



**CODE OF BUSINESS ETHICS
AND COMPLIANCE**



FOREWORD



Dear Bering Straits Directors, Officers and Employees:

Bering Straits Native Corporation promotes the economic well-being, social well-being and Alaska Native heritage of our more than 7,000 shareholders. Through our businesses and subsidiaries Bering Straits creates and maintains a sustainable future for our shareholders, the people of the Bering Straits Region.

We serve the private and government sectors in business lines including aircraft and airfield services, base operations, commercial equipment sales, communications, construction, IT services, logistics, management and consulting services, mining support services, real estate development and ownership, resource development, specialized training and security services and tourism.

We adhere to the highest business ethical principles and compliance standards. These principles and standards are the foundation for this Code of Business Ethics and Compliance. This Code, our Code, provides a common understanding of these principles and standards to which we hold ourselves accountable.

Understanding and living by this Code are essential for Bering Straits' success. I have personally taken the time to study it. I ask you to do the same.

Compliance with this Code is our commitment to ourselves, our shareholders and our customers. We have earned a stellar reputation, one that allows us to succeed for the benefit of our shareholders. I thank each of you for your continued commitment and service to our Company.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Schubert', written in a cursive style.

Gail R. Schubert, President and CEO
March 1, 2016



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INTRODUCTION: PURPOSE AND SCOPE

WHY A CODE OF BUSINESS ETHICS AND COMPLIANCE?

A Code of Business Ethics and Compliance ensures that Bering Straits' directors, officers, employees and agents understand, follow and promote our commitment to the highest ethical principles and standards.

Compliance with the law is a given and expected of Bering Straits and each of us at all times. And we do more than just comply with the law. We adhere to the higher principles and standards in this Code to maintain and increase our reputation for fair and ethical business conduct in everything Bering Straits does.

WHO IS COVERED?

This Code applies to all Bering Straits directors, officers, employees and agents. These individuals are included in the definition of "Bering Straits" in this Code. All Bering Straits subsidiaries and related entities are also included in the definition of "Bering Straits."

Many of this Code's provisions state that "Bering Straits shall..." to emphasize that this Code applies to the Company and to each of us, and that the actions of each of us represent Bering Straits as a whole.

BERING STRAITS' BUSINESS ETHICS AND COMPLIANCE PROGRAM

This Code is the heart of our Business Ethics and Compliance Program. This Code communicates Bering Straits' commitment to its mission, values, ethical business conduct and strict compliance with the law. We are committed to compliance and emphasize each individual's responsibility to understand and comply with the laws, policies, procedures and practices that govern her or his job activities.

Our compliance program includes this Code, the Bering Straits Employee Handbook, all Bering Straits policies and procedures involving compliance and all other directives of the Bering Straits Board of Directors or management.

HOW DO YOU REQUEST GUIDANCE OR REPORT CONCERNS?

Every Bering Straits employee, officer, director and agent is responsible to report concerns if he or she has witnessed or been the victim of a violation of this Code. This is an obligation and vital to our ability to maintain the integrity of this Code.

If you do not understand a provision of this Code, are confused as to what actions you should take in a given situation or wish to report a violation of the law, this Code or Bering Straits' standards generally, contact your supervisor or any member of Bering Straits management, including executive management. You may also call the Business Ethics and Compliance anonymous "hotline" at

(877) 206-0664

or make an online report at

www.beringstraits.alertline.com





MISSION

Our mission is to improve the quality of life of our people through economic development while protecting our land and preserving our culture and heritage.

VALUES

Our values arise from the culture of our people. We honor our commitments. We empower one another. We respect diversity. We lead with responsibility.

VISION

On the edge of tomorrow, we cast our vision to the future. We strive to empower our people as leaders in the development and protection of the Arctic region.





CULTURE OF COMPLIANCE

We accomplish our Mission and reflect our Vision and Values by creating and maintaining a culture of compliance at Bering Straits. Our culture of compliance includes:

Ethical Conduct | Integrity | Respect & Citizenship



ETHICAL CONDUCT

Bering Straits is ethical in all matters. We recognize actions have consequences and we are guided by a commitment to do what is right so the consequences are right and good for Bering Straits.

ANTI-BRIBERY AND ANTI-KICKBACK

Bering Straits prohibits the payment of bribes or kickbacks to government officials or other businesses whether as an attempt to influence or solicit proprietary or source selection information from a government or other public official or for any other reason.

EQUAL OPPORTUNITY AND ANTI-HARASSMENT

Bering Straits values diversity. Bering Straits provides equal opportunity in all aspects of employment and shall not tolerate unlawful discrimination or harassment. Bering Straits reserves its legal right to give certain employment preferences to our shareholders.

EXPORT CONTROL

Bering Straits complies with laws related to export of defense articles, services and related technical data, including the International Traffic in Arms Regulations (ITAR).

FAIR COMPETITION AND ANTITRUST LAWS

Bering Straits believes in fair competition and complies with all federal and state antitrust laws. Antitrust and competition laws generally prohibit agreements between competitors to fix prices, collusive bids, market or customer allocations or refusal to do business with others.

INSIDER TRADING AND NON-PUBLIC INFORMATION

Bering Straits complies with all laws that prohibit insider trading, including trading in securities, by persons who have material information not generally known or available to the public.

Bering Straits is subject to insider trading laws. Insider trading laws apply to material, non-public information about publicly traded companies with which we conduct business or are considering conducting business. In the course of conducting our business, any of us may hear material, non-public information such as a current or potential business partner's or vendor's plans for expansion, new products or services, management changes, mergers, acquisitions or other business information. When that occurs we cannot trade in stock of any company related to that information or in any way "tip" others (such as friends, co-workers or family members) to trade in the stock of that company.





INTELLECTUAL PROPERTY

Bering Straits protects its intellectual property and the intellectual property rights of others. Bering Straits' logos, work products, patents, trademarks, copyrights and trade secrets are all Bering Straits' intellectual property.

INTERNATIONAL BUSINESS

Bering Straits respects and complies with the laws of foreign countries with which Bering Straits conducts business. This includes understanding and complying with the United States Foreign Corrupt Practices Act and the UK Bribery Act, both of which prohibit payments, either directly, indirectly or through a third party, to foreign government officials, parties or candidates for the purposes of influencing favorable government action or obtaining or retaining business.

Regulatory investigations, inspections, reports and requests for information
Bering Straits promptly and properly responds to all government investigations, inspections and requests for information, including regular reporting in connection with Bering Straits' government contracting activities.

Bering Straits complies with mandatory reporting obligations in connection with government contracting in a timely and accurate manner.

ZERO TOLERANCE FOR RETALIATION

Bering Straits prohibits and has zero tolerance for workplace retaliation against an employee for reporting a potential act of wrongdoing or seeking guidance regarding any situation of concern relating to this Code or any legal or compliance issue. Retaliation includes improper treatment, discipline, demotion or discharge of an individual for such reporting.

INTEGRITY

Integrity is fundamental to everything Bering Straits does. Integrity includes honesty in everything we do and compliance with all laws.

CLASSIFIED INFORMATION

Bering Straits shall not solicit or accept classified government information unless authorized by the government and subject to appropriate clearance. All classified information shall be maintained in compliance with federal government requirements.

CONFIDENTIAL INFORMATION

Bering Straits may have access to confidential information related to Bering Straits' business activities. Such confidential information is critical to Bering Straits' success and must not be disclosed to anyone other than those who have a legal right, a legitimate business need or as Bering Straits' legal advisors deem appropriate.

Bering Straits shall safeguard confidential information to avoid improper disclosure. When a person accepts a position with Bering Straits she or he accepts the legal and ethical obligation to protect this information and must sign a Confidentiality Agreement acknowledging such obligation.

CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Bering Straits deals with conflicts of interest in accordance with company policy. A conflict of interest may arise when a personal interest interferes or competes with a Bering Straits interest. Even the appearance of a conflict of interest can be harmful to Bering Straits. Accordingly, Bering Straits requires every individual at Bering Straits to promptly disclose potential conflicts of interest and to take reasonable steps to either eliminate or mitigate them where possible.

Bering Straits' directors, officers, employees and agents have a duty of undivided loyalty to Bering Straits and shall put the interests of Bering Straits before their personal interests. None of us shall be unduly influenced by external relationships or avail ourselves of a Bering Straits corporate opportunity unless such matter is properly disclosed and authorized in writing by Bering Straits.

FINANCIAL REPORTING

Bering Straits records revenue, costs, labor, material and financial matters truthfully and accurately. Bering Straits prohibits the improper mischarging of work time, charging an unauthorized account or cost objective or approving such mischarging or shifting of costs to improper accounts. Bering Straits maintains its financial integrity and takes all necessary steps to properly account for assets.

FRAUD, WASTE AND ABUSE

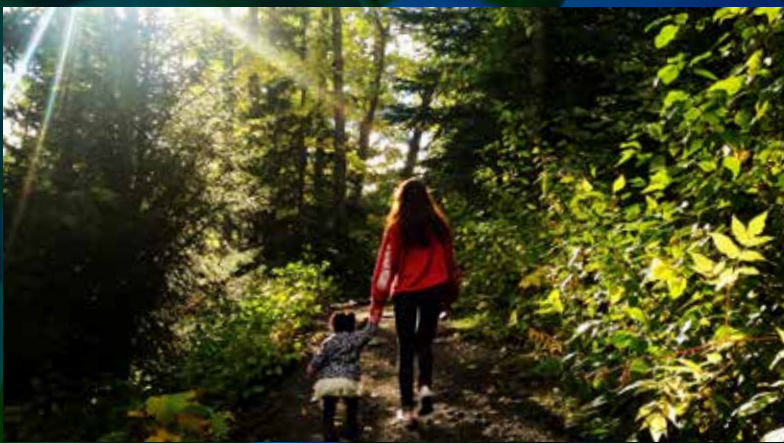
Bering Straits prohibits fraud, waste and abuse with respect to our property and that of others, including the government. Fraud, waste and abuse can include illegal or fraudulent conduct, waste of funds, abuse of property or resources, gross mismanagement or misappropriation of funds. Bering Straits reports evidence of fraud, waste or abuse to the proper authorities in a timely and accurate manner.

GIFTS OR GRATUITIES

Bering Straits acknowledges that giving and receiving gifts or gratuities, such as meals or entertainment in a business setting, are often a part of ordinary business practice and may be used to strengthen business relationships.

Offering gifts or gratuities, defined as "anything of value," to a government employee or official in connection with government procurements is prohibited. Gifts to government officials in other contexts shall be in accordance with the law.

Gifts or gratuities may be given or accepted to non-government individuals when there is no intent to influence, or appear to influence, business decisions. Bering Straits does not impose rigid dollar limitations on gifts. Bering Straits relies on the use of sound judgment and discretion in connection with the giving and accepting of gifts or gratuities as long as such actions are in accordance with Bering Straits policies and procedures.



PROCUREMENT INTEGRITY

Bering Straits complies with all laws related to government procurements, including those related to solicitations and source selection, pricing (e.g. the Truth in Negotiations Act) and performance (e.g. the False Claims Act).

SAFEGUARDING CORPORATE ASSETS

Bering Straits safeguards all corporate assets, including physical property (desks, files, equipment, supplies and facilities), technical resources (computers, telephones, voice and electronic mail, internet and copy and fax machines) and non-physical assets (confidential information, business strategies, intellectual property and technology).

TRAFFICKING IN PERSONS

Bering Straits has a zero tolerance policy prohibiting human trafficking. Bering Straits' policy prohibits trafficking in persons for commercial sex acts or forced labor or for any other reason.

VENDOR SELECTION

Bering Straits selects vendors based on objective criteria including, product and service quality, cost and price, flexibility, technical excellence, safety record and ability to meet schedules and delivery commitments. Purchasing decisions are based on the ability of the vendor to meet Bering Straits' business needs and not on personal relationships or other non-business criteria.

RESPECT AND CITIZENSHIP

Bering Straits respects and honors our Alaska Native culture, our region and our land. We maintain our role as a good corporate citizen and steward of the environment.

CORPORATE CITIZENSHIP AND SOCIAL RESPONSIBILITY

Bering Straits cares for the welfare of our region and the communities around the world in which we do business. Bering Straits behaves in a socially responsible manner and strives to do its part to improve the world.

CORPORATE GIVING

Bering Straits is a leader in Alaska. Bering Straits regards its corporate giving as an investment in the future. Bering Straits supports programs and organizations that provide long-term solutions and make a difference in the lives of our shareholders and descendants.

DIRECTOR, OFFICER AND EMPLOYEE EXCELLENCE

Bering Straits' directors, officers and employees commit to the highest level of legal, ethical and moral standards in the conduct of business based on a fundamental belief in honesty, fair dealing and open competition.

HEALTH AND SAFETY

Bering Straits provides a safe and healthy work environment. Each of us is responsible for compliance with safety laws and policies that apply to our job. Our emphasis on health and safety is our commitment to Bering Straits, each of us and each of our customers.

Work hazards or unsafe work practices should be reported to the Bering Straits Risk and Safety manager.

POLITICAL PARTICIPATION

Bering Straits avoids any impropriety, or the appearance of impropriety, in corporate dealings with political officials and adheres to all local, state and federal laws including laws applicable to corporate and individual contributions to political campaigns, gifts to public officials and lobbying activities.

PRESERVATION OF ALASKA NATIVE CULTURES

Bering Straits respects and preserves our treasured Alaska Native cultural values, traditions and history.

Bering Straits supports organizations and individuals who improve Alaska Native cultural awareness and advance Alaska Native cultural traditions. Bering Straits supports efforts to safeguard cultural resources.

PROTECTING THE ENVIRONMENT

Bering Straits cares for and protects natural resources. Bering Straits conducts business activities in a manner that respects and preserves the quality of the environment. The continuation of our subsistence way of life is central to BSNC's mission and is the most important consideration when management and the Board meet to plan and set goals for the future growth of the Company.

RESPECT FOR SHAREHOLDERS AND DESCENDANTS

Bering Straits is owned by and exists for the benefit of our shareholders and descendants. Bering Straits treats shareholders and descendants with dignity, honesty and respect as a group and as individuals. Respecting our shareholders and descendants means honoring their diversity and understanding their needs.

Bering Straits is proud of its service to shareholders and our commitment to preserving Alaska Native history and traditions and preservation of Alaska Native cultural heritage.



CONTACT INFORMATION

Andrew P Hall, Vice President and General Counsel (907) 334-8369
ahall@beringstraits.com

Gail R. Schubert, President and CEO: (907) 334-8313
gschubert@beringstraits.com

Bering Straits Compliance Hotline: (877) 206-0664
or www.beringstraits.alertline.com

