

## Alaska Communications Code of Ethics

In accordance with the requirements of the Securities and Exchange Commission and the NASDAQ Stock Exchange, the Board of Directors of Alaska Communications Systems Group, Inc. (with its subsidiaries, “the Company”) has adopted this Code of Ethics (this “Code”) in order to :

- promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by the Company;
- promote compliance with applicable governmental laws, rules and regulations;
- Promote the protection of Company assets, including corporate opportunities and confidential information;
- Promote fair dealing practices;
- Deter wrongdoing; and
- Ensure accountability for adherence to the Code.

This Code applies to all directors, officers and employees of the Company and each is expected to be familiar with the Code and do adhere to the principles and procedures set forth in the Code, report any suspected violations to the appropriate authority within the Company immediately upon first becoming aware of such violations.

### Honest and Ethical Conduct

The Company’s policy is to promote high standards of integrity by conducting its affairs honestly and ethically. Each director, officer and employee owes a duty to the Company to act with integrity and observe the highest ethical standards of business conduct in dealing with the Company’s customers, suppliers, partners, service providers, competitors, employees and anyone else in the course of performing his or her job.

### Conflict of Interest

ACS requires employees to avoid or mitigate conflicts of interest at all times. A conflict of interest occurs when an employee’s personal or financial interests (or the interest of a member of his or her family) interfere with or appears to interfere with interests of the Company. For example, a conflict of interest would arise if a director, officer or employee, or a member of his or her family, receives improper personal benefits as a result of any transaction or transactions of the Company. Actual or apparent conflicts must be treated equally. Employees unsure as to whether a certain transaction, activity or relationship constitutes a conflict of interest should contact Leonard Steinberg (“Corporate Compliance Officer”). Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest

exclusively from the Nominating and Corporate Governance Committee of the Board of Directors.

#### Full, Fair, Accurate and Timely and Understandable Reporting and Disclosure

The Company is regulated by numerous federal, state and local agencies, which monitor the conduct of business and reporting, or disclosure, or certain required pieces of information at specific times. The Company reports and makes full disclosure, to the extent of the law or regulations, and requires that all employees participate when called upon to do so. If an employee becomes aware of a reporting of disclosure violation, the Corporate Compliance Officer should be immediately notified.

Each director, officer or employee, to the extent involved in the Company's disclosure process must:

- be familiar with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company;
- not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the company's independent auditors, governmental regulators and self-regulatory organizations.

#### Compliance with Applicable Laws and Regulations

It is the Company's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each director, officer and employee to adhere to the standards and restriction imposed by those laws, rules and regulations in the performance of their duties for the Company, including those relating to accounting and auditing matters and insider trading. If uncertain about the language or scope of a law or regulation, employees must comply with the strictest interpretation of the law or regulation, and seek guidance from a supervisor or the Corporate Compliance Officer.

Other policies issued by the Company also provide guidance as to certain of the laws, rules and regulations that apply, including rules regulating the purchase or sale of Company securities.

#### Protection and Proper Use of Company Assets

All directors, officer and employees should protect the Company's assets and ensure their efficient use. All Company assets should be used only for legitimate business purposes, though incidental personal use may be permitted. Any suspected incidence of fraud or theft should be reported for investigation immediately.

All directors, officers and employees owe a duty to the Company to advance its interests when the opportunity arises. Directors officers and employees are prohibited from taking for themselves personally (or the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position. Directors, officers and employees may not use Company assets, property, information or position for

personal gain (including gain of friends or family members). In addition, no director, officer or employee may compete with the Company.

#### Confidentiality

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners, except when disclosure is expressly authorized or legally required. Confidential information includes all non-public information (regardless of its source) that might be of use by the Company's competitors or harmful to the Company or its customers, suppliers or partners if disclosed.

#### Fair Dealing

Each director, officer and employee must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing her or his job. No director, officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any unfair dealing practice.

#### Accountability

This Code of Ethics, which binds all employees, holds every employee accountable for adhering to its component sections. Failure to abide by these requirements may lead to disciplinary action, up to and including, termination of employment. Directors, officers or employees with questions should contact the Corporate Compliance Officer.

#### Prompt Internal Reporting and Response to Violations

As stewards of the Company's resources and reputation, it is imperative that directors, officers and employees report any suspected violations of this Code of Ethics to the Corporate Compliance Officer. Any employee who encounters a violation or possible violation of the Code, any applicable law of regulation, reporting or disclosure requirement or conflict of interest must report such a discovery to appropriate authorities. Any employee who reports any suspected violation of the Code of Ethics in good faith will not be penalized or suffer any retaliation as a result of taking such action.

The Company will follow the following procedures in investigating and enforcing this Code and in reporting on the Code:

The General Counsel or the Chief Financial Officer will take all appropriate action to investigate any violations reported. In addition, the General Counsel or Chief Financial Officer shall report each violation and alleged violation involving a director or an executive officer to the Chairperson of the Audit Committee. To the extent appropriate, the Chairperson of the Audit Committee shall participate in any investigation of a director or executive officer. After the conclusion of an investigation of a director or executive officer, the conclusions shall be reported to the Audit Committee.

The Audit Committee will conduct such additional investigation as it deems necessary. If the Audit Committee determines that a director or executive officer has violated this Code, it will report its determination to the Board of Directors. Upon being notified that a violation has occurred, the Board of Directors or the General Counsel will take such disciplinary or preventive action as deemed appropriate, up to and including dismissal or, in the event of criminal or other serious violations of law, notification of the SEC or other appropriate law enforcement authorities.

The Company's Board of Directors (in the case of a violation by a director or executive officer) and the General Counsel (in the case of a violation by any other person) may waive provisions of this Code. In the case of a violation by a director or an executive officer, any waiver shall be disclosed as required by SEC and NASDAQ rules.