

Port of Adak Pier Five Improvements
Project Narrative

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Introductory Information

Field Name	Guidance
Name of applicant	The Aleut Corporation
Is the applicant applying as a lead applicant with any private entity partners or joint applicants?	No
What is the project name?	Port of Adak Pier Five Improvements
Project description	The proposed small project at the small Port of Adak, in the remote Aleutian Islands of Alaska, will address much needed repairs and updates to Pier Five, specifically fixing and modernizing the fender and piling system to current industry and safety standards, and upgrading the pier utilities and lighting. These improvements will enable goods to once again be safely and efficiently loaded and unloaded, as well as allow for the safe embarking/disembarking of the vessels' crews. This will significantly support the local economy of the island and more broadly the regional fishing and seafood industry.
Is this a planning project?	No
Is this a project at a coastal, Great Lakes, or inland river port?	Coastal
GIS Coordinates (in Latitude and Longitude format)	latitude 51°51'44" N, at longitude 176°38'11" W
Is this project in an urban or rural area?	Rural
Project Zip Code	99546
Is the project located in a Historically Disadvantaged Community or a Community Development Zone?	Yes, the project is located on tribal land and therefore according to the Justice40 Initiative guidance and the PIDP NOFO definition is in a Historically Disadvantaged Community. The Port of Adak, located in the West Aleutian Islands of Alaska is also a Qualified Opportunity Zone, Low-Income Community (02016000100)
Has the same project been previously submitted for PIDP funding?	No
Is the applicant applying for other discretionary grant programs in 2022 for the same work or related scopes of work?	No
Has the applicant previously received TIGER, BUILD, RAISE, FASTLANE, INFRA or PIDP funding?	No

Field Name	Guidance
PIDP Grant Amount Requested	\$10,161,900
Total Future Eligible Project costs	\$11,291,000
Total Project Cost	\$11,291,000
Total Federal Funding	\$10,161,900
Total Non-Federal Funding	\$1,129,100
Will RRIF or TIFIA funds be used as part of the project financing?	No

Section I: Project Description

The Port of Adak is located on Adak Island, one of the Aleutian Islands, in Alaska. The Port is owned by The Aleut Corporation (TAC), one of the 13 regional Alaska Native corporations created by the Alaska Native Claims Settlement Act of 1971, and managed and operated by its wholly owned subsidiary Aleut Enterprise, LLC (AE). U.S. forces built the Port and other facilities on Adak Island during World War II to support efforts to retake the far western Aleutian Islands of Attu and Kiska after they were invaded and occupied by the Japanese in 1942, and to guard against a possible counter-offensive. With the surrender of Japan in 1945, the military rapidly began to stand down its forces in Alaska and the Aleutians, and while Adak continued to operate, the level of staffing and resources provided declined. By the early 1950s, Adak was the only major base in the Aleutian Islands and was the major Naval base in the northern Pacific Ocean. It became strategically important during the Cold War as the location of fleet communication antennas, listening posts, and a support base for anti-submarine patrol aircraft. The Naval Air Facility in Adak operationally closed in 1997, and in 2002 the U.S. Department of the Navy and U.S. Department of Interior entered into a land exchange agreement with TAC that resulted in conveyance of 47,150 acres of the former Adak Naval Complex property to TAC, including the Port of Adak.

Currently, Adak has a year-round population of 80 residents and meets the definition of rural based on the 2010 Census-designated data. The Port of Adak is a small coastal seaport within Sweeper Cove with an average annual tonnage of cargo for the past three calendar years of less than 8 million short tons. Since the U.S. Army Corps of Engineers (USACE) does not keep records or have data on the Port's annual tonnage of cargo, and there is no harbormaster at the Port and therefore no records of annual tonnage, TAC has deduced that it meets the PIDP's definition as a small port based on records provided by their most recent tenant at the Port adjacent seafood processing plant, which has been unoccupied since 2020. Ninety-five percent of the cargo coming into the Port is fish and other seafood and there was no fish/seafood coming into the Port in 2021, but the total tonnage of fish/seafood landed and shipped out over Pier Five in 2020 was 10,350 short tons, and in 2019 was 18,181 short tons. The Port of Adak has three piers: Pier Three, an older wooden structure that is amenable to foot traffic and temporary moorage; a concrete decked Fuel Pier, used exclusively for fueling of commercial fishing, military, and private vessels calling on the Port; and Pier Five, the primary working dock for the loading and unloading of goods and the focus of the proposed project.

Pier Five was constructed in 1980 by the U.S. Navy as the primary supply pier to support military operations on Adak and more broadly the Aleutian Islands. At the time Pier Five was constructed, an estimated 6,000 military personnel and family members resided on Adak. Pier Five is a 730-foot-long concrete decked pier with precast concrete panels and concrete topping/wear surface, has a 40-foot-wide trestle for the initial 165 feet from shore, and is 90-feet-wide over the remaining 565 feet, the main body of the pier. The superstructure of the pier is constructed of concrete rated at 1,000 pounds per square foot working capacity and third-party engineers have evaluated Pier Five and determined it to be in good condition with significant remaining life, except for the existing fender and piling systems that are in poor condition. The deck is supported by a system of 38 concrete pile bents consisting of 20-inch octagonal prestressed precast concrete piles. The structure is protected by an aging timber pile fender

system consisting of groupings of three creosote treated fender piles with the groupings spaced approximately 10 feet on center. Each timber pile (14-inch butt diameter) is driven tip-down to an elevation of 50-feet below Mean Lower Low Water to achieve a minimum embedment of 10-feet below the seafloor. The topside piling ends are attached to a substantial timber wale system at the perimeter concrete bullrail. Small, trapezoidal rubber fenders are located between the wale and the bullrail spaced approximately 10 feet on center. Clusters of timber fender piles protect the outboard corners of the pier. A concrete topped steel ramp is located on the west side of the pier adjacent to the trestle, and this loading/unloading ramp has two associated breasting dolphins.

Since the closure of the Naval Air Facility in Adak, the primary economic engine on the island has been the commercial fishing industry supported by a seafood processing plant, which when fully operational had 500 employees. The seafood processing plant, housed in a 145,000 square foot warehouse, handles Federal Pacific Cod, State Pacific Cod, Halibut, Golden King Crab, and Black Cod/Sablefish, among other species of fish and shellfish. The seafood processing plant is located directly adjacent to the trestle approach of Pier Five. When the plant was last operational in 2020, it landed 6,900 short tons of fish, shipped out 3,450 short tons, for a total of 10,350 short tons over Pier Five. In 2019, it landed 12,121 short tons of fish, shipped out 6,060 short tons, for a total of 18,181 short tons; and in 2018 it landed 13,281 short tons of fish, shipped out 6,640 short tons, for a total of 19,921 short tons.

Since the most recent fish processing company, Golden Harvest Alaska Seafoods, departed Adak in October 2020, the seafood processing plant has been shuttered, and the Port of Adak and Pier Five have largely gone unused. Pier Five was built to accommodate large commercial vessels and barges, and therefore, smaller regional barges and landing craft vessels are prevented from calling on Adak because they cannot mate up to the deck of the pier or the barge ramp. The City of Adak owns and operates a small boat harbor that is also located within Sweeper Cove, but this facility has a challenging approach for smaller barges and landing craft due to underwater obstructions. As a result, barge arrivals at Adak are intermittent and occur no more than twice annually. When the seafood processing plant was occupied and operational, the most common commercial fishing vessels delivering seafood were the Alaska-specific 58-foot catcher vessels, known as the Super-8 fleet, and the working deck of these vessels only typically extends about half the height of Pier Five's deck surface which resulted in significant inefficiencies related to handling lines to moor the vessels to the dock as well as created issues for the crew of these vessels to safely embark/disembark the vessel while moored.

Some repairs and updates have been made over the years, but many of the details are not available. When the Navy left Adak, the existing fender was identified as in poor condition and in need of modernization. When PND Engineers, Inc., a consulting engineering firm founded in 1979 in Anchorage, Alaska with expertise in the remote and Arctic regions of Alaska, first inspected Pier Five in November 2005 it reported that the fender system was in poor condition and recommended replacement, and when PND inspected the Pier again in May 2014 it noted that the fender system was in very poor condition, especially on the east side, and again replacement was recommended (*See attached PND Engineers 2005 and 2014 Inspection Reports*). Due to a lack of resources, no significant repairs have been made to the fender system

following these inspections and it has continued to deteriorate from use and exposure to the harsh Artic elements.

The current fender and piling system is failing with several portions having parted from the concrete deck. On the east side of the Pier, 12 of 56 fender pile assemblies have parted from the dock, and on the west side 8 of the 56 assemblies have parted (See *Figures 1-3 and attached Pier Five Fender Images*). The entire timber waler system of the fenders is severely dilapidated and almost all of the timbers in the waler system are decayed or broken, especially on the east side of the pier.



FIGURE 1 PIER FIVE FENDER ASSEMBLIES 1-3



FIGURE 2 SAMPLE OF PILING DETERIORATION AT WATERLINE



FIGURE 3 PIER FIVE PILINGS MISSING AND FLOATING

Additionally, in 2011 and in 2018 the fenders were further damaged when stuck by barges coming to dock at Pier Five. During the December 2011 barge allision incident at the southwest corner of the pier, two concrete support piles and numerous timber piles of the corner dolphin fender were damaged (See *Figure 4*).



FIGURE 4 SOUTHWEST CORNER OF PIER FIVE

PND inspected the damage in June 2012 and recommended replacement of the damaged concrete support piles and corner dolphin timber fender piles. PND prepared plans, specifications, and bidding/contract documents for the repair/replacement project, but the project was not constructed, again due to lack of resources. During the March 2018 barge allision incident on the west side of the pier, including near the

previously damage southwest corner, numerous timber fender system components/piles were damaged (See Figures 5 and 6 and attached Pier Five Fender Images). The damage was inspected by Delphi Maritime, LLC, and they recommended repair/replacement of the timber fender system components/piles damaged by the barge. PND used the Delphi Maritime report to prepare a rough order of magnitude (ROM) project cost estimate for repairs, but again no repairs to the fender system damaged during this incident have been made to date (responsibility for repairing the damage was the subject of the recently settled litigation with Dunlap Towing).



FIGURE 5 BARGE BOW DAMAGED FENDER PILE ASSEMBLY 1



FIGURE 6 BARGE STERN DAMAGED CAP RAIL 4

The wooden fender system is essential for vessels to moor at Pier Five and without it the deck and the vessels tying up to the pier would be significantly damaged. The proposed project will replace the damaged concrete support piles and replace the entire timber fender system with a heavy-duty steel pin pile and fender sleeve assembly with much more capacity for absorbing energy from berthing vessels.

Additionally, a series of regularly spaced steel egress ladders have been damaged and are in poor condition. Due to the condition of the current fender and piling system, both large and small, commercial and military vessels that have called or been interested in calling on the Port of Adak have been unable to or had issues when mooring.

Additionally, since the Navy and Golden Harvest Alaska Seafoods left, the electrical, firewater, potable water, and wastewater systems on Pier Five have been abandoned in place and not upgraded or repaired. Also only limited electrical service is provided to a National Oceanic and Atmospheric Administration (NOAA) data collection structure. These systems are accessed by galvanized steel stairs that lead down both sides of the pier on the inboard end to a network of open grating (catwalks) that extend under the full length of the pier.

The proposed small project at the small Port of Adak will address much needed repairs and updates to Pier Five, specifically fixing and modernizing the fender and piling system to current industry and safety standards, and upgrading the pier utilities and lighting. The new fender system will be designed per the guidance of “MarCom WG 33: Guidelines for the Design of Fender Systems” published by the Permanent International Association of Navigation

Congresses, The World Association for Waterborne Transport Infrastructure.¹ Based on conceptual level planning and design it is anticipated that a NEPA Categorical Exclusion (CX) can be obtained for this project.

These improvements will enable goods to once again be safely and efficiently loaded and unloaded, as well as allow for the safe embarking/disembarking of the vessels' crews. This will significantly support the local economy of the island and more broadly the regional fishing and seafood industry while addressing food security needs, climate change, environmental injustice, and advancing equity. The major project components include:

- Planning, final design, environmental review, inspection, permitting, and project bidding and award.
- Removal/demolition of the existing timber pile fender system, timber wale top rail, steel egress ladders, under-deck catwalk system and abandoned pipelines and related utilities/infrastructure.
- Repair/replacement of damaged prestressed concrete piles on the southwest end, outboard, section of Pier Five and of concrete pile caps, bullrail and topping slab.
- Installation of a modern high energy absorbing fender system, with rubber cylindrical fenders, designed around the mooring requirements of the 58-foot commercial fishing vessel fleet (*See Figures 7-9 and attached Project Engineering Drawings Sheet Four*).
- Inset egress ladders will be incorporated into the face of the fender assemblies.
- Install anodes on support piles below water.
- Recoating of mooring cleats and bollards.
- Installation of a new sewer, including upland replacement, potable water, firewater, electrical/communication utilities, electrical distribution system, LED lighting and access control fencing on Pier Five.

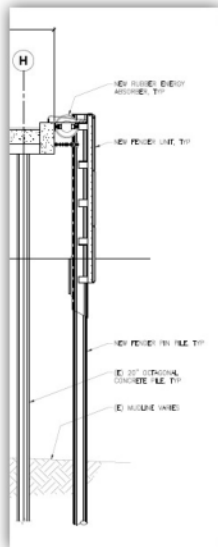


FIGURE 7 ENERGY
ABSORPTION FENDER
SYSTEM



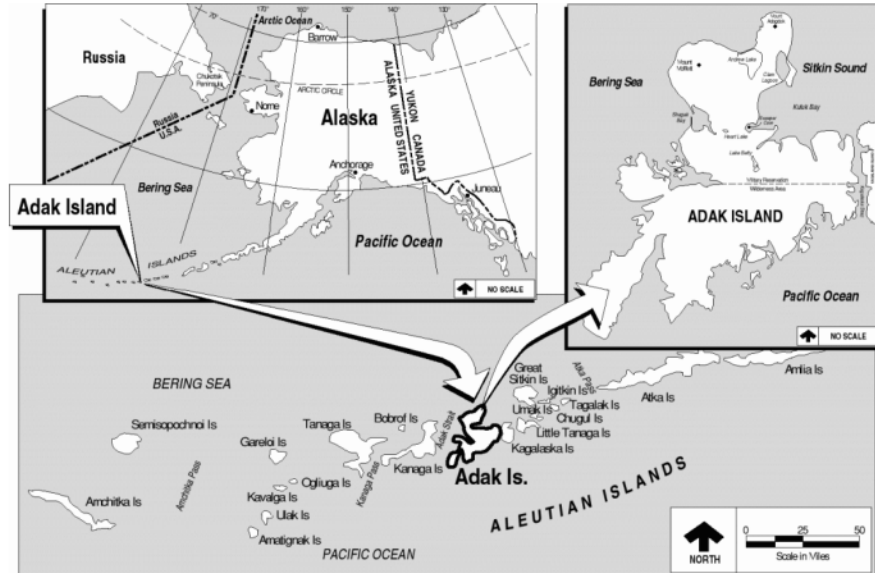
FIGURES 8-9 SIMILAR FENDER SYSTEMS



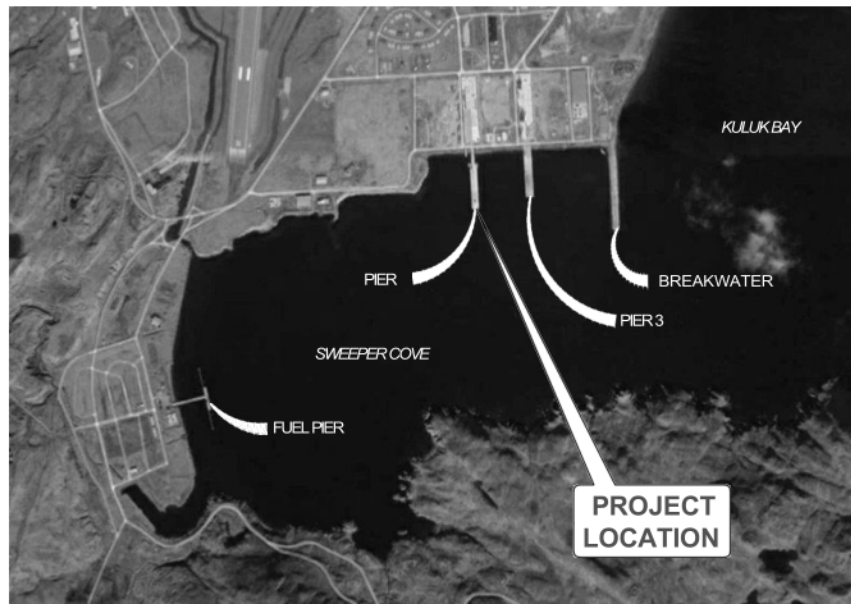
¹ <https://www.pianc.org/publications/marcom/guidelines-for-the-design-of-fender-systems>

Section II: Project Location

As noted, the Port of Adak is a small coastal port located on Adak Island in the West Aleutian Islands, a rural area, in Alaska. Adak Island's coordinates are latitude 51°53'0" N, at longitude 176°38'46" W. The City of Adak is the most western and southern city in Alaska located 1,200 air miles west-southwest of Anchorage, 450 miles from the nearest Port at Dutch Harbor, and 650 miles from the nearest jet capable landing strip. Adak Island is bounded by the North Pacific Ocean to the south and the Bering Sea to the north. For most of the year, strong storms cause winds exceeding 110 knots and waves in excess of 40 feet, which is why Adak is known as the "birthplace of the winds" due to the frequency and strength of storms that develop in the Bering Sea and North Pacific Ocean.



Sweeper Cove, within which the Port of Adak is located is a naturally protected harbor and offers a large refuge from frequent storms to commercial fishing vessels as well as international shipping vessels plying the Great Circle Route between North America and Asia. The Port of Adak is located at latitude 51°51'44" N, longitude 176°38'11" W. The high energy absorption fender system is essential in the Adak environment to widen allowable conditions that vessels can safely moor at Pier Five. Given the great distance and remote nature of Adak, it plays an outside role in many areas that affect the movement of critical goods and services.



The Port serves the small, rural 80-person community of the island which has been home to the Aleut peoples, the Indigenous people of the Aleutian Islands, since ancient times. According to the 2010 Census the population of Adak was 326 people which was ten years before Pier Five became difficult to use safely and efficiently, and as a result the seafood processing plant closed. Since 2002, when TAC, a regional Alaska Native corporation, took ownership of the Port, has been located on tribal lands and therefore according to the Justice40 Initiative guidance and the PIDP NOFO definition is a Historically Disadvantaged Community. Additionally, Adak is located in the West Aleutian Islands a Qualified Opportunity Zone, Low-Income Community (02016000100).

Section III: Grant Funds, Sources, and Uses of Project Funds

According to PND Engineers most recent ROM project estimated budget, completed on April 12, 2022, based on conceptual level planning, the pre-construction costs total \$700,000, construction costs total \$9,841,000, and other project costs, including construction administration and inspection and the Marine Mammal Observation Program protections total \$750,000 for a total project cost of \$11,291,000 (*See attached Project Cost Estimate*). The proposed mobilization and demobilization project costs assume barge mobilization from mainland Alaska or the Pacific Northwest by an off-island contractor.

According to TAC Resolution 01-2022 approved on March 4, 2022, by the Board of Directors, TAC will provide 10% matching funds, contingent on a PIDP award, of the total project costs to make improvements and upgrades to Pier Five (*See attached Non-Federal Fund Documentation*). TAC seeks the remaining 90% in PIDP funding and does not have other planned sources for additional federal funds.

The following is a detailed budget based on PND Engineers' ROM project cost estimate and the proposed breakdown of PIDP and TAC (non-federal matching) funding for each project component.

Component	Quantity/ Unit Price	Non-Federal (TAC)	PIDP	Total
Engineering Design @ 5% of Construction	Pre- construction	\$0	\$500,000	\$500,000
Permitting (NEPA, Non-IHA)			\$50,000	\$50,000
Detailed Condition Inspection			\$65,000	\$65,000
Dive Inspection of Piling			\$85,000	\$85,000
Mobilization and Demobilization		\$0	\$1,500,000	\$1,500,000
Demo Exist. Timber Fender Piles	371/ \$1,000	\$37,100 (10%)	\$333,900 (90%)	\$371,000
Demo Exist. Timber Fender Components	1,200/ \$100	\$12,000 (10%)	\$108,000 (90%)	\$120,000
Demo Exist. Utilities & Light Fixtures		\$15,000 (10%)	\$135,000 (90%)	\$150,000
Demo Exist. Under- Dock Steel Catwalks	1,500/ \$50	\$7,500 (10%)	\$67,500 (90%)	\$75,000
Furnish and Install (F&I) Heavy-Duty Pin Pile Fender Panel Units	27/ \$250,000	\$970,000 (14%)	\$5,780,000 (86%)	\$6,750,000
F&I P/S Concrete Bearing Pile Replacement - SW Corner	2/ \$150,000	\$30,000 (10%)	\$270,000 (90%)	\$300,000
F&I New Under- Dock Steel Catwalk	1,500/\$150	\$22,500 (10%)	\$202,500 (90%)	\$225,000
F&I Concrete Repair at Grid 11D Pile Cap		\$1,000 (10%)	\$9,000 (90%)	\$10,000
F&I Concrete Bullrail & Topping Slab Patch Repairs		\$5,000 (10%)	\$45,000 (90%)	\$50,000
F&I Recoating of Mooring Cleats & Bollards	50/\$800	\$4,000 (10%)	\$36,000 (90%)	\$40,000
F&I New Electrical/Comm Lines		\$15,000 (10%)	\$135,000 (90%)	\$150,000
F&I New LED Fixtures on Existing Light Poles (per Pole)	2/ \$50,000	\$10,000 (10%)	\$90,000 (90%)	\$100,000
Construction Admin/Inspection @ 5% of Construction		\$0	\$500,000	\$500,000
Marine Mammal Observation Program during Construction		\$0	\$250,000	\$250,000
TOTAL		\$1,129,100 (10%)	\$10,161,900 (90%)	\$11,291,000

Section IV: Merit Criteria

Section A: Achieving Safety, Efficiency, or Reliability Improvements

The proposed repairs and modernization upgrades to the Port of Adak will enable goods to once again be safely and efficiently loaded and unloaded at Pier Five, and will enhance the Pier's capacity to serve large and small vessels and freight movements at the Port. As noted, due to the condition of Pier Five's current fender and piling system, both large and small commercial and military vessels that have called or been interested in calling on the Port have been unable to or had issues when docking. The most common commercial fishing vessels coming into Port are the 58-foot catcher vessels and the working deck of these vessels only typically extends about half the height of Pier Five's deck surface resulting in inefficiencies related to handling lines to moor the vessels to the dock as well as creates issues for the crew of these vessels to safely embark/disembark the vessel while moored. Additionally, Pier Five was built to accommodate large commercial vessels and barges, and smaller vessels are prevented from calling on Adak because they cannot mate up to the deck of the pier or the barge ramp. By removing the existing fender and piling system and replacing the damaged piles, concrete pile caps, bullrail and topping, and installing a modern high energy absorbing fender system, with rubber cylindrical fenders, designed around the mooring requirements of the 58-foot commercial fishing vessel fleet Pier Five will allow goods to be safely, efficiently and reliability loaded and unloaded. The installation of new egress ladders will also ensure safe passage of vessel crew as they disembark to make deliveries at Pier Five. Repairs and upgrades to Pier Five will also provide immediate access improvements allowing fishing and other vessel crews to safely disembark onto the Pier surface. All of these improvements will benefit the daily operations of the port by allowing small and large vessels to bring fish and seafood once again to the adjacent seafood processing plant and in turn contribute to the regional and national food supply.

Adak also serves as an oil spill response storage hub for the Alaska Chadux Network, an industry led and funded nonprofit oil spill response organization headquartered in Anchorage, Alaska. The unmanned equipment stored at Adak provides assurance to vessels passing through the Great Circle Route that oil response equipment is available within reasonable response times. Unfortunately, Pier Five cannot currently support the movement of the equipment and it has to rely on the adjacent Adak airfield to fly in response personnel. This may contribute to a delay in responding to oil spills throughout the Aleutian Islands.

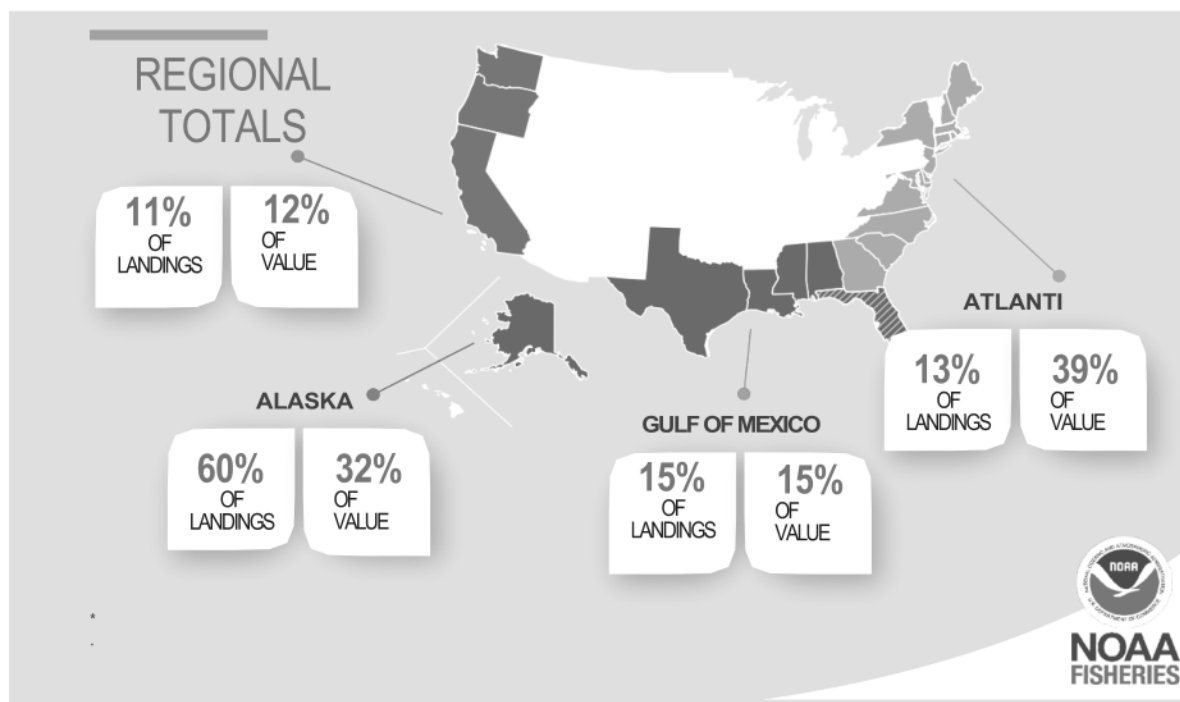
Additionally, the electrical, firewater, potable water and wastewater systems on Pier Five have been abandoned in place and not upgraded or repaired, and only provide limited electrical service to NOAA. Installation of a new sewer, including upland replacement, potable water, firewater, electrical/communication utilities, electrical distribution system, LED lighting and access control fencing on Pier Five will improve Port operations. Removal of the abandoned water systems on the Pier, and under Pier gangway and electrical distribution elements will allow for the efficient installation of updated electrical infrastructure to support modern efficient LED lighting. The LED lighting, and removal and replacement of the fencing will enhance security and ensure safe movement of goods and crew during any time of day or year.

By providing an electrical distribution system with shore power, vessels can engage in cold ironing and will no longer have to run diesel generators when docked reducing carbon emissions. Cold ironing mitigates harmful emissions from diesel engines by connecting a vessel's load to a more environmentally friendly, shore-based source of electrical power. Shore power saves consumption of fuel that would otherwise be used to power vessels while in port, and eliminates the air pollution associated with consumption of that fuel. Use of shore power also facilitates maintenance of the vessel's engines and generators, and reduces noise. Cold ironing does away with the need to burn fossil fuel on board the vessels while they are docked. Under this concept, vessels visiting ports are hooked on to local grid power or other power sources, which are already regulated by local pollution norms. This externally sourced power serves the vessel's internal cargo handling machinery and hoteling requirements. Effectively, all the power generating sources are shut down and the vessel is hence cold-ironed. This brings immediate relief from pollution by shipboard emissions and allows a more holistic maintenance schedule to be followed by vessel operators, which are typically hard pressed to maintain planned maintenance schedules due to commercial operating pressures. The immediate result is lowered heat outputs from vessels, lowered air emissions, lowered risk of accidents from fuel-based machinery, lowered disturbance to the ecosystem, and various other environmental benefits.

Section B: Supporting Economic Vitality at the Regional Level

Economic Advantage of the Port

The proposed project will significantly support the local economy of Adak Island and more broadly the regional fishing and seafood industry. According to NOAA's most recent annual report on Fisheries of the U.S.,² the state of Alaska in 2019 accounted for 60% of the country's commercial fisheries and seafood industry landing and 32% of the economic value.



Dutch Harbor, for the 23rd consecutive year, had the highest volume of seafood landed in 2019 at 763 million pounds and third highest value at \$190 million, and the other Aleutian Islands, where the Port of Adak is located, had the second highest volume at 589 million pounds and fourth highest value at \$142 million.

Unfortunately, due to the recent failures of portions of the fender and piling system on the east side of Pier Five, with actual pilings coming lose, the capability of the Pier has been significantly



² <https://media.fisheries.noaa.gov/2021-05/FUS2019-FINAL-webready-2.3.pdf?null=>

reduced, and without implementing the upgraded, modern and safe fender system the pier will continue to fail with significant negative impact to Adak and the region.

The repairs and upgrades to Pier Five will ensure the continued viability and expanded development of the regional fishing industry and the seafood processing plant, which is the largest economic engine on Adak Island. Installation of an updated, modern high energy absorption fender system will allow large and small commercial fishing vessels to deliver to the plant more efficiently and safely to deliver goods or resupply, and will allow greater access to the Pier in more severe weather. The design elements incorporated have been developed to increase efficiency for both large and small fishing vessels anticipated to deliver to the seafood processing plant. Operation of the processing plant, which is dependent on the Pier Five upgrades, will draw commercial fishing vessels to the western Aleutian Islands year-round which will create the need for both short-term and long-term workers in Adak. To operate at capacity the seafood processing plant needs 350 workers seasonally, November to May, and at least 50 workers during the off season, June to October. Based on historical landings of fish when the plant was last operational and future projections with the plan utilizing the upgraded Pier Five, it is estimated that the total of short tons of fish over Pier Five will increase from zero to 17,963 short tons in 2025 to 19,913 short tons by 2026. TAC is currently in discussions with a potential future tenant for the seafood processing plant, Peter Pan Seafood Company, to ensure it is occupied as soon as the improvements to Pier Five have been made (*See attached Letter of Support*). Doing business since 1912, Peter Pan Seafood is the oldest continuously operating seafood processing company in Alaska. TAC will ensure that in addition to the operator's standard employment practices, and inclusion of the local population, that individuals with families are hired to sustain the local school.

Year-round operation of the plant will also support the success of existing and establishment of a variety of other services and businesses to support the commercial fishing fleet, the processing seafood plant, military vessels, potential new industries, tourism, and the growing community. With the increase in the population of Adak, the local school, food and hospitality services, and other industries will be supported. For example, AE, a subsidiary of TAC, runs the Adak Island Inn which provides long and short-term rental housing to contractors, workers, and tourists, and without access to Pier Five it cannot efficiently, and cost effectively receive goods or visitors. The Adak community will also enjoy greater access to vital deliveries by marine transport to the community. Deliveries of goods to Adak by shipment through marine transportation will be significantly expanded at a much lower price point than the delivery by air which is the current means.

Military vessels, most recently U.S. Coast Guard (USCG) Cutter Alex Haley, have called on the Port of Adak for resupply and to provide crew time for rest and relaxation but, again, the condition of the Pier Five fender and piling system has led to inefficiencies and decreased usage of the Port. Additionally, due to the closure of the Red Hill fuel tanks in Hawaii, the Port of Adak has the potential to become an alternative refueling site for military vessels in the North Pacific and Arctic regions.

Additionally, the Pier Five improvements will allow and attract new businesses to come Adak. For example, TAC is currently in confidential discussions with an innovative space technology

company seeking to establish operations on the island to launch satellites. The company, which would need to utilize Pier Five for its operations, estimates it would bring approximately 300 new jobs in a new industry to Adak. Commercial and small-scale luxury adventure cruise ships have also been interested in calling on the Port of Adak, but the current condition of the fender and piling system have not allowed this to happen.

The resulting increased population will consist of Aleut and other Alaska native tribes as well as a great diversity of workers that support coastal Alaskan fishing communities.

Freight Transportation

The proposed project and replacement of the failing fender and piling system at Pier Five is essential to the continued use of the Port of Adak. The modernized high energy absorption fender system has been designed incorporating the needs and vessel specifications of the commercial fishing fleet. Specifically, the Magnuson-Stevens Fishery Conservation and Management Act, the primary law that governs marine fisheries management in federal waters and the regulations that define the commercial fishery in Western Aleutian Islands Region, establish a standard for the under 60-foot fleet. The under-60 fleet is mainstay of the commercial fishing vessels delivering to the seafood processing plant with vacuum extraction systems located on both the east and west sides of Pier Five to transfer fish efficiently and quickly from the holding tanks to the processing plant. The proposed design incorporates three slots for the under-60 fleet on each side of Pier Five to allow these vessels to queue up and efficiently offload minimizing downtime in Port, and the remainder of the slots will be standard spacing.

As noted, Adak is located in the remote Aleutian Islands surrounded by deep waters home to many species of fish, Pacific Cod, Halibut, Black Cod, Golden King crab, that can be harvested in commercially viable quantities, processed locally on Adak and distributed to fulfill the nutritional requirements of the nation. The North Pacific Fishery Management Council (NPFMC) manages the commercial fishing in these waters utilizing world class fishery management methods. The proposed updated to Pier Five will allow Adak to address the food security needs of the nation in a sustainable manner.

Additionally, as noted, the Alaska Chadux Network keeps oil spill response equipment and materials at the Port of Adak to ensure international marine traffic traversing the Great Circle Route can meet the stringent requirements of the USCG Alternative Planning Criteria that identifies the time for a response to be launched in the event of an incident. The USCG also utilizes the Port to support search and rescue missions in the North Pacific and Bering Sea and Sweepers Cove, where the Port is located, provides a large safe harbor that provides refuge in extreme storm events. Without the proposed Pier Five improvements and upgrades these capabilities will continue to be profoundly impacted.

The high energy absorption fender system will allow greater flexibility for all vessels to safely moor on Pier Five in a wider range of wind and sea states. Greater availability to safely moor will increase the efficiency in the delivery of goods resulting in decreased fuel consumption and

less time in port. Deliveries of goods to Adak by water shipment will be significantly enhanced at a much lower price point than the delivery by air.

Overcoming the Competitive Disadvantage of the Port

When the former Adak Naval Complex property was transferred to TAC it included not only the Port of Adak, but an extensive inventory of buildings and facilities with no mechanism, resource or funding to maintain the facilities. Over time, tough decisions were made to invest in some buildings, structures and infrastructure, and not in others due to the high cost involved.

Significant investment has been made in the fish processing plant and the tank farm and fueling infrastructure. At the time of the transfer, the existing fender system was identified to be in poor condition and in need of modernization upgrades. The Navy had installed similar modernization upgrades on the fuel pier in the late 1980's but the investment was not made on Pier Five. Due to the remote location of Adak, a significant component of the cost is the mobilization of materials, supplies and mobile work platform required to conduct the work. All materials required for the upgrades must be shipped from Seattle which requires a 30-day voyage to reach Adak. In addition to the projected increase in the total of short tons of fish over Pier Five, the jobs of small and large fishermen supported and 350 jobs at the seafood processing plant created, the project could provide potential for significant economic growth.

Section C: Addressing Climate Change and Environmental Justice Impacts

As noted, by providing an electrical distribution system with shore power, vessels can engage in cold ironing and will no longer have to run diesel generators when docked reducing carbon emissions and air pollution, and lessening the consumption of fossil fuels. The proposed project will allow docked vessels hooked on to local grid power or other power sources, which are already regulated by local pollution norms. This externally sourced power serves the ship's internal cargo handling machinery and hoteling requirements. Effectively, all the power generating sources are shut down and the ship is hence cold-ironed. This brings immediate relief from pollution by shipboard emissions and allows a more holistic maintenance schedule to be followed by ship operators, which are typically hard pressed to maintain planned maintenance schedules due to commercial operating pressures. The immediate result is lowered heat outputs from ships, lowered air emissions, lowered risk of accidents from fuel-based machinery, lowered disturbance to the ecosystem, and various other environmental benefits. Additionally, the plans for the project have ensured the most efficient and environmentally friendly components be included, such as more efficient LED lighting, and materials used, including utilizing largely recycled steel material for the fender system.

TAC will continue to operate under the Aleutian people's environmental values and expand economic opportunities for them. The Aleut people have historically been self-sufficient both commercially harvesting fish and subsistence hunting and fishing. The inclusion of the under 60-foot fleet into regulations is recognition of the individual ownership of commercial fishing vessels and permits and endorsements required to legally fish. NPFMC regulations attempt to balance the catch levels between the small under 60-foot fleet and the large (over 250-foot)

catcher vessels known as factory trawlers. A key point of contention is the impacts of the style of fishing between the smaller vessels which fish in a cleaner and more sustainable manner than the factory trawlers that deploy huge trawl nets (up to 5,000 in length) that catch any and everything in their path as well as dragging the seafloor causing a path of destruction. The improvements to Pier Five will allow these smaller vessels to continue to operate and be supported by a seafood processing plant on Adak.

When the Navy departed Adak, it not only left behind remnants of base infrastructure, but fuel-soaked lands, and numerous oil drums at the Port of Adak. Additionally, in some area, munitions like unexploded ordinances were abandoned. Chemicals like arsenic, asbestos, lead, mercury, and polychlorinated biphenyls (PCBs) are routine contaminants polluting Adak and the Aleut region. These sites pose major health and safety risks to the Adak and greater Aleut community, and threaten food and water sources used for subsistence living and hamper economic activity. The Port of Adak functions as the western Aleutian Island hub for ongoing environmental restoration and contamination cleanup activities. Pier Five is a critical component, in conjunction with the Adak airstrip, to handle various environmental remediation and cleanup activities, such as soil and other waste removal, and to convey workers quickly and efficiently to the remote, uninhabited islands where this work is being performed.

Lastly, during recent discussions with U.S. Department of Energy Director of the Arctic Energy Office, George Roe, conversations centered around regional priorities and how the fishery and developing the economy in this region is key to bringing more efficient energy sources to the region and its people. Residents and business currently rely on diesel generators to power and heat their homes and businesses, and any new development delivering energy efficient equipment and materials to Adak will require Pier Five to be operational.

Section D: Advancing Equity and Opportunity for All

The Port of Adak is wholly owned by TAC, a regional Alaska Native corporation, whose mission is to maximize dividends to its shareholders and to provide opportunities for shareholders. TAC and its subsidiaries are committed to advancing equity within its companies and are equal opportunity employers. According to TAC's Equal Employment Opportunity policy, it does not discriminate against any employee or applicant on the basis of race, color, sex, sexual orientation, national origin, religion, disability, age, or other classifications protected by law (*See attached TAC Personnel Policies*). TAC has established a shareholder and descendant preference program to recruit, hire, and ensure the upward mobility of qualified TAC shareholders and descendants, unless specifically prevented by contract or law. AE, TAC's subsidiary who operates on Adak, has consistently held a 60% minority hire rate, and with TAC's focus on providing employment for underrepresented groups, this proven track record will be impactful as this project will provide an increased number of jobs on island.

As an Alaska Native corporation, TAC is mandated by the Alaska Native Claims Settlement Act to provide monetary and non-monetary benefits to Alaska Native people and communities. As such, TAC promotes workforce development including the support and funding for education, training, and development opportunities of employees, Alaska Native people, minorities, and underrepresented groups including women, people of color, people with disabilities, people with

criminal records, and groups that face systemic barriers to employment. TAC's corporate mission is to develop opportunities for the Aleut people and TAC has a comprehensive career development program. This program provides internships, apprenticeships, ongoing training, educational support, leadership training, and full-time employment within our companies, but also links qualified individuals to jobs outside our companies. When individuals are lacking necessary skills or face barriers to employment, TAC provides support and funding so that individuals can receive the necessary tools for employment. TAC also funds The Aleut Foundation which provides workforce development training for individuals as well as communities. The community trainings are provided at the request of the communities in the Aleut region and in collaboration with other entities in the region. TAC meets at minimum four times a year with stakeholders in communities to advance workforce development and equity within our region.

The funding of this project will provide short-term jobs, but longer-term impacts including jobs from industries that will be able to do business in Adak which will provide more opportunities for the people of Adak Island.

Section E: Leveraging Federal Funding to Attract Non-Federal Sources of Infrastructure Investment

As noted, TAC will provide 10% non-federal matching funds, contingent on a PIDP award, of the total project costs.

Section V: Project Readiness

Section A: Technical Capacity

TAC and its subsidiaries and diverse portfolio of companies have the technical capacity and experience to implement the proposed improvement and upgrades to Pier Five. Specifically, TAC's Aleut Federal, LLC manages a number of federal contracts and grants, and TAC will leverage its expertise and numerous subsidiaries and companies in implementing the proposed project (*See attached Aleut Federal Statement of Qualifications*).

PND Engineers, Inc. has also provided TAC with a detailed project schedule which ensures the project's feasibility, and compliance with applicable Federal design and construction requirements (*See below and attached Project Schedule*). According to the project schedule the design and permitting process will be complete by the fourth quarter of 2023, so that project bidding can be complete by the first quarter of 2024, and construction can begin quickly upon obligation of PIDP funds. The construction phase will then proceed and be less than two years until the project is complete.

PROJECT TASK	2022				2023				2024				2025			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Design and Permitting																
Notice of Funding Award (Sept 2022)																
Final Design and Engineering																
NEPA Compliance																
Condition/Dive Inspection																
USACE Permitting																
Protected Species Requirements																
Project Bidding and Award																
Bid Preparation																
Issue Bid RFP																
Bid Response Period																
Bid Award and Approvals																
Funding Obligation (Feb 2024)																
Construction																
Materials Procurement																
Contractor Mobilization																
Demolition																
Replace Damaged/Missing Piles																
Install Fenders																
Relocate/Recoat Mooring Hardware																
Concrete Repairs																
Install Electrical/Comm Utilities																
Install LED Lighting Fixtures																
Project Closeout																
Punchlist Completion																
Contract Closeout																
Project Complete (Dec 2025)																

PND Engineers' ROM project estimate budget from April 2022, based on conceptual level planning (*See attached Project cost estimate information*). The proposed mobilization and demobilization project costs assume barge mobilization from mainland Alaska or the Pacific Northwest by an off-island contractor.

The Port of Adak and the proposed Pier Five improvements are part of and supported by the Southwest Alaska Municipal Conference's Comprehensive Economic Development Strategy (CEDS)^{3,4}. As noted, in the 2015 CEDS, "The marine infrastructure of Southwest Alaska supports one of the richest fisheries ecosystems in the world. Strategically located ports, capable of supporting harvesting and processing of fisheries resource, spread from Kodiak Island to Adak, St. Paul and Bristol Bay. This includes ports of refuge every few hundred miles. In addition to providing the lifeline to the area's fisheries, the marine infrastructure supports other vital community services ranging from basic supply of food, shelter, fuel, marine supplies to specialized services." Additionally, TAC is involved with the State of Alaska in the current efforts to develop a new five-year CEDS, using funding provided by the Economic Development Administration⁵.

The project is also part of local planning and economic development efforts with the City of Adak (*See attached Letter of Support*). In 2005, the federal government allocated 10% of the western Aleutian golden king crab to the City of Adak as part of Crab Rationalization to aid in the development of seafood harvesting and processing activities within the community of Adak. The City of Adak chartered an independent non-profit, the Adak Community Development Corporation⁶ (ACDC) to manage the Adak crab allocation and for the future efforts of obtaining the status of a community quota entity, in order to purchase Halibut, Sablefish and other specific to develop the local economy. Two of ACDC's priorities: to help in the development of small boat harbor and related infrastructure to support the local seafood industry and resident fishing fleet; and to help in the development of support services for the fishing industry for Adak, closely align with and support the proposed improvements and outcomes of the project (*See attached Letter of Support*).

Section B: Environmental Risk

The anticipated environmental permit requirements and their associated activities and timelines are provided below. Of note, the processing and review durations provided above in the project schedule are conservative.

NEPA Compliance (6 Months Scheduled)

The National Environmental Policy Act (NEPA) requires evaluation of the project's effects on the quality of the human environment. Based on past experience, it is anticipated that the lead agency for the NEPA review and process will be the U.S. Department of Transportation (DOT). With DOT's assistance, the project team will consult with USACE, the U.S. Fish and Wildlife Service (FWS), National Marine Fisheries Service (NMFS), and USCG regarding potential environmental impacts.

³ https://www.commerce.alaska.gov/web/portals/4/pub/ARDORs/SWAMC%20CEDS%20_FFY15%20Update.pdf

⁴ <https://www.commerce.alaska.gov/web/Portals/6/pub/SWAMC%20CEDS%202009-2014%20with%202013%20update.pdf>

⁵ <https://www.commerce.alaska.gov/web/StatewideComprehensiveEconomicDevelopmentStrategy.aspx>

⁶ <https://adak-ak.gov/community/page/adak-community-development-corporation>

It is anticipated that CX can be obtained for this project; if so, an Environmental Assessment (EA) to determine the proper level of environmental documentation will not be required. For a CX, six months has been allocated for the NEPA process. If a CX cannot be obtained, then the NEPA process is estimated to take up to 12 months for completion, consistent with other recent, similar Alaska coastal infrastructure projects.

Protected Species Consultation Requirements *(9 Months Scheduled)*

The Endangered Species Act (ESA) Section 7 and Marine Mammal Protection Act (MMPA) consultation with FWS and NMFS is not anticipated to require an Incidental Harassment Authorization (IHA) for incidental take of protected species resulting from permitting project activities. For consultation without an IHA, nine months has conservatively been allocated for the approval process. Should an IHA end up being required by FWS or NMFS, processing is estimated to take between 12 and 18 months. Implementation of a comprehensive protected species observer program will likely be required during construction, regardless of an IHA being required, and this assumption is reflected in the schedule and cost estimates.

Request for consultation for the USACE permit will require the preparation of a Biological Assessment (BA) of potential effects to ESA-protected species. Potential impacts of the project to fisheries or Essential Fish Habitat (EFH) protected by a Fisheries Management Plan under the Magnuson–Stevens Fishery Conservation and Management Act will need to be assessed by the lead agency or its designee. EFH assessments may be incorporated into the project’s BA.

USACE Permitting *(9 Months Scheduled)*

USACE Alaska District Regulatory Division approval will be required for issuance of a Department of the Army Permit (DAP). Regulatory authority for this permit is established under Section 10 of the Rivers and Harbors Act (RHA) for the project’s improvements that impact a navigable waterway and under Section 404 of the Federal Water Pollution Control Act (CWA) for dredge and fill, including piles, in waters of the U.S. USACE review of a DAP application will require coordination with other Federal permitting timelines, and issuance of the permit may not occur until the completion of any FWS, and NMFS protected species consultations and permitting.

Other Permitting Requirements

USCG Requirements

Approval may be required from the USCG for the addition of navigation aids to review compliance and facilitate the appropriate charting of nautical features.

State of Alaska Department of Environmental Conservation (ADEC) Requirements

Issuance of a Section 404 CWA permit by USACE would necessitate the completion of a Section 401 review and certification. Additional water quality information may be requested by ADEC’s Division of Water to complete their Antidegradation review, but processing will typically mirror the USACE process and be completed slightly in advance of the DAP issuance.

Alaska Department of Natural Resources (ADNR) Requirements

Generally speaking, tidelands within State waters are owned by the State (unless otherwise assigned or leased) and require permission from ADNR for all but exempted types of development. Tidelands in the project area have already been conveyed to TAC and will only require development in accordance with existing agreements.

Local Requirements

The project falls within the City of Adak, and building or zoning permits may be required along with additional coordination with appropriate City departments.

Section C: Risk Mitigation

TAC owns all uplands and tidelands within the project extents, and therefore, property and right-of-way acquisition is not a risk to the project.

Permit Delays

Delays associated with permit approvals are almost always a risk for marine/coastal projects. It is planned to mitigate this risk by beginning the permitting process immediately after award to allow maximum float in the project schedule before the funding obligation deadline of September 30, 2025.

Procurement Delays

Similar to the mitigation planned for potential permit delays, by beginning the procurement process immediately after award of the construction contract and allowing two seasons for procurement/construction will mitigate the risk of any procurement delays and allow maximum float in the project schedule before funds are required to be expended, within five years of the obligation deadline. Additionally, during the detailed engineering design phase of the project, materials that may require long lead times, such as steel chain and rubber fender elements, will be identified for potential early procurement through a separate fabrication contract in order to further mitigate this risk.

Construction Delays

Delays in construction could potentially be caused by the presence of endangered species and/or other marine mammals during pile driving activities. As part of the ESA/MMPA consultations during the USACE permitting process, a BA document will be produced to further evaluate this risk and determine if obtaining an IHA would be required to sufficiently mitigate the risk. Obtaining an IHA from NMFS would allow for authorized “takes” of endangered species and/or marine mammals without having to halt pile driving activities when the animals are in the project vicinity, but the time for IHA approval would be six to 12 months longer than for a non-IHA permit from USACE. Similar to procurement delays, the risk of construction delays is further mitigated by allowing for maximum float in the project schedule before funds are required to be expended, within five years of the obligation deadline.

Potential Increases in Project Costs

The risk for potential cost increases is significant due to continued supply chain disruptions associated with the COVID-19 pandemic. While some escalation has been included in the preliminary cost estimates for procurement and construction starting in 2024, estimating escalation in a climate of unstable pricing is difficult. In order to mitigate risk associated with potential cost increases, TAC will be self-funding a portion of the project. In addition, the project is planned to be bid in such a manner that gives TAC flexibility in prioritizing and awarding construction work items to remain within available funds for the project.

Section VI: Domestic Preference

The proposed project will be designed, scheduled, and budgeted to meet Build America, Buy America Act requirements. Preliminary cost estimates include an allowance for any material that may carry a domestic premium, and the project schedule includes an allowance for procurement of domestic long-lead items (e.g., steel chain) that require more time to procure than items produced outside the U.S. Based on communications with material suppliers, procuring engineered rubber fender elements domestically is still challenging. Every effort will be made during the design process to develop fendering details which utilize domestic components, however, if domestic rubber fender elements are not available, a waiver may be required for these components of the project.

Section VII: Determinations

Project Determination	Guidance
1. The project improves the safety, efficiency, or reliability of the movement of goods through a port or intermodal connection to the port.	The proposed repairs and modernization upgrades to the Port of Adak will enable goods to once again be safely and efficiently loaded and unloaded at Pier Five, and will enhance the Pier's capacity to serve large and small vessels and freight movements at the Port. Due to the condition of Pier Five's current fender and piling system, both large and small commercial and military vessels that have called or been interested in calling on the Port have been unable to or had issues when docking. Pier Five was built to accommodate large commercial vessels and barges, and smaller vessels are prevented from calling on Adak because they cannot mate up to the deck of the pier or the barge ramp. By removing the existing fender and piling system and replacing the damaged piles, concrete pile caps, bullrail and topping, and installing a modern high-energy-absorbing fender system, with rubber cylindrical fenders, designed around the mooring requirements of the 58-foot commercial fishing vessel fleet Pier Five will allow goods to be safely, efficiently and reliability loaded and unloaded. The installation of new egress ladders will also ensure safe passage of vessel crew as they disembark to make deliveries at Pier Five. Repairs and upgrades to Pier Five will also provide immediate access improvements allowing fishing and other vessel crews to safely disembark onto the Pier surface. All of these improvements will benefit the daily operations of the port by allowing small and large vessels to bring fish and seafood once again to the adjacent seafood processing plant and in turn contribute to the regional and national food supply.
2. The eligible applicant has the authority to carry out the project.	The Aleut Corporation (TAC) is a regional Alaska Native corporation, created by the Alaska Native Claims Settlement Act of 1971, and according to the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5304) definition and confirmed by <i>Yellen v. Confederated Tribes of Chehalis Reservation</i> , 594 U.S. ____ (2021) is eligible to apply as an Indian Tribe. In <i>Yellen v. Chehalis</i> the Supreme Court found that Alaska Native Corporations (ANCs) are "Indian tribe[s]" under the Indian Self-Determination and Education Assistance Act (ISDA) and thus eligible for funding available to "Tribal governments" under Title V of the Coronavirus Aid, Relief, and Economic Security Act.
3. The eligible applicant has sufficient funding available to meet the matching requirements.	According to TAC Resolution 01-2022 approved on March 4, 2022, by the Board of Directors, TAC will provide 10% matching funds, contingent on a PIDP award, of the total project costs to make improvements and upgrades to Pier Five (<i>See attached Non-Federal Fund Documentation</i>). TAC seeks the remaining 90% in PIDP funding and does not have other planned sources for additional federal funds.

Project Determination	Guidance
4. The project will be completed without unreasonable delay.	The expected obligation date is February 1, 2024, and construction start date is March 1, 2024. According to the project schedule the design and permitting process will be complete by the fourth quarter of 2023, so that project bidding can be complete by the first quarter of 2024, and construction can begin quickly upon obligation of PIDP funds by February 2024. The construction phase will then proceed and be less than two years until the project is complete by December 2025.
5. The project cannot be easily and efficiently completed without Federal funding or financial assistance available to the project sponsor.	While repairs and updates to the 42-year-old Pier Five's fender and piling system have been needed since the Navy left Adak and have only become more dire over the years, due to competing needs and a lack of resources, no significant repairs have been or can be made to the system without federal financial assistance and therefore, the Pier will remain in efficient and inoperable.

List of Supporting Documents/Attachments/Appendices

- **Non-Federal Fund Documentation:** Aleut Corporation Board of Directors Resolution 01-2022 March 4, 2022
- **Project Schedule**
- **Project Engineering Drawings**
- **Project Cost Estimate Information:** PND Engineers, Inc Adak Pier Five Repairs/Upgrades ROM Project Cost Estimate April 12, 2022
- **Letters of support:**
 - Peter Pan
 - City of Adak, Alaska
 - Adak Community Development Corporation
 - Bowhead Transport Company, LLC
- **Other documentation**
 - PND Engineers, Inc. 2005 Inspection Report
 - PND Engineers, Inc. 2014 Inspection Report
 - Pier 5 Fender Images
 - TAC Personnel Policies
 - Aleut Federal Statement of Qualifications

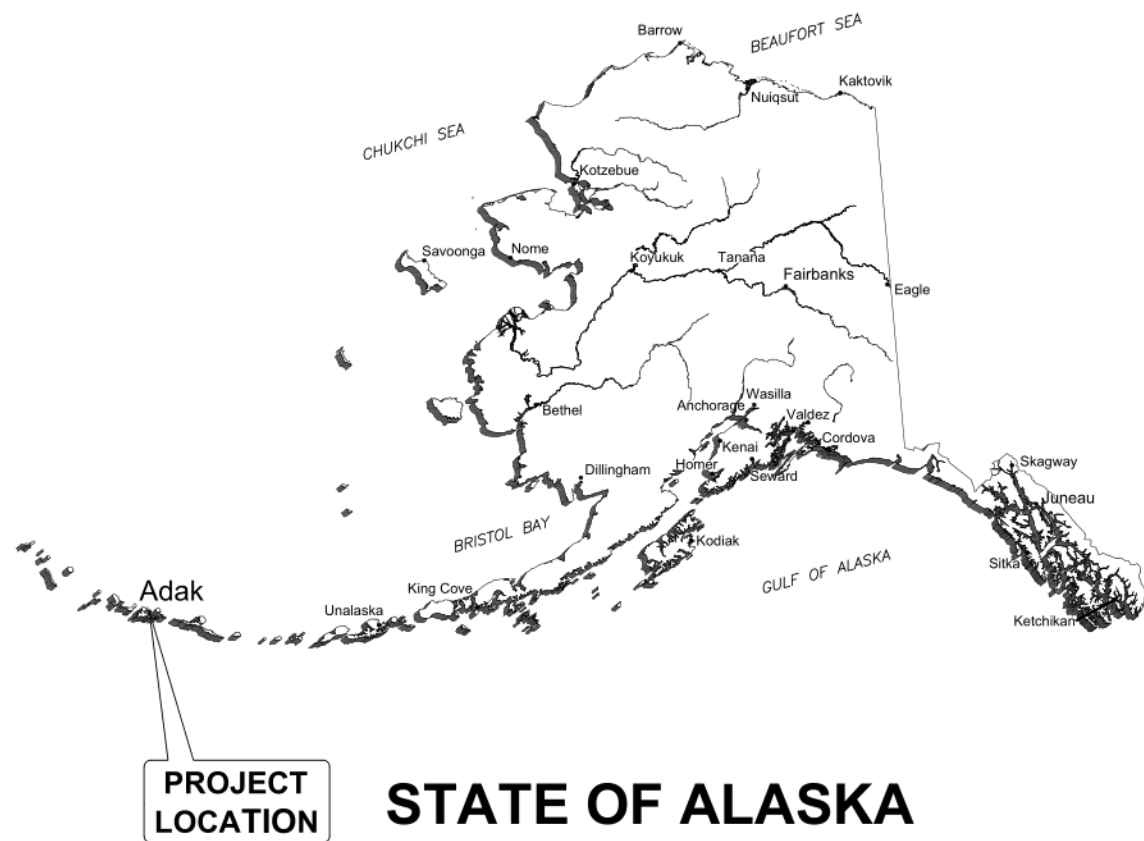
ADAK PIER 5 REPAIRS/UPGRADES

Project Schedule

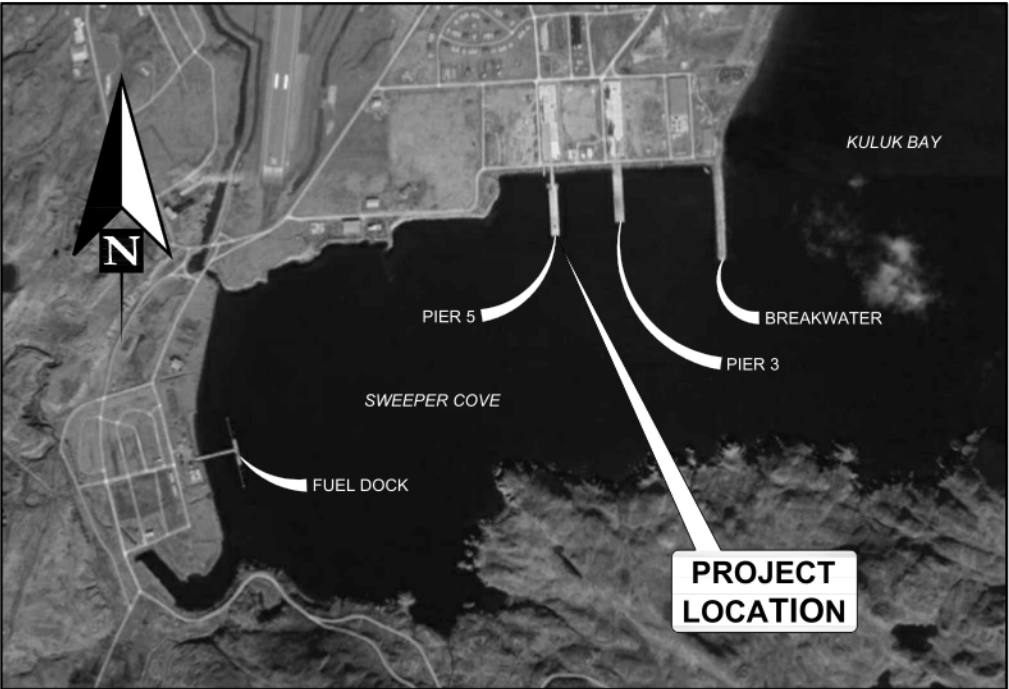
PROJECT TASK	2022				2023				2024				2025			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Design and Permitting																
Notice of Funding Award (<i>Sept 2022</i>)																
Final Design and Engineering																
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Install Fenders																
Relocate/Recoat Mooring Hardware																
Concrete Repairs																
Install Electrical/Comm Utilities																
Install LED Lighting Fixtures																
Project Closeout																
Punchlist Completion																
Contract Closeout																
Project Complete (<i>Dec 2025</i>)																

ADAK PIER 5 REPAIRS & UPGRADES

ADAK, ALASKA
APRIL 2022



SHEET INDEX	
SHEET TITLE	SHEET No.
COVER SHEET & INDEX	1
DOCK LAYOUT (1 OF 2)	2
DOCK LAYOUT (2 OF 2)	3
DOCK SECTION	4



VICINITY

CONCEPT
APRIL 2022

PND Engineers, Inc. is not responsible for safety programs, methods or procedures of operation, or the construction of the design shown on these drawings. Where specifications are general or not called out, the specifications shall conform to standards of industry. Drawings are for use on this project only and are not intended for reuse without written approval from PND. Drawings are also not to be used in any manner that would constitute a detriment directly or indirectly to PND.

REV	DATE	DESCRIPTION

DATE: _____

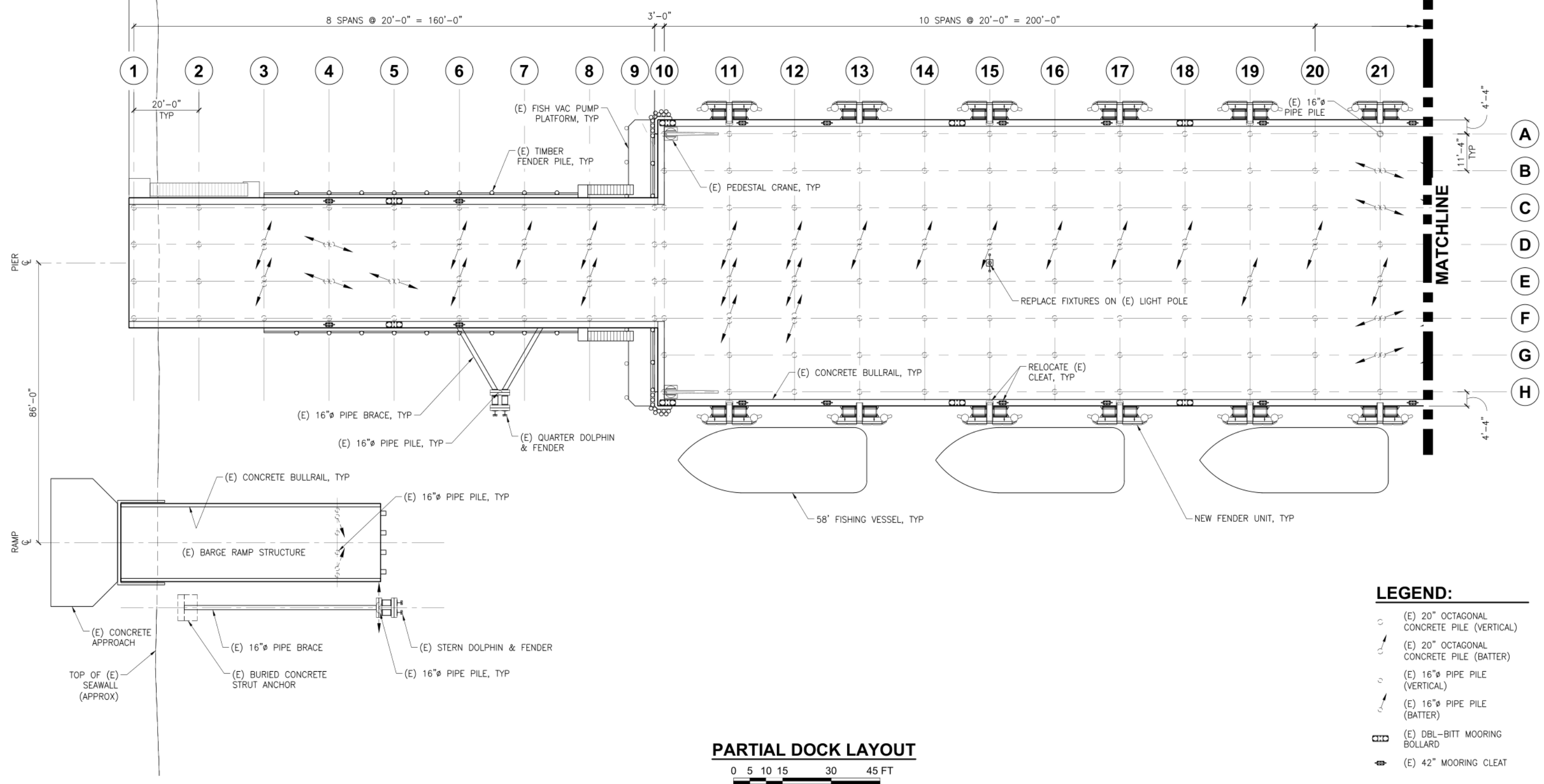
1506 West 36th Avenue
Anchorage, Alaska 99503
Phone: 907.561.1011
www.pndengineers.com
AK LIC# AECC250



PROJECT: **ADAK PIER 5
REPAIRS & UPGRADES**

TITLE: **COVER SHEET & INDEX**

DESIGNED BY: DDH	DATE: APRIL 2022
CHECKED BY: JC	PROJECT NO: 191078



PARTIAL DOCK LAYOUT

0 5 10 15 30 45 FT

CONCEPT
APRIL 2022

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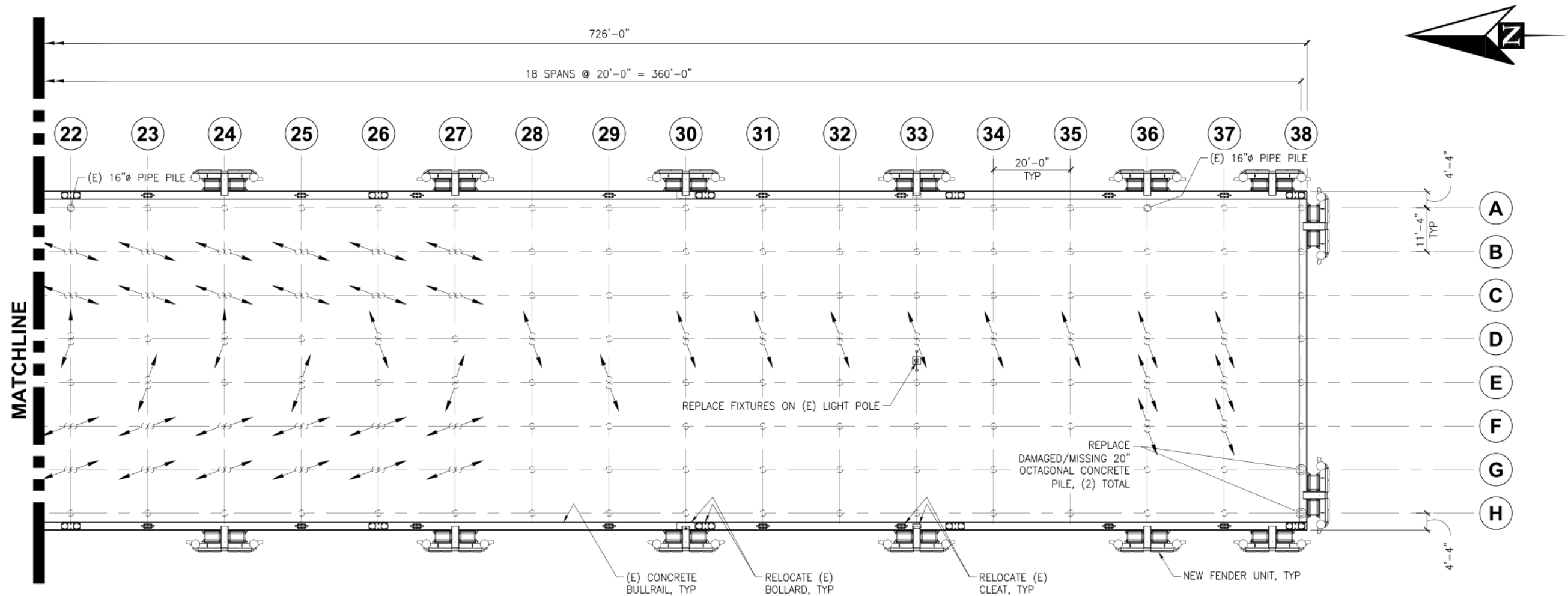
REV	DATE	DESCRIPTION

DATE: _____

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ADAK PIER 5 REPAIRS & UPGRADES	
TITLE: DOCK LAYOUT (1 OF 2)	
DESIGNED BY: DDH	DATE: APRIL 2022
CHECKED BY: JC	PROJECT NO: 191078
SHEET NO: 2 OF 4	



PARTIAL DOCK LAYOUT

0 5 10 15 30 45 FT

LEGEND:

- (E) 20" OCTAGONAL CONCRETE PILE (VERTICAL)
- (E) 20" OCTAGONAL CONCRETE PILE (BATTER)
- (E) 16" PIPE PILE (VERTICAL)
- (E) 16" PIPE PILE (BATTER)
- (E) DBL-BITT MOORING BOLLARD
- (E) 42" MOORING CLEAT

CONCEPT
APRIL 2022

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REV	DATE	DESCRIPTION

DATE: _____

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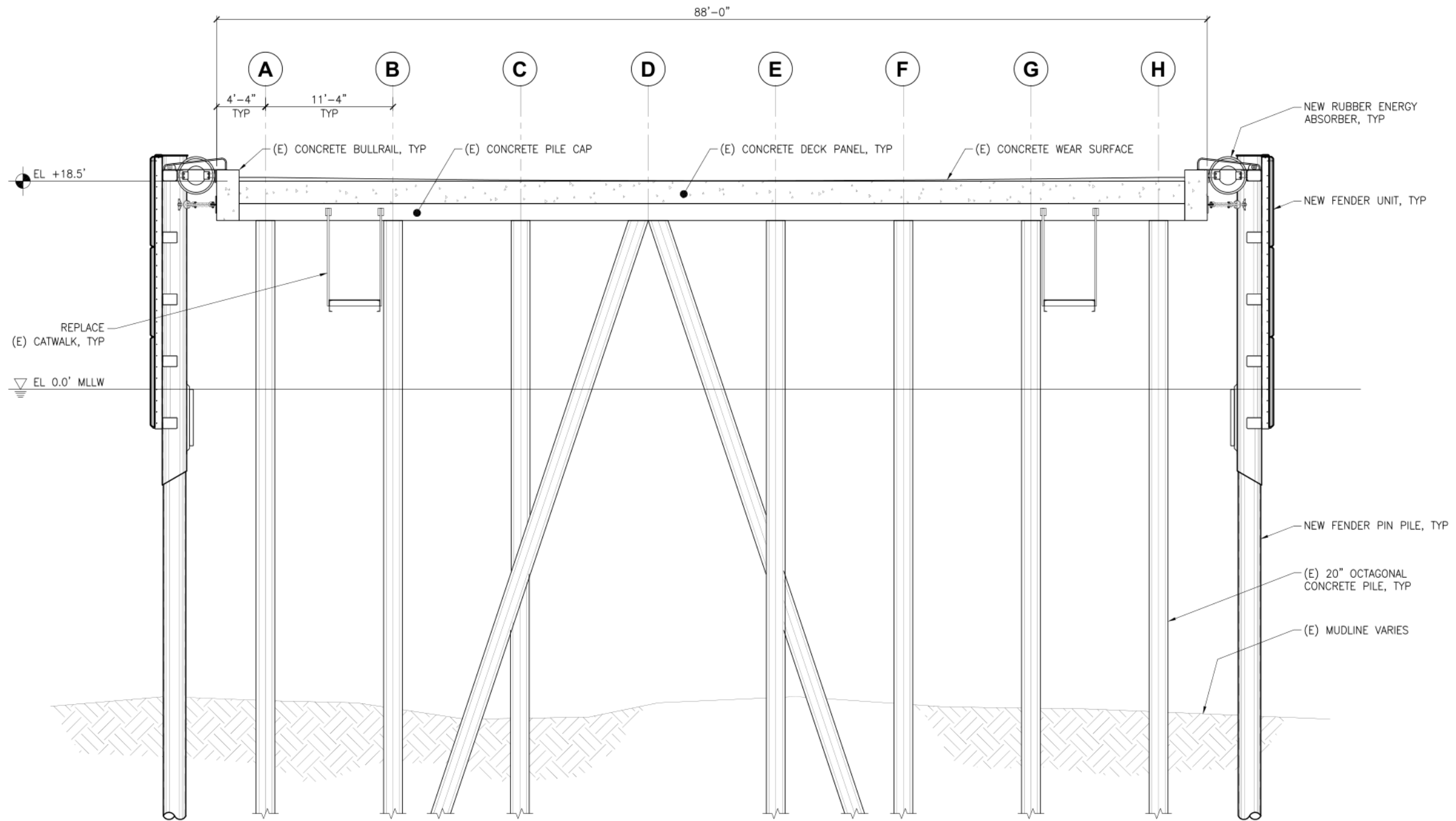
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ENGINEERS, INC.

**ADAK PIER 5
REPAIRS & UPGRADES**

**DOCK LAYOUT
(2 OF 2)**

DESIGNED BY: DDH DATE: APRIL 2022
CHECKED BY: JC PROJECT NO: 191078

SHEET NO: **3** OF 4



PIER SECTION
NTS

CONCEPT
APRIL 2022

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REV	DATE	DESCRIPTION

DATE: _____

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AK LIC# AECC250

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ENGINEERS, INC.

**ADAK PIER 5
REPAIRS & UPGRADES**

DOCK SECTION

DESIGNED BY: DDH DATE: APRIL 2022
CHECKED BY: JC PROJECT NO: 191078

SHEET NO: **4** OF 4

ADAK PIER 5 REPAIRS/UPGRADES ROM PROJECT COST ESTIMATE

Item No. and Description	Unit	Quantity	Unit Price	Amount
1.0 MOB/DEMOB				
1.1 Mobilization & Demobilization	LS	All Req'd	\$ -	\$ 1,500,000
SUBTOTAL =				\$ 1,500,000
2.0 PIER 5 REPAIRS/UPGRADES				
2.1 Demo Exist. Timber Fender Piles	EA	371	\$ 1,000	\$ 371,000
2.2 Demo Exist. Timber Fender Components	LF	1,200	\$ 100	\$ 120,000
2.3 Demo Exist. Utilities & Light Fixtures	LS	All Req'd	\$ -	\$ 150,000
2.4 Demo Exist. Under-Dock Steel Catwalks	LF	1,500	\$ 50	\$ 75,000
2.5 F&I Heavy-Duty Pin Pile Fender Panel Units	EA	27	\$ 250,000	\$ 6,750,000
2.6 F&I P/S Concrete Bearing Pile Replacement - SW Corner	EA	2	\$ 150,000	\$ 300,000
2.7 F&I New Under-Dock Steel Catwalk	LF	1,500	\$ 150	\$ 225,000
2.8 F&I Concrete Repair at Grid 11D Pile Cap	LS	All Req'd	\$ -	\$ 10,000
2.9 F&I Concrete Bullrail & Topping Slab Patch Repairs	LS	All Req'd	\$ -	\$ 50,000
2.10 F&I Recoating of Mooring Cleats & Bollards	EA	50	\$ 800	\$ 40,000
2.11 F&I New Electrical/Comm Lines	LS	All Req'd	\$ -	\$ 150,000
2.12 F&I New LED Fixtures on Existing Light Poles (per Pole)	EA	2	\$ 50,000	\$ 100,000
SUBTOTAL =				\$ 8,341,000
TOTAL CONSTRUCTION COST =				\$ 9,841,000
3.0 PROJECT COSTS				
3.1 Engineering Design @ 5% of Construction	LS	All Req'd	\$ -	\$ 500,000
3.2 Permitting (NEPA, Non-IHA)	LS	All Req'd	\$ -	\$ 50,000
3.3 Detailed Condition Inspection	LS	All Req'd	\$ -	\$ 65,000
3.4 Dive Inspection of Piling	LS	All Req'd	\$ -	\$ 85,000
3.5 Construction Admin/Inspection @ 5% of Construction	LS	All Req'd	\$ -	\$ 500,000
3.6 Marine Mammal Observation Program during Construction	LS	All Req'd	\$ -	\$ 250,000
SUBTOTAL =				\$ 1,450,000
TOTAL PROJECT + CONSTRUCTION COST =				\$ 11,291,000

Notes:

1. Rough order of magnitude (ROM) project cost estimate based on conceptual level planning.
2. Mob/Demob cost assumes barge mobilization from mainland Alaska or Pacific NW by off-island contractor.
3. F&I = Furnish & Install.



May 13, 2022

Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Secretary Buttigieg:

On behalf of Peter Pan Seafood Company, it is with great pleasure that I write to state my support for The Aleut Corporation's Port Infrastructure Development Program grant being submitted to the U.S. Department of Transportation. The proposed project will make critical repairs and updates to the Port of Adak's Pier 5 to ensure its continued usage.

Adak Island's economy is almost solely supported by the fishing industry. Adak is located where the North Pacific Ocean converges with the Bering Sea; creating some of the richest fishing grounds in the world. Pier 5 and the adjacent seafood processing plant are vital to the harvest and processing of this abundant source of US wild capture protein.

Peter Pan Seafood Company is Alaska's oldest continuously operating processing company and was recently re-acquired (from foreign ownership) by a group of US seafood professionals and investors. We believe that the Pier 5 project will provide important benefits to the entire western Aleutians fishing fleet as well as US seafood consumers.

The upgrades and repairs made to Pier 5 will allow for fish, seafood, crew, and other goods to again be safely and efficiently loaded and unloaded, supporting the local economy of the island and more broadly the fishing and seafood industry and seafood consumers.

Sincerely,

A handwritten signature in dark ink, appearing to read 'S Minor', with a long, sweeping horizontal stroke extending to the right.

Steven Minor
Manager, Business Development
Peter Pan Seafood Company

stevenm@ppsf.com
907.572.6108



City of Adak, Alaska
100 Mechanical Street Suite B122
Adak, Alaska 99546-2111

May 3, 2022

Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Secretary Buttigieg:

On behalf of the City of Adak, Alaska it is our pleasure that we write to state our support for The Aleut Corporation's Port Infrastructure Development Program grant being submitted to the U.S. Department of Transportation. The proposed project will make critical repairs and updates to the Port of Adak's Pier 5 to ensure its continued usage.

Adak Island's economy is almost solely supported by the fishing industry that fish in the deep waters around the Aleutian Islands, and the seafood processing plant on the island, adjacent to Pier 5. The City of Adak and its residents are reliant on its economically viable partnerships in our community to provide revenue that support a stable economy through sales tax, jobs, labor force creation, supply chain resiliency and technology for the prosperity of ALL of City of Adak. The proposed Port Infrastructure Development Program will allow The Aleut Corporation and the City of Adak to work hand in glove to reach its shared goals.

The upgrades and repairs made to Pier 5 will allow for fish, seafood, crew, and other goods to again be safely and efficiently loaded and unloaded supporting the local economy of the island and more broadly the fishing and seafood industry that provides food worldwide.

Sincerely,

Angela Engelkes

Angela Engelkes
Interim City Manager

Adak Community Development Corporation

Post Office Box 1943 Adak, Alaska 99546-1943
(907) 592-2335 • acdc@adaktu.net

May 4, 2022

Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Secretary Buttigieg:

On behalf of the Adak Community Development Corporation (ACDC), it is with great pleasure that I write to state our support for The Aleut Corporation's Port Infrastructure Development Program grant application submitted to the U.S. Department of Transportation. The proposed project will make critical repairs and updates to the Port of Adak's Pier 5 to ensure its continued usage.

Our organization is dedicated to the economic development of the community of Adak based on access to the maritime resources of the Aleutian Islands. As part of our duty ACDC holds, on behalf of the community, Golden King Crab, Halibut and Sablefish quota to support the operations of the shoreside seafood processing plant on the island and our resident's participation in these fisheries. Furthermore, we are actively pursuing local mariculture development of kelp and geoduck to further diversify the resources available for shoreside processing. This pier is critical for the participation and success of these economic activities.

Adak Island's economy is almost solely supported by the fishing industry that participates in the federal and state waters in and around the Aleutian Islands, and specifically to the operation of the seafood processing plant on the island, adjacent to Pier 5. Without safe and reliable access to Pier 5, which handles all goods that arrive to Adak using marine transportation, our community would be unable to participate in these critical local and regional fisheries.

Adak is in a unique geographic location, located 1,200 miles from Anchorage and some 450 miles from the nearest port. Adak is limited in transportation options as there are no road connections and all goods must travel by barge or aircraft. As a community we use this pier to move hazardous and bulky cargo, of which there is no other viable option of transportation. While the shoreside processing plant exports product to premium markets using our aviation facilities, most of the processed seafood is exported using this maritime facility. Without Pier 5 there is no readily available alternative to efficiently move these resources in and out of the community to national and global markets.

U.S. Department of Transportation

May 4, 2022

Page 2

The upgrades and repairs made to Pier 5 will allow for fish, seafood, crew, and other goods to again be safely and efficiently loaded and unloaded supporting the local economy of the island and more broadly the fishing and seafood industry that provides food worldwide.

Sincerely,

A handwritten signature in black ink, appearing to read "Layton J. Lockett", with a long horizontal flourish extending to the right.

Layton J. Lockett
President



6700 Arctic Spur Rd. | Anchorage, AK 99518 | TEL 907.677.5213 | BowheadTransport.com

May 3, 2022

Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Secretary Buttigieg:

On behalf of Bowhead Transport, it is with great pleasure that I write to state my support for The Aleut Corporation's Port Infrastructure Development Program grant being submitted to the U.S. Department of Transportation. The proposed project will make critical repairs and updates to the Port of Adak's Pier 5 to ensure its continued usage.

Adak Island's economy is almost solely supported by the fishing industry that fish in the deep waters around the Aleutian Islands, and the seafood processing plant on the island, adjacent to Pier 5. Bowhead Transport utilizes Pier 5 several times each year to deliver equipment, construction material, vehicles, food and supplies to the community of Adak.

The condition of the pier is of critical importance to the community of Adak to receive cargo. Safety of Bowhead Transport personnel and vessels is a priority for our company. The current condition of Pier 5 is generally unsafe and desperately in need of repair and restoration to the existing structure and ramp landing adjacent to Pier 5. Upgrades to the pier and ramp landing would greatly improve the safety aspect for vessel and crew use as well as maximizing efficiency and minimizing lay time in the Port of Adak.

In its current state of disrepair, approaching Pier 5 or the adjacent ramp landing with any vessel must be done in the best of conditions and with extreme caution. Waiting on conditions to improve to an acceptable level is costly to any marine transport company. This downtime, standing by, waiting for conditions to improve is an expense that is passed through to the businesses and residents of Adak. This pass through increases their living costs and hinders the growth of their community.

Making the necessary improvements to Pier 5 and the adjacent ramp landing will greatly improve the efficiency of each landing in the port of Adak lowering the cost of food, supplies and equipment.

In short, the upgrades and repairs made to Pier 5 will allow fish, seafood, crew, and other goods to again be safely and efficiently loaded and unloaded supporting the local economy of the island and more broadly the fishing and seafood industry that provides food worldwide.

Sincerely,
Christopher Palle
General Manager, Bowhead Transport

A handwritten signature in black ink, appearing to read "Chris Palle", is written over the printed name and title.



July 14, 2006

Project No. 051044

Ms. Kristy Despars
Aleut Enterprise, LLC
840 K Street, Suite 202
Anchorage, Alaska 99501

Re: Pier #5 & Fuel Pier Fender Inspection

Dear Kristy,

Aleut Enterprise, LLC, (AEC) hired PND Engineers, Inc. (PND) to inspect the fender systems on Pier #5 and the Fuel Pier located in Adak, Alaska. The purpose of the inspection was to evaluate the general overall condition of the fenders and to identify any significant deficiencies for the purpose of planning possible future repairs. The scope of the inspection involved examining only the above water structural components from the pier itself. This letter report describes the condition of the fender systems and the recommended corrective action where appropriate. Pier #5 and the Fuel Pier were inspected by PND from November 10-13, 2005.

Pier #5

Pier #5, which was built in around 1980, is approximately 720 feet long (including the trestle) and 90 feet wide. The trestle portion is approximately 160 feet long and 40 feet wide. The dock superstructure is constructed of concrete and with the exception of three steel piles is supported by concrete piles.

The fender system on Pier#5 is comprised of treated timber fender piles driven into the seabed and fastened to a rather complex timber waler system at the top of the dock. The piles have been driven as singles along both sides of the trestle and in groups of three along the perimeter of the main dock. The fender piles at the dock corners have been installed in clusters. The pile chocking and waler system consists of multiple layers of treated timber blocking that has been latticed between and around the three grouped pile tops and fastened together with a network of through bolts. The waler timbers have been spliced into these intermittent pile chocks to form a continuous timber structure along each entire length of the main dock superstructure. The waler system is mounted to rubber energy absorbers which are in turn mounted to the heavy concrete beam located along the perimeter of the dock.

The fender system on Pier #5 was found to be in poor condition. During the inspection all fender piles were examined. In total 366 piles were inspected and 49 were found to be broken (13.5%), 17 missing (5%), and 5 repaired with retrofitted sleeves (1.5%). It is suspected that many additional piles were damaged at locations which may only be verified during a dive inspection. Additionally, the entire waler system was observed to be severely dilapidated. Nearly all of the timbers in the waler system were decayed and/or broken.

Pier #5 Recommendations

Due to the tight spacing of the fender pile groups installed on Pier #5, even with missing and damaged piles significant numbers of piles are available to resist light to moderate vessel loading. However, due to the very poor condition of the pile-to-waler connections at the top and the unknown condition of the submerged portion of piling, it would be impossible to identify a safe vessel size or berthing load. The waler system is in such poor condition that it will have to be replaced in the near future. Overall, the superstructure of Pier #5 is in good condition and has significant remaining life. For this reason PND recommends that the fender system be replaced to optimize the pier's operational efficiency and protect it from vessel impact damage.

As one option, AEC could replace the damaged fender piles and the walers with a similar type system. However, in lieu of the labor intensive timber type waler system, PND recommends that a simpler steel waler system be incorporated. In addition to being more cost effective it would be stronger. PND also recommends that larger rubber energy absorbers be used to allow more tolerance for deflection before damage occurs to the fenders, dock, or vessel. It is PND's opinion that the existing energy absorbers are undersized and likely contributed to the large number of broken and missing piles caused by insufficient available deflection.

Another option for AEC to consider which PND feels is more suited and appropriate to Pier #5's industrial usage is the installation of heavy-duty energy absorbing fenders similar to those installed on the Fuel Pier. Energy absorbing fenders allow larger vessels to berth at the dock with less chance of damage. This is of particular concern when severe weather occurs often. Energy absorbing fenders are not inexpensive; however, they can be spaced much wider than the multitude of fender piles that must be installed to provide adequate protection for the dock. To minimize costs, energy absorbing fenders could be installed along selected segments of the dock to accommodate the larger vessels when necessary.

Other Pier #5 Issues

During the inspection of Pier #5 a few other repair/maintenance items were noted and should be mentioned:

Concrete Damage

While overall the concrete portions of Pier #5 are in good condition, one large corner spall was noted on a cast concrete pile cap beneath the dock. While not detrimental to the dock's strength at this time, it should be repaired to prevent possible corrosion of the reinforcing steel within. The spall is located at grid location 11D when referring to the drawing sheets in the *UNDERWATER FACILITIES INSPECTIONS & ASSESSMENTS, JULY 1992* document that was provided to PND prior to the inspection.

Corrosion

Significant corrosion is occurring to several components of the structure. The most serious corrosion is occurring on the reinforcing steel within the pile or pile cap where the pile was cast into the pile cap. The corrosion can be seen leaching out of the pile-to-cap joint while accessing the underside of the dock. There is evidence that these joints have been sealed/repared with grout in the past. Water is likely entering the joint from seawater being blown up from beneath and/or from water leaching through the deck. PND recommends that the pile-to-pile cap joints

be repaired with grout and that the top surface of the deck be sealed to prevent additional corrosion and long term damage to the dock.

While not detrimental to the dock's main superstructure, significant corrosion is occurring on much of the steel support network for the elaborate utilities and catwalk system beneath the dock. Nearly all of the affected brackets, hangars, etc. appear to have been coated, plated, or galvanized. However, some or all of the protection has been depleted to the point where severe corrosion is occurring to the base metal. To preserve the extensive network of utilities on Pier #5, PND recommends that AEC develop and incorporate a rehabilitation program for repair and/or replacement of these vital structural support components.

Fuel Pier

The Fuel Pier was originally constructed in 1957. The main dock structure is a T-shape with an approximately 270 foot long face and 120 foot long trestle. Off both the north and south ends of the dock 180 foot long catwalks with mooring dolphins have been installed. The main dock, trestle, catwalks and mooring platforms have been constructed with a concrete deck supported by concrete piles. The Fuel Pier has received significant repairs and structural upgrades over the years. The last notable upgrade was the addition of two new breasting dolphins and the retrofit installation of six heavy-duty energy absorbing fenders along the face of the main dock. Pile driving logs reveal that the dolphins and fenders were installed in 1994.

The dolphins were installed along the face line of the dock approximately 90 feet from both the north and south end. The dolphins are constructed of three steel piles driven at 2:V to 1:H batter in a tripod layout. The rearward batter pile is 24 inches in diameter and the two front batter piles are 20 inches in diameter. They are tied together with a robust steel pile cap. Two large energy absorbing fender donuts are attached to the dolphin cap. The other end of the donuts are attached to the steel framing of the heavy-duty timber fenders. The fenders have 24 inch diameter steel pipe sleeves incorporated into the frames which slide fit over 20 inch diameter pin piles that provide vertical and lateral support. A vertical 8 inch tie-off pie has been mounted to just outside of the sleeve on each side. All steel has been galvanized. Cathodic protection for each dolphin is provided by two approximately 400 pound aluminum anodes. Since the dolphin and the fender are electrically discontinuous due to the rubber donut between them, one anode protects the dolphin structure; the other protects the fender framing steel. Each anode is suspended from a steel cable with a separate cadwelded cable for electrical continuity to the structure it is protecting.

During the inspection no structural damage was noted on either the north or the south dolphin. Aside from some minor corrosion to the pipe pile splice welds, they appear to be in good condition. However, the south dolphin has a broken support cable on the anode that protects the fender framework. The anode was hanging from the electrical cable only. The anode protecting the dolphin appeared to be fine as did both anodes on the north dolphin.

The six heavy-duty energy absorbing fenders installed along the face of the dock are of the same general construction as the fenders on the dolphins with the exception that the fenders installed at each end of the dock have a ladder incorporated into the center of the timbers. Additionally, there are no dolphins included in the dock fenders. Rather than being mounted to a dolphin cap, the

rubber donuts are bolted to the dock face concrete via anchors and brackets. A single anode was installed to provide cathodic for the fender's steel frame work. For clarity in this report the dolphins will be designated F1 through F6 corresponding to the position along the dock face beginning from north to south, i.e., the north most dock fender will be designated F1.

The only significant structure damage to any fender was noted on F3, where the steel cap on top of the pipe sleeve was cracked and broken. Additionally, this location exhibited a significant amount of corrosion around the welds. Fender F5 was missing entirely. During the inspection a single pin pile was seen in place projecting above the water line. All five remaining fender locations have anode issues. They are as follows: the anode at F1 is missing; fenders F2, F3, F4, and F6 all have broken electrical connections to the anodes effectively rendering the anodes non-functional.


Fuel Pier Recommendations

Except for some minor repair and maintenance work, the fendering system on the Fuel Pier is in good condition. Fenders are the front line structures that take the abuse and protect this highly valuable facility and the vessels it serves. Because of this facilities importance to AEC, it is PND's opinion that the fenders should be kept in a high state of repair. PND recommends the following actions:

- **South Dolphin:** repair the broken support cable on the anode that protects fender framing. Inspect both electrical connections as well as the support cable for the dolphin anode. Repair/replace as necessary.
- **North Dolphin:** inspect both anode support and electrical cable connections.
- **Fender F1:** replace missing anode.
- **Fender F2, F3, F4, & F6:** inspect and repair/replace the support cables as necessary. Reestablish electrical continuity between the anode and fender as necessary.
- **Fender F3:** repair damaged cap plate on pile sleeve pipe. Clean of corrosion and re-coat with spray metallizing.
- **Fender F5:** replace missing fender. This work will require a pin pile to be driven and a replacement fender to be set in place.

PND appreciates the opportunity to assist AEC in their efforts to preserve and enhance their assets. If you have any questions or comments please do not hesitate to call.

Sincerely,

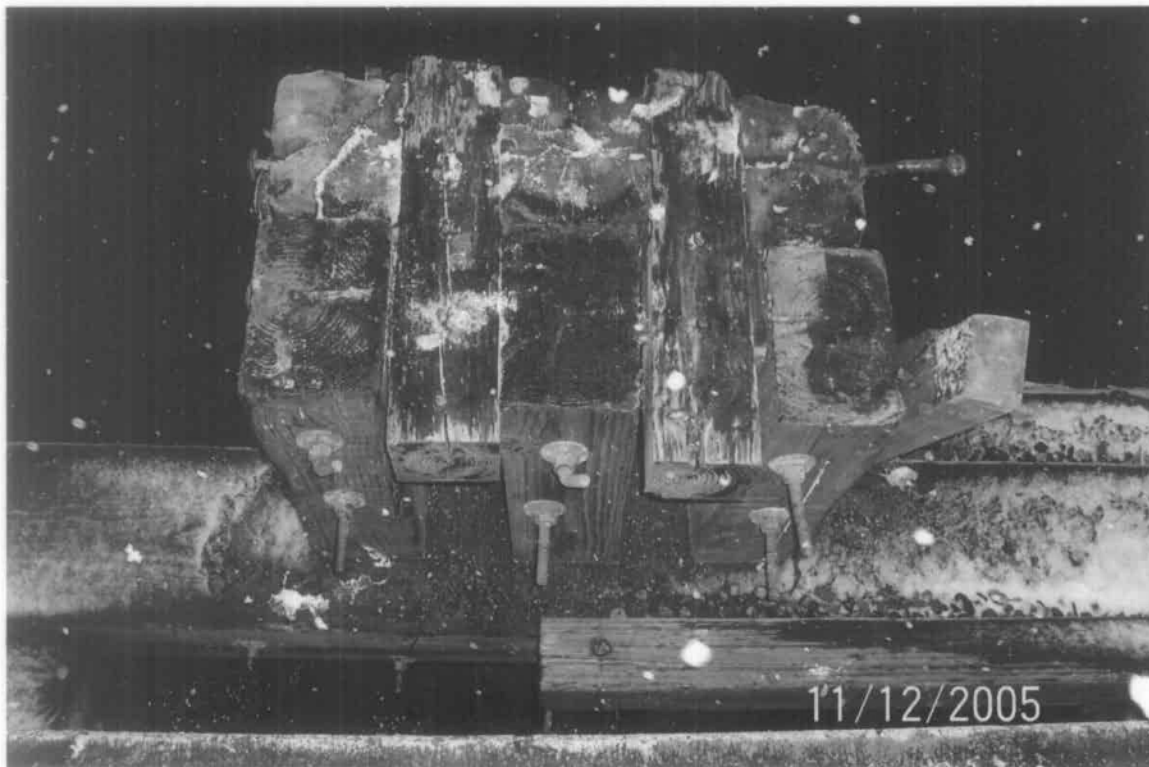


Eric Fontaine, P.E.
Senior Engineer

Attachments: Site Inspection Photos



View of typical Pier #5 fender pile waler system at top of dock. The system is in very poor condition.



The three green topped timbers near the top of the photo are the fender pile tops which have been integrated into the waler system.



View sighting down the east side of Pier #5. The trapezoidal shaped energy absorbers can be seen behind heavily dilapidated fender/waler system.



View sighting down the west side Pier #5. The entire top-side fender/waler system exhibited the broken and decayed timbers which are evident in this picture.



View of broken timber fender piles as viewed from beneath the dock.



View of a large concrete spill on a cast concrete pile cap. Except for this damage and some minor leaching of water through the deck, the concrete on Pier #5 is in good condition.



View of pile-to-cap joint where the concrete piling was cast into the concrete pile cap. This joint is in acceptable condition and did exhibit evidence of being re-grouted sometime after construction.



This pile-to-cap joint exhibits severe leaching of corrosion from the steel reinforcing inside the concrete. Water is entering the concrete, likely from above, and impacting the steel.



View of a plate cast into the concrete to provide an attachment point for utility hangers and brackets. This location was one of the points in better condition yet still exhibits corrosion and is in need of repair.



View of a similar connection in another location exhibiting very severe corrosion. This level of corrosion is common too much of the infrastructure beneath the dock.



View of the North Dolphin and fender as seen from the north catwalk. The North Dolphin is in good condition.



North Dolphin



View of the South Dolphin and fender. Except for some minor corrosion and broken anode support cable it is in good condition.



The pair of cables to the left supports and provides continuity to the anode that protects the dolphin piles and cap. The cables to the left act similarly for the fender framing steel. However, the brown support cable is broken leaving the anode hanging from only the black electrical continuity cable.



View of the broken and heavily corroded F3 fender pipe pile sleeve. This unit should be repaired and re-coated.



View of the missing fender unit at fender location F5. The visible pile is a pin pile which the fender pipe sleeves fit over. The other pin pile was missing. The fender should be replaced in the future.



May 30, 2014

Project No. 141018

Mr. Paul Fuhs
Consultant
c/o The Aleut Corporation
4000 Old Seward Highway, Ste. 300
Anchorage, AK 99503

Subject: **Adak Dock Inspection – Pier #5**

Dear Paul:

At your request, on behalf of The Aleut Corporation (TAC), PND Engineers, Inc. (PND) inspected three docks in Sweeper Cover at Adak, Alaska – Pier #3, Pier #5, and the Fuel Pier. All three docks were inspected on May 9, 2014 by Mr. Derrick Honrud, P.E. The purpose of the inspections was to provide an update to previous condition inspections, conducted by PND in November 2005, in order to support planning and decision making for future port development. The scope of the inspections involved cursory examination of the above-water structural components for general condition and integrity. (A dive inspection to examine the condition of below-water support piles was not conducted as part of these inspections.) This letter report describes the general condition of Pier #5, identifies the deficiencies found, and provides recommended corrective action where appropriate.

Pier #5 (P5) General Description

Pier #5, which was built around 1980, is approximately 720-feet long (including the trestle portion) by 90-feet wide. The trestle portion is approximately 160-feet long by 40-feet wide. The superstructure of the pier is constructed of concrete and, with the exception of five (5) steel piles on the east side, is supported by octagonal concrete piles. Overall, Pier #5 appears to be in good condition, excluding the fender system, and has significant remaining life. This evaluation is similar to that for the 2005 inspection. Based on the inspection, it did not appear that any maintenance/repair items had been addressed since the 2005 inspection. Refer to Appendix A for photos of Pier #5 taken during the inspection.

The structural elements of Pier #5 were visually evaluated for their condition in the field. The descriptions and evaluation for each structural element type follows below:

P5 Support Piles

Pier #5 is supported by 20-inch octagonal, prestressed concrete piles spaced at 20 feet on-center in the longitudinal direction and 11.33 feet on-center in the transverse direction. The majority of the piles are vertical bearing piles with battered pile pairs located throughout the interior of the pier substructure. Five (5) 24-inch diameter steel piles are installed on the east side Pile Line “A” as repair (sleeve pile) or replacement for previously damaged concrete piles.

The vast majority of concrete support piles appear to be in good condition, with the exception of two (2) piles at the southwest corner of the pier that were damaged by barge impact in 2012. These two piles, at grid location 38H and 38G, are in need of replacement. Personnel from PND's Seattle office inspected the damage in 2012 and developed repair drawings for the corner of the pier (corner fender piles were also damaged). It appears that the repairs have yet to be carried out, which was confirmed by personnel from Aleut Enterprise, LLC (AE).

Significant corrosion is occurring on several components of the structure. However, the most serious corrosion is occurring on the reinforcing steel within the pile or pile cap where the pile is cast into the pile cap. The corrosion can be seen leaching out of the pile-to-cap joint (and staining the piles a red-brown color) while accessing the underside of the pier. There is evidence that these joints have been sealed/repared with grout in the past. Water is likely entering the joint from seawater being blown up from beneath and/or from water leaching through the deck. Similar to the 2005 inspection, PND recommends that the pile-to-cap joints be repaired with grout, and that the top surface of the deck be sealed to prevent additional corrosion and long-term damage to the pier.

P5 Pile Caps

The pile caps are constructed of reinforced concrete and cast into the tops of the support piles. They were cast in two stages for the initial construction. The first-stage pile cap was cast into the top of the support piles and directly supports the precast concrete deck panels above. The second-stage pile cap was cast as an in-fill between adjacent deck panel spans and ties/bonds the pile cap and deck panels together.

Overall, the concrete pile caps of Pier #5 appear to still be in good condition. (Corrosion inside the pile-to-cap joints is addressed above in the P5 Support Pile section.) However, a large corner spall was observed, similar to the 2005 inspection, on a cast concrete pile cap section beneath the pier. While not detrimental to the pier's strength at this time, it should be repaired to prevent potential corrosion of the reinforcing steel within. This spall was identified in the 2005 inspection, and appears to have slightly advanced in deterioration. The spall is located at grid location 11D, which is a dual batter pile location.

Associated with the barge impact damage at the southwest corner of the pier in 2012, there is also spalled and cracked concrete on the pile caps at grid locations 38G and 38H. This damage should be repaired per the drawings developed by PND's Seattle office.

P5 Deck Panels

Precast concrete deck panels span between the pile bents in the longitudinal direction of the pier. The deck panels are haunched at their support ends and function as both stringers/beams to transfer loads from the deck surface to the pile caps (and down through the support piles) and structural decking. The deck panels appear to be in good condition, and no physical damage was observed.

P5 Topping Slab

The deck panels are covered with a concrete topping slab that varies in thickness across the pier. The topping slab functions as a wear surface for the deck, covers the deck panel joints, and is sloped toward drains installed in the deck. While the topping slab is in generally fair condition and showing signs of weathering throughout, there are a few localized areas of moderate deterioration. These localized areas of deterioration are not in heavy traffic areas of the pier and appear to have developed some time ago. As such, repair is not absolutely necessary at this time.

As the topping slab continues to weather and deteriorate (and if traffic across the dock increases), it may become necessary in the future to replace portions of (or the entire) topping slab.

P5 Bullrail

The bullrail is constructed of concrete and runs around the entire perimeter of the pier. There are numerous block-outs in the bullrail for utility components such as water hydrants and valves. The bullrail exhibits general weathering and has some areas of localized spalling, but is generally in good condition.

P5 Tie-Off Points

Pier #5 has numerous vessel tie-off points consisting of double-bit bollards and cleats attached to the concrete bullrail and distributed around the entire perimeter of the pier. While corrosion is evident on all of the tie-off points (even those that have been painted), there does not appear to be sufficient corrosion to require de-rating of the bollards and cleats from their original line-pull capacities. One of the bollards on the west side of the pier was observed to have a loose through-bolt from the underside of the pier.

P5 Fender Piles

The fender system on Pier #5 is comprised of treated timber fender piles driven into the seabed and fastened to a rather complex timber waler system at the top of the pier. The piles have been driven as singles along both sides of the trestle and in groups of three along the perimeter of the main pier. The fender piles at the outboard pier corners have been installed in clusters of thirteen (13) piles. The pile chocking and waler system consists of multiple layers of treated timber blocking that has been latticed between and around the three-grouped fender pile tops and fastened together with a network of through-bolts. The waler timbers have been spliced into the intermittent pile chocks to form a continuous timber structure along the entire length of the main pier. The waler system is mounted to rubber arch-type energy absorbers which are mounted to the heavy concrete beam located along the perimeter of the pier.

The fender system was found to be in very poor condition, especially on the east side of the pier. Numerous fender piles were broken, missing, or disconnected from the waler. The entire waler system was observed to be severely dilapidated. Nearly all of the timbers in the waler system were decayed and/or broken. Due to the tight spacing of the fender pile groups installed on Pier #5, even with missing and damaged piles a significant number of piles are still available to resist light to moderate vessel loading, especially on the west side of the pier. However, due to the very poor condition of the pile-to-waler connections at the top and unknown condition of the submerged portion of the piling, it would be impossible to identify a safe vessel size or berthing load. The fender/waler system is in such poor condition that it will have to be replaced in the near future to safely moor vessels.

Associated with the barge impact damage at the southwest corner of the pier in 2012, the corner fender pile cluster is damaged beyond repair and is still in need of replacement. It should be replaced per the drawings developed by PND's Seattle office.

During the inspection, it was observed that a section of fendering approximately 33-feet long had been replaced in front of the marine crane at the northeast corner of the main pier. The fender replacement appears to have happened fairly recently (within the last couple of years). The new fender section is similar style construction as the existing fender system with timber fender piles and timber waler system attached to the existing arch-type rubber energy absorbers.

The new fender section is in good condition, but the fender piles are showing signs of wear from vessels riding up against them.

P5 Ladders

It appears that at least six (6) steel ladders, three (3) on each side, were installed on the pier as part of the original construction. It also appears that a few of the ladders were replaced sometime after original construction. The ladders connect to the fender/waler system and depend on the system for support; therefore, the condition of the fender/waler system directly affects the ladders. Where a newer ladder existed, and the supporting fender/waler system was also in decent condition, the ladder and ladder platform appeared to be in good to fair condition. As part of replacing the fender/waler system (as recommended above), it is recommended that the ladders also be replaced.

P5 Catwalk System and Utilities

The access/inspection catwalk under Pier #5 is constructed of steel framing (structural angles and C-channel sections) and steel grating. The catwalk extends under the east side of the trestle and both the east and west sides of the main pier to grid line 35. The majority of the utilities running under the pier (potable water, fire-suppression water, electrical, etc.) are attached to the catwalk for support.

While not detrimental to the pier's main superstructure, significant corrosion is occurring on much of the steel support network for the elaborate utilities and catwalk system beneath the pier. Nearly all of the affected brackets, hangers, etc. appear to have been coated, plated, or galvanized. However, some or all of the protection has been depleted to the point where severe corrosion is occurring in the base metal. To preserve the extensive network of utilities on Pier #5, PND recommends (similar to the recommendation from the 2005 inspection report) that TAC develop and incorporate a rehabilitation program for repair and/or replacement of these vital support components.

For utility components above the deck, two (2) water hydrants were observed to be damaged (bent over from original position), and the associated line guards disconnected from the bullrail. Also, a majority of the steel covers for the utility-way in the bullrail were observed to be damaged and even removed. The hydrants should be repaired/replaced and reconnected as needed for service, and the utility-way covers should be repaired/replaced to prevent deterioration of the piping, valves, etc. from further exposure to weather and moisture.

P5 Conclusions and Recommendations

Overall, Pier #5 appears to be in good condition, excluding the fender system, and still has significant remaining life. Based on the generally good condition, there is no need at this time to reduce the capacity rating of the pier from the original design loads. The original design live loads are as follows:

- 1,000 PSF Uniform
- HS20-44 Truck (Axle Load = 32,000 lbs)
- 40-ton Mobile Crane (DL = 81,200 lbs)

The original design live loads are commensurate with typical ocean container storage and transfer loads for a naval supply pier (without a container gantry crane) at the time of construction.

Loads, other than pedestrian foot traffic, should not be allowed on the southwest corner of the pier until repair work for the damaged support piles, pile cap, and fender piles has been completed. Berthing and mooring of vessels near the southwest corner should also not be allowed until repairs are completed.

Given the generally good condition of the pier, PND recommends that the fender system be replaced to optimize the pier's operational efficiency and protect it from vessel impact damage.

As one option, the damaged fender pile/waler system could be replaced with a similar type system, similar to the replacement recently installed in front of the crane at the northeast corner of the pier. However, in lieu of the labor-intensive timber-type waler system, PND recommends that a simpler steel waler system be incorporated. In addition to being more cost-effective, it would be stronger. PND also recommends that larger rubber energy absorbers be used to allow more tolerance for deflection before damage occurs to the fenders, pier, or vessel. It is PND's opinion that the existing energy absorbers are undersized and likely contribute to the large number of broken and missing piles caused by insufficient available deflection.

Another option to be considered, which PND feels is more suited and appropriate to the pier's industrial usage, is the installation of heavy-duty energy-absorbing fenders similar to those installed on the Fuel Pier at the west end of Sweeper Cove. Energy-absorbing fenders allow larger vessels to berth at the pier with less chance of damage. This is of particular concern when severe weather occurs often. Energy-absorbing fenders are not inexpensive; however, they can be spaced much wider than the multitude of fender piles that must be installed to provide adequate protection for the pier. To minimize costs, energy-absorbing fenders could be installed along selected segments of the pier to accommodate larger vessels when necessary.

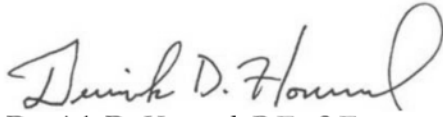
PND further recommends the following actions (categorized as Structural, Safety, or Maintenance items):

- **Southwest Corner of Pier:** Complete repair/replacement of the support piles, pile caps, and corner fender pile cluster. This is a STRUCTURAL item.
- **Ladders:** Replace ladders with fender system (fender system replacement described above). This is a SAFETY/MAINTENANCE item.
- **Grid 11D Pile Cap:** Repair damaged/spalled corner of pile cap. At this time, this is a MAINTENANCE item.
- **Support Pile to Pile Cap Interface:** Where corrosion staining is evident, repair interface with grout. Seal top surface of the deck as necessary to keep water from leaching down into joint. At this time, this is a MAINTENANCE item.
- **Catwalk System & Utilities:** Develop and incorporate a rehabilitation program for repair and/or replacement of access and utility support components under the pier. Above the deck, replace the damaged water hydrants and re-install the associated line guards, and replace the damaged utility-way covers. These are MAINTENANCE items.
- **Topping Slab:** monitor condition of slab and repair/replace as necessary. This is a MAINTENANCE item.
- **Support Piles:** conduct a thorough dive inspection to determine the condition of the support piles below water. This is a STRUCTURAL/MAINTENANCE item.
- **Tie-Off Points:** Tighten a loose through-bolt on one of the west-side double-bit bollards. The loose bolt can be identified from the catwalk under the pier. This is a MAINTENANCE item.

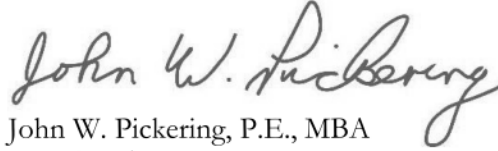
PND appreciates the opportunity to assist TAC in their efforts to preserve and enhance their assets. If you have any questions or comments, please do not hesitate to contact us.

Sincerely,

PND Engineers, Inc. | Anchorage Office



Derrick D. Honrud, P.E., S.E.
Senior Engineer



John W. Pickering, P.E., MBA
President/Principal Engineer

Attachments:

- Appendix A: Pier #5 Photos

APPENDIX A:
Pier #5 Photos



Photo P5-1. East side of Pier #5.



Photo P5-2. West side of Pier #5.



Photo P5-3. Looking south down the deck of Pier #5.



Photo P5-4. Area of localized damage on concrete deck topping slab.



Photo P5-5. Damaged hydrant and detached line guard on west side of pier.



Photo P5-6. Damaged/missing covers for utility-way blockouts in bullrail.



Photo P5-7. Dilapidated fender/waler system on east side of the pier.



Photo P5-8. Dilapidated fender/waler system on west side of pier.



Photo P5-9. Severely damaged fender pile cluster at southwest corner of pier.



Photo P5-10. Replaced section of fender/waler system in front of crane at northwest corner of pier.



Photo P5-11. Abrasion damage on fender piles of replaced fender/waler section.



Photo P5-12. Catwalk and utilities under pier.



Photo P5-13. Severely corroded catwalk support members.

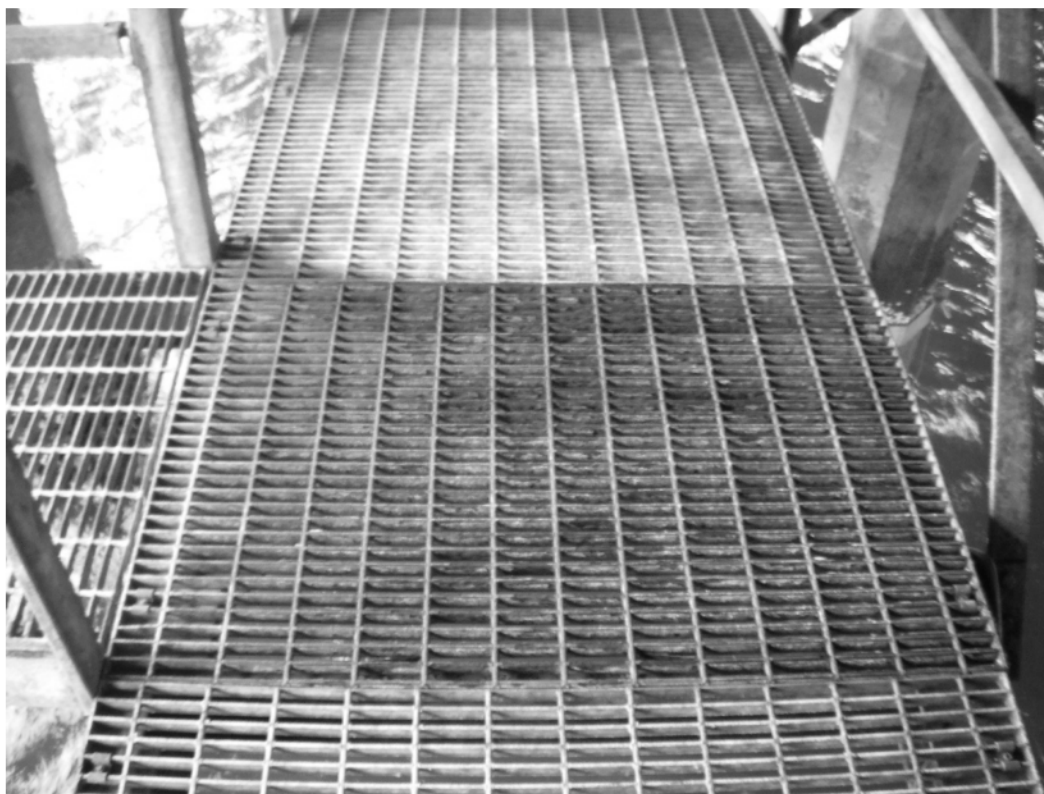


Photo P5-14. Severely corroded catwalk grating.



Photo P5-15. Deck panels, pile caps, and support piles under the pier.



Photo P5-16. Looking north down western-most pile line under pier.



Photo P5-17. Spalled concrete pile cap at grid 11D.

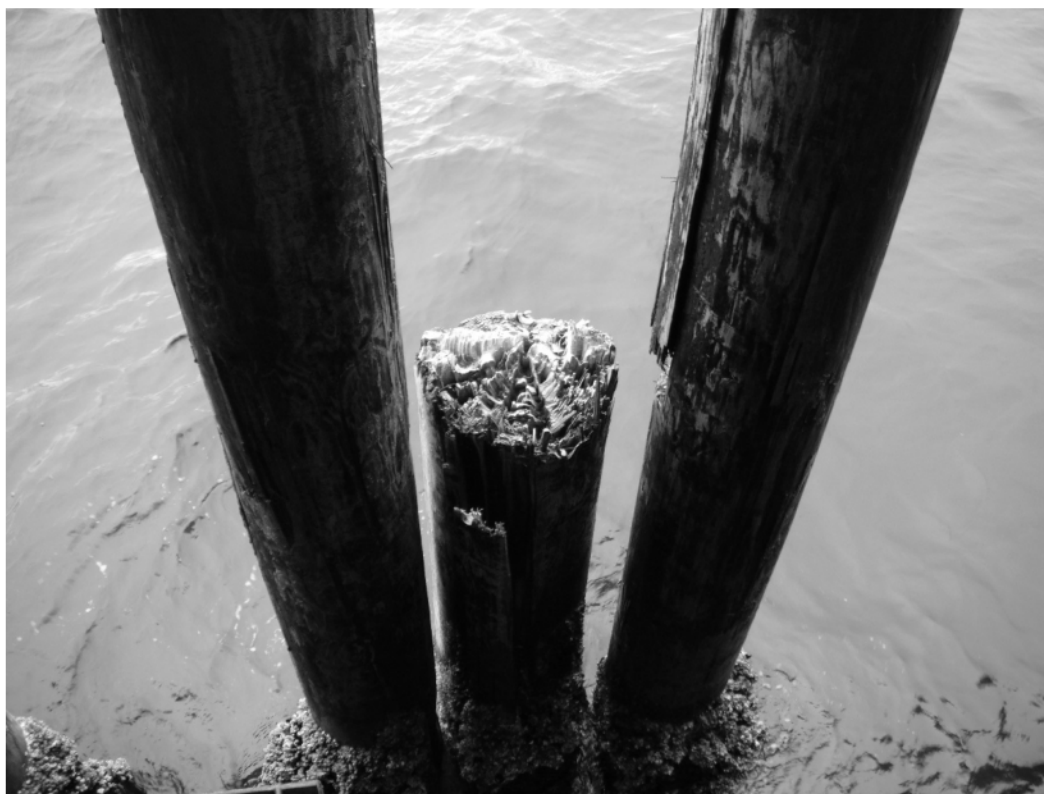


Photo P5-18. Broken fender pile observed from under the pier.



Photo P5-19. Corrosion staining at top of support pile from pile cap attachment.



Photo P5-20. Bollard through-bolt connection under the pier, note the loose bolt.

Barge alongside dock showing how compromised fender piles (angled) and proximity of barge life lines





Pier 5 looking North to South



Pier 5 Piling Floating



Pier 5 Fender Assemblies 4-7



Pier 5 Fender Assemblies 17-24



Pier 5 Fender Assemblies 13-24



Pier 5 Fender Assemblies 27-45



East face of Pier 5



D rubber energy unit on the west face of Pier 5. (12 inches high, 8 inches wide, 3.5 feet long.)



West face of Pier 5 in the 2018 allision / damage area.



West face of Pier 5 2018 allision / damage area.

THE ALEUT CORPORATION

Personnel Policies

Adopted March 2020

4000 Old Seward Highway, Suite 300
Anchorage, Alaska 99503

THE ALEUT CORPORATION

PERSONNEL POLICIES

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700 PERSONNEL POLICIES

700.1 FUNCTIONS OF PERSONNEL POLICIES

I. PURPOSE

To ensure all employees of The Aleut Corporation for which these policies apply to, understand TAC's Core Values of Honesty, Integrity, Accountability, Respect and Perseverance, and TAC's Mission "to maximize dividends and opportunities for our shareholders".

To provide guidance for consistent personnel actions and establish generally applicable performance and behavior expectations in the workplace.

II. SCOPE

The policies and procedures set forth in this manual pertain to employees of The Aleut Corporation, hereafter referred to as "TAC" or the "Company".

III. POLICY

These Personnel Policies are designed to carry out the core values and mission of TAC. As policies and benefits are updated and revised, changes will be communicated to employees through standard communication channels, and continued employment with TAC will thereafter be deemed acceptance of the changes by the employee. The policies stated herein are subject to change at the sole discretion of TAC, as are all other policies, procedures, benefits, or programs of TAC. The process of change to these policies requires President/CEO approval prior to final approval by the TAC Board of Directors. Employees may receive updated information concerning changes in these policies for which advance notice is not required. The Board of Directors must approve changes to policies. The President/CEO or designee must approve proposed changes to procedures.

The policies and procedures contained herein constitute guidelines only. They do not constitute part of an employment contract, nor are they intended to make any commitment to any employee concerning how individual employment actions should or will be handled. These policies are not a contract, expressed or implied, guaranteeing employment for any specific duration. The Company does not guarantee any minimum length of employment. Although we hope that your employment relationship with the Company will be long term, your employment is at-will, meaning that either you or the Company may terminate this relationship at any time, for any reason, with or without cause.

It is the intent of these Personnel Policies to comply with all Federal, State, and local laws applicable to TAC and its operations in Alaska. If any policy conflicts with applicable law, rules, regulations, and conditions prescribed by any funding source or regulatory body, the applicable law will prevail. In general, Alaska law follows Federal Law with some exceptions.

- A. Revisions. The President/CEO or designee and HR will review the Personnel Policies every three years to identify areas where policy should be adopted or revised according to the law or the needs of TAC and its employees. Employees are encouraged to recommend new policies or revisions for consideration. Suggested policies or revisions should be directed to the employee's supervisor and/or President/CEO.

- B. Responsibilities. The President/CEO, department heads, and supervisors are responsible for monitoring employee compliance with the Personnel Policies. However, employees are also individually responsible for knowledge of and compliance with these Personnel Policies.

700.2 PERSONNEL RECORDS

I. PURPOSE

To provide a uniform procedure for the maintenance, safekeeping, and disclosure of employee personnel files, employee medical records, and information in the files. These files are maintained for administrative purposes and to comply with applicable Federal, State and local laws.

II. SCOPE

All employees of TAC.

III. POLICY

The Company shall maintain a system of confidential personnel records accessible only to the employee, his/her supervisor, President/CEO, and other Company officials who have a business need to know. This system shall be maintained and controlled by HR for access and safekeeping.

- A. Personnel Records. Personnel records are those documents which reflect an individual's status during the period of employment. The following employee records are maintained in segregated personnel files in the HR department:
 1. Central Personnel File. The Central Personnel File is the official personnel record for an individual employee and includes, but is not limited to, employment applications, prior employment, reference letters, verification of employment, job description, offer letter, work performance, corrective actions including documentation of verbal reprimands, training, and personnel action forms.

A supervisor is discouraged from establishing and maintaining an "unofficial departmental personnel file" for individual employees where documents should otherwise be in the Central Personnel File. If a supervisor believes it is necessary to maintain such records, HR should be consulted prior to creation of such files.
 2. Benefit Records. These documents are to be maintained separate from the Central Personnel File. Due to the protected class and personal data they contain, these documents are not relevant to the person's position and how they perform their job.
 3. Confidential/Employee Medical Records. Employee medical records, including pre-employment physicals, background checks, alcohol screening, employee work restriction notices from medical providers, records of medical examinations, treatment, medical test results, and medical clearances are subject to Health Insurance Portability and Accountability Act (HIPAA) and shall be maintained in separate employee medical files. Such files are considered confidential and shall be kept under lock and key except when accessed by the employee or an authorized Company official.
 4. Workers' Compensation File. A Workers' Compensation (WC) File would only be set up at the time an employee experiences a WC accident. If additional accidents occur, they would be added to this file.

5. Investigation File. If there is an investigation of an employee, an investigation file will be kept under lock and key by the HR. It is the property of the company and not available to the employee as it includes protected witness testimony.
 6. I-9 Forms and Supporting Documentation. I-9s are filed in binders alphabetically with supporting documentation filed separately in the employee's Central Personnel File. If an error is discovered, a new I-9 form can be created with the old form stapled to the back of the new correct form. Once an employee is terminated, the I-9 form will be transferred to the I-9 inactive or terminated employees' binder.
- B. Access to Personnel Files. Pursuant to AS 23.10.430, an employer must permit an employee or former employee to inspect and make copies of the employee's personnel file, as well as inspect other employee personnel related information maintained by the employer.
1. Employee Access to Records. An employee is permitted access to the records maintained by the Company regarding that employee. However, these records may be viewed only in the presence of designated personnel. Employees may not mark up, alter, or change the data contained in the files. An employee (or former employee) may obtain a photocopy of his or her file on reasonable advance written notice to the HR, subject to payment of customary photocopying expenses.

The Company will honor an employee's right to access per Alaska law.
 2. Central Personnel File. The Central Personnel File may be inspected by the employee's supervisor, President/CEO, TAC Legal Counsel, and any other person with written authorization from the President/CEO or designee.

No document shall be removed from a personnel file without prior written approval from TAC Legal Counsel, and notice must be provided to the employee.

To the extent required by Federal law, medical information regarding an employee's medical condition must be kept in a separate file from the Central Personnel File and treated as a confidential medical record.
- C. Corrections to Personnel Records. In order to make corrections to a personnel record, the employee must first submit a written request to his/her supervisor. If the request is granted, then the changes will be made by the supervisor under the direction of the employee while the employee and Human Resources is present. If the request for correction is denied, the employee may have his/her statement of disagreement with the personnel record placed in the file.
- D. External Requests for Personnel Records. The Company will not provide information from a present or former employee's personnel file to any external person or organization (governmental agency, employer, or corporation other than the Company) unless the Company has received prior written authorization from the employee before any information is released. The primary exceptions to this policy include:
1. Verification of employment for active employees;

2. Responses to legitimate credit source inquiries (*e.g.*, to confirm employment and income for a home loan to an active employee);
3. Response to a governmental agency investigation; and
4. Pursuant to subpoena or order from the court.

700.3 RECORDS RETENTION

I. PURPOSE

The Human Resources department retains and destroys personnel records in accordance with Company policies on business records retention, as well as Federal and State laws governing record retention.

II. SCOPE

HR maintains both employee record information and government compliance reports. Both are subject to the following retention requirements and destruction procedures.

III. POLICY

Type of Record Relevant	Retention Period	Relevant Law(s)
<p>Selection, hiring and employment records:</p> <ul style="list-style-type: none">• Job applications.• Resumes.• Job ads.• Screening tools/tests.• Interview notes and other records related to hire/no-hire decisions. <p>Records related to:</p> <ul style="list-style-type: none">• Promotion.• Demotions.• Transfers.• Performance appraisals.• Terminations.• Reasonable accommodations and/or requests.• Training records.• Incentive plans.• Merit systems.• Seniority systems. <p>Copy of EEO-1 survey and self-identification forms if applicable.</p>	<p>3 years after creation of the document or the hire/no-hire decision, whichever is later.</p> <p>In the case of termination, employers must keep the terminated employee's employment records for 1 year from the date of the termination.</p>	<ul style="list-style-type: none">• Age Discrimination in Employment Act (ADEA)• Americans with Disabilities Act (ADA)• Civil Rights Act of 1964 (Title VII)• Section 503 of the Rehabilitation Act Executive Order 11246 Vietnam Era Veterans Readjustment Assistance Act (VEVRAA)

Type of Record Relevant	Retention Period	Relevant Law(s)
Payroll records, time sheets/cards: Basic employee data: <ul style="list-style-type: none"> • Name. • Address. • Social Security number. • Gender. • Date of birth. • Occupation. • Job classification. Compensation records: <ul style="list-style-type: none"> • Amounts and dates of actual payment. • Time and day of week when employee's workweek begins. • Total hours worked each day and workweek. • Basis and rate at which wages are paid. Straight time and overtime hours/pay. All additions to or deductions from the employee's wages. • Total wages paid each pay period. • Records explaining any sex-based pay differences. • Annuity and pension payments. • Fringe benefits paid. • Date of payment and the pay period covered by the payment. 	3 years There are no retention requirements under Lilly Ledbetter; however, it is recommended that employers retain records for the length of employment, plus an additional 5 years or indefinitely.	<ul style="list-style-type: none"> • Age Discrimination in Employment Act (ADEA) • Fair Labor Standards Act (FLSA) • Service Contract Act • Davis-Bacon Act Walsh-Healey Act (Federal contractors) • Family Medical Leave Act (FMLA) • Lilly Ledbetter Fair Pay Act
	Under the Equal Pay Act, employers must keep for at least 2 years all records (including wage rates, job evaluations, seniority and merit systems, and collective bargaining agreements) that explain the basis for paying different wages to employees of opposite sexes in the same establishment.	<ul style="list-style-type: none"> • Equal Pay Act (EPA)
Form I-9: <ul style="list-style-type: none"> • Form I-9. • Copies of documentation (if applicable). 	3 years after date of hire or 1 year after date of termination, whichever is later.	<ul style="list-style-type: none"> • Immigration Reform and Control Act (IRCA) • Immigration and Nationality Act (INA)

Type of Record Relevant	Retention Period	Relevant Law(s)
<p>Employment benefits: Except for specific exemptions, Employee Retirement Income Security Act's (ERISA) reporting and disclosure requirements apply to all pension and welfare plans, including:</p> <ul style="list-style-type: none"> • Summary plan descriptions (updated with changes and modifications). • Annual reports. • Notice of reportable events (e.g., plan amendments that may decrease benefits, a substantial decrease in the number of plan participants). • Plan termination. <p>See more at §107 [29 U.S.C. §1027].</p>	<p>6 years Records used to determine benefits that are or will become due for each employee participating in the plan must be retained if they are relevant.</p>	<ul style="list-style-type: none"> • Employee Retirement Income Security Act (ERISA)
<p>Background checks: Background check information obtained through a consumer reporting agency, for example:</p> <ul style="list-style-type: none"> • Credit reports. • Criminal history reports. • Driving records. • Information regarding character, general reputation, personal characteristics or mode of living. • Any other background check reports created by a third party. • Consent forms and required disclosures to individuals subject to background checks. 	<p>1 year No specific retention requirement under the FCRA, but general EEOC requirements to retain hiring and selection records apply.</p> <p>Experts recommend retaining related information for at least 5 years after the date of the consumer report, which is the statute of limitations in the Fair Credit Reporting Act (FCRA).</p>	<ul style="list-style-type: none"> • Civil Rights Act of 1964 (Title VII) • Fair Credit Reporting Act (FCRA) • The FCRA does not apply when an employer does their own background investigation, only when it uses a third party.

Type of Record Relevant	Retention Period	Relevant Law(s)
<p>Tax records:</p> <ul style="list-style-type: none"> • Employer identification number. • Amounts and dates of all wage, annuity and pension payments. • Amounts of tips reported. • The fair market value of in-kind wages paid. • Names, addresses, Social Security numbers, and occupations of employees and recipients. • Any employee copies of Form W-2 that were returned as undeliverable. • Dates of employment. • Periods for which employees and recipients were paid while absent due to sickness or injury and the amount and weekly rate of payments the employer or third-party payers made to them. • Copies of employees' and recipients' income tax withholding allowance certificates (Forms W-4, W-4P, W-4S and W-4V). 	<p>4 years after filing the 4th quarter for the year.</p>	<ul style="list-style-type: none"> • Federal Insurance Contribution Act (FICA) • Federal Unemployment Tax Act Internal Revenue Code
<p>Safety data:</p> <ul style="list-style-type: none"> • Log of occupational injuries and illnesses. • Records of injuries and illnesses. • Summary of injuries and illnesses. • Records of exposure to toxic substances for each employee. 	<p>5 years following the year records pertain to (medical exams, material safety data sheets and exposure to toxic substances records retained for the duration of employee's job tenure plus 30 years).</p> <p>The medical records of employees who have worked for less than 1 year for the employer do not need to be retained beyond the term of employment if they are provided to the employee upon the termination of employment.</p>	<ul style="list-style-type: none"> • Occupational Health & Safety Act (OSHA) Walsh-Healy Act (Federal contractors)

Type of Record Relevant	Retention Period	Relevant Law(s)
<p>Disability accommodations: Requests for reasonable accommodation from employees and/or applicants and responses and/or accommodations provided by employer.</p>	<p>1 year from the date of making the record or of the personnel action involved, whichever occurs later. In the case of involuntary termination, retain the terminated employee's personnel or employment records for 1 year from the date of termination.</p>	<ul style="list-style-type: none"> Americans with Disabilities Act as Amended (ADAAA) Section 503 of the Rehabilitation Act of 1973 Executive Order 11246 Vietnam Era Veterans Readjustment Assistance Act (VEVRAA)
<p>Drug test records: See list of records at 49 C.F.R. §382.401 for employees covered by the U.S. Department of Transportation (DOT).</p>	<p>1 year from test date and up to 5 years for records relating to drug testing for DOT positions.</p>	<ul style="list-style-type: none"> DOT-covered safety-sensitive transportation positions in industries such as aviation, trucking, railroads, mass transit and pipelines.
<p>Military leave records: All records related to a military leave of absence and reemployment and employee benefits during and upon return from a military leave.</p>	<p>Indefinite; no statute of limitations under the Uniform Services Employment and Reemployment Rights Act (USERRA).</p>	<ul style="list-style-type: none"> Uniform Services Employment and Reemployment Rights Act (USERRA)

701 EMPLOYMENT

701.1 EMPLOYMENT CLASSIFICATIONS

I. PURPOSE

To provide a system of employment classifications at the Company, including identification of overtime exempt and non-exempt positions.

II. SCOPE

All employees of TAC.

III. POLICY

Regular, Part-Time, and Temporary Employment Classifications:

- A. Regular Full-Time Employee. An employee who is scheduled to work a full-time work week of forty (40) hours and whose position is not considered to be of a temporary nature shall be considered a full-time employee.
- B. Regular Part-Time Employee. An employee who is scheduled to work less than a work week of forty (40) hours shall be considered a part-time employee.
 - 1. Part-Time Benefited. An employee working a minimum of thirty (30) but less than forty (40) hours in a regular part-time position will be eligible for benefits.
 - 2. Part-Time Non-benefited. An employee working less than thirty (30) hours in a regular part-time position are not eligible for benefits.
- C. Intermittent Employee. Intermittent employment is irregular or recurring, hourly employment that is less than full-time each year. It is used to provide a trained work force available on an “on-call” basis to supplement a department’s full-time staff in handling peak workloads. This employee is typically not eligible for benefits.
- D. Temporary Employee. An employee who is occupying a position where the need for that position is for a specific duration and where the work to be performed may not normally exceed six months. The terms and conditions of the employment are defined in the employment letter. These employees are not eligible for benefits, except to the extent any of these policies where it is expressly incorporated by reference in the employment letter.

Exempt and Non-Exempt Classifications: Employees will be notified as to their employment status upon hire or whenever reclassification is necessary.

- A. Exempt Employee. An employee who is employed by the Company in an executive, administrative, professional, or other exempt classification recognized by applicable law. Exempt employees are those who are not covered by (i.e., exempt from) the overtime provisions of Federal and State wage and hour laws.

Exempt employees are paid on a salary basis regardless of the number of hours worked per week. Exempt employees do not receive overtime pay.

- B. Non-Exempt Employees. Non-exempt employees are paid an hourly wage and receive overtime compensation for all hours worked in excess of eight (8) hours per day and/or forty (40) hours per week, unless the employee and the Company agree upon a flexible work hour plan, such as a 9/80 or 4/10, that is approved by the state where they are employed.

701.2 EMPLOYMENT AT WILL

I. PURPOSE

To ensure all employees understand that their employment relationship is “at will” and employment may be terminated at any time at their discretion or at the discretion of the Company.

II. SCOPE

All employees of TAC.

III. POLICY

While the Company strives to maintain long term, mutually beneficial relationships with employees, it is recognized that employees and the Company must retain the maximum flexibility in deciding when to terminate the employment relationship. All employment relationships at TAC are at will and are without any specific term or duration. As such, each employee and the Company may end the employment relationship at any time, with or without cause, with or without advance notice.

Only the TAC Board of Directors has authority to enter into an employment contract for any specific term or duration. Any such agreement must be in writing, signed by the President/CEO or the Chair on behalf of TAC. No oral communication of any kind (e.g., offer, acceptance, understanding, implication, inference, or preference) shall be binding on the Company unless it is in writing as an employment agreement and signed by the President/CEO or the Chair on behalf of the TAC Board of Directors.

701.3 EQUAL EMPLOYMENT OPPORTUNITY

I. PURPOSE

To ensure that TAC's Personnel Policies and practices are administered without unlawful discrimination.

II. SCOPE

All employees of TAC.

III. POLICY

- A. The Company does not discriminate against any employee or applicant on the basis of race; color; sex; sexual orientation; national origin; religion; marital status; pregnancy; parental status; disability; age; status as disabled veteran, special disabled veteran, Vietnam veteran and all other eligible veterans; or other classifications protected by law.
- B. Recruitment, selection, placement, training, promotion, demotion, termination, and layoff decisions made by TAC supervisors will be based on the job-related qualifications, job performance, and abilities of candidates. In some cases, tenure with TAC or status as a TAC shareholder or descendant thereof shall be treated as factors to be considered in the selection process.
- C. All other personnel policies and practices of TAC, including compensation, benefits, corrective action, and safety and health programs will be administered and conducted without regard to any individual's race; color; sex; sexual orientation; national origin; religion; marital status; pregnancy; parental status; disability; age; status as disabled veteran, special disabled veteran, Vietnam veteran and all other eligible veterans; or other classifications protected by law.
- D. TAC has established shareholder and descendant preference program to recruit, hire, and ensure the upward mobility of qualified TAC shareholders and descendants, unless specifically prevented by contract, Federal law, and/or State law. Please refer to policy 701.4. Application of that preference program is not a violation of this equal employment opportunity policy.
- E. Employees who have Equal Employment Opportunity (EEO) related questions, problems, or complaints should first communicate their concerns to their immediate supervisor. If they are dissatisfied with the supervisor's handling of the matter, they should take the matter directly to Human Resources. If the employee is still dissatisfied with the handling of the matter, they may contact the President/CEO; if the matter relates to the President/CEO then it must be taken to the Chair of the Board of Directors.

701.4 SHAREHOLDER & DESCENDANT PREFERENCE PROGRAM

I. PURPOSE

To provide opportunities to TAC shareholders and their descendants pursuant to the Alaska Native Claims Settlement Act, 43 U.S.C. § 1601 et seq (P.L. 100-241) and other Federal laws.

II. SCOPE

All employees of and candidates for employment with TAC.

III. POLICY

To the extent required or permitted by applicable law:

- A. Pursuant to the Alaska Native Claims Settlement Act, 43 U.S.C. § 1601 et seq, the Company may grant preference to eligible and qualified TAC shareholders and their descendants when two applicants or employees have equal or similar qualifications and/or experience in employment practices which include without limitation: filling vacancies through initial hiring, promotion, lateral transfer, and reassignment; training; and other similar employment opportunities.
- B. TAC may give preference to TAC shareholders and their descendants in the award of contracts and grants. Where allowable by law, grantees, sub-grantees, contracts, and subcontracts of TAC may include the requirements of similar TAC shareholder and descendant preference statements.

701.5 RECRUITMENT & HIRING

I. PURPOSE

To provide for the recruitment and hiring of the best qualified individuals while carrying out TAC's Shareholder and Descendant Preference Program.

II. SCOPE

All employees of and candidates for employment with TAC.

III. POLICY

The Company will recruit and hire the most qualified applicant for vacancies in compliance with all applicable contracts, Federal, State, and municipal laws and with policy 701.4 regarding TAC's Shareholder and Descendant Preference Program.

A statement shall be included in job postings for TAC indicating that the Company is an equal opportunity employer and, that to the extent the law allows, preference will be given to qualified shareholder and descendant applicants as defined in policy 701.4.

- A. Personnel Requisitions. Filling a position begins with the department supervisor submitting the requisite information to the President/CEO for approval, and then forwarded the information to the HR.

Personnel requisitions should indicate the following:

1. Position title.
2. Position's hours/shifts.
3. Exempt or nonexempt status of the position.
4. Reason for the opening.
5. Essential job functions and qualifications (or a current job description may be attached).
6. Any special recruitment advertising instructions.

- B. Job Postings/Recruitment Advertising. Positions are advertised externally based on need and budget requirements. All regular exempt and nonexempt job openings are posted both internally and externally. HR is responsible for placing all recruitment advertising. Jobs will remain posted until the position is filled.

- C. Internal Transfers. Employees who have been in their current position for at least one year may apply for internal job openings. This requirement may be waived with the consent of the employee's supervisor and HR.

All applicants for a posted vacancy will be considered based on their qualifications and ability to perform the job successfully. Internal candidates who are not selected will be notified by HR.

If an internal candidate has been identified for an internal transfer and/or promotion, depending on the circumstances, the competitive recruitment process may be forgone with the approval of the President/CEO and HR.

- D. Interview Process. HR and the hiring supervisor will screen applications and resumes prior to scheduling interviews. Initial interviews will be conducted by the hiring supervisor with HR's participation in the process as needed.

Team interviews may be conducted as needed. If a team interview is conducted, a structured interview process is recommended. Interview questions should be compiled by the interviewing team and reviewed by HR prior to the interview. After the team completes the interview process, the results of the interview should be forwarded to HR as part of the recruitment file. The hiring supervisor or supervisor has the authority to make the hiring decision.

Supervisors must notify HR of all interviews conducted. All applications and resumes of applicants not selected must be forwarded to HR for retention.

HR will notify applicants who are not selected for positions.

- E. Reference Checks. Criminal background checks, drug and alcohol testing, and reference checks are completed after a decision has been made to hire a candidate. An offer will be made to that individual contingent on the satisfactory completion of criminal background checks, drug and alcohol screening, and reference checks.

All reference checks and interviews are conducted by the hiring supervisor and provided to HR along with interview notes of all candidates interviewed including those not selected.

- F. Job Offers. If HR receives satisfactory results from the reference checks, criminal background check, and the drug and alcohol testing, HR will notify the candidate to confirm the job offer. On an employee's start date, the employee will complete required paperwork and an orientation with HR. The new employee's supervisor is responsible for providing a department orientation for the new employee.

701.5(a) REFERENCE & BACKGROUND CHECKS

I. PURPOSE

To ensure that TAC hires only the most qualified candidates for open positions by taking meaningful actions to protect its employees, finances, property, and other assets. This policy sets forth procedures for checking references and conducting pre-employment background checks for all positions.

II. SCOPE

Qualified applicants being seriously considered for a position and those who have been extended an offer of employment.

III. POLICY

The post-offer background checks conducted under this policy do not replace the reference checking expected to be completed and reviewed by hiring supervisors as part of the candidate selection process prior to the extension of an offer of employment. Hiring supervisors with questions about checking employment references on final candidates may contact Human Resources.

- A. Consent to Conduct Background Checks and Confidentiality. Finalists for positions will be informed during the pre-employment process that any offer of employment is contingent upon completion of a background check with acceptable results. Prior to conducting the background check, a signed, written consent will be obtained from the finalist. Refusal to authorize the background check will make the finalist ineligible for employment.

The information obtained through background checks is confidential and will be shared only with individuals with an essential business need to know. Records of the background check will be maintained with Human Resources separately from the employee personnel files.

Generally, employment in the position should not begin until HR and the hiring supervisor has received and reviewed the results of the background check. Exceptions may be made at the hiring supervisor's request with the approval of HR and the President/CEO.

- B. Determining Required Background Checks for Position. Finalists for all positions are subject to standard background checks of employment, educational, criminal, and sex and violent offender histories. Criteria for identifying a position as possibly requiring license, credit, or other additional background checks include but are not limited to:
1. Direct responsibility for the care, safety, and/or security of individuals.
 2. Direct responsibility for handling or managing money or credit information.
 3. Responsibility for operating vehicles or machinery that could cause accidental injury or death; or
 4. A requirement for a certificate, professional license, or accreditation.

Information discovered through the background check process is to be used solely for the purpose of evaluating a finalist's suitability for employment and will not be used to discriminate against a finalist based on any area of protected status.

- C. Background Checks for Current Employees. Background checks will not be required for current employees under the following circumstances:
 - 1. Transfers or promotions if the background check or checks required for the position were completed within the five (5) years preceding the transfer or promotion.
 - 2. Shift changes where the employee continues to hold the same position in the same department; or
 - 3. Lateral position changes within the same department resulting from a reorganization or restructuring of a work unit.
- D. Background Checks for Former Employees. Background checks will not be required for former employees who are offered a regular or temporary staff position within one year of ending their most recent employment, so long as the background check or checks required for the position were completed within the five (5) years preceding the rehiring.
- E. Current Employees and Duty to Report Convictions/Pleas. Employees have an ongoing responsibility during their employment to inform HR of any felony or misdemeanor convictions or pleas which are acknowledgements of responsibility. Any convictions or pleas should be reported to Human Resources within 24 hours of the incident or the next scheduled business day.
- F. Evaluation of Background Check Results. Once the background checks are completed, management will make a final hiring decision based upon the information gathered. If negative information is obtained through the background check process, the Company will determine whether the information is job-related and if a decision not to hire would be consistent with business necessity. In making this determination, the Company will consider, among all other relevant information, the following:
 - 1. For all criminal convictions or pleas, the nature and seriousness of the offense(s), the number and type of offense(s), the amount of time that has elapsed since the offense(s), whether such offense(s) are related to the responsibilities of the position, and the accuracy and completeness of the information provided by the finalist during the application process.
 - 2. For all other negative information, the nature and seriousness of the activities or data obtained, the amount of time that has elapsed since the activities or data, whether the information is related to the responsibilities of the position, and the accuracy and completeness of the information provided by the finalist during the application process.
- G. Adverse Action Taken Due to Background Check Results. If adverse action is probable based in whole or in part on the results of a background check covered by the Fair Credit Reporting Act (FCRA), the finalist will receive a copy of the background check report, a Pre-Adverse Action Notice, and a document summarizing the finalist's rights under the

FCRA. Finalists will be permitted to provide responsive information regarding their criminal history, including evidence that they did not commit the offense (in the case of a misidentification), evidence of rehabilitation or character, the length of time since the last criminal conviction, and other extenuating circumstances. The finalist will be given five (5) business days to provide this information so as not to halt the recruitment process for the position. Extensions may be provided to the finalist at the sole discretion of the Company.

If adverse action is taken against the finalist in whole or in part based upon the results of a background check, the finalist will receive an Adverse Action Notice indicating that the offer will be rescinded. The finalist will also receive a document summarizing the finalist's rights under the FCRA.

- H. Exceptions to the Background Check Policy. Exceptions to this policy may be made at the discretion of HR and the President/CEO or designee. Categories of employees that are excluded from this policy include temporary employees not directly paid by the Company, unpaid interns, and volunteers, unless a background check is otherwise required by State law, Federal law, or the Company due to the nature of the role.

Definitions:

- Finalist - The candidate selected for a regular or temporary employment position who has been extended an offer of employment contingent upon successful completion of a background check with acceptable results.
- Background Check - Checking or verifying any or all parts of the finalist's employment, educational, criminal, sex and violent offender, license, or credit histories. The nature and scope of the background check will be determined by TAC and will be appropriate to the position. The background checks in this policy may be conducted internally or a background check vendor.
- Background Check Vendor - A company engaged by HR to conduct background checks. Whenever a background check vendor conducts all or any portion of a background check, HR will require the vendor to comply with State and Federal law, including the requirements of the Fair Credit Reporting Act (FCRA).
- Employment History Check - Verifying the finalist worked in the positions cited or listed in the finalist's application. The employment history check is not a substitute for checking employment references prior to extending an offer of employment.
- Criminal History Check - A search for any felony or misdemeanor convictions or pleas which are acknowledgements of responsibility (e.g. plea of no contest or nolo contendere) and which have not been annulled or sealed during the seven (7) years immediately preceding the finalist's application. Criminal convictions or pleas will not automatically exclude a finalist from consideration for employment unless they are job-related and the decision not to hire is consistent with business necessity.
- Sex and Violent Offender Check - A search of State and Federal sex offender registries.

- License History Check - Verifying, if required for the position, that the finalist possesses the licenses cited or listed in the finalist's application, resume, or cover letter, including establishing the current status of the relevant licenses. This includes, for example, checking any motor vehicle driver's license required for the position, or any professional license required for the position.
- Credit History Check - Checking the credit history of the finalist, if required for the position.
- Adverse Action: A denial of employment or any other decision made for employment purposes that adversely affects any current or prospective employee.

701.5(b) EMPLOYMENT OF MINORS

I. PURPOSE

To ensure the Company follows the specific laws should they employ minors.

II. SCOPE

Individuals that qualify as a minor in the state for which they are employed. This policy applies to all employees that are minor employees of TAC.

III. POLICY

Minor Age Employee. An employee who is hired for a specific period of time or project assignment. Child labor laws in Alaska restrict the occupations in which minors may be employed and the number of hours and times during which they may work. All minors are generally prohibited from working in hazardous occupations, and minors that are 14 and 15 years of age are prohibited from working in a variety of other occupations such as manufacturing and transportation.

All minors are prohibited from working more than six (6) days a week. Additionally, minors 16 years of age and under may work only:

- A. A combined total of nine (9) hours of school attendance and employment in one day;
- B. Between 5:00am and 9:00pm;
- C. Up to 23 hours in one week when school is in session, except domestic work and babysitting; and
- D. Up to forty (40) hours a week when school is out.

Alaska employers must provide a rest break of at least 30 minutes to minors who are scheduled to work for six (6) or more consecutive hours. The rest break must occur after the first hour and a half of work and before the beginning of the last hour of work. Minors who work for five (5) consecutive hours without a break also are entitled to a break of at least 30 minutes before continuing to work.

701.6 INTRODUCTORY PERIOD

I. PURPOSE

To orient new employees to their position, enhance their productivity, and welcome them to the TAC team. It is an opportunity for both parties to determine if the individual, the position, and the Company is a good fit for all.

II. SCOPE

This applies to all new employees of TAC except employees with written employment contracts.

III. POLICY

A newly hired employee is in the new hire Introductory Period for the first six (6) months (180 days) of employment. This period is established to benefit both the employee and the Company. It is a period of adjustment and adaptation, both personally and in terms of learning the job requirements and work rules. If, during this period, an employee is unable to adapt successfully to the requirements of the position, the department, or the Company as a whole, employment may be terminated immediately. Supervisors may offer advice and counseling when a problem becomes apparent, but this is not required. Employees may be given advance notice, but that also is not required.

New employees shall be informed of the core values and mission of TAC, functions of the department in which they work, and the relationship of their specific job to the Company.

New employees shall be informed of all pay and benefits available to them as an employee of the Company. This information shall include enrollment in each benefit program as required; published information on each applicable program shall be provided to the employee.

All employee benefits shall commence in accordance with the plan and/or as dictated by the benefit plan itself.

Employees in the Introductory Period, like other employees of TAC, are employed at will pursuant to policy 701.2.

702 PERSONAL CONDUCT

702.1 WORKPLACE MISCONDUCT

I. PURPOSE

To inform employees of the standards of conduct expected of them as employees of TAC.

II. SCOPE

All employees of TAC.

III. POLICY

- A. Workplace Standards of Conduct. Employees of the Company are required to abide by certain standards of behavior and uphold *TAC's Core Values of Honesty, Integrity, Accountability, Respect and Perseverance*. These standards have been established to protect employees and the Company from injury or other threats to well-being, and to promote harmonious, efficient working practices.

Failure to observe the established standards of behavior may lead to corrective action including, but not limited to, formal warnings, suspension, corrective probation, and termination.

The Company's normal practice is to help employees identify problems, and to improve performance and behavior. The specific corrective action will normally be based on an assessment of the offense, the circumstances, and the employee's previous record. The Company reserves the right to take whatever corrective measures it believes are appropriate, including termination, if in the judgment of the supervisor that action is in the best interest of the Company.

- B. Types of Prohibited Conduct. The following types of conduct are prohibited and may result in corrective action, up to and including termination of employment for more serious offenses:

Personnel Conduct

- Excessive absence or lateness
- Excessive personal use of the telephone during work hours (time theft)
- Insubordination or refusal to follow instruction
- Intoxication or use or possession of illegal drugs during working hours
- Conduct which disrupts business activities

Violence and Safety Issues

- Violation of safety rules
- Workplace violence
- Use of abusive language
- Unlawful workplace harassment
- Bullying another employee

- No weapons in the workplace

Company Information and Records

- Unauthorized release of confidential information
- Falsification of company documents or records

Company Property

- Neglect of Company property
- Deliberate misuse of Company property
- Theft of Company property or that of other employees
- Misuse of Company computer equipment

Other offenses that in the supervisor's judgment seriously threaten the well-being of the Company or any employee. For some specific situations, counseling and/or attending Employee Assistance Programs (EAP) may be offered. The specific action to be taken will depend on the nature of the offense, the circumstances, and the employee's previous record.

702.2 HARASSMENT IN THE WORKPLACE

I. PURPOSE

To prevent all forms of harassment and to establish effective procedures for prompt corrective action if such harassment occurs. To encourage employees who believe harassment has occurred to come forward at the earliest opportunity and to forbid any form of retaliation.

II. SCOPE

All employees of TAC.

III. POLICY

- A. All Forms of Workplace Harassment are Prohibited. The Company is committed to providing a workplace that is free of verbal, physical, and visual forms of harassment so that each employee can work in a productive, respectful, and professional environment. Harassment because of a person's sex, sexual orientation, race, national origin, religion, age, disability, or any other basis protected by Federal, State, or local law is strictly prohibited. Employees who violate this policy are subject to corrective action, up to and including termination of employment. Examples of harassment based on race, national origin, religion, age, or disability can include, but are not limited to:
- Cartoons or other visual displays of objects, pictures, or posters that depict any of these protected groups in a derogatory manner; and
 - Verbal conduct, including making or using derogatory comments, epithets, slurs, and jokes towards such groups.
- B. Sexual Harassment is Prohibited. Sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors, or other visual, verbal, or physical conduct of a sexual nature. Sexual harassment includes harassment based on another person's gender or harassment based upon pregnancy, childbirth, or related medical conditions. It also includes harassment of another employee of the same gender as the harasser. Examples of sexual harassment include, but are not limited to:
- Unwelcome sexual advances such as requests for dates or propositions for sexual favors;
 - Offering or conditioning an employment benefit, like a raise, a promotion, or a special job assignment, in exchange for sexual favors;
 - Making or threatening reprisals after an employee has turned down a sexual advance;
 - Visual conduct, like leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters;
 - Verbal conduct, like making or using derogatory comments, epithets, slurs, and jokes of a sexual nature;

- Other verbal abuse of a sexual nature, like graphic verbal commentaries about an individual's sex life or body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations; and
- Unwelcome physical contact, including pats, hugs, touching, assault, or impeding or blocking movements.

This policy is also violated if an employee is fired, demoted, denied a job, or denied some other employment benefit because the employee refused to grant sexual favors, complained about harassment, or assisted in an investigation of harassment.

- C. Prevention and Reporting. The Company is committed to taking reasonable steps to prevent harassment from occurring in the first place and will take immediate and appropriate action when it is learned that unlawful harassment has occurred. To do this, however, we need the cooperation of all employees. It is virtually impossible for management to know about your day-to-day interactions unless you bring problems like harassment to management's attention. No employee is expected to (nor should) tolerate inappropriate harassing behavior in the workplace. You should make your feelings known to the offending employee. But if you are not comfortable doing that, then you must promptly report any offending behavior, whether such behavior is directed towards you personally or to other employees, to your supervisor, or if it pertains to your supervisor, to HR.
- D. Investigation. Any employee who believes that he or she, or a coworker, has been harassed by another coworker, a supervisor, or by anyone else with whom an employee comes in contact in the workplace (e.g. salespersons, vendors, or clients) must promptly report such incidents and the names of the individuals involved to HR.

HR will promptly and thoroughly investigate all claims of harassment. Persons with relevant information will be interviewed. After the investigation is completed, HR will share its findings with the complaining employee, the alleged harasser, and if appropriate, other employees directly concerned with the incident.

If you have brought a complaint to Human Resources or the President/CEO, or you are not comfortable doing so, or if you do not feel that the complaint was satisfactorily investigated or addressed, you should then take the complaint to the Chair of the Board of Directors.

- E. Corrective Action. If, as a result of its investigation, HR concludes that unlawful harassment occurred, prompt and effective corrective action will be taken. This may include corrective counseling of the harasser or other actions to remedy the effects of the harassment and prevent further harassment, including going through an Employee Assistant Program (EAP). It may even include termination of the harasser's employment. No action will be taken against any employee who in good faith files a complaint of harassment or assists in the investigation of such a complaint. Employees who believe they have been retaliated against for having reported harassment or participated in an investigation of a harassment complaint are urged to promptly notify any supervisor, HR, or the President/CEO.

- F. No One is Authorized to Unlawfully Harass an Employee. Employees should understand that no employee, supervisor, officer, or Board member are authorized to engage in harassment or other misconduct that violates this policy, even if that person is in a supervisory position. Such harassment or misconduct exceeds that person's authority. Any such behavior should be reported immediately to HR. If it relates to the President/CEO or a Board member, it should be reported immediately to the Chair of the Board of Directors so appropriate corrective action may be taken.

702.3 DRUG & ALCOHOL

I. PURPOSE

To provide guidance regarding the prevention of job-related drug and alcohol use by employees.

II. SCOPE

All employees of TAC.

III. POLICY

The welfare and success of the Company depends on the physical and psychological well-being of all employees. The abuse of drugs, controlled substances, and alcohol poses a serious threat to both the Company and employees. Commonly abused or improperly used drugs and substances include, among others, alcohol, pain killers, sedatives, stimulants and tranquilizers, as well as marijuana, cocaine, heroin, and other controlled substances. It is the responsibility of both the Company and the employees to maintain a safe, healthful, and efficient working environment. For that purpose, the Company has adopted these policies.

The unauthorized possession, use, misuse, and/or sale of alcohol, controlled substances, or any legal drugs while in the workplace or while on Company business during regular work hours is prohibited and constitutes grounds for corrective action, up to and including termination.

- A. Pre-Employment Drug and Alcohol Screening. All prospective employees will be tested for the use of drugs and alcohol as part of the required pre-employment screening pertinent to the position being hired for, after a contingent job offer has been presented. Positive test results will be considered in the final employment decision.
- B. Random Drug and Alcohol Screening. Depending on the position an employee fills, they may be required under Federal or State regulations to submit to random drug and alcohol screening. An employee with positive test results may be disqualified to work and may also be subject to corrective action up to and including termination.
- C. For Cause Screening. Employees covered under these policies may be tested for the use of drugs and alcohol after an accident which results in injury of self, others, and/or damage to Company property. An employee with positive test results may be disqualified to work and may also be subject to corrective action up to and including termination.

Each employee is responsible for promptly reporting to his or her supervisor or Human Resources any use of prescription medications which may affect the employee's judgment, performance, or behavior.

The Company will establish such procedures as it finds necessary to effectively enforce this policy. This may include a requirement that employees cooperate in personal searches or facility searches when there is reason to believe drugs or alcohol are present, when the employee's performance is impaired, or when the employee's behavior is erratic. Refusing to cooperate with these procedures may be cause for corrective action up to and including termination.

An employee convicted of a criminal charge related to drug and/or alcohol (i.e., Driving Under the Influence) must notify their supervisor or HR immediately. Depending on the offense, and if employee remains employed, the employee may be required to successfully complete a drug or alcohol rehabilitation program as a condition of continued employment, as well as going through an Employee Assistant Program (EAP). The Company's medical insurance may provide partial coverage for counseling and treatment for drug and alcohol abuse.

If an employee discloses to their supervisor or HR that they are struggling with substance abuse (whether prompted or on their own admission), HR, the supervisor, and the employee will discuss options and resources available to assist the employee such as a drug or alcohol rehabilitation program. The Company's medical insurance may provide partial coverage for counseling and treatment for drug and alcohol abuse. This may not conclude in termination if the employee acts in good faith in finding a solution.

If you have any questions about the Drug & Alcohol policy, you are advised to direct your questions to your supervisor or HR.

702.4 ATTENDANCE & TARDINESS

I. PURPOSE

To promote the efficient operation of the Company, minimize unscheduled absences, and address employee attendance.

II. SCOPE

All employees of TAC.

III. POLICY

Employee regular attendance is critical to the operation of the Company. Frequent or unexplained absences from work, or tardiness in reporting to work will seriously impair the value of the employee's service to the Company and will be considered grounds for corrective action, up to and including termination.

If an employee must be absent because of illness, accident, or other unavoidable cause, the employee is required to contact his/her supervisor as soon as possible notifying him/her of the absence.

For multiple day absences, the employees must notify his/her supervisor each day of the absence. If an employee does not call in for three consecutive days, it will be considered as job abandonment and may result in termination.

Employees leaving the office must notify their immediate supervisor and the receptionist of their scheduled time away from the office.

Absences and Tardiness are defined as follows:

- A. Leave Without Pay (LWOP). LWOP is approved by an employee's supervisor or Human Resources.
- B. Excused Absence. If it is necessary for an employee to be absent or late for work because of an illness or an emergency, the employee must notify his or her supervisor no later than the employee's scheduled starting time on that same day. If the employee is unable to call, he/she must have someone make the call. An excused absence occurs when any of the following conditions are met:
 - The employee provides notice to his/her supervisor.
 - The absence request is approved in advance by the employee's supervisor.
 - The employee has enough accrued paid time off (PTO) to cover the absence.
- C. Unexcused Absence. An unexcused absence counts for the purposes of corrective action under this policy.

Employees must take earned PTO for every absence unless otherwise allowed by company policy (e.g., bereavement, jury duty).
- D. Tardiness and Early Departures. Employees are expected to report to work and return from scheduled breaks on time. If employees cannot report to work as

scheduled, they must notify their supervisor no later than their regular starting time. This notification does not excuse the tardiness; however, it may notify the supervisor that a schedule change may be necessary.

Employees who must leave work before the end of their scheduled shift must notify a supervisor immediately for approval.

Excessive tardiness or early departures can be disruptive and compromise productivity and may result in corrective action under this policy.

702.5 APPEARANCE & DRESS

I. PURPOSE

To establish a policy regarding acceptable employee attire in a business office environment.

II. SCOPE

All employees of TAC.

III. POLICY

In an office setting, appearance is important. Employees are expected to be neat and well groomed, and their attire should be appropriate for their position and the image of the Company. Supervisors may offer guidance as to proper attire if an employee's attire is inappropriate. Supervisors may also establish special requirements for safety reasons.

If an employee arrives at their workstation and the supervisor determines that the employee does not fulfill the requirements as set above, the supervisor has the right to send the employee home to change. The employee will not be paid for that period of their absence. If the issue of appearance cannot be resolved between the supervisor and employee, then HR should be involved.

702.6 SOCIAL MEDIA & INTERNET

I. PURPOSE

To outline the appropriate use of social media and internet sites.

II. SCOPE

All employees of TAC.

III. POLICY

The Company recognizes that electronic social media (such as personal websites, blogs, Facebook, Snapchat, Twitter, Instagram, LinkedIn, online discussion groups, text messaging, message boards, chat rooms, etc.) can be used by employees for personal as well as business purposes. The Company understands that the use of the internet and social networking sites can shape the way the public views our Company. The Company respects the rights of all employees to maintain a blog or post a comment on social media sites. At the same time, the Company is committed to ensuring that the use of such communications is done responsibly, ethically, and consistent with the Company's identity, integrity, reputation, values, and policies.

Nothing contained in this Social Media and Internet policy is intended to violate or infringe upon any rights afforded to employees under the National Labor Relations Act with respect to engaging in protected concerted activities.

If an employee chooses to identify themselves as an employee of the Company on any internet site, readers may view that employee as a representative or spokesperson for the Company. Accordingly, care must be taken to ensure that personal viewpoints and opinions are properly identified. In addition, certain comments and activities can be problematic if they have a negative effect on co-workers such as harassing, demeaning, threatening, or hostile comments.

To avoid problems related to the use of social media and internet, the Company has established this policy which provides guidelines for communicating information related to the Company, its subsidiaries, and any of their respective clients, beneficiaries, guests, suppliers, employees, officers, directors, and/or shareholders.

- A. Social Media and Internet on Company Time. Employees of the Company may not post on any personal internet sites or participate in personal electronic social media during worktime or at any time with Company equipment or property. This is considered "time theft" and open to corrective action. Worktime is defined as the employee's scheduled time of work, not including their lunch hour, breaks, or time prior to or after the employee's shift.
- B. Authorization to Comment Regarding Company Services or Products. Employees must receive authorization from the President/CEO before commenting about Company services or products on the internet or social media sites. If authorization is given, the employee must clearly and conspicuously disclose his or her employment relationship with the Company when posting a comment regarding the Company's services or products.

- C. Legitimate Business Purpose. Any employee engaging in internet or electronic social media use for legitimate business purposes (a Company-sponsored web page, blog, or social media site) must get the express approval of all content with the appropriate supervisor before posting. Employees engaged in internet or electronic social media use for legitimate business purposes are responsible for complying with all Company policies.
- D. Disclaimer. Any employee referencing the Company or its affiliates on a personal internet or social media site must include a disclaimer which specifically states that the opinions and attitudes expressed are those of the employee alone and may not be aligned with those of the Company. The employee must make it clear that he/she is speaking for himself/herself and not on behalf of the Company or affiliate.
- E. Prohibition on Advertising or Selling Company Products or Services. Employees are not to advertise or sell any Company products or services on any internet or social media site that is not managed by the Company, or is outside of their roles and responsibilities.
- F. Proprietary and Confidential Information. All Company rules and policies regarding disclosure of sensitive, proprietary, financial, or confidential information apply in full to internet and social media sites. This includes, but is not limited to, information about trademarks, upcoming product releases, finances, products sold, number of employees, Company strategies, and any other information not previously publicly released by the Company. Any employee having a question about whether information has been released publicly, should speak with the Company's general counsel or President/CEO before releasing information that could potentially harm the Company, our products, employees, vendors, partners, and customers. Company logos and trademarks may not be used without express written permission from the Company. The Company is committed to taking a strong stand against any internet or social media sites containing false information or false accusations regarding the Company.
- G. Discrimination and Harassment. All other Company rules or policies regarding discrimination and harassment apply in full force to internet and social media sites. The Company is firmly committed to its equal employment opportunity policies and does not condone or tolerate discrimination. The Company also prohibits all forms of unlawful harassment. Employees are prohibited from engaging in any conduct, activities, communications, or postings which violate Company policies regarding discrimination and harassment. No messages with derogatory or inflammatory remarks about any legally protected characteristic or status shall be transmitted or retrieved. No abusive, profane, or offensive language is to be transmitted. Any conduct which is impermissible under the law if expressed in any other form or forum is also impermissible if expressed through internet sites, social media sites, text messages, or other similar electronic means.
- H. Media Contacts. Media contacts made via internet or social media sites regarding the Company, its products, services, employees, partners, vendors, customers, or competitors should be referred for coordination and guidance to the President/CEO.

- I. Right to Monitor. The Company reserves the right to monitor all public internet and social media sites for the purpose of protecting its interests and monitoring compliance with Company policies.

If activity is found to be compromising, insubordinate, or adverse to the Company's legitimate business interests, the Company may require cessation and removal of any detrimental commentary or postings. The Company reserves the right to access any Company computers and electronic communication devices to monitor internet sites and social media sites. Employees should not maintain any expectation of privacy with respect to information transmitted over, received by, or posted on such sites.

Any violation of any portion of this Social Media and Internet policy may result in corrective action, up to and including termination.

Nothing in this policy is intended to restrict or in any manner limit the ability of employees to fully engage in the rights afforded to them under Section 7 of the National Labor Relations Act

Any questions regarding this policy or its implementation should be directed to HR.

702.7 TOBACCO USE

I. PURPOSE

To establish that Company facilities as tobacco-free places (i.e., tobacco use is prohibited including chew, cigarettes, vape/electronic cigarettes, pipes, cigars, etc.) and assist employees to stop smoking.

II. SCOPE

All employees of TAC.

III. POLICY

There will be no tobacco use permitted inside the offices or building common areas of the Company building or in Company owned vehicles. Tobacco is restricted to the designated smoking area outside the building.

To promote the good health of its employees, the Company may reimburse all reasonable costs for tobacco cessation programs to full-time employees who wish to quit tobacco use with supervisor approval. Please see HR for program assistance.

702.8 EMPLOYMENT OF RELATIVES

I. PURPOSE

To address the employment of relatives at the Company with the objectives of providing value to TAC shareholders and facilitating fair treatment of all employees.

II. SCOPE

All employees of TAC.

III. POLICY

- A. Employment of Relatives. It is permissible for the Company to employ members of an employee's immediate family if steps are taken by supervisors to avoid special treatment or favoritism. When possible, two or more members of an immediate family should not be placed in positions where one family member supervises or exercises control over the working conditions of another family member.
- B. Immediate Family Members. As used in this policy, the term "immediate family" means husband and wife (including separated or divorced spouses), parents and children, brothers and sisters (whether related by blood or adoption), and "significant others" (i.e., persons living together or sharing the same household even though not married).
- C. Avoidance of Favoritism and Appearance of Special Treatment. The primary reason the Company employs employees is to provide value to its shareholders. Shareholder value and employee morale will be impaired if employees have reason to believe that there is favoritism or special treatment among immediate family members employed at the Company. It is therefore incumbent on every supervisor to be vigilant regarding favoritism and the appearance of special treatment, and to take all reasonable and necessary steps to ensure that employees are managed based on their job performance and conduct. If in doubt as to appropriate action to take regarding an employee that is an immediate family member of another employee, the supervisor should confer with HR.
- D. Employee Complaints. Any employee who in good faith believes that an employee of an immediate family member is receiving favoritism or special treatment, is encouraged to discuss his/her concerns with his/her supervisor. If the employee is not satisfied with the supervisor's response, the employee may take his or her concerns to HR. In each case, there shall be no retribution or other adverse action against an employee who complains in good faith. As used herein, the term "good faith" means that the employee acted honestly and without ulterior or malicious purpose.
- E. Removal of Relatives. The Company always reserves the right to transfer, reassign duties, promote, demote, or discharge any employee of an immediate family member if the Company determines, in its discretion, that such action is in the best interests of the Company.

702.9 GRIEVANCE

I. PURPOSE

To provide a process to resolve employee grievances in order to preserve a positive work environment.

II. SCOPE

All employees of TAC.

III. POLICY

A “grievance” means any dispute involving working conditions, the interpretation, application, or any alleged violation of policies as stated in the Personnel Policies or handbooks published based on these policies.

Employees should identify and report concerns, disagreements, and disputes to their supervisor. Whenever possible, they should also actively participate in the resolution of those issues affecting them by working directly with their colleagues and supervisors. Employees are encouraged to follow the grievance process outlined below. If an employee feels uncomfortable with this approach, or if prior efforts have not fully resolved a situation, the employee should seek assistance from HR.

- A. When an employee has a grievance, the employee shall first present the grievance to his/her supervisor. If the supervisor is unable to resolve the matter, the supervisor shall refer it to their supervisor or HR who shall, with good faith, work within a reasonable timeframe on resolution of the grievance.
- B. Once reported to HR, it will be determined if an investigation should occur. The decision and the findings shall be provided to the employee within a reasonable timeframe.
- C. The intent is to seek resolution of the complaint at the lowest level of the organization possible, to foster sound interpersonal relations between each level of the organization, and to be supportive of open communication between supervisors and employees.

Retaliation is strictly forbidden. Individuals may not be penalized for making good faith reports of concerns, disagreements, or disputes or for trying to use the process to resolve them.

Individuals who believe they are being subject to retaliation should report it to HR.

If it relates to the President/CEO, it should be reported to HR.

702.10 PERFORMANCE MANAGEMENT

I. PURPOSE

To promote a clear understanding of the work expected from them, to receive ongoing feedback regarding how they are performing relative to expectations, to distribute rewards accordingly, to identify development opportunities, and to address performance that does not meet expectations. A comprehensive performance management system empowers employees to have greater input to their personal career progression and will enable supervisors to better identify, recognize, and reward individuals based upon an agreed set of criteria.

II. SCOPE

All employees who have worked during at least 6 months of the Performance Management cycle.

III. POLICY

The Company strives to provide an environment where all employees understand the impact their contributions have on the achievement of the Company goals and are provided the opportunity for ongoing personal growth. One way the Company can accomplish this goal is through a strong performance-based management program that culminates in an annual performance review. The Performance Management cycle is continuous as the Company plans, manages, reviews, and rewards performance.

The Performance Management cycle consists of Planning, Managing, and Final Review commencing on April 1st with the Final Review before March 31st. The cycle may conclude and coincide with the salary administration, incorporating pay for performance and discretionary bonus.

The Planning phase is the foundation of the entire Performance Management cycle. In this phase, individual goals and objectives are set for the performance period. Goals that are SMART (Specific, Measurable, Achievable, Relevant, and Time-based) increase employee motivation and commitment to goal attainment, leading to greater performance and productivity.

Regular communication between the supervisor and employee is critical during the Managing phase of the Performance Management cycle. Through formal and informal conversations, both parties are kept abreast of progress towards the successful completion of goals and expectations. These discussions also enable the supervisor to provide timely feedback and coaching as the year unfolds. Given the Performance Management cycle, it is important for supervisors and employees to keep track of key performance highlights and challenges that occur during the year. These notes will help immensely when it is time to prepare the Final Review.

At the conclusion of the Performance Management cycle, the supervisor will meet with the employee to conduct the Final Review. If SMART goals have been set during the Planning phase, and ongoing communication and feedback has taken place during the Managing phase, the overall outcome of the Final Review should come as no surprise to the employee.

703 HOURS OF WORK & PAY

703.1 DAILY WORK SCHEDULES

I. PURPOSE

To establish workdays and workweeks, and to allow enough flexibility to meet the Company's operational needs.

II. SCOPE

All non-exempt employees. This policy also applies generally to exempt employees; however, their hours of work and workweeks may vary depending upon the needs of the Company.

III. POLICY

- A. Workweek. Depending on the work location and position, the typical workweek for all full-time employees is forty (40) hours. There may be occasions when employees will be required to work overtime. Depending on the circumstances necessitating the overtime, employees will be given as much advance notice as possible. Overtime must be authorized in advance by the employee's supervisor.
- B. Workday. Each employee should be provided with their work schedule. Under special circumstances, an employee may request deviation from the regular hours. Such special requests will be considered by the employee's supervisor, department supervisor, and/or the President/CEO.
- C. Flexible Work Schedule. If the circumstances warrant, the President/CEO may authorize a flexible work schedule (e.g., 9/80s or 4/10-hour workdays) as permitted by AS 23.10.060(14), provided that all requirements of the law are met. Human Resources will work with the employee and supervisor to ensure all correct documentation is submitted to Alaska DOL for approval.
- E. Office Closure. The President/CEO or designee may close the office temporarily on a given workday due to weather or other reasons.

703.2 OVERTIME WORK

I. PURPOSE

To establish guidelines for authorizing overtime compensation, and for discouraging off-the-clock and other unlawful work practices by non-exempt employees.

II. SCOPE

All non-exempt employees of the Company (i.e., those employees who are entitled to overtime compensation for overtime work pursuant to the Alaska Wage & Hour Act and/or the Federal Fair Labor Standards Act). This policy does not apply to exempt employees of the Company.

III. POLICY

Except in the case of an emergency, non-exempt employees may only work overtime hours with prior authorization of the employee's supervisor or the President/CEO.

Regardless of the foregoing, non-exempt employees shall always, and without exception, accurately record and report all hours worked, even if unauthorized overtime hours were worked.

Overtime work is defined as work in excess of eight (8) hours per day or work in excess of forty (40) hours per work week. An employee who is authorized to receive overtime pay shall be paid for all such overtime hours worked at a rate of one and one-half times (1.5x) the employee's regular hourly rate of pay.

The only exception to the overtime rule is if an employee is working under an approved flexible workweek schedule. If the circumstances warrant, the President/CEO may authorize a flexible work schedule (e.g., 9/80s or 4/10-hour workdays) as permitted by AS 23.10.060(14), provided that all requirements of the law are met. HR will work with the employee and supervisor to ensure all correct documentation is submitted to Alaska DOL for approval.

A part-time employee who is authorized to receive additional pay shall be paid for such excess hours worked times the hourly rate for the position, or at the employee's overtime rate of one and one-half (1.5x) base hourly rate, depending on the number of hours worked and in accordance with the law.

Non-exempt employees should not be called after regular work hours for Company business unless necessary. In these situations, the employee will be considered working and should report the time worked on their timesheet.

Violations of this policy may lead to corrective action, up to and including termination of employment.

703.3 SALARY ADMINISTRATION

I. PURPOSE

To establish standards for efficient and fair administration of employee pay.

II. SCOPE

All employees of TAC.

III. POLICY

The Company strives to maintain a balanced compensation program applicable to all employees, which clearly relates to the skill, responsibility, experience, and education requirements of each position. Also considered is the performance of assigned duties and competitive pay rates and salary ranges within the industry for comparable work.

The objective of this policy is to attract, motivate, and retain the caliber of individuals required for effective operation and to fairly remunerate all employees in return for the fulfillment of their responsibilities.

- A. Rate of Pay. Each employee will be notified in writing at the time of hire, and at the time of subsequent adjustments in his/her rate of pay, of the rate of pay applicable to the employee's position at that time. Non-exempt employees will be paid by hourly rate of pay. Exempt employees will be paid by salary.
- B. Pay Periods. The established pay period is bi-weekly. All hours must be recorded in the Human Resources management system.
- C. Deductions from Pay. The Company shall make payroll deductions as required by law and for reimbursement of payroll advances and court ordered or employee elected deductions.

An employee who is inadvertently paid for time not worked or who receives compensation to which employee is not entitled shall have the overpayment deducted from his/her next paycheck following discovery of overpayment. If improper deductions are made to an employee's pay, the employee will be compensated on his/her next paycheck unless, due to hardship, the employee requests immediate payment.

- D. Payroll Advances. Payroll advances require the approval of the President/CEO or CFO and supervisor. An employee may request equivalent payment of up to two weeks PTO he/she has accrued. PTO time secured by a payroll advance cannot be used by the employee until the advance is fully repaid.

Payroll advances will be deducted from the employee's next paycheck or subsequent paychecks, according to terms agreed upon at the time of the advance, until paid in full.

- E. Company Travel Advances. Employees may request advances for Company business travel, food, and lodging costs. These requests will be subject to approval by the employee's supervisor or the President/CEO.

Note: Payroll and Company business travel advances will not be approved for any employee who has not settled expense reports for the preceding month.

- F. Pay Adjustments. Pay increases are based on evaluations by an employee's immediate supervisor. If a merit increase is recommended by the supervisor and approved by the President/CEO, that increase will take effect on the first day of the next scheduled pay period or as stated in written notification to the employee.
- G. Deceased Employee Payments. The spouse of an employee who dies while employed by the Company is entitled to receive payment for any earned unpaid wages, accrued vacation, or other monetary compensation, as provided by Alaska law, to which the deceased employee was entitled, unless the employee has submitted other written instructions.

Single employees' entitlement will be paid to the designated beneficiaries as stated on the group insurance application unless otherwise instructed.

For cases in which a beneficiary has not been designated, the employee was single, or there are no written instructions on file, entitlement will be paid to the employee's estate.

704 HOLIDAY & LEAVE BENEFITS

704.1 HOLIDAYS

I. PURPOSE

To establish guidelines for paid holidays for eligible Company employees in recognition and observance of designated holidays.

II. SCOPE

All eligible employees of TAC.

III. POLICY

- A. Paid Holidays. Regular, full-time employees will be provided paid time off for the following holidays:

New Year's Day	Alaska Day (floating)
President's Day	Veteran's Day
Good Friday	Thanksgiving Day
Memorial Day	Thanksgiving Friday
Aleut Day	Christmas Day
Labor Day	Birthday (floating)
Independence Day	

- B. When a recognized holiday falls on a Sunday, the Monday following shall be observed as the officially recognized holiday. Holidays that fall on a weekend will be observed the next business day. Floating holidays, such as birthday and Alaska Day, are to be approved by the employee's supervisor and must be used in the calendar year (by December 31).
- C. Holiday pay will be at the equivalent rate of straight time pay for eight (8) hours per day for non-exempt employees. Exempt employees will receive their regular salary.
- D. An employee must be in "paid" status the day before and the day after a paid holiday in order to be compensated for that day. Employees in a LWOP status, will not be eligible for holiday pay.
- E. If a non-exempt employee is requested to work on a holiday, the employee will receive the holiday pay and regular pay for any hours worked on the holiday (For example, if a non-exempt employee works 8 hours on a observed holiday they would be paid for 8 hours at their regular wage and 8 hours of holiday pay).
- If an exempt employee is requested to work on a holiday, he/she may substitute another day off at the employee's choice. The scheduled substitute day off must be approved in advance by the employee's supervisor and used in the calendar year.
- F. Employees on unpaid leave of absence do not qualify for paid holidays.

- G. Employees will be given their birthdays off with pay subject to supervisor approval. If it is inconvenient to take the actual day off, another day may be scheduled off in lieu of the employee's birthday with supervisor approval.

704.2 PAID TIME OFF

I. PURPOSE

To establish requirements for paid time off for eligible Company employees.

II. SCOPE

All eligible TAC employees.

III. POLICY

- A. Paid Time Off (PTO). Full-time employees shall accrue paid time off at a rate based upon length of service with the Company as follows (which includes vacation time and sick leave):

Years of Service	Paid Time Off	Accrual Per Pay Period
less than 3 years	20 days (4 weeks)	6.20 hours
3 – 7 years	25 days (5 weeks)	7.69 hours
8 – 14 years	30 days (6 weeks)	9.30 hours
15+ years	35 days (7 Weeks)	10.80 hours

Employees will accrue PTO from the date of employment. Accrual of PTO time is based on a 40-hour week. For employees scheduled to work less than 40 hours per week, PTO may be prorated. Overtime hours are not counted towards PTO accrual.

- B. Maximum Accrual Hours. The maximum PTO hours an employee can accrue will be 360 hours.
- C. Scheduling PTO. Employees are required to obtain supervisor approval when scheduling time off. Employees should notify their supervisor as soon as possible for approval of leave.
- D. Exempt Status. Employees may use PTO in partial day increments. An exempt employee who works four hours or less in a regularly scheduled workday will have four hours of PTO deducted from his or her accrued balance. Example:
- An employee who works between 1-4 hours, would record 4 hours worked and 4 hours of PTO.
 - An employee who works 4-8 hours, would record 8 hours worked.
- E. PTO Cash-Out. Employees will be allowed to cash-out down to 80 PTO hours (in increments of 10 hours) twice per year (time of which will be determined by the President/CEO).
- F. Voluntary PTO Donation Bank. The Company understands that employees may face individual or family emergencies and may not have the available PTO to take off to address these times. This policy enables employees to donate PTO on a dollar-for-dollar

basis, regardless of differing pay scales to another employee. Participation is entirely voluntary and applies only to the donation of PTO credit. Once given, the PTO donation is irrevocable. Donations are anonymous unless the donor chooses to self-identify.

Below are examples an employee may need to utilize the PTO Donation Bank:

- The employee has exhausted their own PTO hours due to a catastrophic illness or injury affecting themselves or an immediate family member or affecting a person(s) they have a close relationship to and is in their care.
- The employee has a need to take extended bereavement leave or is on an approved extended leave plan.
- Due to a catastrophic casualty loss, the employee may need to take time to manage their personal affairs.

1. Voluntary PTO Bank Receiving Employee Conditions.

- a. Be in good standing. Employees in good standing are not currently on a performance improvement plan (PIP), or corrective action.
- b. Be in a position that accrues PTO.
- c. Have exhausted all PTO.
- d. Not currently eligible for workers' compensation benefits and disability benefits (if applicable).
- e. Be on an approved leave of absence.

2. Voluntary PTO Bank Donating Employee Conditions.

- a. The employee must be in a position that accrues PTO.
- b. The donating employee may donate any available amount of PTO but cannot deplete his/her own accrual below 40 hours.
- c. The minimum donation of leave under this policy is 4 hours and donations above this amount must be made in 4-hour increments.
- d. A receiving-employee will not be credited with leave credits that exceed the number of hours needed to ensure continuance of the employee's regular salary during the period of the approved catastrophic leave.
- e. Complete a PTO donation form and submit the form to HR.

3. Voluntary PTO Bank, HR and Payroll Processing

- a. HR will be responsible for verification of both the donor's and the recipient's current PTO balances.
- b. HR will verify the reason for the recipient's absence (personal emergency). A PTO donation may be denied if the donation or the nature of the recipient's absence does not meet these guidelines.

- c. Supervisor and President/CEO or designee may be asked to provide final approval for PTO donations.
 - d. Payroll will convert and distribute the number of hours donated into the recipient's PTO account.
- G. Misuse of Leave. Misrepresenting reasons for requesting time off or misrepresenting reasons in applying for a leave of absence may result in corrective action, including suspension without pay and/or termination from employment.

Individuals on an approved leave of absence for which a medical certification is required may jeopardize their right to leave and/or their continued employment by engaging in activities that are incompatible with the medical certification submitted in support of the leave.

704.3 LEAVE OF ABSENCE, RETURN TO WORK, & MODIFIED DUTY

I. PURPOSE

To establish criteria regarding other leaves of absence (both paid and unpaid) available to eligible employees.

II. SCOPE

All eligible employees of TAC.

III. POLICY

The Company recognizes that there may be compelling personal reasons for employees to request a leave of absence. The employee must submit a written request to his/her supervisor. The employee's accrued PTO must be exhausted before taking unpaid leave. The leave of absence may qualify for other paid benefits. Any time off work beyond the employee's accrued PTO will be treated as leave without pay. PTO will not accrue while an employee is in a leave without pay status.

- A. Planned Leave of Absence. A planned leave of absence is not to exceed 12 weeks, unless approved. Employees are eligible for a planned leave of absence only after completion of 12 months of continuous employment. Approval of this leave is limited and at the discretion of the employee's supervisor and HR.
- B. Unplanned Leave of Absence. An unplanned leave of absence includes, but is not limited to, non-benefit eligible illness or injury and personal needs. Employees may be subject to corrective action up to and including termination if their use of unplanned leave is excessive, disruptive, or creates an undue burden on other employees.

The Company will assume an employee has voluntarily resigned if the employee fails to return to work on the agreed upon return date. Reinstatement of the employee to the same position, and to identical terms and conditions of employment, is not guaranteed, and permission for leave does not limit the Company's right to eliminate positions or to terminate the employment relationship at will.

The Company may grant a leave of absence for the following:

- A. Medical Leave of Absence. A medical leave of absence is not to exceed 12 weeks due to personal illness or injury (including pregnancy). Approval of this leave is at the discretion of employee's supervisor and HR. The employee may be required to provide HR with an update from their medical provider stating the current status of the employee's inability to work.
- B. Return to Work (Duty). Employees that are out of work for two or more weeks must produce a Return to Work Form/Release from their doctor which clearly articulates that they can perform their current position with or without accommodations prior to being allowed to return to work. Verification must be faxed from the doctor's office to HR prior to, or at the time that the employee returns to work. Employee will not be allowed to return to work without documentation.

The Company will comply with its obligations under the Americans with Disabilities Act (ADA) and other Federal and State laws to make reasonable efforts to accommodate employees' disabilities in the case of a non-work-related injury or illness if applicable. There is no modified duty for non-work injuries that do not comply with ADA or other Federal and State laws.

- C. Modified Duty. It is the policy of the Company to attempt to provide immediate temporary work assignments (modified duty) to full-time and part-time employees who have been injured or incurred illnesses that are work related, but who are unable to immediately perform their regular work duties. HR will work with the Company's Worker's Compensation (WC) agent, the supervisor, and the employee to determine the availability of a modified duty assignment. However, the Company does not guarantee the availability of modified duty work.

It is the policy of the Company to treat all injured/ill employees with equity and fairness.

Modified duty jobs are intended to be temporary positions, lasting only a period of a few weeks and not to exceed 12 weeks. In addition, modified duty jobs provide tasks that are compatible with restricted job functions until an employee is released by their physician to return to the employee's former position or an equivalent position. If modified duty is not available in the injured employee's department, the employee may be assigned jobs in other departments.

Unless under a worker compensation claim, modified duty will only be offered if a position is available and does not create an undue hardship on the Company.

Clarification of type of modified duty will be necessary and may be limited to only shorter hours, not different duties.

In the case of a "light" or modified duty, not limited hours, wages may be adjusted as in the case of modified duty for Workers Compensation.

After the temporary modified duty time is reached, a return to duty evaluation will need to occur including an ADA assessment.

- D. Subsistence Leave. Subsistence leave is an authorized absence during regular working hours for which the employee is fulfilling his/her right to hunting, fishing, or gathering as to maintain the Native traditional lifestyle while residing in urban areas. Subsistence leave may be taken against PTO or as leave without pay. Subsistence leave must be requested in advance and approved by the employee's supervisor.
- E. Administrative Leave. The President/CEO may grant, at his/her discretion, paid administrative leave to an employee when it is in the best interest of both employee and the Company.
- F. Bereavement Leave. Full-time employees will receive five (5) days of paid bereavement leave per death of an immediate family member. The following qualify as an immediate family member: spouse, children, mother, father, sister, brother, mother-in-law or father-in-law.

- G. Jury Duty Leave. The Company encourages all employees to accept their civic responsibilities, and as a good corporate citizen, the Company supports employees in the performance of these duties. The Company provides leave to eligible employees who are called to serve as jurors or who are summoned to appear as witnesses in a judicial proceeding, pursuant to a subpoena or other court order. Full-time employees who are called to jury duty will continue to be paid their regular rate of pay. The employee must call in or report to work each day or part of a day that he/she is on jury duty.
1. Eligibility. Employees should immediately notify the Company of the need for leave under this policy when summoned to jury service or witness duty, including providing appropriate documentation.
 2. Pay. Employees will continue to be compensated at their regular rate of pay while on jury duty are not required to use accrued PTO.
 3. Procedure. Employees requesting leave under this policy should comply with the following requirements:
 - On receiving a jury summons, subpoena, or other court order requiring appearance in a judicial proceeding as a witness, the employee should notify his/her supervisor or HR. Employees should submit appropriate documentation, including a copy of the jury summons, subpoena, or other court order as soon as practicable.
 - An employee who is released from jury service or witness duty before the end of his/her regularly scheduled shift is expected to call his/her supervisor as soon as possible and report to work.
- H. Military Leave. The Company is committed to protecting the job rights of employees absent on military leave. The Uniformed Services Employment and Reemployment Rights Act (USERRA) protects employees who serve in the United States military, including those who serve in the Army, Navy, Marine Corps, Air Force, Coast Guard, Reserves, Army or Air National Guard, and Commissioned Corps of the Public Health Service. No person will be denied employment, reemployment, promotion, or other benefit of employment based on such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under applicable law or this policy. If any employee believes that he or she has been subjected to discrimination in violation of this policy, the employee should immediately contact HR.
- I. Short-Term Military Leave with Pay. A regular, full-time employee for six (6) months or more immediately preceding an application for military leave and who is a member of the National Guard or a reserve component of the armed forces of the United States, is entitled to a leave of absence from their duties for a period not exceeding fifteen (15) calendar days in any calendar year. Such leave shall be granted without loss of time, pay, or benefits to which they are entitled.

- J. Extended Military Leave without Pay. An employee serving the Guard or Reserve who is called to active duty for an extended tour of duty is eligible for an extended military leave of absence, which may continue up to five (5) years.

Upon return from active duty service, the employee shall return to a position in the same range as their last position at the salary step prevailing for such position without loss of seniority or employment rights. If it is established that they are not physically qualified to perform the duties of their former position by reason of such service, he/she shall be reinstated in other work that they are able to perform at the nearest appropriate level of pay of their former position. Such employees shall make application for reinstatement within forty-five (45) days of discharge or return.

Failure to comply will terminate the extended military leave. When an employee voluntarily reenlists or extends his/her period of military service, this unpaid military leave shall be deemed canceled. This rule shall apply so long as it does not violate 38 U.S.C. SS 2021 –2026 pertaining to reinstatement of Company employees returning from active duty. Only to the extent necessary to comply with 38 U.S.C. SS 2021 – 2026, those provisions shall prevail over this rule

Military Leave Procedure. All employees requesting leave under this policy should comply with the following requirements:

1. Employees should request leave under this policy with as much advanced notice as practicable.
2. In support of the employee's request for leave under this policy, employees should provide his/her supervisor and HR a copy of their orders or other appropriate written certification that the employees have been called to Federal military duty for purposes of military training, drills, encampment, naval cruises, special exercises or the like (or that CA-State military members have been called for military training, drills, unit training assemblies or similar inactive duty training).

705 DEVELOPMENT OPPORTUNITIES

705.1 TRAINING & EDUCATION

I. PURPOSE

To provide employees of the Company with professional development opportunities that increase their skills and enhance their contributions to the Company.

II. SCOPE

All eligible employees of TAC.

III. POLICY

For the purpose of increasing, enhancing, or improving the capabilities or abilities of employees, the Company encourages participation in on-going training and education. The cost of participation in training and education may be partially or fully paid by the Company, subject to prior approval by the employee's supervisor and the President/CEO.

It is the employee's responsibility to seek out educational courses and training opportunities that will enhance career development and which are in line with the Company's mission. Professional development can be obtained through trainings, seminars, educational courses or webinars, and degree programs that will assist the employee in performing his/her essential job functions and increase the employee's contribution to the Company.

Membership fees to professional organizations, subscriptions for scholarly journals, books and computer-based resources are also included with prior supervisor approval.

- A. Request for Approval for Advanced Funding. Employees must first submit to their supervisor for review and approval a Request for Training and/or Educational Assistance form. The form will require the following information:

- Name and description of course of study
- Name of institution or source of training
- Purpose
- Job relevance
- Cost
- Dates and times

For Degree Programs, if the employee passes the course with C or above, the employee remains eligible for future training and education funds.

If the employee received below a C, they are no longer eligible for future training and education funds, until they can show proof of passing additional classes with C or better.

- B. Request for Reimbursement. Employees may receive reimbursement when pursuing educational opportunities. Reimbursement is based on available funding and will reimburse expenses for approved coursework from the prior academic semester.

Employees may also seek reimbursement for subscriptions, professional membership dues or other similar expenses. The employee must provide documentation in a timely manner before receiving reimbursement.

To request reimbursement, the employee must submit the following:

1. A completed employee Expense Report;
2. Purchase receipts for expenses;
3. Documentation of courses and enrollment if enrolling in a degree program; and
4. Grade report or completion certificate.

For degree programs, grade C or above is eligible for reimbursement of approved amount. Any grade less than a C is not eligible for any level of reimbursement.

C. Payback Requirements. As a matter of record, employees accepting the terms of this policy will be required to sign a Service Obligation Agreement to remain with the Company for a specified amount of time.

1. For every cumulative two-thousand dollars (\$2,000) received by the employee, one (1) full-time equivalent year of service obligation is required.
2. One (1) full-time equivalent year of service obligation is equal to two-thousand eighty (2080) working hours.
3. Maximum service obligation is three (3) years.
4. The service obligation begins immediately upon the employee receiving the educational funds.
5. The service obligation may be delayed if the employee continues or returns to school and receives additional funding.
6. An employee who voluntarily or involuntarily terminates prior to the completion of the service obligation will be required to repay the Company a monthly pro-rated amount.

706 SAFETY AND HEALTH

706.1 GENERAL SAFETY STATEMENT & EMPLOYEE RESPONSIBILITIES

I. PURPOSE

To provide a safe and secure environment for TAC employees.

II. SCOPE

All employees of TAC.

III. POLICY

The Company strives to provide safe working conditions for the safety, health, and well-being of our employees.

While the Company has responsibility for overall safe work practices in the workplace, employees share a responsibility for following all safety practices and maintaining a safe workplace. The Company expects each employee to accept safety as a personal responsibility.

Each employee is expected to comply with the following health and safety-related responsibilities:

- Follow all Company and health and safety-related policies and procedures.
- Contact a supervisor immediately if asked to perform a task that is unsafe.
- Report unsafe working conditions to your supervisor or Human Resources.
- Report any violation of policy or procedure to a supervisor.
- Work only with tools and equipment that are in proper working order.
- Report any damaged or malfunctioning equipment immediately to a supervisor.
- Always wear proper safety equipment.
- Keep work areas clean and neat.
- Keep all aisles and exits clear of any obstacles.
- Immediately report any work-related accident, injury, or illness to your direct supervisor or Human Resources.

This list is not all inclusive, these are just a few examples of health and safety responsibilities all employees are expected to comply with.

- A. Fires and Emergencies. In the case of an emergency, dial 911. The Company has an emergency procedure and evacuation plan to follow in the event of a fire or other disaster. These are posted prominently by all exits and located in common areas. Exits, fire extinguishers, and first-aid kits are located throughout the building. All employees should be familiar with the location of each of these items. Exits and areas around fire extinguishers must be kept clear at all times.

- B. Trespassers. In the case of trespassers or loitering inside or outside the building located at 4000 Old Seward Highway, please contact the property manager. In the event that you are unable to reach the property manager, dial 311 (APD non-emergency). Do not approach trespassers; wait for non-emergency personnel to arrive.

If the person becomes combative, is displaying threatening behavior, or you feel employees are in danger, call 911 immediately and secure the office doors, if possible. Remember to remain calm and wait for emergency personnel to arrive.

- C. On the Job Accidents or Injury. All on-the-job injuries must be reported. If you injure yourself while on-the-job, notify your supervisor or HR immediately.

- D. In addition, employees are expected to follow common-sense safety practices and to correct or report any unsafe condition to their supervisor. As soon as one or more employees realizes that a work-related accident, injury, or illness has occurred, any and all employees with knowledge of the incident are required to report the occurrence to their supervisor or HR as quickly as is practicable and to complete necessary documentation of the incident.

All employees must abide by safe work practices and adhere to general safety rules to ensure their safety as well as the safety of others. Employees may be subject to progressive corrective action if found violating the health and safety rules and responsibilities outlined in this policy.

706.2 WORKPLACE VIOLENCE

I. PURPOSE

To acquaint employees with what the Company considers workplace violence and inform employees how to recognize workplace violence.

II. SCOPE

All employees of TAC.

III. POLICY

The Company is committed to providing a violence-free workplace for its employees. In keeping with this commitment, the Company has established an anti-violence policy that prohibits actual or threatened violence by employees against co-workers or other persons.

The policy is also intended to promote workplace security by addressing situations in which outsiders may enter the workplace and engage in violent acts or threaten employees with violence. Although some kinds of violence result from societal issues that are beyond our control, the Company believes that it can adopt some measures that will increase security and protection for our employees. In order to accomplish this objective, we must require the cooperation of all employees.

The Company believes that employees may be better prepared to avoid or prevent violence if they are able to recognize early warning signs in advance and follow appropriate response procedures. Employees will therefore play a crucial role in the administration of this anti-violence policy.

- A. Early Warning Signs. Employees should understand that certain risk factors and behavior patterns may offer early warning signs of violent conduct. Examples of such warning signs include the following:
- A history of emotional or mental disturbance.
 - A history of threatening or violent behavior.
 - Paranoia or easily panicked behavior.
 - A fascination or preoccupation with weapons, or explosives that could be used for mass destruction, such as semi-automatic guns.
 - Extreme stress from personal problems or a life crisis.
 - Events affecting workplace conditions and/or generating stress.
 - Identifying with incidents of workplace violence reported in the media and either condoning or sympathizing with the actions of the individuals committing the violence.
 - Being a loner with little or no involvement with other employees.
 - Engaging in frequent disputes with supervisors or co-workers.

- Routine violation of company policy.
- Obsessive involvement with one's job, particularly where it occurs with no apparent outside interest.

If a supervisor becomes aware of risk factors and behavior patterns of the type described above, the supervisor should contact HR, a member of the management team, or the President/CEO. The President/CEO or designee should evaluate the matter and provide the supervisor with direction and assistance to deal with the situation.

B. Threats of Violence. Every threat of violence is serious and must be treated as such. Threatening behavior can include such actions as:

- Throwing objects.
- Making a verbal threat to harm another individual or destroy property.
- Making menacing gestures.
- Expressing significant grudges against co-workers.
- Displaying an intense or obsessive romantic interest that exceeds the normal bounds of interpersonal interest.
- Attempting to intimidate or harass other individuals.
- Behavior indicating that the individual is significantly out of touch with reality and that he or she may pose a danger either to himself or herself or to others.

Employees who become aware of any threat of workplace violence must report the threat immediately to their supervisor. When a supervisor becomes aware of risk factors and behavior patterns of the type described above, the supervisor should contact HR, a member of the management team, or the President/CEO. The President/CEO or designee should evaluate the matter and provide the supervisor with direction and assistance to deal with the situation.

C. Imminent Risks of Violence. If an employee becomes aware of any actual violence, imminent violence, or threat of imminent violence, obtaining emergency assistance must be a matter of priority. The employee should immediately contact local law enforcement authorities by dialing 911. Immediately after contacting the law enforcement authorities for emergency assistance, the employee must report the incident to his/her supervisor if the supervisor is available. The supervisor must then notify HR immediately. If the supervisor is not immediately available, the employee should contact HR immediately after contacting the law enforcement authorities. Employees may report any incidents of violence or threats of violence without fear of retaliation of any kind.

D. Policy Violations. In cases where it is determined that an employee has violated this policy by threatening another individual with violence or engaging in violent behavior, HR will determine the appropriate corrective action, if any, including whether corrective action is warranted. If it is determined that a threat of violence was made, or actual violence has occurred, corrective action will be imposed, up to and possibly including

termination. In situations where it is found appropriate to do so, an individual who violates this policy may be required to obtain counseling or other appropriate assistance.

707 WORKPLACE ETHICS

707.1 CONFIDENTIAL MATERIALS & INFORMATION

I. PURPOSE

To establish standards regarding employee responsibilities for maintaining the confidentiality of Company materials and information.

II. SCOPE

All employees of TAC.

III. POLICY

During employment, employees may have access to records and other information about other employees, shareholders, other businesses, or other information of a confidential nature. Employees must not discuss confidential information with anyone without proper authority.

Employees should keep Company business affairs private. All information that is created or used in support of Company business activities is the property of TAC. Employees should never release non-public financial or operational information without prior approval by the Company and only share with those who have a legitimate business need to know.

The obligation continues even after separation of employment within the Company. Employees should observe Company rules in relation to the treatment of confidential information. If there is any doubt about whether the information is confidential, employees should contact their supervisor for clarification. If employees do not know whether the material is confidential or private, assume it is.

Employees also have the responsibility to guard the confidential information and the privacy of our partners, business teammates, subcontractors, and others with whom we do business.

Below is a list of employee responsibilities, this list is not all inclusive.

- Don't gossip about business. Many business deals or procedures are private and can be subject to confidentiality or non-disclosure agreements that prohibit you from discussing. Therefore, do not share confidential information with others.
- Employees should safeguard the privacy of their fellow employees.
- Employees should exercise good judgement when using social media such as Facebook, Twitter or other services on the internet for personal or professional activities.
- Employees should not accept confidential or proprietary information from other companies except pursuant to a written confidentiality or non-disclosure agreement.
- If an employee is approached with an offer of confidential information which they have reason to believe may have been obtained improperly, immediately report to HR.
- Divisions and departments are responsible for identifying and implementing appropriate security measures to protect confidential and proprietary information within their areas.
- Employees exposed to confidential material may be required to sign a separate employee confidentiality agreement.

707.2 CONFLICTS OF INTEREST

I. PURPOSE

To support employee loyalty to the Company through the identification, disclosure, and avoidance of conflicts of interest.

II. SCOPE

All employees of TAC.

III. POLICY

- A. Conflicts of Interest Prohibited. Employees shall always refrain from having a conflict of interest with the Company. A conflict of interest means: (1) a “conflicting interest” or (2) a “financial interest” as these terms are defined below.
- B. Definitions.
 - 1. “Conflicting Interest” shall mean service as a member, shareholder, trustee, owner, partner, director, officer, or employee of any organization or governmental entity that either:
 - a. competes with this Company or any Affiliate, or
 - b. is involved or is likely to become involved in any litigation or adversarial proceeding with this Company or any Affiliate.
 - 2. “Financial Interest” shall mean any arrangement or transaction pursuant to which the employee has, directly or indirectly, through business, investment, or immediate family, a present or potential ownership, investment interest, or compensation arrangement in any entity with which this Company or any Affiliate has or may have a transaction or business arrangement.
 - 3. “Affiliate” shall mean any organization that is controlled by or is related by common control to the Company.
- C. Disclosure. Any employee who has, or suspects he or she may have, a conflict of interest shall promptly and fully disclose the relationships to the President/CEO.
- D. Periodic Reports. The Company may, in its discretion, require employees to submit periodic written reports regarding outside activities, memberships, and interests which are or might rise to the level of a conflict of interest.
- E. Personal Investments. Nothing in this policy is intended to restrict investment or require disclosure of any investment by an employee in stock or any other security provided that such investment does not exceed one (1) percent of the market value of the outstanding security.

707.3 OUTSIDE EMPLOYMENT

I. PURPOSE

To establish guidelines that ensure employees can satisfactorily perform their job at the Company and that an employee's outside job does not interfere with Company scheduling demands.

II. SCOPE

All employees of TAC.

III. POLICY

An employee may hold an outside job if they can satisfactorily perform their Company job, and the outside job does not interfere with the position the employee holds or their required work schedule.

TAC holds all employees to the same performance standards and scheduling expectations regardless if an employee has another job.

In order to remain employed at the Company, management will ask an employee to terminate an outside job if it is determined that it is impacting the employee's performance or ability to meet the position's requirements, which may change over time.

Outside employment is not allowed if it constitutes a conflict of interest with Company operations. In addition, the employee cannot be paid or receive anything in return from an individual outside the Company in exchange for something the employee already produces or a service the employee provides as part of their Company job.

Employees that are found to be in violation of this policy, may be subject to progressive corrective action up to and including termination of employment.

707.4 GOOD FAITH REPORTING & NON-RETALIATION

I. PURPOSE

To establish guidelines for employees to report violations of Company policies or procedures, and to ensure employees are not retaliated against for reporting such violations.

II. SCOPE

All employees of TAC.

III. POLICY

Employees are encouraged to report in good faith any prohibited conduct, such as, but not limited to, harassment, discrimination, fraud, waste, and abuse. These practices are unacceptable in the workplace and in any work-related setting outside the workplace, including business trips, business meetings and business-related social events.

These policies apply to all employees, whether related to conduct engaged in by fellow employees (regardless of the offender's identity or position) or by someone not directly connected to the Company (e.g., an outside vendor, consultant or customer).

- A. Non-Retaliation. As stated above, the Company encourages the reporting of all perceived incidents of discrimination, harassment, safety violations, as well as violations of policies.

It is the Company policy to promptly and thoroughly investigate such reports. The Company prohibits retaliation against any individual who reports these violations or participates in an investigation of such reports.

Retaliation against an individual for reporting violations of policies or for participating in an investigation of a claim, is a serious violation and, like harassment or discrimination itself, will be subject to corrective action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Responsive action may include, for example, training, referral to counseling, or progressive corrective action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as the Company believes appropriate under the circumstances.

The Company will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

- B. Whistleblower Protection. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, demotion, compensation decreases, poor work assignments, and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact HR immediately. The right of a whistleblower for protection against retaliation does not include immunity from personal wrongdoing that is alleged and investigated.

A person is not entitled to the protections under this policy unless he/she reasonably believes the information reported is, or is about to become, a matter of public concern and reports the information in good faith.

- C. Reporting. If an employee has knowledge or concern regarding illegal, dishonest, or fraudulent activity; violation of internal policies or procedures; or other concerns, the employee is to contact his/her immediate supervisor or HR immediately.

To report anonymously, employees can call the Employee Hotline 24 hours a day, 7 days a week at #XXX-XXX-XXXX. All anonymous reports will be reviewed immediately by HR to determine next steps.

708 SEPERATION FROM EMPLOYMENT & CORRECTIVE ACTION

708.1 SEPARATION FROM EMPLOYMENT

I. PURPOSE

To identify the ways in which the employment relationship at the Company may come to an end.

II. SCOPE

All employees of TAC, except those employees whose written employment contract specify different separation terms.

III. POLICY

The Company is an at will company and recognizes both voluntary and involuntary separations from employment. When applicable, HR requests that the employee participate in an exit interview.

A. Voluntary Separation.

1. Resignation. An employee may resign his/her employment with the Company at any time by giving notice of resignation to the employee's supervisor. As a matter of courtesy, employees who decide to resign from the Company are asked to give at least two weeks' notice.
2. Retirement. An employee may retire from employment with the Company at any time by giving notice of retirement to the employee's supervisor. As a matter of courtesy, employees who decide to retire from the Company are asked to give at least two weeks' notice.
3. Disability of Employee. In case of disability, when the employee no longer feels he/she can continue employment in their current position, the employee should work with HR to identify reasonable accommodations or another possible position that would accommodate their disability. If it is no longer possible to modify duties and no other position is available, then the employee may be given notice of termination due to disability.
4. Death of Employee. In case of death of the employee, the employee's employment shall be considered terminated as of the date of death.

B. Involuntary Separation.

1. Layoff or Reduction in Force. The Company may, in its discretion, eliminate and/or combine positions when it determines that action is in the best interests of the Company. A layoff or reduction in force is considered a non-corrective termination of employment. There is no guarantee of recall, however, laid-off employees who are recalled within six (6) months will retain the years of service and benefits to which they were entitled at the time of layoff to the extent permitted by the Company's benefit plans.

2. Termination. An employee may be discharged pursuant to the Company's At-Will policy at any time, with or without cause.
- C. Temporary Continuation of Coverage Notice. Whenever an eligible employee is separated from employment with the Company, the employee and his/her eligible dependents will be provided with the appropriate Temporary Continuation of Coverage notice of medical, dental, and vision benefits coverage under COBRA, at the cost of the employee. In case of death, the employee's family may be eligible for benefits if they were enrolled and receiving benefits at the time of the employee's death.

708.2 CORRECTIVE ACTION

I. PURPOSE

To establish standards used by supervisors to correct concerns, unacceptable behavior, or misconduct.

II. SCOPE

All employees of TAC.

III. POLICY

- A. Corrective Actions. Employees that are in violation of work rules, demonstrating instances of unacceptable behavior or misconduct, or continuing poor performance may be subject to progressive corrective action.

There is, however, no obligation for the Company to follow the corrective action steps. One or more corrective steps may be bypassed when appropriate. Some instances of misconduct are so intolerable they may, even for a first occurrence, be subject to more serious forms of corrective action, up to and including termination. In general, supervisors will adhere to the following corrective action schedule:

1. First Offense - Verbal Warning/Counseling. The supervisor advises the employee that his/her behavior is unacceptable and of the steps necessary to bring job performance to an acceptable level.
 2. Second Offense - Written Warning. If the concern, unacceptable behavior, or misconduct recurs or is sufficiently serious in the first instance, the supervisor will provide a written document which describes the unacceptable conduct and specifies the improvement needed. This will be issued to and acknowledged by the employee. The letter will be added to the employee's Central Personnel file.
 3. Third Offense - Suspension or Termination. Depending on the severity and circumstances surrounding the situation, an employee may experience suspension without pay. Should the employee's behavior remain unacceptable without progress or is sufficiently serious in the first instance, the employee may be terminated.
- B. Review by Human Resources. Any employee who feels his or her corrective action is too severe or unfair, should discuss this corrective action with the employee's supervisor. If the employee is not satisfied with the supervisor's response, the employee may discuss the corrective action decision with HR per policy 702.9 Grievance.

709 GENERAL POLICIES

709.1 EXPENSE REPORTS & EMPLOYEE BUSINESS TRAVEL

I. PURPOSE

To establish guidance regarding expense reports, reimbursement of actual and reasonable business expenses, and business travel incurred on behalf of the Company.

II. SCOPE

These guidelines apply to all employees of TAC. The President/CEO must preapprove any exceptions or deviations in writing, unless another authority is expressly indicated.

III. POLICY

This policy provides guidance on payment or reimbursement for authorized expenses and Company travel. Employees must always act in the best interest of the Company. The objectives of these guidelines are to:

1. Facilitate efficient business travel for all employees.
 2. Provide internal controls and audit trail documenting all business and travel expenses.
- A. Expense Report Form. All business and travel expenses must be recorded on the standard company Expense Report form and must be accompanied by original receipts at the end of the month in which the expense occurred. If a receipt is lost and the effort to obtain a receipt is not reasonably justified, the item may still be claimed for reimbursement provided a written explanation is attached to the expense report.
- All expense reports must be approved by the employee's supervisor, President/CEO, or CFO. Upon approval, employees will be reimbursed for all valid expenses, provided the employee has properly completed the Expense Report form.
- B. Advances. Requests for advances to cover Company travel expenses are subject to the approval of the CFO or President/CEO. Upon return from travel, the Expense Report form must be completed, and any approved expenses not covered by the advance will be reimbursed to the employee. Likewise, any advance funds not expended for travel expenses will accompany the expense report form.
- C. Business Entertainment Expenses. For reimbursement of business entertainment, the names of all parties entertained, the name of the company they represent, their titles, and the nature of the business must be recorded on the receipts. Approval for business entertainment will be limited to the CFO or President/CEO.
- E. Business Travel Guidelines. The Company will reimburse employees for ordinary, necessary and reasonable travel expenses that pertain to the transaction of Company business by a Company employee. All travel expenses should be paid using the following methods:
- Direct billing to the Company,
 - Company Credit Card, or

- Personal credit card or cash if traveler does not have a Company credit card.
1. Documentation. The Internal Revenue Code requires reimbursable expenditures to be supported by adequate records which clearly establish that they were: (i) ordinary and necessary, (ii) reasonable in amount, and (iii) incurred for a valid business purpose.

Documentation for Company travel must include hard copy receipts and provide the following information:

- Who – Identification of both Company employees and non-Company persons or business associates present when the business expense is charged. For non-Company persons, include their name, Company, job title, and any other information necessary to establish a business relationship with the Company.
- What – Receipts and type of expense (e.g., meal, theater, athletic event, etc.).
- Where – Name of the place of expense and the city.
- When – Date of the expense.
- Why – Business purpose for the expense, including the nature of the business discussion or activities, and the benefits to be derived or expected to be derived as a result of the expense.
- Cost – Total cost of the expense.

Per IRS regulations, Company-paid items directly benefiting employees that are not ordinary and necessary, not reasonable in amount, which do not have a clearly valid business purpose, or which are not supported by adequate documentation, must be included as income on the employee's W-2. The employee is responsible for paying all taxes on such income, along with making any elections for tax protection negotiated under any applicable employment contract with the Company.

2. Travel Authorization. An employee's supervisor must pre-approve all employee travel. The employee must provide all expected costs (hotel, airfare, car, etc.) to the supervisor so that they are able to approve the expected travel. Employees and approving supervisors must always act in the best interest of the Company and make sure that they are booking the most reasonable cost for travel available.
3. Preferred Travel Suppliers. The Company has an Alaska Airlines EasyBiz account and all trip fares booked on Alaska Airlines, or associated airlines, should be booked directly through the Company's Alaska Airlines EasyBiz account.
4. Air Travel. All air travel should be booked in Coach Class, picking the lowest available fare that correlates with the most reasonable travel times. Exceptions must be pre-approved by the employee's supervisor.
5. Travel Time. Non-exempt positions within the Company may require travel. Employees in positions classified as non-exempt under the Fair Labor Standards Act are eligible for compensation for the time they spend traveling. The compensation

depends on the type of travel and whether the travel time takes place within normal business work hours. The following provisions apply to non-exempt employees only:

- a. Travel by an employee who will be away from home overnight is work time only during those periods that coincide with the employee's regular working hours (e.g. 8:00am – 5:00pm). Such time is counted as time worked even if it occurs on a non-working day (e.g., Saturday or Sunday between 8:00am and 5:00pm). Travel outside of regular working hours as a passenger in a plane, boat, bus, or automobile is not considered hours worked. If traveling between two or more time zones, use the time zone associated with the point of departure to determine whether the travel falls outside of normal work hours.
6. Lodging. Business-related lodging will be reimbursed. All employees must keep the best interest of the Company in mind when finding the best priced lodging. Any lodging that is over \$300/night (including any taxes and fees) must be pre-approved by the employee's supervisor.
7. Meals. Employees may be reimbursed for meals, including a reasonable gratuity, when traveling on Company business or when conducting prescribed business activities. Meals may be charged to the traveler's room at lodging facilities with room service or may otherwise be paid for by the traveler in accordance with the IRS guidelines stated above.

Travelers will be entitled to reimbursement of meal expenses based on the actual cost of reasonable business-related meals.

To comply with IRS regulations, meals and lodging must be recorded separately. When filling out the expense report, meals and lodging are required to be broken out if they are on one bill.

8. Car Rental. Personal convenience is not a proper use of a rental car. In general, the Company will pay for or reimburse the reasonable actual costs associated with parking a rental (or employee owned vehicle) used during Company travel. Unless pre-approved by the employee's supervisor, all rentals should be intermediate-sized cars unless other options are available that are less expensive. If a full-size/SUV is needed and is not less expensive than other options, it should not be reserved unless three or more people are traveling together. Employees are encouraged to refuel rental cars before returning them to the vendor to save on the fuel cost.

Rental cars for international use must be preapproved by the President/CEO.

9. Car Rental Insurance Coverage. Decline all rental car insurance (CDW/LDW) because the Company insurance provides adequate insurance coverage for employees on authorized Company travel except for international car rentals. Most jurisdictions require proof of insurance for personal use of rental cars. Employees may be required by the rental car company to return the rental car at the end of company business and open a new rental contract for a vehicle in order to procure required insurance coverage for extended personal use.

10. Parking Infractions. The cost of any parking tickets or other motor vehicle infractions incurred during business travel will be the sole personal responsibility of the traveler. The Company will not reimburse for expenses for infractions incurred during business travel.

709.2 USE OF TECHNOLOGY RESOURCES

I. PURPOSE

To inform employees of the appropriate use of the Company's technology resources (*i.e.*, computers, printers, internet, electronic mail, voice mail, cell phones, copiers, and facsimile machines), and to advise that employees are to have no expectations of privacy regarding utilization of these resources.

II. SCOPE

All employees of TAC.

III. POLICY

The Company furnishes computers, printers, Internet, electronic mail, voice mail, cell phones, copiers and facsimile machines for employee use to conduct Company business. Utilization of these technology resources is not to be conducted in any way that may be disruptive to operations or in violation of Company policy or law.

Technology is provided exclusively to assist in the conduct of Company business; however, occasional use of technology for personal purposes is permissible so long as it does not interfere with Company business or the employee's assigned duties, is not related to outside business activities, and does not conflict with Company policy or law.

Hardware, software, and data processed by computers and electronically stored must be safeguarded against damage, loss, alteration, theft, and unauthorized access or disclosure.

Software. Due to copyright infringement and licensing considerations, computer software programs are not to be copied without the express prior written approval of the President/CEO. Should an employee receive permission to copy Company software onto the employee's computer, the employee is responsible for removing the software from that computer if the employee is terminated from the Company or if the employee changes jobs within the Company and no longer has access to that software in the new position. Under no circumstances is the software to be duplicated in any way or form, including, but not limited to, the duplication of software for which the company has the licensee, or installing the software on more than one computer for the employee's home use.

The communication, dissemination, or printing of copyrighted materials, employee records, software, trade secrets, or other proprietary information through Company technology is strictly prohibited, as is unauthorized posting of any material, including postings on the internet.

- A. Data. When information is stored on or in Company-owned resources, authorized employees may have occasion to review and disclose the contents of such information for reasons including, but not limited to, another employee's absence or unavailability, system maintenance, system integrity checks, quality control, and litigation.

- B. Email. Remember that email sent on the Internet is not secure. Never include in an email a message which you want to keep private and confidential. Email is sent unencrypted and is easily readable.

Non-business-related communication through internet sites via “chat rooms” or “instant message” exchange is strictly prohibited.

1. Phishing. Employees need to be aware that e-mail phishing scams are a common threat to companies and their employees. Phishing e-mails commonly request information such as payroll logins, tax data, banking accounts, and other personal identifiable information. These e-mails may appear to be legitimate or from current employees. If an employee receives an email that appears to be suspicious, do not open or click on any links within the email and delete it immediately. If an employee is not sure if the email is legitimate, they should reach out to their supervisor and the IT desk support immediately.
- C. Privacy. Information sent and stored on Company technology is the property of the Company. By using the Company’s technology, all individuals knowingly and voluntarily consent to their usage being monitored and acknowledge the Company’s right to conduct such monitoring.

Individuals should not expect that facsimile transmissions, computer files or transmissions, or email or voice mail messages are confidential or private and should be aware that all types of business records are subject to inspection, review, or disclosure without prior notice for any business purpose or as required by law. In general, these communications are treated no differently than any other business record or correspondence, and may be used in administrative, judicial, or other proceedings.

Individuals are advised that even if a message is erased, it is often possible to recreate or restore it; therefore, privacy of messages cannot be ensured to anyone.

In addition, the Company reserves the right to review an individual’s technology activity at any time for any reason whatsoever without notice to the individual.

Such reasons include, but are not limited to, to determine and/or prevent unauthorized or inappropriate personal use of email or voice mail; to assure compliance with Company policies; to conduct business; and/or to investigate conduct or behavior that may be illegal or adversely affect the Company, its employees, agents, or others.

The Company reserves the right to override any individual passwords and/or codes or require individuals to disclose any passwords and/or codes to facilitate access to computer files, email and voice mail accounts, and any other Company technology.

- D. Violations. Violations of any of the foregoing will subject violators to corrective action up to and including termination. In addition, the Company may refer certain violations, including, but not limited to, accessing pornographic materials or illegally duplicating software, to appropriate authorities.

Anonymous communications, as well as any communications that may constitute verbal abuse, slander, or defamation, or that may be considered offensive, harassing, vulgar,

obscene, or threatening, are strictly prohibited, as are copying, posting, and/or accessing sexually explicit or offensive material (such as though an Internet sites) are prohibited. Offensive content would include, but not be limited to, sexual comments or images, racial slurs, gender-specific comments, or any comments that would offend someone on the basis of his or her age, race, sex, sexual orientation, color, religion, national origin, handicap, disability, or veteran status. Refer to 702.2: Harassment in the Workplace.

709.3 CELLULAR PHONE USE

I. PURPOSE

To promote a safe and productive work environment while practicing discretion in cell phone usage.

II. SCOPE

All employees of TAC.

III. POLICY

- A. Cell Phones. Excessive personal calls during the workday, texting, and other personal activities can interfere with employee productivity and be distracting to others. Employees may carry and use cell phones while at work on a limited basis. If employee use of a cell phone causes disruptions or loss in productivity, the employee may be asked to refrain from use of their device or become subject to corrective action.

All phones (personal or Company issued) may be required to be turned off or set to silent or vibrate mode during meetings, conferences and in other locations where incoming calls may disrupt normal workflow.
- B. Company Cell Phones. When job or business needs require immediate access to an employee, the Company may issue a business cell phone to an employee for work-related communications. It is important to be aware that any and all activity and content on the Company issued phone is property of the Company. Therefore, it is incumbent on the employee to use good judgement and maintain professional use of all Company issued devices.

Employees in possession of Company equipment such as cell phones are expected to protect the equipment from loss, damage or theft.

Company provided cell phones must be returned upon termination of employment.
- C. Safety Issues. All employees are expected to follow applicable Federal, State and local laws and regulations regarding the use of cell phones.
- D. Video or audio recording devices. The use of camera phones or other audio/video recording capable devices within the Company may constitute an invasion of employees' personal privacy and may breach the confidentiality of Company trade secrets or other protected information. Therefore, the use of camera phones or other audio/video recording capable devices on company premises is prohibited without the express prior permission of management and of the person(s) present at the time. This is specifically applicable to restrooms and locker rooms.

709.4 COMPANY VEHICLE USE

I. PURPOSE

To inform employees of the appropriate use of Company owned, leased, and rented vehicles and the responsibility of each employee's use of the vehicle.

II. SCOPE

All employees of TAC.

III. POLICY

All employees agree to operate Company vehicles according to this policy. Failure to adhere to this policy may result in revocation of an employee's privilege to operate Company vehicles or termination of employment under some circumstances.

Insured employees are the only authorized individuals to operate Company owned, leased, and rented vehicles.

A. Company Vehicles.

- Employee must maintain a proper and current driver's license and a driving record in compliance with the Company's insurance policy.
- Employee must maintain license and driving record for the type of vehicle they are operating and notify management immediately if they no longer have a valid license.
- The Company's auto insurance policy will not cover the use of a personal vehicle.
- Employee must report all accidents and citations in a Company vehicle immediately to their supervisor. Most likely, an accident will require an employee to take a drug and alcohol test.
- The employee agrees to operate the vehicle in such a manner that will not expose the Company to excessive liability or risk.
- Employee will ensure that all occupants of a Company owned vehicle are properly wearing safety belts while the vehicle is in motion.
- The use of alcohol and controlled substances prior to and during operation of any vehicle is strictly prohibited.
- Any hazardous substances, chemicals or dangerous goods (as defined by law) are prohibited from being carried in a company vehicle.

709.5 COMPANY CREDIT CARDS

I. PURPOSE

To define the appropriate use and responsibilities of Company issued credit cards.

II. SCOPE

All employees of TAC.

III. POLICY

The President/CEO shall authorize all Company credit cards. The Company credit card is to be used solely for Company business. Cardholder transactions will be scrutinized to ensure compliance with this policy. Employees issued a Company credit card are in a position of trust regarding use of Company funds. Improper or unauthorized use of the card may result in the cardholder being held liable for expenditures, legal/corrective action being brought against the cardholder and termination of card use.

The Company credit card cannot be used:

- To obtain cash advances.
- For personal expenditures.
- For expenses other than those incurred by the assigned officer named on the credit card.
- To make donations.
- To pay wages.

Infractions of the conditions of this policy will result in cancellation of the card and withdrawal of Company credit card privileges. Breaching of this policy may also lead to corrective action against the employee. In all cases of misuse, the Company reserves the right to recover any monies from the cardholder. Cardholders will be required to sign a declaration authorizing the Company to recover, from their salary, any amount incorrectly claimed.

Company credit card expenditures must be reconciled within 5 business days of the statement date. Cardholders who have not reconciled their monthly expenditure within this period will be asked to reconcile their monthly expenditure immediately to avoid having their expense debited for the outstanding statement amount. This procedure will ensure that accounting records maintain an accurate and meaningful balance. Continued or repeated non-conformance to this policy will result in cancellation of the card and such other actions as appropriate.

If the card expenditures are not reconciled or acquitted within 2 months of the statement date or a plausible explanation has not been received, the Company credit card will be cancelled and, the cardholders' unit account debited for the amount outstanding. Note that further action may also be taken against the cardholder.

Cardholders must retain the original receipts to support all charges. Card purchases without receipts are ultimately the responsibility of the user. A failure to provide receipts or credible

explanation for the unsupported expenditure may result in a payroll deduction through one or more pay periods to ensure the funds are reimbursed back to the Company.

If an employee uses a Company credit card for personal expenses unknowingly, they must reimburse the Company as soon as reasonably possible once they have become aware of the charge(s).

Reimbursement for return of goods and/or services must be credited directly to the card account.

Cardholders are responsible for ensuring that their purchases meet the Company's Expense Report policy and procedures.

The card must be surrendered upon termination of employment. Prior to departure or termination of duties, the cardholder must reconcile all expenditures on his/her card account. It is the responsibility of the departing employee to ensure that his/her account is settled prior to departure. Accounts in arrears will be liable for legal action.

709.7 POLITICAL ACTIVITIES

I. PURPOSE

To provide guidance regarding employee participation in political activities in the workplace.

II. SCOPE

All employees of TAC.

III. POLICY

The Company encourages employees to be involved in the political activities, such as voting in elections and supporting their candidates. Employees may wear campaign buttons while at work and use earned PTO for volunteer political activities. However, employees may not post political campaign material in office space occupied by the Company, including individual work areas. Nor may they solicit for their candidates while carrying out Company business or while in a work status. Participating in these activities must be conducted on the employee's own time.

Employees should also be mindful when supporting political activities on their personal time that they are not perceived as representing the Company, for example wearing TAC gear or other items linked to the Company.

Employees are encouraged to refrain from endorsing candidates for the TAC annual board election. Employees may not solicit for TAC board candidates while carrying on Company business, while using company equipment, or during their working hours. Employees who elect to endorse or support a candidate for the TAC board on their own time must clearly state that their views are their own and are not endorsed by the Company, TAC employees, TAC management, or TAC board members.

APPENDIX

ACKNOWLEDGEMENT: HR PERSONNEL POLICIES

I _____ have received my copy of TAC's HR Personnel Policies.

I acknowledge receipt of The Aleut Corporation ("TAC") Personnel Policies and understand that compliance with the policies is a condition of my employment at TAC. I will abide by all the rules, regulations, directives, and policies.

I understand that the purpose of these policies is to provide me with essential information needed for me to function effectively as an employee, and that the policies may be revised at any time. I understand that any updates to policies will be made available to me and it is my responsibility to ensure I am familiar with any and all updates.

I also understand and agree that the rules described in these policies supersede any previous written or oral policies provided thus far. I further understand that these policies are not an employment contract, express or implied, guaranteeing employment for any specific duration, and that my employment is at-will and the Company or I can terminate employment at any time, for any reason, with or without cause or notice.

Employee's Signature

Employee's Name (Print)

Date

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE

ART



A



Fueled by innovation, driven by integrity, we deliver world-class, best value services and solutions.



TECHNOLOGY SERVICES GROUP

Helping customers deliver their critical services while reimagining and redefining their mission through enterprise and program services, training & education, cloud, cyber, data, technology O&M, and application & platform services.



ENVIRONMENTAL SERVICES GROUP

Delivering services and solutions to improve the environment in which we live including environmental compliance, analytical, demolition, radioactive, hazardous, military munitions, site characterization and remediation.



INFRASTRUCTURE SERVICES GROUP

Providing wide-ranging services for operations support and facilities operations and maintenance as a trusted provider of Base Operations Support Services (BOSS), public works, logistics integration, training operations, special facilities support, and engineering support.



CONSTRUCTION SERVICES GROUP

Offering expertise in construction and specialized services from security/facility upgrades and small renovations to large-scale design-build projects. Delivering cost-effective solutions with a focus on quality, safety, and collaboration.

Small business agility,
with the stability of a
large corporation.

Aleut Federal & TAC

...

Aleut Federal, LLC, is The Aleut Corporation (TAC) entity for managing federal services. TAC was one of 13 Alaska Native Corporations established under the Alaska Native Claims Settlement Act (ANCSA), passed by the U.S. Congress in 1971. Aleut Federal offers a portfolio of subsidiaries that are Small Business Administration certified 8(a) program participants, Small Disadvantaged, and Small Business. Aleut Federal is diversified into four main service groups: Technology, Environmental, Infrastructure, and Construction.



- 100% Alaska Native Owned
- Strong Portfolio of SBA 8(a) Certified Companies
- Highly Skilled and Diverse Workforce
- Significant Bonding Capacity
- EM 385-1-1, Safety & Health Requirements
- USACE Quality Control Standards
- ISO 9001:2015 Certified | Certificate No. US4620



Aleut Federal, LLC



About Aleut Federal



With more 700 employees, operating in over 33 states and territories internationally, Aleut Federal has the financial resources and stability of a much larger company. Principal-level management, each with extensive federal experience in similar magnitudes provide the expertise and oversight necessary to ensure continued project success. Aleut Federal has established infrastructure, accounting practices, personnel, equipment, and mobilization plans designed to protect your mission.

Maximize the benefits of an ANC to achieve your mission



Claim Categories

Satisfy up to three categories in your small business contracting plan: Small Business, Native American / Tribal, 8(a) Economically Small Disadvantaged Business (13 CFR 124.109(a)(2)).

Subcontracting Rebate

Apply for a 5% subcontracting rebate under the Indian-Owned Economic Enterprise if either of the following clauses are present in the contract (48 CFR 52.226-1) or (DFAR 252.226-7001).

Sole Source Advantages

Expedite procurements by utilizing SBA sole source contracting advantages:

- ✓ Up to \$100M without justification. No contract value limitations with justification (48 CFR 206.303 1(a))
- ✓ 8(a) Sole Source awards meeting certain criteria cannot be protested (13 CFR 124.517(a))

The SBA Sole Source Process



STEP 1:

Sole Source contract strategy is reached with Aleut



STEP 2:

Contracting Officer works with proposed subsidiary to determine eligibility for the requirements.



STEP 3:

Contracting Officer preps 8(a) offer letter with a description of contract and forwards to the SBA Business Opportunity Specialist.



STEP 4:

SBA reviews, verifies the ANC 8(a) status of the subsidiary, and interfaces direct with Contracting Officer on approval of the offer letter.



STEP 5:

Contracting Officer informs Aleut subsidiary that they may begin negotiations so they can assist the government with SOW development and pricing strategy.



STEP 6:

Once mutually acceptable terms are negotiated, contract is awarded.

ALEUT GOVERNMENT CUSTOMERS





Technology Services Group

GEOFF VAUGHAN

Vice President, Technology Services Group

571-345-8760

geoff.vaughan@aleutfederal.com

About Aleut Technology



Aleut Federal Technology Services Group (TSG) is dedicated to helping customers deliver their critical services through our broad, mission enabling offerings. From large-scale technology delivery programs in highly regulated environments, to full-service training delivery, Human Centered Design, and Mission Support, Aleut delivers innovative and cost-effective outcomes. We offer a portfolio of subsidiaries that are U.S. Small Business Administration (SBA) certified 8(a) program participants and Small Disadvantaged Businesses. We are committed to providing all Federal agencies with streamlined, integrated access to solutions – TSG subsidiaries hold active contracts under acquisition vehicles such as the General Services Administration (GSA) One Acquisition Solution for Integrated Services (OASIS) Small Business (SB) Contract – Pool 3.

Aleut Maintains DoD Top Secret Clearance

Capabilities



✓ STRATEGIC SERVICES

- Human-Centered Design
- Program Management
- Financial Management
- Supply Chain Management
- Advisory Services
- Education and Training
- SETA
- Cybersecurity

✓ DIGITAL SERVICES

- DevSecOps
- Agile Transformation
- Application Modernization
- Cloud Services
- Platform Services
- Data Management
- ERP

✓ TECHNOLOGY OPERATIONS

- IT LAN/WAN
- Application Operations
- Cloud & Infrastructure
- Systems Engineering & Integration
- Cyber Operations
- Space Operations

Notable Contract References



Colorado Springs, CO

USAF Academy (USAF) Advisory & Assistance Services (A&AS) | \$14M

Peterson AFB, CO

Advanced Space Operations School | \$20M

Peterson AFB, CO

Primary Information Technology (T) & Cyber Related Data-Systems (PICRD) Support | \$21M

Edgewood, MDUS

Army MEDCOM IT Support Services | \$15M

CONUS

DCGS Program Management Office (PMO) | \$25M

Colorado Springs, CO

319th Combat Training Squadron (319 CTS) | \$20M

Washington, D.C.

National Institute of Health NITAAC Salesforce / Website DevSecOps Operation | \$4.5M

ALEUT GOVERNMENT CUSTOMERS



**GSA OASIS Small Business
8(a) Contract Sub Pool 3
Contract No. 47QRAD20D8337**



Environmental Services Group



DARRIN LAWRENCE

👤 Vice President, Environmental Services Group

☎ 210-383-8189

✉ darrin.lawrence@aleutfederal.com

About Aleut Environmental



Aleut Federal Environmental Services Group (ESG) provides safe execution of environmental and waste management, analytical, and technical services to commercial and government agencies. We offer a portfolio of subsidiaries that are U.S. Small Business Administration (SBA) certified 8(a) program participants and Small Disadvantaged Businesses.

Capabilities



✓ ENVIRONMENTAL COMPLIANCE & REMEDIATION

- Radioactive & Hazardous Waste Site Remediation
- Munitions and Explosives of Concern
- Waste Characterization, Handling, & Disposition
- Site Investigations, Assessments, & Final Status Surveys
- Remedial Action Well Installation & Closure

✓ DEMOLITION

- Decontamination & Demolition (D&D)
- Site Preparation & Demolition Services

✓ TECHNICAL & ADMINISTRATIVE SERVICES

- Staff Augmentation including Professional, Administrative, & Radiological Controls Personnel

✓ LABORATORY ANALYTICS

- Radiochemistry, Standard Chemistry, Industrial Hygiene & Other Specialty Services
- Mobile Laboratories & Sample Management Offices

✓ FLOOD MANAGEMENT

- Pump Station Reconstruction, Rehabilitation & Maintenance
- Levee Construction & Rehabilitation
- Underwater Berm Construction & Stabilization

Notable Contract References



St. Mary Parish, LA

West Atchafalaya Basin Protection Levee | \$20M+

Central & Midwest United States

*Facilities Reduction Program
\$133M Agg / \$20M+ Awarded*

Rock Island, IL

*Various Levee and Pump Station Repairs
\$22M Agg / \$9M Awarded*

Cape Canaveral Air Force Station and Kennedy Space Center

*Deconstruct Facilities, Structures, Various Locations
\$15M+*

Kennedy Space Center

Safety and Reliability Upgrades | \$5.5M+

Midwest / Southeast / Northeast Region/

*USACE Facility Reduction Program MATOC IDIQ
\$95M Aggregate (per region)*

NRC MATERIALS LICENSE

Aleut holds an NRC Materials License covering work associated with any activity related to:

- Site characterization, decontamination, and decommissioning of facilities, equipment, and containers
- Conduct waste characterization, compaction, and solidification or vitrification of waste
- Remediation of soil or soil-like material and radiation surveys; packaging and transporting wastes
- Calibration sources and reference standards for operational testing or radiation detection equipment

SIGNIFICANT BONDING CAPACITY

\$75M Single / \$150M Aggregate



Infrastructure Services Group

STEVE WATKINS

👤 Vice President, Infrastructure Services Group

☎ 703-826-3211

✉ steve.watkins@aleutfederal.com

About Aleut Infrastructure

• • •

Aleut Federal Infrastructure Services Group (ISG) is a trusted provider of wide-ranging offerings for Base Operations Support Services (BOSS) and Facilities Operations & Maintenance (O&M) for Federal Agencies across the United States. Aleut ISG specializes in professional support services specifically targeting process, physical distribution, and logistics services including productivity improvement, production planning and control, quality assurance and control, inventory management, etc. In addition, Aleut offers administrative management, general management, and other professional consulting services to support operations & maintenance services. Aleut is a career training and job placement support contractor managing Job Corps Centers for the U.S. Department of Labor. We offer a portfolio of subsidiaries that are U.S. Small Business Administration (SBA) certified 8(a) program participants and Small Disadvantaged Businesses.

GSA Multiple Award Schedule

Aleut is approved by the GSA to participate in the MAS as a prime contractor (Contract No. 47QSHA21D002M) for awards in Special Item Number (SIN) 561210FAC – Facilities Maintenance and Repair. Contract scope includes the provision of professional support services to federal real property, focusing on complete operations, maintenance, and repair. Aleut proudly provides a wide range of SIN561210FAC capabilities including, but not limited to:

✓ MAINTENANCE SERVICES

- Elevator
- HVAC
- Electrical
- BAS Systems
- Plumbing
- Mechanical
- Fire Alarm / Suppression
- Waste Management
- Energy Management Control Systems
- Water Distribution
- Water Tanks
- Renewable Energy Systems

Capabilities

✓ FACILITIES MAINTENANCE

- Labor & Staff Augmentation
- Materials & Equipment
- Facility Maintenance/Repairs
- Engineering Support Services
- Heating, Ventilation, Air Conditioning (HVAC)

✓ JOB CORPS

- Staff Augmentation
- Recruiting, Training & Retention
- Curriculum Development
- Job Placement

✓ BASE OPERATIONS SUPPORT SERVICES

- Facility Operations & Maintenance (O&M)
- Project Management & Delivery
- Waste Management
- Environmental Health & Safety
- Mission Critical Systems
- Road & Sidewalk Maintenance
- Custodial Services

✓ LOGISTICS INTEGRATION

- Supply & Materiel Management
- Warehousing, Inventory Control, Quality Control, Consolidation, Asset Management

✓ TRAINING OPERATIONS SUPPORT

- Expeditionary Logistics
- Camp Construction & Program Management
- Rapid Response & Mobilization

✓ SPECIAL FACILITIES SUPPORT

- Perimeter Acquisition Radar System (PARCS)
- Optical Deep Space Surveillance
- Tethered Aerostat Radar System (TARS)
- Solid State Phased Array Radar System (SSPARS)
- Ground-Based Electro-Optical Deep Space Surveillance (GEODDS)



Construction Services Group



Design-Build MSHA Pool Repair

About Aleut Construction

Aleut Federal Construction Services Group (CSG) provides construction and specialized services to commercial and government agencies; from security/facility upgrades and small renovation projects to large-scale design-build engagements. We offer a portfolio of subsidiaries that are U.S. Small Business Administration (SBA) certified 8(a) program participants and Small Disadvantaged Businesses.

Capabilities

✓ DESIGN-BUILD

- Constructability Analysis
- Construction Management
- Engineering, Architectural & Specialized Subcontracting Partners

✓ DESIGN-BID-BUILD

- Competitive & Realistic Estimators
- Strategic & Efficient Construction Management
- Avoid Common Pitfalls of D-B-B

✓ VERTICAL CONSTRUCTION

- New Construction
- Improvement
- Renovation

✓ CIVIL INFRASTRUCTURE SERVICES

- Water & Wastewater Systems
- Sewers, Levees, & Dikes
- Underground Utilities

✓ SUSTAINMENT, RESTORATION, & MODERNIZATION

- Preventative Maintenance
- Facility Component Replacements
- Safety Upgrades for Critical Projects

JOHN MROZ

👤 Vice President, Construction Services Group

☎ 276-244-3316

✉ john.mroz@aleutfederal.com

Notable Contract References

Indian Head, MD

Design-Build NAVFAC Replacement of Two Compressed Air Plants | \$4.5M

Beaver, WV

Design-Build Mine Safety & Health Administration (MSHA) Academy Renovations | \$9M

Continental U.S.

*Bureau of Indian Affairs National Multiple Award Construction Contract (NMACC)
\$500M Agg / \$28.9M Awarded to Aleut*

Brookhaven National Laboratory

Hot Cells B801 Laboratory Renovation | \$3.15M

Herlong, CA

Design-Bid-Build Sierra Army Depot (SIAD) B301-303,305 Renovation | \$14.6M

Mariposa County, CA

Design-Bid-Build Rehabilitate El Portal Sanitary Sewer, Yosemite National Park | \$14M

ALEUT GOVERNMENT CUSTOMERS



SIGNIFICANT BONDING CAPACITY

\$75M Single / \$150M Aggregate



aleutfederal.com

ATTACHMENTS FORM

Instructions: On this form, you will attach the various files that make up your grant application. Please consult with the appropriate Agency Guidelines for more information about each needed file. Please remember that any files you attach must be in the document format and named as specified in the Guidelines.

Important: Please attach your files in the proper sequence. See the appropriate Agency Guidelines for details.

1) Please attach Attachment 1	1234-Project Narrative.pdf	Add Attachment	Delete Attachment	View Attachment
2) Please attach Attachment 2	1235-Non-Federal Fund Document	Add Attachment	Delete Attachment	View Attachment
3) Please attach Attachment 3	1236-Project Schedule.pdf	Add Attachment	Delete Attachment	View Attachment
4) Please attach Attachment 4	1237-Project Engineering Drawings	Add Attachment	Delete Attachment	View Attachment
5) Please attach Attachment 5	1238-Project Cost Estimate.pdf	Add Attachment	Delete Attachment	View Attachment
6) Please attach Attachment 6	1239-Peter Pan Letter of Support	Add Attachment	Delete Attachment	View Attachment
7) Please attach Attachment 7	1240-City of Adak, AK Letter	Add Attachment	Delete Attachment	View Attachment
8) Please attach Attachment 8	1241-Adak Community Development	Add Attachment	Delete Attachment	View Attachment
9) Please attach Attachment 9	1242-Adak Bowhead Transport License	Add Attachment	Delete Attachment	View Attachment
10) Please attach Attachment 10	1243-PND 2005 Inspection Report	Add Attachment	Delete Attachment	View Attachment
11) Please attach Attachment 11	1244-PND 2014 Inspection Report	Add Attachment	Delete Attachment	View Attachment
12) Please attach Attachment 12	1245-Pier 5 Fender Images.pdf	Add Attachment	Delete Attachment	View Attachment
13) Please attach Attachment 13	1246-TAC Personnel Policies.pdf	Add Attachment	Delete Attachment	View Attachment
14) Please attach Attachment 14	1247-Aleut Federal Statement	Add Attachment	Delete Attachment	View Attachment
15) Please attach Attachment 15		Add Attachment	Delete Attachment	View Attachment

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

05/16/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

The Aleut Corporation

* b. Employer/Taxpayer Identification Number (EIN/TIN):

(b)(4)

* c. UEI:

(b)(4)

d. Address:

* Street1:

4000 Old Seward Hwy

Street2:

Suite 300

* City:

Anchorage

County/Parish:

* State:

AK: Alaska

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

99503-6079

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Mandy

Middle Name:

* Last Name:

Hawes

Suffix:

Title:

Director of Operations

Organizational Affiliation:

The Aleut Corporation

* Telephone Number:

907-561-4300

Fax Number:

* Email:

mhawes@aleutcorp.com

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

X: Other (specify)

Type of Applicant 2: Select Applicant Type:

K: Indian/Native American Tribally Designated Organization

Type of Applicant 3: Select Applicant Type:

* Other (specify):

Alaska Native Corporation

* 10. Name of Federal Agency:

Maritime Administration

11. Catalog of Federal Domestic Assistance Number:

20.823

CFDA Title:

Port Infrastructure Development Program

* 12. Funding Opportunity Number:

MA-PID-22-001

* Title:

2022 Port Infrastructure Development Program Grants

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Port of Adak Pier Five Improvements

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="10,161,900.00"/>
* b. Applicant	<input type="text" value="1,129,100.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="11,291,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed:

BUDGET INFORMATION - Construction Programs

NOTE: Certain Federal assistance programs require additional computations to arrive at the Federal share of project costs eligible for participation. If such is the case, you will be notified.

COST CLASSIFICATION	a. Total Cost	b. Costs Not Allowable for Participation	c. Total Allowable Costs (Columns a-b)
1. Administrative and legal expenses	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
2. Land, structures, rights-of-way, appraisals, etc.	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
3. Relocation expenses and payments	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
4. Architectural and engineering fees	\$ <input type="text" value="500,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="500,000.00"/>
5. Other architectural and engineering fees	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
6. Project inspection fees	\$ <input type="text" value="950,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="950,000.00"/>
7. Site work	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
8. Demolition and removal	\$ <input type="text" value="716,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="716,000.00"/>
9. Construction	\$ <input type="text" value="7,625,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="7,625,000.00"/>
10. Equipment	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
11. Miscellaneous	\$ <input type="text" value="1,500,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="1,500,000.00"/>
12. SUBTOTAL (sum of lines 1-11)	\$ <input type="text" value="11,291,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="11,291,000.00"/>
13. Contingencies	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
14. SUBTOTAL	\$ <input type="text" value="11,291,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="11,291,000.00"/>
15. Project (program) income	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
16. TOTAL PROJECT COSTS (subtract #15 from #14)	\$ <input type="text" value="11,291,000.00"/>	\$ <input type="text"/>	\$ <input type="text" value="11,291,000.00"/>
FEDERAL FUNDING			
17. Federal assistance requested, calculate as follows: (Consult Federal agency for Federal percentage share.) Enter the resulting Federal share.			Enter eligible costs from line 16c Multiply X <input type="text" value="90"/> % \$ <input type="text" value="10,161,900.00"/>

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013

Expiration Date: 02/28/2025

1. * Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name <input type="text" value="The Aleut Corporation"/> * Street 1 <input type="text" value="4000 Old Seward Hwy"/> Street 2 <input type="text" value="Suite 300"/> * City <input type="text" value="Anchorage"/> State <input type="text" value="AK: Alaska"/> Zip <input type="text" value="99503"/> Congressional District, if known: <input type="text" value="AK-001"/>		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime: 		
6. * Federal Department/Agency: <input type="text" value="Department of Transportation/MARAD"/>	7. * Federal Program Name/Description: <input type="text" value="Port Infrastructure Development Program"/> CFDA Number, if applicable: <input type="text" value="20.823"/>	
8. Federal Action Number, if known: <input type="text"/>	9. Award Amount, if known: \$ <input type="text"/>	
10. a. Name and Address of Lobbying Registrant: Prefix <input type="text"/> * First Name <input type="text" value="N/A"/> Middle Name <input type="text"/> * Last Name <input type="text" value="N/A"/> Suffix <input type="text"/> * Street 1 <input type="text" value="N/A"/> Street 2 <input type="text"/> * City <input type="text" value="N/A"/> State <input type="text"/> Zip <input type="text"/>		
b. Individual Performing Services (including address if different from No. 10a) Prefix <input type="text"/> * First Name <input type="text" value="N/A"/> Middle Name <input type="text"/> * Last Name <input type="text" value="N/A"/> Suffix <input type="text"/> * Street 1 <input type="text" value="N/A"/> Street 2 <input type="text"/> * City <input type="text" value="N/A"/> State <input type="text"/> Zip <input type="text"/>		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. * Signature: <input type="text" value="Lisa Huffman"/> * Name: Prefix <input type="text"/> * First Name <input type="text" value="Lisa"/> Middle Name <input type="text"/> * Last Name <input type="text" value="Huffman"/> Suffix <input type="text"/> Title: <input type="text"/> Telephone No.: <input type="text"/> Date: <input type="text" value="05/16/2022"/>		
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