SITKA TRIBE OF ALASKA

CODE OF CONDUCT

(01.03)

Enacted November 29, 2005; REVISED May 20, 2026

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Chapter 1 General Provisions

01.03.01 Purpose

The purpose of this Code of Conduct is to establish ethical standards for the Sitka Tribe of Alaska (STA) Tribal Council, employees, or agents.

01.03.02 Authority

Under the Sheet'ká Kwáan Tribe (SKT) Constitution, Article VII, Section 1.d. and f., the Tribal Council shall regulate the internal affairs and procedures of the Tribal Council and authorize or direct subordinate boards, committees, Tribal officials, or Tribal employees to administer the affairs of the Tribe and to carry out the directives of the Tribal Council.

01.03.03 Statement of Policy

All Tribal Council members, employees, or agents of SKT must always conduct themselves in a professional and ethical manner that promotes the best interest of SKT.

All persons acting on behalf of SKT will be provided with a copy of this Code of Conduct at the time of hire, contracting, or the beginning of their term as a Tribal Council Member or committee or commission member. All employees are also subject to the terms and conditions of the SKT Employee Handbook. As it pertains to the management of SKT employees, in circumstances where the Code of Conduct and the STA Employee Handbook conflict, the Employee Handbook controls.

01.03.04 Definitions

a. **Agent** means any person or business acting on behalf of SKT, including contractors, consultants, committee or commission members, or volunteers.
b. **Calendar Day** means every day of the week, including weekend days and holidays.
c. **Favoritism** means the display of partiality toward a favored person or group.

d. **Immediate Family** means an individual's children (including step or adopted), father, mother, husband, wife, brother/sister, father-in-law, mother-in-law, son-in-law, daughter-in-law, grandparents or grandchildren, sister-in-law, brother-in-law, aunts, uncles, nephews or nieces.
e. **Nepotism** means favoritism shown or patronage granted to immediate family members or a business owned by immediate family members.
f. **Sheet'ká K̲wáan Tribe (SKT).** The Tribe, also known as the Sitka Community Association and Sitka Tribe of Alaska, a federally recognized Tribal government.

01.03.05 Severability

The provisions of this Code of Conduct are severable. If a court of competent jurisdiction finds any provision of this Code of Conduct to be invalid, that determination does not affect the validity of any other provision of this Code.

01.03.06 Computation of Time

A deadline under this Code that falls on a weekend day or holiday shall be met on the regular working day prior to the weekend day or holiday.

Chapter 2 Standards of Conduct

01.03.07 Conflict of Interest

SKT business must be conducted in a professional manner that prohibits real or apparent conflicts of interest. A real or apparent conflict of interest may occur when a Tribal Council member, employee, or agent of SKT, or an immediate family member of any of the above, has a financial or personal interest in any of SKT's government or business dealings.

a. Disclosure of Conflict of Interest

Any Tribal Council member, employee, or agent who has a financial or personal conflict of interest in a matter before SKT must disclose that conflict of interest immediately and disqualify himself or herself from participating in a discussion and/or vote on the matter.

1. **Tribal Council Member Failure to Disqualify**

If the majority of the Tribal Council determines that a Tribal Council member should have voluntarily disqualified himself or herself from a vote or discussion due to a financial or personal conflict of interest, the Tribal Council may prevent the Tribal Council member from participating in the discussion or the vote.

2. **Financial Conflict of Interest**

A financial interest means an interest held by the affected person, which is an ownership, income, investment, security, employment or other beneficial interest in a business, government or organization.

3. **Personal Conflict of Interest**

A personal interest means any situation in which the affected person is in a position to exploit a professional or official capacity in some way for their personal benefit.

b. Cultural, Tribal, or Clan Affiliation Conflict of Interest

No Tribal Council member, employee, or agent will place their personal cultural, tribal or clan interests above the interests of SKT. The best interests of SKT must be the highest priority at all times.

c. Organization, Government, Employer, or Board Conflict of Interest

No Tribal Council member, employee, or agent will place their personal interest in an organization, government body, employer or board, above the interests of SKT.

01.03.08 Confidential Information

No Tribal Council member, employee, or agent shall disclose or use for their own benefit or the benefit of others confidential information that they have acquired by reason of their office or position.

01.03.09 Harassment

SKT prohibits sexual and non-sexual harassment (collectively, "harassment").

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal and physical conduct of a sexual nature when:

1) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or engagement with SKT; or
2) Submission to or rejection of such conduct by an individual is used as the basis of management decisions affecting such individual; or
3) Such conduct has the purpose or effect of unreasonably interfering with the individual's performance at SKT or creating an intimidating, hostile, or offensive working environment.

Examples of sexual harassment include, but are not limited to: sexual touching, advances or propositions, use of sexually explicit language, jokes of a sexual nature, and the display in the workplace of sexually suggestive objects or pictures or images, including nude photographs, drawings, and computer-generated images or material.

Non-sexual harassment is any type of harassment that is not sexual in nature. Harassment violates SKT policy when the conduct has the purpose or effect of creating an intimidating, hostile, or offensive environment at SKT; has the purpose or effect of substantially and unreasonably interfering with an individual's performance at SKT; or otherwise adversely affects an individual's opportunities at SKT because of the individual's membership in a protected class. It can include unwelcome conduct based on a person's race, color, religion, sex, national origin, age, disability, or genetic information. Harassment includes, but is not limited to:

- Offensive jokes, objects, or pictures;
- Name-calling, yelling, bullying;
- Physical assaults or threats; and
- Intimidation.

No Tribal Council member, employee, or agent of SKT shall harass any other Tribal Council member, employee, agent, Tribal Citizen, or member of the public.

01.03.10 Use of SKT Property

No Tribal Council member, employee, or agent shall use or permit the use of SKT equipment, vehicles, boats, materials, or property for unauthorized activities or personal benefit.

01.03.11 Public Statements

Only the Tribal Chair, or in their absence, the Presiding Officer, and the SKT General Manager are authorized to speak on behalf of SKT. Tribal Council members must obtain permission from the Tribal Chair before speaking with the media or on behalf of SKT. Employees or agents of SKT must obtain permission from the SKT General Manager before speaking with the media or on behalf of SKT.

01.03.12 Use of Alcohol and Controlled Substances

Alcohol or controlled substances must not be abused. No Tribal Council member, employee, or agent of SKT shall use alcohol or controlled substances in a manner that results in harm to the reputation of the Tribal government or negatively affects the integrity of their office or position.

01.03.13 Gifts or Favors

a. Permitted Gifts

The following gifts are permitted regardless of value:

1. Gifts that are received as an award or honor, customarily and publicly presented in recognition of public service.

2. Gifts that are obviously motivated by family or social relationships, as among immediate family members or family inheritances.

b. Prohibited Gifts

Notwithstanding the permitted gifts listed in Section 01.03.12(a), all Tribal Council members, employees, or agents are prohibited from soliciting or accepting gifts or gratuities for their

personal benefit in excess of $50.00 in value from any person receiving benefits or services from SKT, from any person or entity performing services under contract for SKT, or from any person who is otherwise in a position to benefit from the actions of any employee, Tribal Council member, or agent of SKT.

This provision does not apply to tips received by Tribal Tours staff from tour customers.

01.03.14 Favoritism and Nepotism

The practice of favoritism or nepotism, as defined in Section 01.03.04, creates a negative environment where some people receive preferential treatment at the expense of others. No Tribal Council member, employee, or agent of SKT will participate in any action or that could be construed as favoritism or nepotism.

01.03.15 Timeline for Calling Tribal Council Meetings

Under the SKT Constitution, Article IV, Section 5, the Chair or a majority of the Tribal Council may call a meeting of the Tribal Council. Personal notice must be provided to each Council member no less than forty-eight (48) hours prior to the meeting.

a. Committee Meetings

This provision does not apply to SKT committee meetings. However, committee members, employees and agents of SKT will make to provide adequate notice to members of scheduled meetings and to not schedule committee meetings at the same time as previously scheduled meetings or obligations of the Tribal Council.

01.03.16 Special Provisions: Tribal Council Members

a. Tribal Council Members' Meeting Attendance

Tribal Council members must make every effort to attend regular Council meetings, special council meetings, assigned committee or commission meetings, government-to-government meetings, work sessions, and executive sessions, as scheduled.

b. Excused v. Unexcused Absences

Any Tribal Council member, who will not be able to attend a Tribal Council meeting, must notify the Tribal Chair or the Presiding Officer prior to the start of the meeting and provide an explanation for their absence. During the roll call at the Tribal Council meeting, the Chair or the Presiding Officer will share the absent Council member's reason for the absence, if appropriate, and state whether the absence is excused or unexcused.

c. Consequence for Unexcused Absences

Pursuant to the SKT Constitution, Article IV, Section 7, a Tribal Council member who is absent from three (3) successive monthly Tribal Council meetings without being excused by the Tribal Council for good cause automatically forfeits their office. The Chair will meet with Council members with numerous unexcused absences from meetings and Council obligations other than the regular monthly meeting as necessary.

d. Convictions

Under the SKT Constitution, Article IV, Section 7 and the SKT Election Ordinance Section 02.01.12, a Tribal Council member who is convicted of a felony crime or a misdemeanor involving a sexual offense, automatically forfeits their office.

e. Executive Session

No Tribal Council member or staff privy to an executive session will disclose information discussed during that session unless expressly authorized by the Tribal Council.

f. Tribal Council Interaction with Employees and Agents

1. Threats or Intimidation.

Tribal Council members shall not threaten or intimidate any employee or agent in retaliation for the employee or agent acting within their scope of duties.

2. Tribal Council Must Act as a Unit.

Tribal Council members shall not direct employees or agents or assign specific tasks unless specifically authorized by the Tribal Council and the STA General Manager. However, Tribal

Council members, through their work on STA committees, may make motions to recommend actions for staff to take, subject to General Manager approval.

Chapter 3 Code of Conduct Violations & Penalties

01.03.17 Anti-Retaliation Policy

It is contrary to the values of SKT for anyone to retaliate against any Tribal Council member, employee, contractor, or volunteer who engages in "protected activity", namely: in good faith reporting a Code of Conduct violation, a suspected violation of law (such as a complaint of discrimination, or suspected fraud), or a suspected violation of any regulation or Employee Handbook provision governing the operations of SKT.

a. What is retaliation?

Retaliation occurs when a person in a position of power takes a materially adverse action against someone in a lesser position of power because the latter person reported a Code of Conduct violation, a suspected violation of law (such as a complaint of discrimination or suspected fraud), or a suspected violation of any regulation or Employee Handbook provision governing the operations of SKT. Examples of "materially adverse actions" include, but are not limited to:

- work-related threats, warnings, or reprimands;
- negative or lowered evaluations;
- filing a civil action;
- engaging in abusive verbal or physical behavior that is reasonably likely to deter protected activity, even if it is not yet "severe or pervasive" as required for a hostile work environment;
- taking (or threatening to take) a materially adverse action against a close family member (who would then also have a retaliation claim, even if not an employee).

01.03.18 Code of Conduct Violations

a. Code of Conduct Complaints Process

All Code of Conduct complaints must be filed in writing within forty-five (45) calendar days of the date the alleged violation occurred or within forty-five (45) calendar days of the date the alleged violation was discovered.

Only SKT Tribal Council members, Committee members, employees, contractors, or volunteers may file a Code of Conduct complaint against an SKT Tribal Council member, Committee member, contractor, or volunteer. Allegations against an employee should be reported through the Employee Handbook grievance process.

All Code of Conduct Complaints will be filed with the Tribal Attorney, who will screen out improper complaints within five (5) days of receipt. If the complaint is against a Tribal Council member, Commission member, or the General Manager, the Tribal Attorney will then deliver the complaint to the Tribal Chair, unless the complaint is about the Tribal Chair, in which case, the Tribal Attorney will deliver the complaint to the Vice Chair.

The Tribal Attorney will deliver complaints against contractors or volunteers to the General Manager. Complaints will be reviewed and a final decision issued, notwithstanding any appeal, within fifteen (15) calendar days of receiving the complaint from the Tribal Attorney.

b. Alleged Code of Conduct Violations by Tribal Council, Committee or Commission Members, or the General Manager

The Chair (or Vice Chair, as applicable) will appoint an Ad Hoc Committee consisting of three Tribal Council members to review the allegations and make a recommendation to the full Tribal Council. The full Tribal Council will have the final decision-making authority concerning violations of the Code of Conduct by a Tribal Council member, committee or commission member, or General Manager. There is no further right to appeal after the Tribal Council has made its determination.

c. Alleged Code of Conduct Violations by Employees, Contractors, or Volunteers

If an employee is alleged to have violated the Code of Conduct, then the Employee Handbook grievance process will control. The General Manager will review Code of Conduct complaints against contractors and volunteers, make reasonable efforts to investigate the allegations, and make a determination. The General Manager's decision is final and not subject to appeal.

01.03.19 Penalties

Violations of the Code of Conduct may result in a letter of reprimand, repayment of the amount of personal gain, termination of contract, censure, or removal from office, depending on the nature and circumstances of the violation.

Chapter 4 Date of Enactment

01.03.20 Date of Enactment

This Code was originally enacted by an emergency vote of 7 in favor, 0 against, and 2 absent, at a special meeting of the Sitka Tribal Council on November 29, 2005, at which a quorum was present. This Code was amended on the date below. The following Sections were amended: 01.03.03, 01.03.04, 01.03.08, 01.03.12, 01.03.15, 01.03.16, 01.03.17.

CERTIFICATION

This Code of Conduct was adopted after three readings at a duly convened meeting of the Tribal Council of the Sheet'ká Kwáan Tribe on June 17, 2026 and at which a quorum was present, by a vote of __8__ IN FAVOR, __0__ AGAINST, __0__ ABSTAIN, and __1__ ABSENT.

Dionne Brady-Howard

Yeidikook'áa |Dionne Brady-Howard,
Tribal Chairwoman

ATTEST:
Marsha Moses

Lxe'is | Martha Moses, Tribal Secretary