



Employee Handbook



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1. INTRODUCTION

1.1 Welcome

Welcome to Colville, Inc., Brooks Range Supply, Inc., Colville Transport LLC, and the other companies within our organization. In this Handbook, we refer to all these entities together as the “Company.” We are pleased that you are joining us, a leader in this community and in our industry. Pride in yourself, your work, and the contribution you make to support your colleagues and serve our customers is vital to our success.

Keep this Handbook as a guide and ready reference throughout your tenure with the Company. If you have questions as you read through this Handbook, please do not hesitate to discuss them with your manager or supervisor.

1.2 Functions of Manual

It is the policy of the Company that this manual be used as an outline of the basic policies, practices, and procedures for the Company. The manual, however, is not intended to alter the employment-at-will relationship in any way.

This manual contains general statements of Company policy and should not be read as including the details of each policy. These policies apply and pertain to all employees of the Company. These policies supplement and interpret the written contracts entered into between some individual employees and the Company. All of these policies and procedures are subject to change or modification at the Company’s discretion at any time that circumstances warrant. These policies supplement and supersede any oral statements that may have been made. The Company reserves the right to change, modify, eliminate, or deviate from any policy or procedure at any time as it deems appropriate.

2. EMPLOYMENT

2.1 Employment at Will

Although it is the desire of the owners and officers of the Company to provide stable and long-term employment opportunities, and to deal with all employees in a fair and equitable manner, the Company operates under an employment at will policy. More specifically, the term of your employment is not defined. Employees may resign and may be terminated at any time, for any reason, with or without notice.

2.2 Employee Categories

The Company offers regular full-time and part-time employment opportunities to meet a variety of staffing requirements and accommodate employee needs and preferences. The Company also uses project and temporary employees to respond flexibly to changing staffing requirements.

2.2.1 Regular:

2.2.1.1 Full-time regular employees are hired to regularly work 30 or more hours weekly.

2.2.1.2 Part Time regular employees are hired to regularly work less than 30 hours weekly.

2.2.2 Temporary:

2.2.2.1 Full-time temporary employees are hired directly by the Company to work for specific projects, assignments, or durations for 30 hours or more each week.

2.2.2.2 Part-time temporary employees are hired directly by the Company to work for specific projects, assignments, or durations for less than 30 hours each week.

2.2.2.3 Temporary assignments generally do not extend beyond a 12-month period, unless approved by the respective Manager.

2.2.3 Exempt Employees

Exempt employees are not subject to federal and state overtime requirements and are paid a salary, rather than an hourly wage. An employee is exempt as defined by the Fair Labor Standards Act and state law.

2.2.4 Non-Exempt Employees

Non-Exempt employees are paid an hourly wage and are covered by the State of Alaska Wage and/or Hour Law or by the Federal Fair Labor Standards Act.

2.3 Application

All persons wishing to be considered for employment with the Company must complete an application for employment. This information and supporting documents must be materially complete and accurate. Failure to follow this policy can result in removal from the applicant pool or termination, if already offered employment.

2.4 Offer of Employment, Conclusion of Employment

2.4.1 Policy

The Company's General Manager functions as the primary Human Resources Office. All offers of employment, and all terminations of employment, shall be decisions of the General Manager. The

General Manager may delegate the role of hiring to the Operations Managers or to Department heads. The General Manager may not delegate the role of terminations.

2.4.2 Procedure

The General Manager shall function as the primary HR resource within the company, with responsibility for ensuring the orderly and lawful management of staff resources, including payroll, work assignments, benefits, leave, recruiting, job offers, and terminations. The General Manager is expected to consult extensively with their respective Operations Managers and Department Heads to assist in human resource administration that is consistent with Company policy and available funding.

2.4.3 Appeals

Decisions of the General Manager may be appealed to the Company's President, whose decision will be considered final.

2.5 Promotions, Demotions, and Temporary Assignments

2.5.1 Promotions

The promotion of an employee to higher classification with a higher salary range may include an increase in salary consistent with the budget and the salary schedule.

2.5.2 Demotions

In the event that an employee is reclassified to a lower step or classification, the employee's salary may be reduced to any lower step in the lower salary range.

2.5.3 Temporary Assignments

An employee may temporarily be assigned to a position of higher responsibility. If that assignment exceeds four consecutive calendar weeks, the General Manager may authorize compensation at the level of responsibility assigned.

2.6 Nepotism

2.6.1 Policy

It is the policy of the Company to prohibit relatives from holding positions in which one family member directly supervises another, or has some influence over the relative's pay, promotion, or work situation. This policy also covers persons who cohabitate but are not legally related.

2.6.2 Definition

Nepotism implies favoritism towards relatives and friends, including granting of employment, undeserved rewards, or other advantages. Typically nepotism refers to preferences in hiring, advancement, or work conditions based in part on the person's relationship with a supervisor, employee, officer, or other company affiliated party. This applies to both employment and contractual relationships.

2.6.3 Exceptions

In certain limited circumstances, the Company's anti-nepotism policy may be waived, including:

2.6.3.1 Summer “stick picker” hire for students who are children or relatives of employees.

2.6.3.2 Inventory counts no longer than two weeks.

2.6.3.3 Short-term public service jobs such as staffing polling stations and voter registration.

2.7 Work Schedules

2.7.1 The work week and/or rotation schedule will be reviewed and published by applicable General Managers.

2.7.2 For employees working a rotational schedule in Prudhoe Bay, the standard rotation schedule is two weeks on followed by two weeks off.

2.7.2.1 Exceptions to this rotation schedule must be agreed upon by both rotation partners and approved by the supervisor.

2.7.2.2 If rotation partners cannot agree, the General Manager will make the final determination. In the event of an employee vacancy, the open position will be advertised with the current rotation schedule of the position.

2.7.2.3 The Company reserves the right to alter rotation schedules with appropriate notice.

2.8 Attendance and Punctuality

2.8.1 It is the policy of the Company for employees to report for work punctually and to work all scheduled hours and any required overtime. Employees are expected to be engaged in carrying out their duties during all scheduled work time and should be ready to begin working at their scheduled starting time. Tardiness and poor attendance disrupt workflow and customer service and will not be tolerated.

2.8.2 Employees are required to personally and promptly notify their supervisor if they are unable to report to work as scheduled. Such notification should include a reason for the absence and an indication of when the employee can be expected to report for work.

2.9 Personnel Files

2.9.1 Policy

The Company maintains records for each employee as required by local, state, federal laws and regulations.

2.9.2 Changes in Personal Information

To keep personnel records up-to-date, employees are required to notify the Company of any changes in the following

2.9.2.1 Name

2.9.2.2 Address

2.9.2.3 Telephone Number

2.9.2.4 Beneficiary Designations for any Company insurance and/or benefit plans

2.9.2.5 Persons to be notified in case of emergency

2.9.2.6 When a change in the number of dependents or marital status occurs, the employee should complete a new Form W-4 for income tax withholding purposes and forward it to payroll.

3. COMPENSATION

3.1 Payroll

The Company complies with federal and state wage-hour and wage-payment laws. This policy is designed to help reduce the chance of pay-related misunderstandings and give employees the information they need to plan their personal finances.

3.1.1 Payday Schedule

The Company customarily issues paychecks twice each calendar month. For specific dates, or other payroll-related details, employees may directly contact the payroll office.

3.1.2 Payroll Deductions

Federal and state taxes are deducted from paychecks as required by law. Voluntary deductions such as health care benefits can be made after an employee completes the necessary authorization forms.

3.1.2.1 401(k) contributions are automatically deducted from salary and begin after 90-days of employment. Contribution levels and participation may be changed at any time, by the employee.

3.1.2.2 It is the employee's responsibility to satisfy any personal debt incurred while on the job. Personal debt must be repaid prior to separation from the Company, whether separation is voluntary or involuntary and the Company may deduct the outstanding debt from the employee's final paycheck.

3.1.2.3 The Company deducts court-ordered garnishments for personal debts (such as child support) without the employee's prior authorization. Deductions for federal, state, and city tax liens also can be made by the Company without prior employee authorization.

3.1.3 Direct Deposit

3.1.3.1 Employees may elect to have their pay deposited directly into their personal checking or saving accounts instead of receiving printed paychecks.

3.1.3.2 Employees desiring to use this convenient option should contact the payroll office for enrollment details.

3.1.4 Lost or Missing Paychecks

3.1.4.1 An employee should report a lost or missing paycheck to the Payroll Office immediately. The Company will issue a new paycheck to the employee after payment is stopped on the original check.

3.1.4.2 If a check is lost through no fault of the Company and the Company is unable to stop payment on the check, the Company is not obligated to indemnify the employee for the loss.

3.1.5 Administrative Pay Corrections

3.1.5.1 The Company takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck.

3.1.5.2 In the event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of their respective manager. Corrections are normally made in the subsequent pay period.

3.1.6 Payroll Advance

3.1.6.1 Advances on earned wages or salaries are discouraged and will be made on a case-by-case basis.

3.1.6.2 All payroll advances shall be authorized by the General Manager at his or her sole discretion.

3.1.6.3 The Company will not make any advances or loans over earned wages except in the case of an absolute emergency.

3.1.6.4 All advances or loans on unearned wages can only be approved by a Company Officer and will be properly documented by signed promissory note.

3.2 Work Hours

3.2.1 Work Week

The work week for the Company begins at 12:01 am on Sunday and ends at 11:59 pm on Saturday. The Company reserves the right to change the workweek with appropriate notice. Wages shall be paid in accordance with the Alaska Department of Labor & Workforce Development statutes and regulation: <http://labor.state.ak.us/>

3.2.2 Travel Time

Rotation travel time to and from the North Slope, travel between camp facilities and a work site, meal breaks, time spent away from the designated job location, time spent on personal business, and scheduled or unscheduled personnel shift changes are not considered part of the work shift.

3.2.3 Shift Hours

Each company may have varying work hours per shift. This typically changes seasonally, and will also change based on immediate circumstances such as increases and decreases in client demands, projects, and requirements.

3.3 Company Credit Cards

Personal use of the Company credit cards will not be permitted for any purpose. Reasonable and customary reimbursable expenses, such as travel and business meals, may be charged on a personal credit card, and then submitted with a standard expense account report for reimbursement.

3.4 Conclusion of Employment

3.4.1 Severance Pay Policy

Generally, the company does not pay severance to departing employees, whether they quit, are laid off, or are terminated for any reason. However, the President reserves the right to pay severance. Decisions about severance pay will be made on a case-by-case basis and are entirely within the discretion of the President. No employee has a right to severance pay, and should not expect to receive it.

3.4.2 Termination of Benefits

3.4.2.1 Medical Insurance- coverage will continue until the last day of the month during which employment was terminated. Medical insurance may be continued by eligible employees under the federal COBRA law.

3.4.2.2 Group Life, accident, short term disability, and long term disability- these policies end on the same date that employment with the Company ends.

3.4.2.3 Voluntary life insurance – the policies end on the same date that employment with the Company ends, however portions of the policy may be portable or convertible.

3.4.2.4 HRA- departing employees may still submit a claim after termination, but only for services received up through the date of termination.

3.4.2.5 401k – contributions are 100% vested from the date they are contributed. Departing employees can choose to keep their funds in the account, roll them over to another account, or withdraw them in a lump sum.

3.5 Worker's Compensation & Medical Insurance Coverage

3.5.1 The Company provides Worker's Compensation Insurance as required by Alaska Statutes. If you are injured on the job and placed on Worker's Compensation the Company will continue to provide medical insurance as it did while you were working, for a period of 90 days.

4. TIME OFF

4.1 Paid Time-Off (PTO)

Colville believes that employees on full-time, regular work schedules should have opportunities to enjoy time away from work to help balance their lives. Colville recognizes that employees have diverse needs for time off from work and has established this PTO policy to meet those needs. The benefits of PTO are that it promotes a flexible approach to time off. Employees are accountable and responsible for managing their own PTO hours to allow for adequate reserves if there is a need to cover vacation, illness or disability, appointments, emergencies, or other situations that require time off from work. The PTO program consists of accrued paid time off and a selection of observed federal holidays.

4.1.1 Observed Holidays

The company will observe the following holidays:

New Year's Day

Memorial Day

Independence Day

Labor Day

Thanksgiving Day

Christmas Day

4.1.2 Standard Minimum 30-Hour, Monday through Friday Work Schedules.

On a holiday, employees under a standard work schedule are generally excused from 8 hours of non-overtime work, which are considered part of the 40-hour basic workweek. If the holiday falls on a Saturday, the observed holiday will be taken on the preceding Friday. If the holiday falls on a Sunday, the observed holiday will be taken on proceeding Monday.

4.1.3 Non-Standard Minimum 30-Hour, Sunday through Saturday Work Schedules.

Employees scheduled to work on a holiday will be credited with 8 hours towards their basic work requirement for the pay period. Employees under flexible work schedules are credited with 8 holiday hours even if they would otherwise work more hours on that day.

4.1.3.1 Eligibility

4.1.3.1.1 PTO is accrued upon hire or transfer into a benefits eligible position where the employee is scheduled to work at least 30 hours per week and no more than 12 hours per day, each week. The follow employment types are not eligible to accrue PTO:

4.1.3.1.2 Employees working less than 30 hours per week

4.1.3.1.3 Employees working more than 12 hours per day

4.1.3.1.4 Employees working a rotational schedule

4.1.3.1.5 Seasonal or temporary employees

4.1.4 Procedures

Length of service determines annual PTO accrual. The full annual PTO accrual will be available for use on anniversary of hire each year and is based upon the employee's length of service as of this

date. Employees that transfer from a non-PTO eligible position to a PTO eligible position will receive the annual PTO accrual based on their original date of hire.

4.1.5 Accrual and Payment of PTO

Years of Service	Annual PTO Accrual
1-3 years	1 week (40 hours)
4-9 years	2 weeks (80 hours)
10-14 years	3 weeks (120 hours)
15-19 years	4 weeks (160 hours)
20-25 years	5 weeks
Over 25 years	Additional 1 week (40 hours) for each five years thereafter

4.1.6 Use and Scheduling of PTO

4.1.6.1 Employees are required to use available PTO when taking time off from work with the exception of a company-required absence due to low workload or absences occasioned by the company. PTO may be taken in increments of as low as one hour. However, PTO may not be used for missed time because an employee reports late to work, except during inclement weather.

4.1.6.2 Whenever possible, PTO must be scheduled in advance. PTO is subject to supervisory approval, department staffing needs and established departmental procedures. Unscheduled absences will be monitored. An employee will be counseled when the frequency of unscheduled absences adversely affects the operations of the department. The supervisor may request that the employee provide a statement from a health care provider concerning the justification for an unscheduled absence.

4.1.6.3 When PTO is used, an employee is required to request payment of PTO hours according to his or her regularly scheduled workday, not to exceed eight hours per day. For example, if an employee works a six-hour day, he or she would request six hours of PTO when taking that day off. PTO is paid at the employee’s straight time rate. PTO is not part of any overtime calculation.

4.1.7 Change of Anniversary Year/Cash Out

PTO banks do not carry over from year to year. Employees must use all PTO on or before their hire anniversary date of each year. Employees cannot elect to cash the remaining balance out.

4.1.8 Payment upon Termination

In accordance with Alaska law, an employee will be paid their unused PTO accrual upon resignation, separation, retirement, or employees whose positions are eliminated through a RIF or re-org or whose hours drop below 30 hours per week.

4.2 Military Leave (USERRA)

The Company recognizes the important role of the National Guard and Reserves and supports employee participation. The following provisions apply for military leave of absence when an employee is required by a branch of the armed forces to attend an annual training session or serve under emergency mobilization orders.

4.2.1 Military Leave Of Absence

Leave of absence to perform military duties will be granted in accordance with applicable requirements of state and federal laws. In the event of an emergency mobilization order, the employee on military leave will be granted a leave of absence without pay for the duration of the mobilization orders, and will be reinstated upon release from military duty.

4.2.2 Notification to Supervisor

You are expected to notify your supervisor or manager of upcoming military duty by furnishing the Company with a copy of your official military orders plus inform the Company as soon as possible as to when you can return to work.

4.3 Unpaid Medical Leave (FMLA)

Full-time and part-time employees are eligible for unpaid leaves of absence for family or personal medical reasons in accordance with the Family and Medical Leave Act (FMLA).

4.3.1 Eligibility

Employees who have been with the Company for at least twelve months and who have worked at least 1250 hours during that period are eligible for up to twelve (12) weeks of unpaid leave in any twelve-month period. Intermittent leave may also be permitted. In determining the twelve weeks, we will consider time spent on Family Leave as well as Medical Leave during the twelve-month period.

4.3.2 Qualifying Reasons

Eligible employees can take up to 12 work weeks of leave in a 12 month period for one or more of the following reasons:

4.3.2.1 The birth of the employee's child or to care for such child;

4.3.2.2 Placement of child for adoption or foster care;

4.3.2.3 The child's placement with the employee for adoption or foster care;

4.3.2.4 Family serious health condition;

4.3.2.5 The care of a spouse, child, or parent who has a serious health condition.

4.3.2.6 The employee's own serious health condition.

4.3.2.7 A qualifying exigency arising out of the fact that the employee's spouse, son, daughter or parent is a military member on covered active duty.

4.3.2.8 An eligible employee may also take up to 26 work weeks of FMLA leave in a single 12 month period for the care of a covered service member or veteran with a serious injury or illness if the employee is the spouse, son, daughter, parent or next of kin of the service member or veteran.

4.3.3 FMLA Procedures

4.3.3.1 Employees must notify their supervisor within three (3) days after commencing leave taken as Family and Medical Leave To qualify for family leave to take care of a seriously ill spouse, child or parent, you will need to provide us with a statement from a physician or other health care provider that you are needed to care for the family member. To qualify for a medical leave of absence, you will need to provide us with a statement from your physician, indicating that you are unable to work due to one of the situations listed above. In either case, please give us as much advance notice as possible.

4.3.3.2 The Company expects an employee on Family and Medical Leave to stay in communication with his or her supervisor as to the extent of leave and provide a contact phone number for further communications.

4.3.3.3 The Company supervisor of an employee on Family and Medical Leave will keep a record of all days taken under this unpaid leave category.

4.3.4 Continuation of Group Health Insurance While on FMLA

While on FMLA your group health insurance will remain in effect during your leave on the same basis as before. If you are paying a portion of the insurance premium to cover a spouse and/or additional family members, you will need to make arrangements with Payroll to continue these payments before you go on leave. Failure to do this may result in a gap in coverage for your spouse and/or family member.

4.3.5 Return to Work

4.3.5.1 If an employee is returning to work after recovering from his/her own medical, the employee must be documented as Fit for Duty by a health care professional before returning to work. If your primary position is in Prudhoe Bay or other remote area, the documented Fit for Duty completed by a health care professional must address the employee's ability to return to a remote worksite with potentially limited medical resources

4.3.5.2 When you return from leave, we will return you to your original position or an equivalent position.

4.3.5.3 You may request an extension of your unpaid leave beyond the twelve (12) week limit described above, and such requests will be considered on a case-by-case basis. The Company cannot guarantee that it will hold an employment position for an employee, in the event of an extension your unpaid leave beyond the twelve (12) week limit described above, time off due under an unpaid LOA or FMLA. If the employee's original position is filled, the Company will attempt to place the employee in another position for which they are qualified, provided one is available. If no position is available, the employee may be terminated.

4.4 Unpaid Leave of Absence (LOA)

Employees who do not qualify for FMLA or who wish to take an extended period of time off from work may request an unpaid leave of absence.

4.4.1 All unpaid LOA requests must approved through the General Manager or CEO and will be considered on a case-by-case basis.

4.4.2 If your LOA is approved, your group health insurance will remain in effect during your leave on the same basis as before until you no longer qualify by the Affordable Care Act standards as in a stability period. If you are paying a portion of the insurance premium to cover a spouse and/or additional family members, you will need to make arrangements with Payroll to continue these payments before you go on leave. Failure to do this may result in a gap in coverage for your spouse and/or family member.

4.4.3 Return to Work

4.4.3.1 The company cannot guarantee that it will hold an employment position for an employee, in the event of time off due under an unpaid LOA. If the employee's original position is filled, the Company will attempt to place the employee in another position for which they are qualified, provided one is available. If no position is available, the employee may be terminated.

4.4.3.2 If a position is available upon the employee's return, and the employee is returning to work after recovering from his/her own medical condition, the employee must be documented as Fit for Duty by a health care professional before returning to work. If your primary position is in Prudhoe Bay or other remote area, the documented Fit for Duty completed by a health care professional must address the employee's ability to return to a remote worksite with potentially limited medical resources

5. CODE OF ETHICS

5.1 Purpose

The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

5.2 Policy

5.2.1 Respect for the Individual

5.2.1.1 We all deserve to work in an environment where we are treated with dignity and respect. The Company is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

5.2.1.2 The Company is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

5.2.2 Create a Culture of Open and Honest Communication

5.2.2.1 Everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

5.2.2.2 The Company will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

5.2.3 Set Tone at the Top

5.2.3.1 Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

5.2.3.2 To make our code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. We want the ethics dialogue to become a natural part of daily activities.

5.2.4 Uphold the Law

5.2.4.1 The Company's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of Company

policies, laws, rules and regulations that apply to our specific roles.

5.2.4.2 If we are unsure of whether a contemplated action is permitted by law or Company policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

5.2.5 Competition

5.2.5.1 We are dedicated to ethical, fair and vigorous competition. We will sell Company products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors.

5.2.5.2 We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for the Company or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

5.3 Disclosure

5.3.1 Proprietary Information

5.3.1.1 It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information.

5.3.1.2 We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

5.3.2 Selective Disclosure

5.3.2.1 Integral to the Company's business success is the protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners.

5.3.2.2 Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors.

5.3.2.3 Employees should refrain from disclosing confidential and nonpublic information without a valid business purpose and proper authorization.

5.3.2.4 We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to the Company, its securities, business operations, plans, financial condition, results of operations or any development plan.

5.3.2.5 We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

5.3.3 Accurate Public Disclosures

5.3.3.1 The Company will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such

reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

5.3.3.2 Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

5.4 Corporate Recordkeeping

5.4.1 Company records are created, retained and disposed of as a part of normal business practices and in compliance with all Company policies and guidelines, as well as all regulatory and legal requirements.

5.4.2 All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with the Company's and other applicable accounting principles.

5.4.3 Employees must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Company books, records, processes or internal controls.

5.5 Accountability

5.5.1 Each employee is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

5.5.2 The Company takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

5.6 Use of Company Resources

5.6.1 Questions about the proper use of company resources should be directed to your manager.

5.6.2 Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

5.6.3 Employees and those who represent the Company are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

5.6.4 Generally, employees should not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations.

5.6.5 Employees should refrain from soliciting contributions or distributing non-work related materials during work hours.

5.6.6 In order to protect the interests of the Company network and our fellow employees, The Company reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or the Company's intranet.

5.6.7 The use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate will not be tolerated.

5.6.8 Employees are prohibited from salvaging, selling, or removing any Company owned item regardless of its condition. Employees are ineligible to purchase used or surplus items from the Company. Such equipment or material will be disposed of through third parties.

6. CONFLICTS OF INTEREST

6.1 Purpose

6.1.1 Employees must avoid any relationship or activity that might impair, or even appear to impair the ability to make objective and fair decisions when performing jobs.

6.1.2 Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

6.2 Policy

6.2.1 Employees must never use Company property or information for personal gain or personally take for themselves any opportunity that is discovered through position with the Company.

6.2.2 Here are some other ways in which conflicts of interest could arise:

6.2.2.1 Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with the Company.

6.2.2.2 Hiring or supervising family members or closely related persons (see section 602 for further information)

6.2.2.3 Serving as a board member for an outside commercial company or organization.

6.2.2.4 Owning or having a substantial interest in a competitor, supplier or contractor.

6.2.2.5 Having a personal interest, financial interest or potential gain in any company transaction.

6.2.2.6 Placing company business with a firm owned or controlled by a Company employee or his or her family.

6.2.2.7 Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Company employees.

6.2.3 Employees with a conflict of interest question should seek advice from management.

7. GIFTS, GRATUITIES AND BUSINESS COURTESIES

7.1 Purpose

The Company is committed to competing solely on a merit of our products and services.

7.2 Policy

7.2.1 Employees should avoid any actions that create a perception that favorable treatment of outside entities by the Company was sought, received or given in exchange for personal business courtesies.

7.2.2 Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom the Company does or may do business.

7.2.3 Employees or the Company will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of the Company or customers, or would cause embarrassment or reflect negatively on the Company's reputation.

7.2.4 Accepting Business Courtesies

7.2.4.1 Most business courtesies offered to employees in the course of employment are offered because of positions at the Company. Employees should not feel any entitlement to accept and keep a business courtesy.

7.2.4.2 Although employees may not use his/her position at the Company to obtain business courtesies, and should never ask for them, employees may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that the Company maintains or may establish a business relationship with.

7.2.5 Awarding Business

7.2.5.1 Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.

7.2.5.2 The prudent course is to refuse a courtesy from a supplier when the Company is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Company business.

7.2.6 Meals, Refreshments and Entertainment

7.2.6.1 Employees may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

7.2.6.1.1 They are not inappropriately lavish or excessive.

7.2.6.1.2 The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.

7.2.6.1.3 The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.

7.2.6.2 The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

7.2.7 Gifts

7.2.7.1 Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

7.2.7.1.1 Flowers, fruit baskets and other modest presents that commemorate a special occasion.

7.2.7.1.2 Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

7.2.7.2 Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom the Company does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

7.2.7.3 Employees with questions about accepting business courtesies should talk to their managers or the HR department.

7.2.8 Offering Business Courtesies

7.2.8.1 Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the Company. An employee may never use personal funds or resources to do something that cannot be done with Company resources. Accounting for business courtesies must be done in accordance with approved company procedures.

7.2.8.2 Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

7.2.8.2.1 The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.

7.2.8.2.2 The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.

7.2.8.3 The business courtesy is properly reflected on the books and records of the Company.

8. HEALTH AND SAFETY

8.1 Purpose

8.1.1 The Company is dedicated to maintaining a healthy, safe, and secure environment. We must be vigilant, disciplined, and always looking out for one another.

8.1.2 Safety training is provided to educate you on safety in the workplace. Please refer to the current Colville Occupational Safety and Health Manual (COSH) for job specific health and safety requirements.

8.2 Policy

8.2.1 Do not undertake work that you are not qualified to perform.

8.2.2 Stop work, your own or others', if you consider it unsafe.

8.2.3 Play your part in protecting the environment – make it a personal priority.

8.2.4 Be sure that your performance is not impaired, for example by lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.

8.2.5 Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.

8.2.6 Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.

8.2.7 Know the emergency procedures that apply where you work.

8.3 Training

8.3.1 All employees are required to complete a suite of mandatory safety courses upon hire. Employees will be given the time and resources to complete this training prior to reporting to the work section. Employees will claim these hours on their timecards.

8.3.2 All Fairbanks and Prudhoe Bay-based employees are required to complete the North Slope Training Cooperative (NSTC) course. The course may be taken at Company expense in Anchorage or Fairbanks. All company employees are required to complete initial NTSC training and must be completed prior to reporting for your first rotation. In addition, all Fairbanks and Prudhoe Bay-based employees are required to attend refresher NTSC training every 36-months.

8.4 Incidents

All employees must immediately report any work related incidents, no matter how small or apparently inconsequential to their supervisor.

8.5 Driving On Company Business

8.5.1 When driving a Company vehicle you must:

8.5.1.1 Be at least 18 years old

8.5.1.2 Have a valid driver's license that covers the type of vehicle to be operating

8.5.1.3 Use seatbelts for the driver and all passengers

8.5.1.4 Obey all traffic laws and speed limits, including using extra caution on wet or icy roads; and during times of reduced visibility

8.5.1.5 Not smoke or use other tobacco or nicotine products in Company vehicles

8.5.1.6 Be aware of and comply with other vehicle- specific operations procedures

8.5.1.7 In order to increase employee safety and eliminate unnecessary risks behind the wheel, employees will adhere to the following practices. These apply to any employee operating a company vehicle or using a company-issued cell phone while operating a personal vehicle.

8.5.1.8 Company employees may not use a hand-held cell phone while operating a vehicle – whether the vehicle is in motion or stopped at a traffic light. This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.

8.5.1.9 If phone use is required while driving, you must pull over safely to the side of the road or another safe location.

8.5.1.10 This policy does not apply to the use of CB or field radios, if company installed and affixed to the vehicle. Does not include handheld or portable radios.

8.5.1.11 On-the-job employees and authorized persons are the only people permitted to ride in Company-owned vehicles.

8.5.1.12 Drivers who drive a Company vehicle will immediately report the following.

8.5.1.12.1 Traffic infractions and accidents

8.5.1.12.2 Any change in driver's license status, including suspension, revocation, or restriction

8.6 Driving Non-Company Owned Vehicles

8.6.1 Employees may, on occasion, be requested to drive their private vehicle on Company business. In such cases, the employee should submit a mileage log to their supervisor for the reimbursement of miles driven.

8.6.2 All employees who drive on Company business must first be cleared to drive through the Company's insurance carrier.

8.7 Violations

Employees who are required to drive on Company business in Company owned vehicles or their private vehicle shall report to the manager any conviction for a traffic violation regardless of whether the offense occurred in the employees' vehicles, the Company –owned or leased vehicles, on personal business, or on Company business.

8.7.1 Substance Abuse While Operating a Vehicle.

Substance abuse by employees who operate Company-owned or -leased vehicles (including short-term car rentals) or their own vehicles on the Company business can create a very serious risk for both the employees and members of the public. Therefore, the following rules and disciplinary action shall apply to those employees”

8.7.1.1 Employees who operate Company-owned or -leased vehicles (including short-term car rentals) shall be subject to disciplinary action, up to and including termination of employment, for

a conviction from driving a vehicle while under the influence of alcohol or drugs. This provision applies regardless of whether the vehicle is being operated for personal or business use.

8.7.1.2 Employees who operate their own personal vehicles shall be subject to disciplinary action, up to and including termination of employment, for a conviction of driving while under the influence of alcohol or drugs when the employees are operating the vehicles on Company business. For purposes of this paragraph, "operating on the Company business" shall mean that the employee would be entitled to reimbursement by the Company for that specific trip.

8.8 Internal Investigations and Searches

The Company reserves the right to conduct searches of its premises and equipment at any time, including rooms, employee work areas, common areas, lockers, furnishings, and vehicles either on or off premises, at any time. Employees have no expectation of privacy in these areas. An employee who fails to cooperate with such a search may be subject to disciplinary action.

8.9 Responsibility

If you feel something needs to be added to enhance the safety of our personnel, please see your Health Safety Security Environmental (HSSE) department.

9. FIT FOR DUTY

9.1 Purpose

Company full and part-time staff are expected to report for work fit for duty, which means able to perform their job duties in a safe, appropriate and an effective manner free from the adverse effects of physical, mental, emotional and personal problems. This program applies to all Company projects and operations.

9.2 Policy

It is the goal of the Company to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements.

9.3 Pre-Employment Testing

Employees must physically capable of performing their job function. Pre-employment physicals should be included in the hiring process, and also when changing into certain job functions and different environments.

9.4 Training and Safe Work Requirements

9.4.1 All employees must be properly trained for their assigned tasks. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, etc. based on a training matrix that reflects the job description and/or tasks being performed. All training is documented.

9.4.2 Safe work practices and procedures must be followed. Safe work procedures must be in place prior to work beginning. Employees shall follow the Company's and/or client's safety requirements. Examples may include, hot work permitting, confined space, lockout tag-out, process safety management, electrical safety, operator safety and other standard work practices, safety rules or procedures.

9.5 Personal Medical Reporting Requirements

Employees must report all medications they are taking that could impair their ability to work safely. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. The reporting must occur before the employee arrives for work or arranges for transportation to a remote site.

9.6 Employee Activity and Behavior

We will monitor employee activities and behaviors to determine if employees should be removed from the work site. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.

9.7 Fit for Duty Examination

9.7.1 Confidentiality

Medical Records and other related records are protected by state and federal confidentiality laws and Company policy. The medical record of fitness for duty examination will be maintained in the Human Resources office. Employee medical records will not be released to unauthorized personnel without the employee's written consent or subpoena in accordance with state and federal laws.

9.7.2 Self-Referrals

9.7.2.1 Employees are responsible for notifying their supervisor if they are fatigued to the point of not being able to perform their duties safely. Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

9.7.2.2 Disciplinary action may occur for an employee not reporting to work in a condition which could endanger their safety or the safety of any other person(s). See below for Management Referral in case there is a question of the employee's ability to work safely.

9.7.3 Management Referral

Management personnel are responsible for monitoring the attendance, performance and behavior of their employees. When an employee's performance and/or behavior (including the odor of alcohol or possible use of any illegal substance) appears to be unsafe, ineffective and/or inappropriate, it is every manager's responsibility to challenge the employee's behavior and the ability to function, remove the employee from the job, refer the employee for a Fitness for Duty exam immediately and conduct appropriate follow up.

Due to the safety issues involved, supervisors have a special responsibility to implement this policy in a consistent and fair manner.

9.7.3.1 Procedure

9.7.3.1.1 When any manager or their designee observes an employee who is not performing his/her job safely, appropriately, and effectively, or an odor of alcohol is present, or whose behavior is inappropriate, that manager is to remove the employee from her/his duty immediately and call Human Resources to continue the Fitness for Duty procedure. The employee will be referred to a medical provider for a fitness for duty exam.

9.7.3.1.2 The Fitness for duty evaluation may include testing for chemical (e.g. alcohol and drug) levels, referral for psychiatric evaluation or any other evaluation or follow-up deemed necessary.

9.7.3.1.3 The manager or designee must document the reasons for the fitness for duty request by recording the employee's behavior and noting the names of any witnesses who observed that behavior. Documentation must be submitted to Human Resources by the next business day.

9.7.3.1.4 The employee is required to cooperate fully with the manager and medical personnel. The employee must sign consent forms for both the fitness examination and communication of its results in confidence to Human Resources. Refusal to cooperate will be considered insubordination and will be grounds for disciplinary action. The employee should be suspended pending investigation, which could result in termination.

9.7.3.1.5 Medical personnel will advise Human Resources if the employee is fit or not fit for duty. The medical results of the fitness for duty exam will be communicated to Human Resources.

9.7.3.1.6 If medical personnel determine that the employee is FIT FOR DUTY, the employee must contact Human Resources on the next general business day and the manager in

consultation with Human Resources will determine discipline in situations where misconduct may have occurred.

9.7.3.1.7 If medical personnel determine that the employee is NOT FIT FOR DUTY:

The manager makes every effort to arrange for safe transportation home for the employee.

The employee must contact Human Resources, on the next general business day.

The manager, in consultation with Human Resources, will determine discipline in situations where misconduct has occurred.

9.7.4 Subsequent Fitness for Duty Exams

Dependent upon the reason for the fitness exam, employees who violate this policy a second time may be subject to progressive discipline, up to and including termination of employment.

10. WORK ENVIRONMENT

10.1 Purpose

10.1.1 Every employee has a responsibility to maintain the workplace free of harassment, violence, intimidation, and coercion, including sexual harassment.

10.1.2 For Managers and Supervisors, this duty includes discussing this policy with all employees and assuring them that they are not to endure insulting, degrading, or exploitive harassment or sexual treatment.

10.1.3 For employees, this duty includes immediately reporting behavior believed to be harassing.

10.2 Policy

It is the policy of the Company that all employees should be able to enjoy a work environment free from all forms of violation, discrimination, or harassment.

10.2.1 Harassment

10.2.1.1 The definition of harassment is: unwelcome verbal or physical conduct which threatens, intimidates, or coerces an employee, creates a hostile working environment, or impairs an employee's ability to perform his or her job.

10.2.1.2 Sexual harassment also includes threats or insinuations, either explicit or implicit, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, advancement, assigned duties, shifts, or any other condition of employment or career development.

10.2.1.3 Harassment or sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is offensive, that lowers morale and that, therefore, interferes with one's work effectiveness.

10.2.1.4 While it is impossible to describe every action that would be sexual harassment, some examples of sexual harassment are:

10.2.1.4.1 Verbal: Sexual innuendos, suggestive comments, joke of a sexual nature, sexual propositions, lewd remarks, and threats. Requests for any type of sexual favor (this includes repeated, unwelcome requests for dates). Verbal abuse or "kidding" which is sex oriented.

10.2.1.4.2 Non-verbal: The distribution, display, or discussion of any written or graphic material; including calendars, posters, and cartoons that are sexually suggestive, or show hostility toward an individual or group because of sex, suggestive or insulting sounds, leering, staring, whistling, obscene gestures, content in letters and notes, facsimiles, e-mail, that is sexual in nature.

10.2.1.4.3 Physical: Unwelcome, unwanted physical contact; including but not limited to, touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, forced sexual intercourse, or assault.

10.2.1.5 Harassment, including sexual harassment, can occur in a variety of circumstances, including but not limited to the following:

10.2.1.5.1 The victim as well as the harasser may be a woman or a man. The victim does not have to be of the opposite sex.

10.2.1.5.2 The harasser can be anyone who affects the work place, the victim's supervisor, an agent of the Company, a supervisor in another area, a co-worker, or a non-employee.

10.2.1.5.3 The victim does not have to be the person harassed but could be someone unreasonably affected by the offensive conduct.

10.2.1.5.4 Unlawful harassment may occur without economic injury to or discharge of the victim.

10.2.1.5.5 Any employee who violates this policy may be subject to disciplinary action up to and including termination.

10.2.2 Retaliation

10.2.2.1 Retaliation is to fire, demote, harass, or otherwise retaliate against either job applicants or employees for these reasons if the employee or job applicant

10.2.2.1.1 Filed a charge of discrimination

10.2.2.1.2 Complained to employer or other covered entity about discrimination on the job

10.2.2.1.3 Participated in an employment discrimination proceeding, such as an investigation or a lawsuit.

10.2.2.2 Retaliation against any employee who opposes a practice forbidden under this policy, or has filed a charge, testified, assisted or participated in any manner in an investigation, proceeding or hearing under this policy, or is otherwise engaged in protected activity is prohibited.

10.2.2.3 The following behaviors may be seen as retaliatory

10.2.2.3.1 Open hostility to complainant, participant, or others involved

10.2.2.3.2 Exclusion or ostracism of the complainant, participant, or others

10.2.2.3.3 Creation of or the continued existence of a hostile work environment

10.2.2.3.4 Discriminatory remarks about the complainant, participant, or others

10.2.2.3.5 Special attention to or assignment of the complainant, participant or others to demeaning duties not otherwise performed

10.2.2.3.6 Tokenism or patronizing behavior

10.2.2.3.7 Discriminatory treatment

10.2.2.3.8 Subtle harassment

10.2.2.3.9 Unreasonable imposed time restrictions on employees in preparing complaints or compiling evidence of unlawful harassment activities or behaviors.

10.2.3 Violence

10.2.3.1 It is the policy of the Company to expressly prohibit any threats or acts of violence against any employee, or its clients, suppliers, contractors, or visitors.

10.2.3.2 Any employee who displays a tendency to engage in violent, abusive, or threatening behavior, or who otherwise engages in behavior that the Company, in its sole discretion, deems offensive or inappropriate to the work environment will be subject to disciplinary action, up to and including discharge.

10.3 Weapons in the Workplace

10.3.1 Employees are not permitted to carry (either openly or in a concealed manner) any firearms or lethal weapons while on the company's premises, while at client work locations on company business, while in company vehicles, or while acting as a company representative at any work related activities, meetings or functions.

10.3.2 This prohibition against the possession or carrying of firearms applies even if the employee is licensed to carry a concealed handgun or to openly carry a handgun by the state of Alaska.

10.3.3 Employees are permitted to transport and store in a safe and discreet manner a legal firearm and ammunition in a personal vehicle while the vehicle is in the employee parking area.

10.3.4 This policy is intended to comply with all applicable state laws concerning employee rights to possess and carry firearms and shall be interpreted and enforced accordingly.

10.4 Reporting

10.4.1 Any employee who believes that he or she is or has been the subject of discrimination, retaliation, harassment, or an act of violence should report the behavior immediately.

10.4.2 All information will be held in as much confidence as possible and will be disclosed only on a need-to-know basis to investigate and resolve the matter.

10.4.3 The individual alleging the prohibited behavior the incident to their manager.

10.4.4 If the alleged harasser is a manager it is to be reported directly to a corporate officer or director.

10.4.5 The person against whom the complaint is filed may be reassigned temporarily, or placed on paid or unpaid administrative leave during the investigation, at the discretion of management

10.4.6 If the allegations are not substantiated, the alleged harasser will return to work with pay retroactive to the date of unpaid leave commencement, if applicable.

10.4.7 Retaliatory activities will be treated as a violation of this policy and will subject the individual to the same disciplinary consequences up to and including termination.

11. DRUG AND TOBACCO-FREE WORKPLACE

11.1 Purpose

11.1.1 The Company believes that illegal drugs, tobacco use, and the abuse of prescription medicine or alcohol have no place in the workplace. The management of the Company will utilize every reasonable measure to maintain a drug- and alcohol-free work environment. This includes marijuana, in any form, which remains an illegal drug under federal law.

11.2 Policy

11.2.1 All Company employees or contractors are required to perform all Company related job duties, either on or off Company premises, without the presence of illegal drugs, tobacco, alcohol, or inappropriate legal drugs in their systems.

11.2.2 This policy covers the use of marijuana, which remains an illegal drug under federal law.

11.2.3 Applicants who have had a conviction for a DWI/DUI within the previous five years will not be considered for driver positions.

11.2.4 On-boarded tobacco users are required to quit within 12-months of onboarding and will be offered tobacco cessation resources.

11.2.5 Effective January 1, 2014 the use of tobacco by employees was banned on all Company premises.

11.2.6 All employees are required to abide by the Non-DOT Drug and Alcohol Policy / DOT Drug and Alcohol Policy.

11.2.6.1 On-the-Job Drug Use, Sale, Possession, or Distribution

11.2.6.1.1 Any employee who is found to use, sell, possess, be under the influence of, or distribute alcohol or any illegal drug while performing Company related job duties, either on or off Company premises, or while operating any Company owned or leased equipment, or while transporting Company clients, will be subject to disciplinary actions up to and including termination.

11.2.6.2 Employees Convicted of Drug Activity

11.2.6.2.1 Any employee who is convicted of illegal drug activity, either on or off the job, may be considered to be in violation of this policy.

11.2.6.3 Legal Medication

11.2.6.3.1 It is a violation of the Company's policy for anyone to use prescription drugs illegally.

11.2.6.3.2 If an employee is taking any over-the-counter medication or prescribed drugs, the employee should consult the prescribing medical professional to determine whether the drug may reasonably have an adverse effect on his or her personal safety or job performance while at work.

11.2.6.3.3 If the effects of the medication could reasonably pose a danger or affect judgment, the employee should make his or her supervisor aware of this condition.

11.2.6.3.4 Every effort will be made to adjust the worker's duties until such time as full, effective, and safe work activities can be resumed.

11.2.6.3.5 If alternate duties are not available, the employee may be subject to provisions of the leave policy.

11.2.7 An employee who needs help due to the use of drugs and alcohol is encouraged to voluntarily seek help, and is additionally encouraged to leave the work site, if necessary.

11.2.7.1 When this occurs, the employee should notify his or her supervisor of the specific situation.

11.3 Drug/Alcohol Testing

The Company may conduct drug and/or alcohol testing of employees under the following circumstances

11.3.1 Pre-employment: Applicants offered employment will undergo testing for the presence of illegal drugs as a condition of employment. Any applicant with a confirmed positive test result will be denied employment. The Company will not discriminate against applicants for employment because of a past history of drug abuse. Individuals who have failed a pre-employment test may initiate another inquiry after a period of at least 30 days, but must present themselves drug-free.

11.3.2 Post-Accident: The Company reserves the right to require a drug and alcohol screening test immediately after an on-the-job accident or incident to either confirm or refute drug or alcohol use as a possible cause. The manager will determine when post-accident testing will take place.

11.3.3 Reasonable Suspicion: When there is reasonable suspicion to believe that an employee may be under the influence of alcohol or illegal drugs while at work or on work premises.

11.3.4 On a Random Basis: All employees will be subject to random drug testing as administered by the Company's contractor or authorized representative.

11.3.5 Waiting for Results: If an employee is tested due to a "post-accident or reasonable cause", that employee may be placed in an administrative paid or unpaid leave status until the test results come back. If the test results come back "negative for drugs of abuse and/or alcohol" the employee will be paid for any work time lost. If the test results come back "positive for drugs of abuse and/or alcohol" the employee will not be paid for any work time lost.

11.3.6 Follow-up Testing: Following a determination by a substance abuse professional that an employee is in need of assistance in resolving problems associated with alcohol misuse and/or use of controlled substances, the Company will require the employee to submit to follow-up alcohol and/or controlled substances testing as directed by the substance abuse professional.

11.4 Privacy

11.4.1 To protect the rights of the Company as well as that of the employee, the Company shall take reasonable measures to safeguard the privacy of employees in connection with this policy, including maintaining the confidentiality of employees who come forward to discuss alcohol or drug use affecting them. The Company will reasonably cooperate in rehabilitation; however, an employee may still be subject to disciplinary action for unacceptable behavior or policy violations at work.

11.4.2 2. Neither the Company, nor any of its supervisors/managers or other personnel, shall disclose any information regarding the fact of testing or test results to any other employee except supervisors, managers or officers of the Company on a need to know basis.

11.5 Contract with Testing Facilities

11.5.1 Nothing in this policy shall preclude the Employer from entering into an agreement with a third party which imposes conditions that are different from those in this policy.

11.5.2 In such circumstances the Company may vary from the procedure set forth in the agreement, so long as the variations do not reduce the minimum standards set forth herein regarding the testing method, results, and the basis upon which testing can be required.

11.6 Compliance with State Law

The Company complies with all terms and conditions of drug and alcohol testing set out in AS 23.10.600 et. seq., including the right of employees to request a confirming retest, and to discuss negative results in private.

11.7 Good-Faith Efforts to Remain Drug Free

The Company will make a good faith effort to continue to maintain a drug-free environment through the implementation of this policy and ensure that all new employees are informed of the policy.

11.8 Company and Management Responsibility

Every supervisor working for the Company is required to take responsibility for ensuring a safe and effective working environment and the well-being of each and every employee through awareness, education, and appropriate training in recognition of drug and alcohol issues.

12. ELECTRONIC MEDIA AND SERVICES POLICY

12.1 Purpose

The following policy applies to all electronic media and services that are accessed on or from Company premises, accessed using Company computer equipment or via Company paid access methods, used in a manner that identifies the individual with the Company.

12.2 Policy

12.2.1 Electronic media cannot be used for knowingly transmitting, retrieving, or storing any communication that is:

12.2.1.1 Discriminatory or harassing

12.2.1.2 Derogatory to any individual or group

12.2.1.3 Obscene

12.2.1.4 Defamatory or threatening

12.2.1.5 Engaged in for any purpose that is illegal, or contrary to the Company's policy or business interests

12.2.2 The Company provides electronic media and services primarily for employees' business use. Limited, occasional, or incidental use of electronic media for personal, non-business purposes is understandable. However, employees are expected to demonstrate a sense of responsibility and not abuse this privilege.

12.2.3 The Company maintains the right to access and monitor employee communication by any method at any time. Employees have no expectation of privacy as to any communication while at work or while using Company equipment.

12.2.4 Electronic media and services should not be used in a manner that is likely to cause network congestion or significantly hamper the ability of other people to access and use the system.

12.2.5 Anyone obtaining electronic access to other companies' or individuals' materials must respect all copyrights and cannot copy, retrieve, modify, or forward copyrighted materials except as permitted by the copyright owner.

12.2.6 Departing employees are required to return all Company documents, computers, and electronic storage devices on their last day of employment. Employees may not retain copies of company documents after employment

12.2.7 Employees must respect the confidentiality of other individuals' electronic communications. Except in cases in which explicit authorization has been granted by Company management, employees are prohibited from engaging in, or attempting to engage in:

12.2.7.1 Monitoring or intercepting the files or electronic communications of other employees or third parties

12.2.7.2 Hacking or obtaining access to systems or accounts they are not authorized to use

12.2.7.3 Using other people's log-ins or passwords

12.2.7.4 Breaching, testing, or monitoring computer or network security measures

12.2.7.5 Attempting to hide the identity of the sender or represent the sender as someone else or encrypting the text

12.2.8 Proper use of telephones, voice mail, and other components of the Company's telephone system is important in controlling costs, ensuring effective communications, and maintaining productivity.

12.2.9 Employees are permitted to make and receive personal calls that are urgent or extremely difficult or impractical to schedule outside of work hours. Such calls should be infrequent and as brief as possible.

12.2.10 Whenever possible, employees should make their personal calls during meal or break periods.

12.2.11 Employees must pay for their personal long-distance calls.

12.2.12 Employees should avoid using telephone services that charge the Company service fees.

12.2.13 Using work telephones for recreation-for example, calling commercial chat lines-or for activities that others might find offensive is strictly forbidden under any circumstances.

12.2.14 Mobile phones issued to employees are for use on Company business calls only.

12.2.15 Managers may approve the use of personal cell phones are for work purposes with the Company reimbursing the portion of the bill used for business.

12.2.16 This policy can allow an employee to carry one cell phone instead of both Company and personal cell phone.

12.2.17 Replacement of lost or stolen phones will be the responsibility of the employee to whom the phone was issued.

12.2.18 Phones must be returned at the end of a work rotation, termination of employment, or upon demand.

13. MEDIA

13.1 Purpose

To provide guidance when engaging in commercial media or social media activities

13.2 Policy

13.2.1 Media Inquiries

13.2.1.1 In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the President/CEO through your supervisor. No one may issue a press release without first consulting with the President/CEO.

13.2.2 Social Media

13.2.2.1 Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log, or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with the Company, as well as any other form of electronic communication.

13.2.2.2 Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may result in corrective action, up to and including termination.

13.2.2.3 Employees should always be fair and courteous to fellow employees and people who work on behalf of the Company and uphold the values of respect for the individual.

13.2.2.4 Employees should not use their web site or web log to disparage the name or reputation of the Company and other employees.

13.2.2.5 If employees decide to post complaints or criticism, they should avoid using statements, photographs, and video or audio that reasonably could be viewed as malicious, obscene, and threatening or intimidating, that disparages employees or that might constitute harassment or bullying.

13.2.2.6 Employees should make sure they are always honest and accurate when posting information or news, and if a mistake is made, it should be corrected quickly.

13.2.2.7 Employees should never post any information or rumors that they know to be false about the Employer, fellow employees, or people working on behalf of the company or competitors.

13.2.2.8 Employees should maintain the confidentiality of the Employer's trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology.

13.2.2.9 Employees should not post internal reports, policies, procedures, or other internal business-related confidential communications.

13.2.2.10 Employees should not create a link from their blog, website, or other social networking site to the company's website.

13.2.2.11 Employee and make it clear that their views do not represent those of the Company, fellow employees, or people working on behalf of the Company.

13.2.2.12 Avoid identifying your position, your work location or schedule with the Company

13.2.2.13 Employees should refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by their manager or consistent with the Company's policy.

13.2.2.14 Employees should not use the company's email addresses to register on social networks, blogs, or other online tools utilized for personal use.

14. UNIFORMS AND PERSONAL PROTECTIVE EQUIPMENT

14.1 Purpose

14.1.1 The Company provides clothing items and some Personal Protective Equipment (PPE), which together comprise the “company uniform.” Clothing items provided by the Company include shirts, coveralls, and jackets.

14.1.2 Each employee is responsible to purchase his or her own safety-toed footwear and blue jeans or trousers of equivalent color. The Company also provides hard hats, hearing protection, safety glasses and work gloves. Other PPE is made available for specialized tasks requiring it.

14.2 Policy

14.2.1 All employees will wear the Company uniform while at work and/or while operating Company vehicles while on duty and they may wear the uniform while traveling, but are not required to do so.

14.2.2 Uniforms are not to be worn at other, off duty, times.

14.2.3 The use of PPE, where required, is mandatory and a condition of your employment. High Visibility clothing (i.e. jackets or vests) is required to be worn outside while in performance of your duties.

14.2.4 The Company uniform must be worn in a manner, together with personal grooming, that projects a professional image of the person and the Company. A professional appearance is important to the Company.

14.2.5 Personal hygiene, including hair styles, should project a well-groomed and appropriate image.

14.2.6 Men’s facial hair should be clean shaven or closely trimmed and neat looking. Any questions regarding this policy should be directed to your Operations Manager.

15. FEEDBACK MANAGEMENT SYSTEM (FMS)

15.1 Purpose

The Company values its employee's input. Because of this, The Company uses a Feedback Management System designed for employees and clients to report problems, suggestions, policy questions, safety concerns, or various other types of feedback.

15.2 Policy

15.2.1 When using the FMS, please be as specific and complete as possible and be sure to include the name of the location you are calling about. If the Company does not know the location of concern, the company cannot properly investigate.

15.2.2 If you would like a Company representative to contact you to discuss your concerns, you can leave your name, a telephone number, and times when you prefer to be called, but this information is optional.

15.3 Submitting Feedback

15.3.1 TOLL FREE AT 1-844-894-2990

15.3.1.1 Before you begin your message, please note that you do not have to identify yourself. Your message will be transcribed by the independent company providing this helpline service and then erased.

15.3.1.2 Only the written transcript of your call will be sent to the Company. No one at the Company will hear your voice.

15.3.1.3 In every case, the message you leave will be confidential and unless you provide your name and/or other identifying information, your message will also be anonymous.

15.3.2 EMAIL COLVILLE@GETINTOUCH.COM

15.3.2.1 Employees can submit feedback via email. Your message will be transcribed by the independent company providing this service and then erased.

15.3.2.2 Only the written transcript of your email will be sent to the Company.

15.3.2.3 No one at the Company will see your original email or email address. In every case, the message you leave will be confidential and unless you provide your name and/or other identifying information, your message will also be anonymous.

16. EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

This employee handbook has been prepared for your information and understanding of the policies, philosophies and practices and benefits of Colville, Inc., Colville Transport, LLC, and Brooks Range Supply, Inc. (hereinafter referred to as the “Company”). Please read it carefully.

Upon completion of your review of this handbook, please sign the statement below, and return it to your supervisor for placement into your personnel file.

I, _____, have received and read a copy of the Company Employee Handbook which outlines the goals, policies, benefits and expectations of the Company, as well as my responsibilities as an employee.

I have familiarized myself with the contents of this handbook.

By my signature below, I acknowledge, understand, accept and agree to comply with the information contained in the Employee Handbook provided to me by the Company. I understand this handbook is not intended to cover every situation which may arise during my employment, but is simply a general guide to the goals, policies, practices, benefits and expectations of the Company.

I understand that the Company Employee Handbook is not a contract of employment and should not be deemed as such.

(Employee Signature)

Date: _____