

## **Code of Ethics**

### **Statement of Philosophy:**

Alaska Communications Systems will conduct business in an honest, ethical, and responsible manner, mindful of its customers, employees, and corporate business partners, as well as its obligations to the community and environment. This Code of Ethics applies to all employees, vendors and contractors, and is the framework upon which the Company is built. Each employee, from the Chief Executive Officer to the newest trainee, is accountable for the Code and reporting any violations to the appropriate authority.

## **ACS Code of Ethics**

### **Conflict of Interest**

ACS requires employees to avoid or mitigate conflicts of interest at all times. A conflict of interest occurs when an employee's personal or financial interests interfere with or appear to interfere with duties and responsibilities to the Company. Actual or apparent conflicts must be treated equally. Employees unsure as to whether a certain transaction, activity or relationship constitutes a conflict of interest should discuss it with the Corporate Compliance Officer. Where actual or apparent conflicts exist, employees must disclose the conflict and, wherever practicable, defer decision-making to another conflict-free employee.

### **Fair, Accurate and Timely Reporting and Disclosure**

ACS is regulated by numerous federal, state and local agencies, which monitor the conduct of business and reporting, or disclosure, or certain required pieces of information at specific times. ACS reports and makes full disclosure, to the extent of the law or regulation, and requires that all employees participate when called upon to do so. If an employee becomes aware of a reporting or disclosure violation, the Corporate Compliance Officer should be immediately notified.

### **Compliance with Applicable Laws and Regulations**

ACS and its employees comply with all applicable laws and regulations governing the telecommunications industry and fair business practices, including the Company's Corporate Compliance Manual. If uncertain about the language or scope of a law or regulation, employees must comply with the strictest interpretation of the law or regulation, and seek guidance from a supervisor, Corporate Legal Counsel, or the Corporate Compliance Officer.

### **Prompt Internal Reporting and Response to Violations**

As stewards of the Company's resources and reputation, it is imperative that employees bring suspected violations of this Code of Ethics to the attention of a manager, supervisor, or the Corporate Compliance Officer. Any employee who encounters a violation or possible violation of the Code, any applicable law or regulation, reporting or disclosure requirement or conflict of interest must report such a discovery to appropriate

authorities. An employee who reports in good faith will not be penalized or suffer any retaliation as a result of taking action.

### Accountability

This Code of Ethics, which binds all employees, holds every employee accountable for adhering to its component sections. Failure to abide by these requirements may lead to disciplinary action, up to and including, termination of employment. Employees with questions should contact the Corporate Compliance Officer immediately.