

TAPS CODE OF CONDUCT

OCTOBER 2023

POL-001



Changes to Revision 10 of the TAPS Code of Conduct are as follows:

- » deleted and replaced page 1

Changes to Revision 9 of the TAPS Code of Conduct are as follows:

- » deleted and replaced page 1

Changes to Revision 8 of the TAPS Code of Conduct are as follows:

- » deleted and replaced page 1
- » deleted and replaced a portion of page 3

The printed TAPS Code of Conduct (Revision 8) distributed in 2021 remains in effect with these changes.



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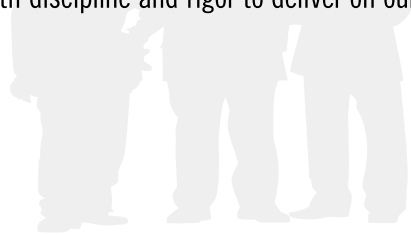
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▼ A MESSAGE FROM THE PRESIDENT

At Alyeska Pipeline, our Code of Conduct describes commitments that guide and ground us. Working safely is a constant mindset that captures our collective identity and the values that drive us every day. At its heart, our Code of Conduct documents our safety culture, our obligation to protect the environment and each other, and our pride in operational excellence and discipline that makes us a prudent and responsible operator.

We are all safety leaders on TAPS and we Believe in Zero. This means zero accidents, zero injuries, zero spills, and zero upsets. We speak up when we see something unsafe or a way to reduce exposure to hazards; we respond openly to those who speak up; and we act with urgency to address all safety concerns.

To TAPS workers, I pledge that your leadership team welcomes reports of hazards or incidents as opportunities to get better every day. Everyone is free to report issues without fear of reprisal. Our expectations and standards are high and represent our confidence that we strive to do what is best for TAPS. Safety is what matters most, and what we will prioritize as we operate TAPS with discipline and rigor to deliver on our mission.



A handwritten signature in black ink that reads "John E. Kurz". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John Kurz
Alyeska President



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MISSION

Provide safe, environmentally responsible, reliable, and cost-effective oil pipeline transportation from the North Slope of Alaska.

VISION

Alaska's pipeline to the future: Safely delivering oil today - sustaining operations for tomorrow.

VALUES

TEAMWORK

We share responsibility for Alyeska's mission and the resources entrusted to us. We value our communities, our business partners, and the stakeholders we serve.

SAFETY

We respect, value, and safeguard people, property, and the Alaska environment.

INNOVATION

We leverage knowledge and creativity to continuously improve our operations and increase our efficiency.

INTEGRITY

We hold one another to the highest ethical standards. We focus on maintaining the operational integrity of TAPS and the integrity of business practices.

SUMMARY OF EXPECTATIONS ▼

ALASKA BUSINESS

- » We support the employment of Alaska residents and procurement from competitive Alaska vendors, while promoting an environment of equal opportunity for all businesses.

BUSINESS CONDUCT

- » TAPS workers apply the highest ethical and legal principles to business operations.

COMMUNITY RELATIONS

- » We contribute to community and civic activities and programs to enhance quality of life, and encourage and sponsor employee participation.

COMPLIANCE

- » TAPS workers comply with all applicable laws and regulations, Federal and State Right-of-Way agreements, permits, other binding agency agreements and authorizations, and TAPS policies and procedures.

CONFIDENTIALITY

- » Confidential or restricted information may only be accessed by workers with the appropriate authority.

EMPLOYEE RELATIONS

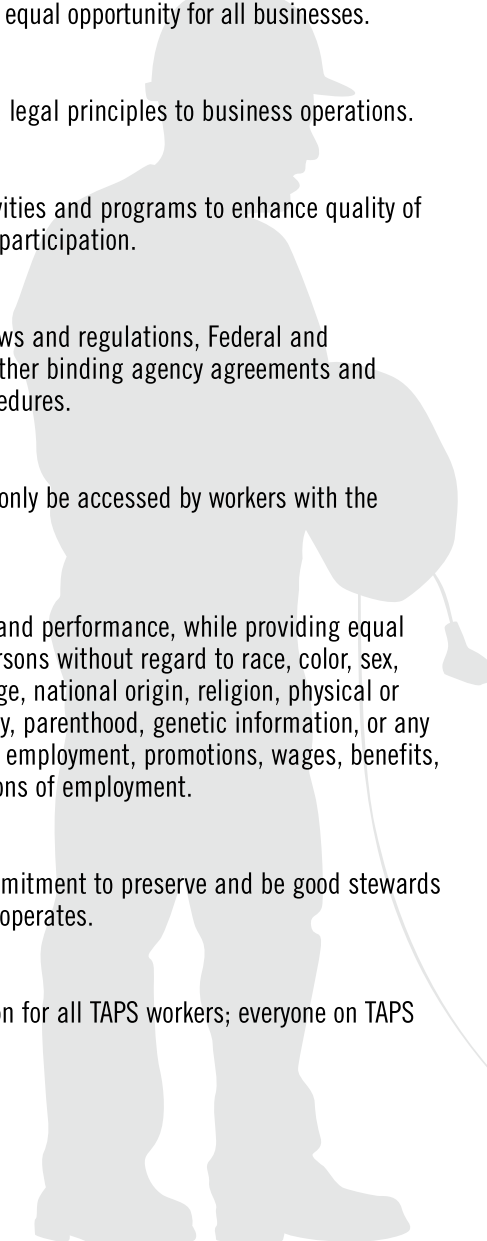
- » Employment decisions are based on skills and performance, while providing equal employment opportunity to all qualified persons without regard to race, color, sex, sexual orientation, gender identification, age, national origin, religion, physical or mental disability, marital status, pregnancy, parenthood, genetic information, or any other bias protected by law for purposes of employment, promotions, wages, benefits, and all other privileges concerning conditions of employment.

ENVIRONMENT

- » TAPS workers conduct business with a commitment to preserve and be good stewards of the natural surroundings in which TAPS operates.

DIVERSITY AND INCLUSION

- » We value a culture of diversity and inclusion for all TAPS workers; everyone on TAPS should feel welcome, safe, and respected.



▼ SUMMARY OF EXPECTATIONS

INFORMATION SECURITY

- » All information, data, and records generated or stored at TAPS facilities or on Alyeska equipment are managed as the property of Alyeska Pipeline Service Company and are subject to access, retrieval, review, or distribution only for legitimate business purposes.

INTERNAL CONTROL

- » We maintain internal control systems and procedures to safeguard pipeline integrity, information, and assets. A formal auditing process provides additional safeguards and verification of internal processes and procedures.

OPEN WORK ENVIRONMENT

- » TAPS workers are free to raise issues, concerns, and questions, without fear of harassment, intimidation, retaliation, or discrimination (HIRD) from management or their peers. We are committed to an Open Work Environment (OWE) in which all individuals working on TAPS work together to make safety, system integrity, and environmental protection the overriding priorities of operating and managing TAPS.

POLITICAL ACTIVITIES

- » TAPS workers engage in political activity as private citizens and not as representatives of Alyeska.

TAPS FRAMEWORK FOR EXCELLENCE (TFX)/QUALITY

- » TAPS Framework for Excellence is our safety management system (SMS). TAPS workers support TFX by planning, performing, checking, and improving work in accordance with Alyeska programs, processes, and procedures.

SAFETY

- » Life safety is our highest priority. We conduct business in accordance with the highest transportation and petroleum industry safety standards.

SECURITY

- » We maintain physical and information security throughout TAPS, taking appropriate measures to regulate access, to protect company assets, and to provide a safe working environment for employees, contractors, and guests.

ALYESKA'S CULTURE ▼



TAKE A SYSTEM VIEW

We act and make decisions that take into account the risk to and the success of the total pipeline system.

ACT WITH DISCIPLINE

We consistently work to the highest standards; we don't cut corners.

MAKE SOUND DECISIONS

We bring the right focus, involve the right people, use the right data, and follow the right processes to achieve sound and timely decisions.

LEARN, IMPROVE, INNOVATE

We learn from our experiences, innovate to overcome challenges and seek to constantly improve our business performance.

SPEAK UP, STEP UP

We take responsibility. We speak up about concerns, opportunities and ideas. We take action to resolve issues.

▼ MAKING ETHICAL DECISIONS

If you suspect or are aware of misconduct, or if you have a question about what to do, speak up.



ASSESS

- » Have I been asked to do something I think might be wrong?
- » Are there potential compliance issues involved?
- » Am I concerned about some ethical aspect of this decision?
- » What is the risk of not speaking up or not stepping up?



ANALYZE

- » What are the legal and company requirements that apply?
- » What are all the relevant facts?
- » What are my options?
- » What are the risks and how can I reduce them?
- » What would be fair and reasonable?
- » How can I best communicate to foster a safe open dialog?
- » Should I seek advice from management, legal, HR, or the Employee Concerns Program?



ACT

- » Apply Alyeska's core values to your decision.
- » Enlist management or other departments if necessary.
- » Communicate your decision and rationale to those affected.
- » Share your successes and lessons learned with others.



ETHICAL QUESTIONS TO CONSIDER

1. Is it illegal or against Alyeska policy?
2. Does it feel right?
3. Is there an alternative action that doesn't pose an ethical conflict?
4. Would I be embarrassed if my co-workers knew I took this course of action?
5. Will it reflect negatively on Alyeska?
6. Who else could be affected by this action (internal or external to Alyeska) and, if appropriate, have I contacted them?

TAPS OPEN WORK ENVIRONMENT ▼

Sustaining a high-performance culture is essential to our success. TAPS workers (Alyeska employees and contractors) demonstrate professional and ethical character as well as technical competence. Workers often perform jobs under difficult conditions, and are expected to treat everyone with respect, dignity, and professionalism. Alyeska does not accept behavior that deviates from these principles.

Alyeska's procedures permit disciplinary actions, up to and including immediate termination or badge hold, for engaging in behaviors found to be harassing, intimidating, retaliatory, discriminatory, bullying, or for creating a chilled or hostile work environment.

DEFINITIONS

- » **Bullying:** A form of harassment characterized by verbal, physical, social, or psychological mistreatment against an individual or group with the intent to intimidate, degrade, humiliate, or undermine work performance.
- » **Chilled Environment:** A work environment where workers are unwilling to raise safety issues or other concerns out of fear of retaliation.
- » **Chilling Effect:** A consequence of actions by an employer, company representative, or other worker who takes (or threatens to take) retaliatory action against someone who identified or reported concerns.
- » **Discrimination:** Treating a person, or class of persons, differently than similarly situated people based on protected status.
- » **Harassment:** Unwelcome or offensive verbal or physical conduct toward an individual that adversely and unreasonably affects the employment relationship or working environment.
- » **Hostile Work Environment:** Harassment, intimidation, retaliation, or discrimination (HIRD) that permeates the work environment, or is directed at another individual through behaviors, actions, or communications, and interferes with the individual's ability to perform their job.
- » **Intimidation:** Conduct or actions with the intent or purpose of generating fear in an individual, or preventing or discouraging the individual from raising a concern.
- » **Retaliation:** An adverse employment action taken to deter or punish an individual for raising a concern.

KEY TAKEAWAY

We are committed to professionalism, respect, courtesy, and dignity.

▼ ACCOUNTABILITIES

Alyeska's Code of Conduct reminds all TAPS workers of the serious obligation they have to conduct Alyeska's operations with candor, honesty, and fairness.

TAPS workers are accountable to:

- » Maintain a positive work environment and communicate in a professional and courteous manner.
- » Complete required training.
- » Comply with the Code of Conduct.
- » Conduct work competently.
- » Contribute to maintaining an open work environment by sharing concerns in an honest and respectful manner.
- » Ask questions when unsure or facing a difficult decision.
- » Report any known or suspected violation of law, regulations, or the Code of Conduct.
- » Cooperate in company investigations.
- » Support the Performance Contract.

Managers and supervisors have additional accountabilities to:

- » Serve as role models for safety and technical competence.
- » Foster a work environment that encourages open discussions about any concerns.
- » Address issues brought to their attention.
- » Support TAPS workers through the reporting process.
- » Support diversity and inclusion.

The Employee Concerns Program is accountable to:

- » Interpret and discuss the application of the Code of Conduct.
- » Investigate non-compliance with the Code of Conduct.



MORE INFO:

The Employee Concerns Program has identified processes on their A-Net site for anonymous reporting.

ACP-303, Alyeska Compliance and Ethics Program

AMS-034, Employee Issue and Concerns Resolution Process

HR-3.01, Harassment

HR-3.03, Disciplinary Actions

ECP-333, Employee Concerns Program Manual

WHERE CAN I GO IF I HAVE QUESTIONS? ▾

When the right thing to do is unclear, speak with somebody about the issue. On TAPS we encourage workers to ask questions and expect you to raise concerns. Open communication is essential to maintaining safe, efficient operations and positive relationships.

SPEAK UP, STEP UP

WE ALL SPOT OPPORTUNITIES, SHARE IDEAS AND CONCERNS,
AND TAKE ACTION ON SOLUTIONS

Safety is not silent.

We each have an affirmative duty and are empowered to help keep
TAPS safe.

If you have a question, suggestion, or concern, your supervisor or manager is in the best position to help you. We consider the relationship between an employee and their supervisor to be the single most important point of contact for the candid sharing of ideas, questions, and concerns.

If you are unsure where to ask your question or are uncomfortable using your chain of command, you may contact or submit a concern to an Employee Concerns Program representative.

A worker may also reach out through any avenue of their choosing to resolve a question or concern.

Our goal is that all TAPS workers are comfortable raising questions and concerns using internal reporting methods, and we strive for timely and effective resolution. However, government agencies are also available avenues for raising concerns.

If you have a question regarding the content of this document, contact the Employee Concerns Program at (907) 787-8104.

If you need help contacting a specific Alyeska department, you can reach departments through Alyeska Directory Assistance by calling (907) 787-8700 or toll-free (877) 257-5778.



Paths to speak up

Speak to your supervisor?

Yes

Contact your supervisor directly about your concern.



No

Speak to another level of management?

Yes

Concerns can be reported to any level of Alyeska management, up to and including the president.



No

Speak to TAPS contractor management?

Yes

Concerns can be reported to TAPS contractor management.



No

Speak to an Alyeska ECP representative?

Yes

ECP can be contacted at 907-787-8104 or Concern@alyeska-pipeline.com.



No

Contact Alyeska's anonymous reporting resource.

Yes

Alyeska EthicsPoint Hot Line
Alyeska-pipe.ethicspoint.com
ECP Hot Line (800) 455-7558



DIVERSITY AND INCLUSION ▼

Alyeska fosters an environment of inclusivity so that all TAPS workers experience a workplace where collaboration and cultural intelligence are reinforced and supported. Alyeska strives to make diversity and inclusion a strong part of everything we do - from how we attract and hire talent to how we commit to working with and treating each other on TAPS. Alyeska's focus on inclusion strives for the following:

- » All TAPS workers believe that they belong. Their background, knowledge, and experiences are valued.
- » Belonging occurs when we all recognize our common goals while also embracing our differences and commit to learning about each other. We value our individual differences and experiences.
- » Alyeska leaders demonstrate and champion inclusive leadership. Leadership generates a sense of belonging by challenging their own biases and listening actively with a positive focus for their workers.
- » Alyeska provides training to understand and challenge our unconscious bias.
- » Alyeska will not tolerate any form of discrimination.

Alyeska is committed to the terms of the Federal Agreement and Grant of Right-of-Way, employing a TAPS workforce consistent with Equal Employment Opportunity. Alyeska maintains an Affirmative Action Plan to support recruitment, promotions, employee development, diversity, and successful job performance for all employees through company procedures, programs, and activities that also support the company's affirmative action goals.

THE ALASKA NATIVE UTILIZATION AGREEMENT (ANUA)

Alyeska entered into an agreement with the government to ensure Alaska's indigenous people would benefit economically from the construction and continued operation of the pipeline, as described in Section 29 of the Federal Agreement and Grant of Right-of-Way. Specifically, through the Alaska Native Utilization Agreement (ANUA), the Alaska Native Program was established to focus on the recruitment, development, and retention of Alaska Native TAPS workers by providing educational scholarships, internships, employment, and professional development opportunities.



KEY TAKEAWAY

Understand and celebrate diversity. Create a healthy culture of diversity and inclusion where every TAPS worker feels welcome, safe, and respected.

Q&A

Q: How do I apply a sense of belonging and inclusion in my daily work?

A:

1. Create a safe environment. Build trust with your co-workers or employees.
2. Check-in with your co-workers or employees.
3. For leadership:
 - a. Give employees a voice
 - b. Listen first
 - c. Ask for input
 - d. Drive engagement and accountability
4. Alyeska will not tolerate Harassment, Intimidation, Retaliation, or Discrimination (HIRD).

MORE INFO:

HR-1.05, Equal Employment Opportunity (EEO)
REF-00465, Alaska Native Utilization Agreement (ANUA)

If you have questions or concerns about equal opportunity issues, contact your HR representative or an ECP representative.

Information about the Alaska Native Program is available at
<https://www.alyeska-pipe.com/alaska-native-program/>
or through the Alaska Native Program Director.



SAFETY MANAGEMENT SYSTEM: TFX ▼

The TAPS Framework for Excellence (TFX) establishes expectations and processes for conducting Alyeska's business. Each process incorporates the “plan, do, check, adjust” elements found in traditional quality management systems.

TFX integrates strategic objectives with plans, processes, procedures, and behaviors into daily operations, and protects people and the environment. It systematically identifies and closes performance gaps for continuous improvement.

TFX enables us to build a safer, stronger, more efficient organization. The individual elements of TFX are designed to improve communication and coordination, resulting in a more integrated system and a stronger safety and performance culture.

The 15 Elements of the TAPS Framework for Excellence

1. Leadership Commitment and Direction
2. Personnel Management
3. Risk Assessment and Management
4. Safeguards
5. Operations and Maintenance
6. Integrity Assurance
7. Design and Construction
8. Third Party Management
9. Management of Change
10. Emergency Preparedness and Response
11. Stakeholder Engagement
12. Financial Stewardship
13. Documentation
14. Evaluate and Improve
15. Management Review and Action

MORE INFO:

AMS-000, TAPS Framework for Excellence (TFX)
QA-36, Quality Assurance Program Manual
AMS-035, Lessons Learned Process

If you have questions, contact a TFX Program representative.



▼ TAPS SAFETY CULTURE

Everything we do respects the responsibility we have been given to protect our people, our neighbors, and TAPS. Alyeska is committed to providing a safe workplace for all TAPS workers. It is the expectation that every TAPS worker understands our safety culture, their role, and that they are empowered to make the workplace safe by mitigating risks inherent in the industrial activities undertaken in an arctic environment.

OUR PLEDGE: NOBODY GETS HURT!

SAFETY IS MY TOP PRIORITY. I SPEAK UP, STEP UP, AND STOP WORK WHEN THINGS ARE UNSAFE. I PREVENT INJURIES BY BEING ACCOUNTABLE FOR MY SELF AND MY CO-WORKERS. I OWN IT!

SAFE PERFORMANCE SELF ASSESSMENT



▲ ASSESS the risk

What could go wrong?

Am I mentally ready to focus on this task? Physically able?

▲ ANALYZE how to reduce the risk

Do I have the necessary training and knowledge to do this task safely?

Do I have the proper tools and Personal Protective Equipment?

▲ ACT to conduct the task safely

Be alert for condition changes. Stop work if unsafe.

Follow written procedures. Ask for assistance, if needed.

**ACT WITH DISCIPLINE • SPEAK UP, STEP UP • TAKE A SYSTEM VIEW
MAKE SOUND DECISIONS • LEARN, IMPROVE, INNOVATE**

TAPS SAFETY CULTURE ▼



Q&A

Q: Should I stop work when I have a concern about safety?

A: Yes. All TAPS workers have the right to stop work in any situation if there is a safety concern, regardless of who is doing the work. While working on TAPS we look out for one another; speaking up could prevent an incident from occurring.

Q: Do TAPS workers need to report all incidents?

A: Yes. The value of reporting all Losses and Near Losses lies within sharing the lessons learned. By reporting even minor incidents others can learn how to prevent similar events from happening in the future.

Alyeska prohibits TAPS workers from being under the influence of alcohol, illegal drugs, or legal drugs that could create a safety concern while performing their assigned duties, while on Alyeska's facilities, or in an Alyeska owned/leased/rented vehicle.

State and local initiatives legalizing marijuana for medical or recreational purposes do not change Alyeska's requirement for a drug-free workplace.

TAPS workers will face disciplinary actions, up to and including immediate termination or badge hold, if they violate Alyeska's substance abuse policies.



MORE INFO:

SA-38, TAPS Safety Manual
LPS-001, Loss Prevention System
EC-71-xx, Emergency Contingency Action Plan series

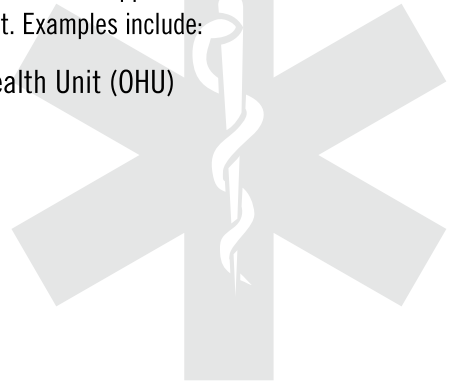
▼ TOTAL WORKER HEALTH

Alyeska provides TAPS workers with opportunities to maintain work-life balance and supports individuals making improvements to their health and well-being. Alyeska believes in the benefits of a workforce that understands and uses emotional intelligence principles in their day-to-day work. TAPS workers create a positive environment and deliver safe outcomes by demonstrating care for self and care for others.

MAINTAINING OVERALL HEALTH AND WELLNESS

Alyeska provides a number of programs and activities that support total worker health including diet, mental health, and medical support. Examples include:

- » Consultations with the Occupational Health Unit (OHU)
- » Educational opportunities
- » Ergonomic evaluations
- » Fatigue management
- » Health fairs
- » Health maintenance reimbursement
- » Healthy food choices
- » Immunizations
- » Wellness & fitness challenges and events
- » Wellness physicals



MORE INFO:

OHU-8.01, Tobacco Use
OHU-8.07, Health Maintenance Reimbursement
OHU-8.08, Fatigue Management Guidelines

Questions about fatigue management, fit-for-duty expectations, and health and wellness programs can be directed to the OHU Program Manager.

ENVIRONMENTAL PROTECTION ▼

TAPS workers comply with environmental laws, regulations, and Alyeska environmental policies and procedures. TAPS workers are responsible stewards of the resources for which we are accountable.

- » Prevent environmental impacts to air, water, habitat, fish, and wildlife.
- » Reduce waste and prevent emissions and releases.
- » Safely use, transport, and dispose of all materials and waste.
- » Immediately report all spills.
- » Secure necessary permits prior to performing work.
- » Preserve and protect the Alaska environment.



Q&A

Q: For which types of work should I consult with the Environment Team during planning and implementation?

A: Robust collaboration is essential. The Engineering Process (AMS-004) and associated procedures dictate which scopes of work require formal environmental review versus informal review. Regardless of scale, you must have proper regulatory permits and approvals in place and follow environmental requirements and best practices. Consult regularly with Environment Team subject matter experts and your local Environmental Coordinator on routine and non-routine work. The Environment Team and broader organization are here to support you to ensure environmental stewardship and compliance.



MORE INFO:

EN-43, Environmental Protection Manual Series
Environment A-Net Site

If you are aware of a potential environmental risk or you have a concern, contact your supervisor immediately or contact an Environment Department representative. In an environmental emergency, contact OCC.



▼ REGULATORY COMPLIANCE

TAPS is highly regulated. The pipeline system runs through some of the most pristine and environmentally sensitive federal, state, and private lands.

Therefore, the Federal and State Governments established strict, legally binding rules on TAPS operations, referred to as the Federal Grant and State Lease of Right-of-Way. Compliance with applicable laws and regulations, Federal and State Right-of-Way agreements, and other regulatory agency permits and agreements is an absolute job requirement.

- » Be aware of the laws, regulations, and procedures that pertain to your work.
- » Follow applicable processes and procedures.
- » Complete all regulatory training requirements.
- » Ensure all regulatory preventive maintenance tasks are completed and documented.
- » Seek help to clarify requirements and prevent violations.
- » Report suspected compliance violations.
- » Be proactive.



MORE INFO:

ACP-303, Alyeska Compliance and Ethics Program
AMS-002, Regulatory Compliance Process
AMS-012, Management Actions and Commitments (MAC) Process
GL-2, Grant and Lease Compliance Manual

If you believe Alyeska is operating in violation of any law or regulation, immediately notify your supervisor or use any of the methods described in the “How Can I Speak Up” section on page 11.

PERSONAL INTEGRITY ▼

TAPS workers are personally accountable for the proper use of work time, company funds, and other assets. This includes computers, cell phones, keys, vehicles, equipment, badges, tools, network systems, IT resources, passwords, records, and other business information such as emails, drawings, and documents.

Individuals who engage in fraud, embezzlement, damage or destruction of company assets, misappropriation of assets, intentional misrepresentations, or mismanagement of records may be subject to civil or criminal prosecution.

- » Safeguard company assets from damage, theft, misuse, sabotage, or loss. Immediately report lost, stolen, or compromised company assets (including IT resources).
- » Report any suspicious activity that you feel threatens control of Alyeska assets.
- » Do not use company assets for personal benefit.
- » Follow all Alyeska processes and procedures.
- » Understand the agreements we have with vendors and contractors regarding sharing information.
- » Follow all physical and cyber security program requirements.
- » Create and maintain records in accordance with all laws, regulations, and company procedures.
- » Follow approval processes to send information outside of the Alyeska network.
- » Electronic monitoring of TAPS workers, including audio or video recording of work-related conversations, is not permitted unless all participants agree.
- » Gambling while on Alyeska property or while using company assets is prohibited.
- » Keep prohibited items out of Alyeska facilities, parking lots, and vehicles, including leased, rented, and contractor vehicles.

KEY TAKEAWAY



You must immediately report any concerning activities using one of the methods described in the “How Can I Speak Up” section on page 11.

Alyeska has many stakeholders, individuals, and groups who are affected by the operations of TAPS and the actions of its workers. Stakeholders include TAPS Owners, TAPS workers, contractor partners, mariners, North Slope producers and connectors, regulatory agencies, and Alaska communities and residents. Alyeska plays an essential role in Alaska's oil industry, whose reliability and operations remain critical to the Alaska economy and the national energy infrastructure.

KEY TAKEAWAY



Understand the interests of those who depend on us to deliver.

OUR COMMITMENT

We want Alyeska's stakeholders to know they can count on us to:

- » Provide a safe, environmentally responsible, cost-effective, and reliable means to move North Slope crude oil to market.
- » Interact with government personnel and fellow TAPS workers in a professional and respectful manner.
- » Deal honestly and fairly with Alyeska contractors and vendors.
- » Maintain high ethical standards.
- » Respect local cultures.
- » Be good community citizens through philanthropy and volunteer activities.



MORE INFO:

AMS-018, Communication Process

If you have questions about Alyeska stakeholders, contact a Corporate Communications representative or a Regulatory Compliance representative.

INFORMATION SECURITY ▼

The following are examples of types of information that must be protected from unauthorized access, modification, disclosure, transmission, storage, or other misuse.

- » Personally identifiable and protected health information such as social security numbers, driver's license numbers, credit card numbers, dates of birth, and medical information.
- » Business sensitive information such as financial information, risk assessments, oil movement data, contractual terms and conditions, and project packages.
- » Security sensitive information such as contingency plans, maps, and diagrams of critical infrastructure.
- » Proprietary information such as company manuals and procedures, engineering studies and designs, corporate databases, software code, copyrighted material, and Alyeska's logo.
- » Third-party proprietary information such as design drawings or other documents marked by a contractor's notice of intellectual property rights.
- » Privileged information such as communication with Alyeska counsel, internal audit information, patient-doctor information, and information marked attorney-client communication.

KEY TAKEAWAY

Don't share information that would infringe upon the proprietary, privacy, or personal rights of others.



MORE INFO:

AMS-001-01, Publishing Documents in TAPS Document System
AMS-006-01, Business and Security Sensitive Information Procedure
AMS-009, Alyeska Master Drawing Update Process
AMS-010-01, Contracting Guide
AMS-013-05, Purchasing Document Control
HR-2.16, Personnel Files
HR-2.17, HIPAA Compliance
IT-220, Computer Usage Policies and Standards
LEGAL-DPOL-001, Data Classification and Access Policy

If you have questions about the proper access, use, modification, disclosure, transmission or destruction of business information, consult with your supervisor, the Legal Department, Cyber Security, or the Security Department.



▼ POLITICAL ACTIVITIES

As a company, Alyeska does not take a position on individual candidates, political parties, or political causes. As private citizens, you are encouraged to support the political parties and candidates of your choice.

Where appropriate and lawful, Alyeska may take a company position on local or national issues that affect our operations. Alyeska political positions are adopted only with the approval of the TAPS Owners and in compliance with Alaska Public Offices Commission requirements. Participation is always voluntary.

- » Never seek reimbursement for any personal political contribution.
- » Do not use company time or resources to support your personal choice of political activity or candidate.
- » Be respectful to others who have opposing political views.
- » Make it clear that your political views are your own and do not represent the company's position.

ASSESS

I went to a fundraising dinner for a pro-development candidate for the state legislature. May I claim the dinner on my company expense report?



ANALYZE

- » Is it illegal or against company policy?
- » Is it the right thing to do?
- » Will it reflect negatively on Alyeska or on me?
- » How could my decision affect others?

ACT

No. You are free to attend fundraisers as an individual, but you must not use Alyeska funds.



MORE INFO:

If you have questions regarding political activities related to working on TAPS, contact your supervisor or manager, or a representative from Corporate Communications, the Legal Department, or ECP.

SOCIAL MEDIA ▼

Alyeska uses social media platforms such as Facebook, Twitter, and YouTube to engage with stakeholders and reinforce the organization's brand and reputation. Only Corporate Communications staff and designees may use social media to communicate on behalf of Alyeska.

Personal use of social media platforms and blogs, as well as participation on internet forums, is an individual choice. Working on TAPS comes with fascinating experiences and a great deal of #TAPSPride, but TAPS workers must also be aware that careless use of social media or online posting can put Alyeska's confidential information and reputation at risk.

In general, when using your personal social media, remember:

- » You must ensure that it is clear your online activity is not on behalf of Alyeska.
- » Do not post Alyeska's confidential or proprietary information, copyrighted information, company logos, or photos or videos of TAPS facilities/operations without prior approval.
- » Posting comments and content that could be viewed as inappropriate, obscene, racially or ethnically hateful, threatening, derogatory, defamatory, inflammatory, offensive, or illegal may result in disciplinary action, up to and including termination or badge hold.
- » Refer requests for information from the media or the public about TAPS, our workers, and our work to a Corporate Communications representative.



KEY TAKEAWAY



Follow the Code of Conduct when using social media, and do not make statements on Alyeska's behalf.



MORE INFO:

If you have questions or concerns related to social media, contact a representative from Corporate Communications or Human Resources.



Alyeska Pipeline Service Company

@alyeskapipeline · Industrial Company

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Promote



ASSESS

Can I post this cool selfie I took at work?



ANALYZE

- » Were you safe when you took the photo?
- » Were you wearing all the required PPE for the area and situation?
- » Does the photo avoid showing any sensitive or confidential information, or images of facilities or equipment that could be considered a security risk?
- » Is it clear your online posts are personal and not made on behalf of Alyeska?



ACT

- » If "Yes" to all of the questions, then post your #TAPSPride!
- » If "No" to any of the questions, don't post.
- » If you're not sure, ask a Corporate Communications representative.
- » If it is approved and it's amazing, send it to Corporate Communications so they can consider including it on Alyeska's social media or A-Net site.



CONFLICTS OF INTEREST ▼

TAPS workers must engage with suppliers, contractors, and other persons doing or seeking to do business with TAPS in a completely impartial manner. If you are aware of a potential or actual conflict of interest, contact your supervisor, the Employee Concerns Program, or a Legal Department representative. The following are examples of common conflicts of interest scenarios:

Family and personal relationships

- » Doing TAPS business with a company owned or controlled by a TAPS worker or their family member.
- » Approving or administering transactions with a company that employs a member of the employee's family.
- » Having a personal or business relationship with a TAPS worker you supervise.
- » Using your position to influence Alyeska or its contractors to hire a family member.

Outside business interests

- » Acting as a consultant to a TAPS contractor or supplier while employed by Alyeska.
- » Conducting outside business during regular working hours.

Personal interest

- » Owning or having a substantial financial interest in a company that is a supplier or contractor that has or is seeking to have business dealings on TAPS.
- » Serving on a board of directors for a company that supplies goods or services to TAPS.

Using assets for personal gain

- » Using TAPS personnel, facilities, equipment, or supplies to conduct outside business or for other personal gain.
- » Using Alyeska confidential or proprietary information for personal benefit, or releasing such information to others for their personal benefit.

Gifts

- » Accepting gifts, payments, services, or entertainment from a vendor that exceeds the acceptable threshold.

Remember

- » The appearance of impropriety can be just as serious as an improper action. Do not engage in actions that give the appearance of a breach of personal integrity while representing Alyeska.

▼ CONFLICTS OF INTEREST



ASSESS

I have been invited to a fundraiser as a guest of a TAPS contractor. Can I attend?



ANALYZE

- » Is it illegal or against company policy?
- » Will it reflect negatively on Alyeska or on me?
- » Am I letting a personal or business relationship take advantage of my influence?
- » How could my decision affect others?
- » How would it look if this was known by my co-workers or reported by the media?



ACT

Possibly, but you must disclose the relationship to your supervisor and ECP for approval. You must complete a conflict of interest statement.



MORE INFO:

LEGAL-DPOL-002, Conflict of Interest/Gifts and Entertainment Policy

If you are unsure about any potential conflict of interest situation, contact your supervisor, an ECP representative, or the Legal Department.

▼ REMINDERS

Non-compliance with Alyeska's Code of Conduct may constitute violations of the law and may subject the individual offender and Alyeska to civil or criminal liability. Failure to adhere to Alyeska policies, procedures, and behavioral expectations will result in management action, and may result in disciplinary action up to and including termination of employment for Alyeska employees and badge hold for contractors. Retaliation against any TAPS worker is prohibited, including for reporting a suspected violation of federal or state law or regulation.

Inappropriate off-duty conduct may result in disciplinary action, up to and including termination or badge hold, if such conduct has an actual or a potential negative impact on the TAPS work environment. Anyone who directs or approves infractions or has knowledge of them and does not promptly move to correct or report them will also be subject to management action.



QUESTIONS OR COMMENTS

Questions, comments or concerns about information in this booklet may be directed to:

Alyeska Employee Concerns Program
P.O. Box 196660, MS 578
Anchorage, AK 99519-6660
(907) 787-8104

ECP TOLL-FREE HOT LINE

[800] 455-7558

