

MEMBER FDIC

## **Ethics Statement**

The President, Chief Operating Officer, and all Senior Vice Presidents each certify to the Board of Directors of First National Bank Alaska that in discharging their duties as an officer of First National Bank Alaska, to the best of their knowledge and ability, they adhere to and advocate the following principles and responsibilities governing professional and ethical conduct.

- 1. I act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships. In avoidance of such conflicts of interest, I disclose to the President of First National Bank Alaska any material transaction or relationship that reasonably could be expected to give rise to such a conflict.
- 2. I provide the bank's stockholders, directors, officers and employees with information that is accurate, complete, objective, relevant, timely and understandable. Any disclosure or report I make on behalf of First National Bank Alaska, including, but not limited to, any report or disclosure filed with or submitted to any regulatory authority, is full, fair, accurate, timely, and understandable.
- 3. I comply with all applicable statutes, regulations, and rules of federal, state and local governments, and their instrumentalities.
- 4. I act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing my independent judgment to be subordinated.
- 5. I respect the confidentiality of information acquired in the course of my employment by First National Bank Alaska except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of employment is not used for personal advantage.
- 6. I share knowledge and maintain skills important and relevant to the needs of stockholders, directors, officers and employees of First National Bank Alaska.
- 7. I promote ethical behavior among employees of First National Bank Alaska and members of the communities it serves.
- 8. I achieve responsible use of and control over all assets and resources employed or entrusted to me as an employee of First National Bank Alaska.
- 9. I promptly report to the President of First National Bank Alaska any violation, or suspected violation, by me or any other employee of First National Bank Alaska bound to adhere to the foregoing principles and responsibilities.
- 10. Any knowing violation by me of any of the foregoing principles and responsibilities may result in disciplinary action taken against me by First National Bank Alaska, including termination of employment.