

TAPS CODE OF CONDUCT

MAY 2024

POL-001





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Employee Concerns Program Toll-Free Hot Line (800) 455-7558

▼ 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 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, and step up to help solve the problems or issues; 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.



John Kurz
Alyeska President



TABLE OF CONTENTS ▼

What We Value:

A Message from the President	1
Vision & Mission	3
Summary of Expectations	4
Alyeska Mindsets	6

Who We Are:

Making Ethical Decisions	7
TAPS Open Work Environment	8
Where Can I Go With Questions?	10
How Can I Speak Up?	11
Diversity and Inclusion	12

How We Work:

Management System	14
TAPS Safety Culture	15
Total Worker Health	18
Environmental Stewardship	19
Compliance	20

How We Work With Others:

Stakeholders	21
Information Security	22
Social Media	23
Conflicts of Interest	25
Political Activities	27

Affirmation	28
--------------------	----

Reminders	29
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VISION

**WE ARE THE
PREMIER
MIDSTREAM
OPERATING
COMPANY,
DELIVERING
TAPS 100.**

MISSION

**MOVE OIL IN A
SAFE, RELIABLE,
AND RESPONSIBLE
MANNER FOR
OUR CUSTOMERS,
EMPLOYEES
AND OTHER
STAKEHOLDERS.**

SUMMARY OF EXPECTATIONS ▼

ALASKA BUSINESS

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

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 with the appropriate authority.

DIVERSITY AND INCLUSION

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

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.

ETHICS AND INTEGRITY

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

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.

▼ SUMMARY OF EXPECTATIONS

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.

MANAGEMENT SYSTEM

- » TAPS workers support the Plan, Do, Check, Act cycle by planning, performing, checking, and improving work in accordance with company requirements.

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.

OPERATIONAL DISCIPLINE

- » TAPS workers demonstrate operational discipline while carrying out the requirements of Alyeska's processes and procedures. The expectation is that every work task is performed adhering to all approved procedures and work practices every time. Operational Discipline assures excellence in work quality and safety.

POLITICAL ACTIVITIES

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

SAFETY

- » Life safety is our highest priority. We conduct business in accordance with the highest transportation and petroleum industry safety standards. Our safety culture protects TAPS assets through their life cycle.

SECURITY

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

ALYESKA MINDSETS ▾

WHAT WE VALUE



BELIEVE IN ZERO



SPEAK UP, STEP UP



BE ACCOUNTABLE



ACT WITH DISCIPLINE



ALYESKA MINDSETS



SPEAK AND WORK
AS A TEAM



SPEND WISELY



GET BETTER EVERY DAY



TAKE ACTION

▼ MAKING ETHICAL DECISIONS

If you suspect or are aware of misconduct, or if you have a question about what to do, speak up. Maintain transparency throughout your decision-making.



ASSESS

- » Have I been asked to do something I think might be wrong?
- » Are there potential compliance issues involved?
- » Am I concerned about an 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 dialogue?
- » Should I seek advice from management, Legal, HR, or the Employee Concerns Program?



ACT

- » Apply Alyeska's mindsets to the decision.
- » Enlist management or other departments if necessary.
- » Communicate decisions and rationale to those affected.
- » Share 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 demonstrate professional and ethical character as well as technical competence. Workers often perform jobs under difficult conditions. We treat everyone with respect, dignity, and professionalism, and celebrate each others' successes.

Behaviors found to be harassing, intimidating, retaliatory, discriminatory, bullying, or creating a chilled or hostile work environment are not tolerated on TAPS.

An Open Work Environment helps make us the exceptional company we are. Your voice matters and is essential for us to be successful, as we win (and lose) together. Play your part by contributing your opportunities, ideas, risks, concerns, and questions.

Our company's promise to you is that you can contribute without fear of HIRD from management or your peers. The workforce can freely report existing or potential violations of law or company policy without fear of reprisal.

TAPS workers' accountabilities include:

- » Create and maintain a positive work environment at all work locations.
- » Respectfully interact with co-workers and approach conflict and differences of opinion in a professional and courteous manner.
- » Treat everyone with respect and dignity.
- » Ask questions when unsure or facing a difficult decision.
- » Cooperate in company investigations.

Managers and supervisors have additional accountabilities to:

- » Serve as role models for safety and Code of Conduct compliance.
- » Exercise emotional intelligence to value and lead all TAPS workers.
- » Actively listen to alternative viewpoints.
- » Create and foster environments where people feel free from emotional and physical danger.
- » Demonstrate and champion diversity, equity, inclusion, and belonging.
- » Address all personnel issues promptly.
- » Support TAPS workers when they raise concerns.

KEY TAKEAWAY

I am committed to professionalism, respect, courtesy, and dignity.



▼ TAPS OPEN WORK ENVIRONMENT

The Business Practices Office supports the Open Work Environment by:

- » Managing the Employee Concerns Program.
- » Providing employee and management consultations.
- » Providing Open Work Environment training and coaching.
- » Conducting work team assessments.
- » Interpreting and discussing the application of the Code of Conduct.
- » Investigating non-compliance with the Code of Conduct.

Speak Up



An Open Work Environment allows and encourages TAPS workers to freely speak up and step up by providing professional and respectful constructive criticism, identifying opportunities, sharing ideas and concerns, and taking actions on solutions by acting with discipline, without fear of harassment, intimidation, retaliation or discrimination.

DEFINITIONS

- » **Harassment:** Unwelcome or offensive verbal or physical conduct toward an individual that adversely and unreasonably affects the employment relationship or working environment.
- » **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.
- » **Discrimination:** Treating a person, or class of persons, differently than similarly situated people based on protected status.

WHERE CAN I GO WITH QUESTIONS? ▾

When the right thing to do is unclear, speak with somebody about the issue. TAPS workers are encouraged to ask questions and are expected to raise concerns. Open communication supports positive relationships that are essential to maintaining safe and efficient operations.

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.

The relationship between TAPS workers and their supervisor is an important point of contact for the candid sharing of ideas, questions, and concerns.

If TAPS workers are unsure where to ask questions or are uncomfortable using their chain of command, they may contact or submit a concern to an Employee Concerns Program representative at (907) 787-8104.

TAPS workers may also reach out through any avenue of their choosing to resolve a question or concern. The goal is that all TAPS workers are comfortable raising questions and concerns using internal reporting methods, and we strive for timely and effective resolution. Government agencies are additional avenues for raising concerns.

Specific Alyeska departments may be reached through Alyeska Directory Assistance by calling (907) 787-8700 or toll-free (877) 257-5778.

MORE INFO:

AMS-034, Employee Issue and Concerns Resolution Process





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 ▾

Every single person working on TAPS is important to our shared success, and no one is more important than anyone else. Alyeska fosters an environment of inclusivity so that all TAPS workers experience a workplace where curiosity, collaboration, and cultural intelligence are reinforced and supported. Alyeska strives to make diversity and inclusion a stronger 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. They feel like part of the team.
- » Belonging occurs when we all recognize our common goals while embracing our differences. We commit to learning about each other. We value our individual differences and experiences. We feel safe sharing our stories and experiences.
- » The leadership roles on TAPS 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.
- » All TAPS workers seek to understand and challenge their unconscious bias.



Alyeska is committed to the terms of the Federal Grant and State Lease of Right-of-Way, and employs 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.

KEY TAKEAWAY



I understand and celebrate diversity. I create a healthy culture of diversity and inclusion where every TAPS worker feels welcome, safe, and respected because every single person on TAPS is important.

LAND ACKNOWLEDGEMENT

It is our privilege and responsibility to operate on land that has been stewarded for centuries by Alaska's Indigenous people. We recognize and honor the Alaska Native nations upon whose traditional lands our pipeline is built and operates. We pay respect to Alaska's Indigenous people, to their past, present, and future, and to their continuing presence and influence throughout Alaska.



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 Grant and State Lease of Right-of-Way. Specifically, through the Alaska Native Utilization Agreement, 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.



MORE INFO:

AK-001, Building Foundations for Excellence Program (BFEP)
HR-1.05, Equal Employment Opportunity (EEO)
REF-00465, Alaska Native Utilization Agreement (ANUA)
RES-00021, Alaska Native Program Implementation Plan

Visit the Alaska Native Program A-Net Site or
contact the Alaska Native Program Director.

MANAGEMENT SYSTEM ▼

AMS-000, Alyeska Management System, allows us to direct and control our operations across the company, and supports managing our risks effectively. It provides a framework for us to meet our goals and objectives using a Plan-Do-Check-Act mindset to strive for continuous improvement.

Every TAPS worker should be familiar with the management system. This means understanding that day-to-day operations are governed by policies, manuals, and procedures designed to help TAPS workers meet management system expectations.

We strive to support continuous improvement of the management system through the use of metrics to identify needed change. Each TAPS worker is responsible for supporting management of change to continually improve the system within their scope-of-work. Alyeska encourages regular conversations to identify both opportunities for improvement and areas of excellence.

For more information, visit the Alyeska Management System A-Net site.



▼ TAPS SAFETY CULTURE

HOW WE WORK

Our “Why” for Safety on TAPS

Self – Loved Ones – Team

- » Nothing is more important than your life, health, and returning safely to your loved ones.
- » We care about every person working on TAPS, and we want everyone to lead their fullest life.
- » We will be injury and accident free.



TAPS SAFETY CULTURE ▼

Alyeska's highest priority is to ensure all operations are safe and secure for TAPS workers, the public, and the environment. We believe we can achieve zero incidents and injuries, and we foster a culture focused on learning and improving. Get better everyday is our mindset. Safety is the way we design, operate, and maintain TAPS. Supervisors lead with safety first. Simply put: safety is how we do things.

As a TAPS worker, I:

- › Work safe with zero incidents and injuries because I have a responsibility to be there for my loved ones.
- › Am a safety leader.
- › Do not compromise safety to achieve any business objective.
- › Am accountable for my own safety and the safety of my co-workers.
- › Am empowered to stop - or to not start - work, if it is unsafe, or if the risk can be practicably reduced, without fear of reprisal.
- › Speak up when I see something unsafe, listen to those who speak up, and take action to address safety concerns.
- › Report loss incidents, near losses, and hazards so everyone can learn and improve.
- › Safeguard company assets from damage, theft, misuse, sabotage, or loss, and report any suspicious activity that may threaten company assets.
- › Embed and contribute to risk-informed decision-making to ensure safety of our personnel, environment, assets, and system.

KEY TAKEAWAY



MY PLEDGE: NOBODY GETS HURT!

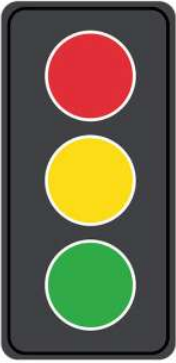
SAFETY IS MY TOP PRIORITY. I SPEAK UP, STEP UP, AND STOP WORK WHEN THINGS ARE UNSAFE OR CAN BE MADE SAFER. I PREVENT INCIDENTS AND INJURIES BY BEING ACCOUNTABLE FOR MYSELF AND MY CO-WORKERS. I DO WHATEVER IT TAKES.
I OWE THIS TO MY LOVED ONES.

▼ TAPS SAFETY CULTURE

SAFE PERFORMANCE SELF ASSESSMENT



HOW WE WORK



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**

Q&A



Q: Should I stop work when I have a concern about safety or see ways to reduce hazard exposure?

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, ultimately leading to an injury and incident free workplace.



MORE INFO:

AMS-000, Alyeska Management System

SA-38, TAPS Safety Manual

LPS-001, Loss Prevention System

TOTAL WORKER HEALTH ▼

HOW WE WORK

WE CARE

Alyeska believes in positively influencing the health and well-being of its workforce by providing TAPS workers with opportunities to maintain work-life balance, and supports individuals making improvements to their health.

FIT-FOR-DUTY

Aligned with TAPS safety expectations, Alyeska has the same expectation that all TAPS workers perform their own personal SPSA for their fitness-for-duty and readiness to work: physically, mentally, and emotionally. This includes:

- » Being accountable for your own health and well-being.
- » Speaking up when you or others have health concerns that may impact your ability to safely work.
- » Understanding and using mindfulness in your daily work.

Report to your supervisor/manager or a medic any injury or illness that will impact job duties, whether or not the injury/illness was incurred at a TAPS facility or outside of work hours.

DRUG AND ALCOHOL POLICY

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

- » Review your medications for side effects and speak up if they could impact your ability to safely work.

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

KEY TAKEAWAY



If I am not fit-for-duty every day, I am not fulfilling my mindset to Believe in Zero.



MORE INFO:

OHU-8.03, Alcohol Misuse

OHU-8.09, Fit For Duty Expectations Policy

RR-320, Rules and Regulations (Alyeska Pipeline Service Company Facilities)

▼ ENVIRONMENTAL STEWARDSHIP

TAPS workers are responsible stewards of our natural resources and preserve and protect Alaska's environment. Alyeska complies with applicable environmental laws, regulations, and Alyeska environmental policies and procedures. TAPS workers live and recreate in Alaska and care about protecting the environment.

As a TAPS worker, I:

- » Stop work and report any conditions that jeopardize environmental stewardship.
- » Prevent adverse environmental impacts of our operations to air, water, habitat, fish, and wildlife, and immediately report all spills.
- » Maintain a state of readiness for effective spill response to minimize environmental damage and potential threats to public safety.
- » Minimize waste generation through source reduction and recycling.
- » Handle and dispose of waste using safe and responsible methods.
- » Monitor our performance and continuously improve.

HOW WE WORK

KEY TAKEAWAY



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

MORE INFO:

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



COMPLIANCE ▼

TAPS workers know that true compliance means much more than adherence to laws and regulations. Compliance is the backbone of TAPS operations, and it provides the standards and structure the company needs to be a prudent operator and ethical organization. Compliance at Alyeska means doing what's right, not just what's required, and the company achieves true compliance when TAPS workers translate operational discipline into everyday behaviors, such as:

- » Properly and wisely using work time, company funds, and assets including computers, cell phones, keys, vehicles, equipment, badges, tools, network systems, IT resources, passwords, records, and other business information.
- » Understanding and adhering to the Federal Grant and State Lease of Right-of-Way.
- » Following all laws, regulations, policies, and procedures, and reporting any known or suspected violations in a timely manner.
- » Planning, implementing, and completing work in accordance with regulatory requirements, industry standards, and permit conditions.
- » Conducting work competently and completing required training.
- » Managing records according to Alyeska's policy and retention schedule, and performing timely scheduled reviews of controlled documents.

KEY TAKEAWAY



I demonstrate my commitment to compliance by completing all regulatory required training, reporting suspected compliance violations, and implementing compliance requirements in my daily work.

MORE INFO:

ACP-303, Alyeska Compliance and Ethics Program
AMS-001, Controlled Documents Process
AMS-002, Regulatory Compliance Process
AMS-016, Records Management Process

▼ STAKEHOLDERS

Alyeska plays an essential role in Alaska's oil industry. Our reliability and operations remain critical to the Alaska economy and the national energy infrastructure. 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, Alaska communities and residents, local, state, and federal leadership, and elected officials.

In maintaining connectivity and trust with stakeholder groups, Alyeska embraces a proven "no surprises" approach to communication to reinforce Alyeska as the first and best source of information about its business.

TAPS workers work closely with Alaska communities, advisory councils, and regulatory authorities to meet the highest safety and environmental standards, and to seek cooperative solutions.

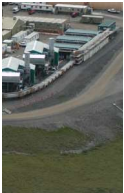
PHILANTHROPY

Through its corporate philanthropy program, Alyeska invests in partnerships and communities where employees live and work. Through company-directed gifts, the annual United Way campaign, and encouraging employee involvement, giving, and volunteerism, Alyeska resources support stakeholder efforts toward underserved populations, youth, diversity, health and social services, and the environment.

KEY TAKEAWAY



I am an ambassador for Alyeska.



MORE INFO:

AMS-018, Communications Process

CC-002, Technical Publication and Presentation Review Procedure

PAP-100, Public Awareness Program

INFORMATION SECURITY ▼

Alyeska data and information must be protected from unauthorized access. This includes modification, disclosure, transmission, storage, or other misuse. Storing Alyeska information outside of the Alyeska infrastructure, sharing passwords, or allowing unauthorized individuals to use or access Alyeska's digital resources is prohibited. Information and data that must be safeguarded includes:

- » Personally identifiable and protected health information.
- » Protected and restricted business information.
- » Security sensitive information.
- » Proprietary information.
- » Third-party proprietary information.

KEY TAKEAWAY



I follow Alyeska's data and information protection policies and procedures and protect the digital infrastructure, computer systems, programs, and data/information.

MORE INFO:

AMS-006-01, Business and Security Sensitive Information Procedure
 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 Corporate Security Department.

Alyeska uses social media to engage with stakeholders and reinforce the organization's brand and reputation. Through these platforms, the company spotlights employees, retirees and pipeline people, supports and reinforces work of industry partners, and celebrates TAPS' legacy and milestones. 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. TAPS workers must also be aware that use of their social media or online posting can put Alyeska's information and reputation at risk.

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



I follow the Code of Conduct when using social media and I do not make statements on Alyeska's behalf. I am an ambassador for Alyeska in my work and personal life.



MORE INFO:

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

SOCIAL MEDIA ▾

HOW WE WORK WITH OTHERS



Alyeska Pipeline Service Company

19K likes • 20K followers

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 exclude 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’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 an impartial manner. Even the appearance of impropriety can be just as serious as an improper action. 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 TAPS worker'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 facilities, equipment, supplies, or personnel to conduct outside business or for other personal gain.
- » Using 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.

KEY TAKEAWAY



I do not engage in actions that give the appearance of a breach of personal integrity while representing TAPS. If there are doubts, I will contact my supervisor and a BPO/ECP representative. I complete the Conflict of Interest statement.

CONFLICTS OF INTEREST ▾

HOW WE WORK WITH OTHERS



ASSESS

I have been invited on a fishing charter 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 an ECP representative for approval. You must complete a Conflict of Interest statement.



MORE INFO:

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

▼ POLITICAL ACTIVITIES

Alyeska does not take a position on individual candidates or political parties. As private citizens, TAPS workers are encouraged to support the political parties and candidates of their choice.

When appropriate, Alyeska may take a position on local or national policy issues that may affect business. Alyeska political positions are adopted only with the approval of the TAPS Owners and in compliance with Alaska Public Offices Commission requirements. Individual participation is voluntary.

- » Never seek reimbursement for any personal political contribution.
- » Do not use company time or resources to support a 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 cannot expense the fundraising dinner on your company expense report. However, you are free to attend the fundraising dinner at your own expense.



MORE INFO:

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

AFFIRMATION ▼

I comply with the Code of Conduct because:

- » It is the right thing to do.
- » I have high integrity.
- » I want to help TAPS and Alyeska be a good corporate citizen.
- » I help TAPS and Alyeska get better every day.
- » It is a representation of who I am and what matters to me.
- » I'm helping us achieve TAPS 100.



CONSEQUENCES FOR DOING THE WRONG THING

Non-compliance with the Code of Conduct may constitute violations of the law and may subject the individual offender and Alyeska to civil or criminal liability.

The following actions by an individual offender will result in management action, may result in disciplinary action up to and including termination of employment for Alyeska employees and badge hold for contractors, and may subject the offender to civil or criminal prosecution:

- » Failure to adhere to Alyeska policies, procedures, and behavioral expectations.
- » Retaliation against any TAPS worker is prohibited, including for reporting a suspected violation of federal or state law or regulation.
- » Anyone who directs or approves infractions or has knowledge of them and does not promptly move to correct or report them.
- » Engaging in fraud, embezzlement, damage or destruction of company assets, misappropriation of assets, intentional misrepresentations, or mismanagement of records.
- » Inappropriate off-duty conduct, if such conduct has an actual or a potential negative impact on the TAPS work environment.





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

