Code of Ethics and Business Conduct

FNA MISSION

Fairbanks Native Association’s mission is to promote spirituality, cultural identity, self-reliance, physical and mental health, by improving the quality of life of our community through professional quality services.

Policy

It is the policy of FNA to provide our Code of Ethics and Business Conduct, which will serve as a guide to proper business conduct and corporate citizenship for all employees and internal stakeholders. We expect to observe the highest standards of ethics and integrity in their conduct. This means following a basic code of ethical behavior that includes the following.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers, membership and funding sources in order to advocate for the consumers we serve. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct.

When considering any action, it is wise to ask: will this build trust and credibility for FNA? Will it help create a working environment in which FNA can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Building and maintaining trust of our funding sources is essential to the success of FNA. It requires a commitment to faithfully fulfilling all funding requirements, allowing a pathway for employees to promptly notifying their manager of program and compliance concerns, and actively managing compliance to identify and address issues in a proactive manner.
**Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. FNA is committed to creating such an environment to bring out the full potential in each of us, which, in turn, contributes directly to our business success.

FNA is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive, or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her program director or to Human Resources.

**Create a Culture of Open and Honest Communication**

At FNA everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Directors and supervisors have a responsibility to promote FNA's “open-door” policy and create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

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

Employees are encouraged, in the first instance, to address such issues with their supervisor, as most problems can be resolved swiftly at the lowest level possible. If, for any reason, that is not possible, or if an employee is not comfortable raising the issue with their supervisor, employees can raise their concern to any higher level management within the chain of command, up to and including the Human Resources or Executive Director. Employees may also raise concerns to the Corporate Compliance Officer for compliance-related issues.

**Set Tone at the Top**

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

To make our Code work, directors must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Directors should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At FNA, we want the ethics dialogue to become a natural part of daily work.
Uphold the Law

FNA’s commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or FNA policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here.

Fraud, Waste & Abuse

Definitions of FWA are below:

**Fraud** – An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or other person.

**Waste** – The extravagant, careless, or needless expenditure of funds resulting from deficient practices, systems, controls, or decisions.

**Abuse** – Practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards of care. It includes enrollee practices that result in unnecessary cost.

Common methods of FWA include:

- Fabrication/falsification of claims;
- Unbundling;
- Duplicate claim submissions; and
- Fictitious providers/members.

Do not be concerned about whether it is fraud, waste, or abuse. Just report any concerns to our compliance officer or our Human Resources department. Our compliance officer will investigate and make the proper determination.

Deficit Reduction Act

This act requires any organization that receives $5 million or more in Federal Medicaid funds annually to adopt a compliance program in accordance with Federal law and to inform its employees and any contractor or agent of the terms of the False Claims Act.
False Claims Act

Prohibits:

- Presenting a false claim for payment or approval;
- Making or using a false record or statement in support of a false claim;
- Conspiring to violate the False Claims Act;
- Falsely certifying the type/amount of property to be used;
- Certifying receipt of property without knowing if it’s true;
- Buying property from an unauthorized officer; and
- Knowingly concealing or knowingly and improperly avoiding or decreasing an obligation to pay.

Whistleblower Protections

The False Claims Act allows everyday people to bring suits against organizations or individuals who are defrauding the government. If the government moves forward with a case, the individual who brings the suit is generally entitled to receive a percentage of any recovered funds once a decision has been made. Federal statutes and related State and Federal laws shield employees from retaliation for reporting illegal acts of employers. An employer cannot retaliate in any way, such as discharging, demoting, suspending or harassing the whistleblower.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of another organization’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

Employees will not at any time or in any manner, either directly or indirectly, use for their personal benefit, or divulge, disclose, or communicate in any manner any information that is learned through their employment with FNA or is proprietary to FNA. Employees will protect such information and treat it as strictly confidential. Employees' obligation not to disclose confidential information shall continue for the period of employment with FNA and for two years after termination with FNA. Prior to, or at the latest within 24 hours after, termination of your employment with FNA you agree to return all FNA records, notes, documentation or other items or records that you obtained by or through your employment with FNA.

Competition

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

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals, or otherwise) any material nonpublic information with respect to FNA,
its securities, business operations, plans, financial condition, results of operations, or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

**Medical Record Information**

As a behavioral health provider, FNA must fully comply with the Health Insurance Portability and Accountability Act (HIPAA) requirements at all times. FNA will not release any medical information to individuals or organizations that would violate HIPAA. FNA employees and management personnel will adhere to all regulations, to prevent improper disclosure of consumer medical record information. Additionally, FNA is covered under 42 CFR Part 2 where all records relating to the identity, diagnosis, prognosis, or treatment of any patient in a substance abuse program that is conducted, regulated, or directly or indirectly assisted by any department or agency of the United States has to be maintained in confidence.

**Health and Safety**

FNA is dedicated to maintaining a healthy environment. A health and safety manual has been designed to educate you on safety in the workplace. A copy of this manual is available with your program director, is available on the FNA website under Employee Resources, or you can review the copy located with HR.

**Avoid Conflicts of Interest**

**Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of FNA may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for FNA. We owe a duty to FNA to advance its legitimate interests when the opportunity to do so arises. We must never use FNA property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with FNA.

All employees are expected to be loyal to FNA. While FNA is dedicated to support employees’ other interests, FNA has always been concerned with outside business interests of its employees that might possibly conflict with the interests of FNA. An adequate definition of what constitutes a conflict of interest is difficult. However, there are certain situations that FNA will always consider to be conflicts of interest. These occur if the employee or any other person having a close personal relationship with the employee:
obtains a significant financial or other beneficial interest in one of FNA's suppliers, customers or competitors without first notifying FNA and obtaining written approval from the Executive Director,

engages in a significant personal business transaction involving FNA for profit or gain unless such transaction has first been approved by the Executive Director,

accepts money, gifts of other than nominal value, excessive hospitality, loans, or other special treatment from any supplier, customer or competitor of FNA (loans from lending institutions at prevailing interest rates are excluded),

participates in any sale, loan, or gift of FNA property without obtaining proper approval,

learns of a business opportunity through association with FNA and discloses it to a third party or invests in the opportunity without first offering it to FNA,

improperly uses their position to obtain preferential treatment for self and/or family members,

accesses a family member’s medical records after discovering the records are on file.

"Persons having a close personal relationship with the employee" refers to the employee's spouse, parents (including stepparents), children, siblings, parents-in-law, sons-in-law, daughters-in-law, brothers-in-law, sisters-in-law, any person living in the same home with the employee, or any business associate of the employee.

We understand there is a potential conflict of interest that exists for Board of Directors and all employees when they or family members request FNA services. While we are committed to unrestricted access to FNA services for Board of Directors, employees, and family members, it is imperative that they understand that they may not use their position to receive or seek preferential treatment, or to obtain confidential information regarding services provided to them or their family members.

When employees have access to confidential information, or they are in a chain of command with authority over services, they must promptly notify their supervisor when such a conflict of interest occurs; steps must be taken to restrict information access and decision-making authority.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, employees must seek review from their program director or the HR department.

**Social Media**

We exist within our community as FNA employees, but we are also individuals with our own thoughts, opinions and interests. What we write in emails, blogs, posts or tweets reaches our community in seconds. What we say and do affects our reputation and we recognize the growing importance of social media as a great vehicle for communicating our passion and knowledge to our coworkers, consumers, and community. Outside of work, many of us blog,
post on social networks and contribute to wikis. Even in these personal pursuits, we all have a responsibility not to disclose company confidential and proprietary information without authorization.

We should engage with social media responsibly, in accordance with the following rules:

- Adhere to the Social Media Policy in all authorized business communications.
- Distinguish clearly between authorized business communications and personal communications.
- When endorsing our company and its products, we identify ourselves as an FNA employee.
- Ensure that our time and effort spent with social media do not interfere with our work commitments.
- Never disclose confidential, proprietary or privileged information.
- Do not make maliciously false statements or statements that violate the law, the community terms of use for the social media application or company policy.
- Realize that FNA may see the social media posts of its current and potential employees.

Use your best judgment and exercise personal responsibility. Your actions can result in unintended consequences, which can result in disciplinary action, up to and including termination.

**Service Delivery**

**Gifts, Gratuities, and Business Courtesies**

FNA is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by FNA was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment, or other benefits from persons or companies with whom FNA does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation, or polices of FNA or customers, or would cause embarrassment or reflect negatively on FNA’s reputation.

**Accepting Business Courtesies**

Most business courtesies offered to us in the course of our employment are offered because of our positions at FNA. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at FNA to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that FNA maintains or may establish a business relationship with.
Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business, or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company’s reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when FNA is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain FNA business.

**Meals, Refreshments and Entertainment**

Unless specifically outlined within grant resources which may prohibit acceptance of some items, we may accept occasional meals, refreshments, entertainment, and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her supervisor or co-worker, or having the courtesies known by the public.

**Gifts**

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

- Flowers, fruit baskets, and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising or promotional items).

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

Employees with questions about accepting business courtesies should talk to their program director or the HR department.
**Offering Business Courtesies**

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

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

- The practice does not violate any law or regulation or the standards of conduct of the recipient’s organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of FNA.

**Personal Fundraising**

Individuals and organizations may not solicit or distribute literature or sell goods and services in the workplace, unless it is in the best interest of FNA, and has prior approval from the Executive Director, or designee.

**Personal Property**

FNA will not be liable for any personal possessions lost, stolen, or damaged. A personal possession is defined as anything used in job-related activities that is not FNA property. Employees should refrain from using personal property in the workplace. Items necessary for work completion will be provided to employees through approval of Program Director. All personnel shall respect and safeguard the personal property of clients, visitors, and other personnel as well as the property of FNA. Employees will not use or allow the use of FNA property or equipment for other than activities approved by program management. Theft and destruction of property may be addressed through treatment planning (clients), disciplinary action (personnel), and/or by contacting law enforcement, as appropriate. FNA is not responsible for personal property that is not safeguarded or is left unattended.

**Professional Boundaries**

Any fraternization (non-professional, non-work-related interaction between any employee and any consumer) is prohibited and will be investigated. Fraternization is prohibited during employment and for two (2) years following employment at FNA.

If a violation is established, the employee will be terminated, and a report will be filed with the appropriate authorities if a vulnerable client is involved.
Notary and Witnessing of Legal Documents

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for clients, personnel, and other stakeholders in accordance with applicable state laws. The person who witnesses a document should be neutral and have no financial or other interest involved.

Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc. as directly related to their job duties.

Corporate Records and Reporting

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely, and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

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

Internal Accounting Controls and Financial Management

FNA shall maintain a system of internal accounting controls that will ensure reliability and adequacy of its books and records, and proper recording of all transactions, including dispositions of its assets. FNA will take necessary steps to identify and remedy any deficiency in internal accounting controls, procedures, and records to ensure continuing compliance.

Corporate Recordkeeping

We create, retain, and dispose of our company records as part of our normal course of business in compliance with all FNA policies and guidelines, as well as all regulatory and legal requirements.

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

We must not improperly influence, manipulate, or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of FNA books, records, processes, or internal controls.
Employees who sign official documents on behalf of FNA must be authorized by FNA management. Employees who are requested to witness documents not related to official FNA business must avoid any appearance that they represent FNA.

**Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department. We take seriously the standards set forth in the Code, and violations are cause for disciplinary action, up to and including, termination of employment.

No Employee shall delegate substantial discretionary authority to any individual who such Employee knows, or through the exercise of due diligence should know, has a propensity to engage in illegal or unethical activities. For this purpose, persons with "substantial discretionary authority" include (i) Management, (ii) individuals who exercise substantial supervisory authority, and (iii) any other individuals who, although not a part of Management, nevertheless exercise substantial discretion when acting within the scope of their authority (for example, an individual with authority to negotiate or set price levels or an individual authorized to negotiate or approve significant contracts).

Integral to FNA’s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses, or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

**Use of Company Resources**

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Employees and those who represent FNA are trusted to behave responsibly and use good judgment to conserve company resources. Program directors are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity. Individuals and organizations may not solicit or distribute literature or sell goods and services in the workplace, unless it is in the best interest of FNA, and has prior approval from the Executive Director, or designee. We will not solicit contributions nor distribute non-work related materials during work hours.
In order to protect the interests of the FNA network and our fellow employees, FNA reserves the right to monitor or review all data and information contained on an employee’s company-issued computer or electronic device, the use of the Internet or FNA’s intranet. We will not tolerate the use of company resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your program director, and you can refer to the Human Resources Manual for additional information on the topic.

**Outside Contracts**

FNA will fairly and accurately bid and negotiate outside contracts at fair market value. To assure that contract services and scope of work requirements are met, FNA will conduct reviews of all contracts. The reviews will be conducted annually, or more frequently as appropriate. The purpose of the reviews is to (1) assess performance of FNA contracts, (2) ensure each contractor follows all applicable FNA policies and procedures, and (3) if applicable, ensure that contract services conform to CARF standards as applicable to the services the contractor provides. The assigned FNA contract manager will use the approved FNA Contract Performance Review Form in conducting the review, filling in all required information.

**Bribes, Kickbacks, or similar Payoffs and Benefits**

FNA prohibits bribes, kickbacks or similar payoffs and benefits paid to suppliers, clients, members, or others. FNA also prohibits employees from receiving, directly or indirectly, anything of a significant value (other than salary, wages or other ordinary compensation) in connection with a transaction entered into by FNA. Bribery of suppliers, clients, members or others includes any payment for the benefit of any representative of the supplier, client, member or others.

**Fundraising Policy**

FNA adheres to the Association of Fundraising Professionals (AFP) Code of Ethics in addition to the guidelines below. FNA abides by the Generally Accepted Accounting Principles (GAAP) when accounting for all funds including those obtained through philanthropic means.

Any individual requesting funds on behalf of FNA will do so in a respectful manner that does not impose any pressure or discomfort on the person or entity being solicited. If the request is made in writing the individual must gain approval from the Executive Director to confirm that the message and means are an appropriate method of soliciting that individual or group. If the solicitor chooses to communicate via phone or in person that meeting and the content of the conversation to be had should be approved by the individual’s supervisor.

If the individual being asked declines the opportunity to give, the solicitor should respect the decision while also thanking them for their support and continued interest in FNA’s mission.
Any gift received by FNA will be accounted for in the Unrestricted Revenue Fund unless otherwise stated by the donor in writing. In the case that a donor chooses to place restrictions on their contribution or given to a specific program, those designations will be honored and the finance department will be notified. If FNA is unable to accommodate the donor’s request a representative will contact the donor to discuss alternative designations for the contribution.

FNA will make every effort to maintain the wishes of any donor indicating that they chose to give their gift anonymously. As a 501 (c)(3) all donations to FNA are tax deductible to the donor in the fullest extent of the law. Written tax receipts shall be issued for all donations in a timely fashion. However, donors are encouraged to review their donations and deductions with a tax consultant or financial advisor.

**Donor Confidentiality Policy**

In recognition of its obligation to respect and protect the privacy of its donors, FNA pledges to handle information about donations with respect and confidentiality. Donors will be informed of FNA’s mission and the way we intend to use contributed resources. Contributions to FNA will be used for the purposes for which they are given.

**Acknowledging Donations**

We strive to acknowledge every contribution with a letter signed by the Executive Director within 48 hours of receipt. Individuals donating $100-$249 will receive an electronic acknowledgement from the intended Program Director. Paper copies of the acknowledgment letters for gifts over $250 will be stored for up to seven (7) years and an electronic version of all other gifts will be kept on network storage for up to seven years as well.

**Compliance**

Compliance with these principles is an essential element in our business success. Day-to-day responsibility is delegated to all management members who are responsible for implementing these principles, if necessary through more detailed guidance. Assurance of compliance is monitored and reported each year. Compliance with the code is subject to review by the board and subject to audit review. Employees are expected to bring to managements’ attention, any breach or suspected breach of these principles. Provision has been made for employees to be able to report in confidence.

From time to time, employees will likely have questions as to how this Code of Ethics and Business Conduct applies in particular situations. We expect all employees with such questions to discuss the exact circumstances with our Human Resources Director, or the Corporate Compliance Officer.
Corporate Compliance Plan

FNA MISSION

*Fairbanks Native Association's mission is to promote spirituality, cultural identity, self-reliance, physical and mental health, by improving the quality of life of our community through professional quality services.*

Purpose

The purpose of this Corporate Compliance Program is to assist and ensure that all employees understand and adhere to the Code of Ethics and Business Conduct (referred to as Code). The Program is designed to educate employees, ensure compliance with the Code, foster an ethical corporate environment, establish a mechanism to detect and identify violations of the Code or other unethical behavior, establish an audit process that ensures grant funding requirements are in full compliance, and audit the Company's and employees' compliance adherence to the Code.

II. Corporate Structure

The Executive Director reports directly to the Board of Directors and is responsible for overall management of FNA in full compliance with the Code. The Executive Director will ensure that all employees are informed and are held accountable for compliance by their supervisors and managers, and that appropriate corrective action is taken to address compliance deficiencies.

III. Corporate Compliance Officer

The position of Corporate Compliance Officer is established to ensure that all employees are aware of and understand the Code and to administer the Corporate Compliance Program. The Corporate Compliance Officer reports to the Executive and, from time to time, to the Board of Directors.
Specifically, the Corporate Compliance Officer has the following responsibilities:

- To develop a schedule and scope of audits of grant programs for funding compliance for review/approval of the Executive Director
- To ensure that all employees receive and acknowledge in writing that they have received, reviewed, and understand the Code and will comply with its requirements;
- To develop and facilitate suitable regular and periodic training programs designed to understand the Code
- To investigate reports of suspected Code violations and make independent determinations as to whether a violation occurred;
- To recommend to the Executive Director, or to the President of the Board, corrective action for Code violations;
- To ensure that all reports of suspected violations and investigations remain confidential;
- To establish and maintain appropriate systems and internal controls to implement the Code and the Program;
- To conduct both periodical and regular of FNA operations to ensure compliance with regulatory and funding requirements
- To recommend hiring such consultants, auditors, or other persons as may be necessary to ensure that each employee receives adequate training and to conduct audits and investigations; and
- To make recommendations to the Executive Director and Board of Directors of changes that may better facilitate compliance with the Code.

IV. Reports

The Corporate Compliance Officer will report bi-annually to the Executive Director concerning all activities regarding the Code of Ethics and Business Conduct and Corporate Compliance Program. The Corporate Compliance Officer will report annually to the Board of Directors all activities regarding the Code of Ethics and Business Conduct.

V. Investigations

Most allegations of violations of Codes of Ethics and Business Conduct should be investigated by the FNA management team at the direction of the Executive Director. When an internal investigation by FNA management team may be inappropriate because of potential conflicts of interest, the Corporate Compliance Officer shall conduct an independent investigation. All investigation reports shall be documented, reviewed and evaluated in accordance and procedure as stated in the HR Policy and Procedures Grievance Policy and the Compliance Officer shall safeguard the confidentiality of all reports and investigations. The Compliance Officer shall also recommend policies to prohibit any form of retaliation against any person who makes a report. The Compliance Officer may recommend that the Company retain such
consultants or auditors as may be necessary to conduct a proper investigation and consult with any outside counsel as may be retained for such purpose.

The Corporate Compliance Officer will promptly notify the Executive Director or President of the Board within five (5) business days following an allegation, and prior to initiating a formal investigation. The Corporate Compliance Officer will provide weekly updates on the investigation status until the investigation is concluded. In conducting an investigation, the Compliance Officer shall have access to all corporate documents, including e-mail, and authority to interview any employee. After concluding an investigation, the Compliance Officer shall make a report and submit it to the Executive Director or President of the Board with recommendations for appropriate corrective actions.

VI. Audits

The Corporate Compliance Officer shall regularly audit the Company’s compliance with the Code and compliance with non-financial grant requirements. The Chief Financial Officer shall audit the effectiveness of, and compliance with, the Company’s financial controls and procedures. In conducting such audits, the Corporate Compliance Officer may recommend that the Company retain such consultants or auditors as may be necessary. After completing an audit, the Corporate Compliance Officer shall submit a report to the Executive Director and make appropriate recommendations for improvement.

VII. Training

The Corporate Compliance Officer shall provide, or arrange to have provided, regular training on the Code of Business Conduct and Ethics. Such training must be provided to all employees, including the Executive Director and the Board of Directors. For new employees, this training shall be provided as part of new hire orientation. At the conclusion of each training session, HR shall obtain a written acknowledgement from every employee that they have received, reviewed, and understand the Code and will comply with its requirements. HR shall maintain a file of all training sessions, attendance at such training sessions, and acknowledgement forms.

VIII. Cooperation & Responsibility

All employees are required to fully cooperate with the Corporate Compliance Officer in administering the Corporate Compliance Program. All supervisory employees are responsible for ensuring that their subordinates cooperate, are aware of and understand the Code, and comply with the Code and the Program.
The Code of Ethics and Business Conduct & Corporate Compliance Plan (referred to as the “Code”) are intended to give an employee an overview of our corporate compliance expectations and procedural information.

**Statement:**

I understand that it is my responsibility to read and comply with the Code.

I acknowledge that I have been provided a copy of the Code and that it is also available on the Fairbanks Native Association (FNA) website, www.fairbanksnative.org (under the Employment drop down menu, click Employee Resources; it is located on the right-hand side).

I understand that FNA reserves the right to unilaterally modify, amend, or eliminate content within the Code at any time, with or without notice to me.

By signing this statement, I acknowledge that I have been informed about how to access a copy of the Code and have a responsibility to read, although I may not necessarily agree with, all statements contained in the document and this acknowledgement statement.

________________________________________
Employee Name (Please Print)

_____________________________  ________________________________
Employee Signature (Date)

Note: This statement is to be signed and placed in the employee’s personnel file.