidential.

I acknowledge that the ability of the Company to continue in business could be seriously jeopardized if Confidential Information were to be used by me or by other persons or firms to compete with the Company. Accordingly, I agree that I shall not, directly or indirectly, at any time, during my term as a Board of Director for the Company or at any time thereafter, and without regard to when or for what reason, if any, use or cause to be used any such Confidential Information in connection with any activity or business except the business of the Company, and shall not disclose such Confidential Information to any individual, partnership, corporation, or other Entity unless such disclosure has been specifically authorized in writing by the Company, or except as may be required by any applicable law or by order of a court of competent jurisdiction, a regulatory or governmental body. The obligation not to divulge private corporate information is in effect even though material may not be specifically identified as private, confidential, privileged, or proprietary. This obligation continues both during and after my term on the Board.

Any work done by a Director on behalf of the Company becomes corporate property that is always accessible to appropriate Officers of the Company. This property, which includes all written, printed, electronic, photographic, tangible or intangible material, shall remain the property of the Company, even when the Director leaves the Company.

I have received a copy of the Sealaska Code of Ethics, agree to read and familiarize myself with its content, and abide by its terms.

Name (Print)

Position

Company

Signature

Date