

Alaska Communications Code of Ethics

In accordance with the requirements of the Securities and Exchange Commission (SEC”) 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 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 this Code.

This Code applies to all directors, officers and employees of the Company and each is expected to be familiar with this Code and to adhere to the principles and procedures set forth in this Code, and to 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 and Related Party Transactions

The Company requires employees, officers and directors to avoid or mitigate conflicts of interest at all times. A conflict of interest occurs when an individual’s personal or financial interest (or the interest of a family member) interferes 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, also known as a related party transaction. Actual or apparent conflicts must be treated equally.

The Company has a Conflicts of Interest and Related Party Transaction Approval Policy that identifies and addresses conflicts and transactions requiring review and governs the review,

approval and disclosure process. Directors and executive officers must seek a determination and prior authorization or approval of any potential related party transactions as defined in the Conflicts of Interest and Related Party Transactions Approval Policy exclusively from the Nominating and Corporate Governance Committee of the Board of Directors. Non-executive employees must seek review and approval of such transactions from their supervisors or the Company's Chief Ethics Officer, as set forth in the Company's Conflicts of Interest and Related Party Transactions Approval Policy.

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

Each director, officer or employee, to the extent involved in the Company's disclosure process, including the Chief Executive Officer and Senior Vice President of Finance, is required to be familiar with the Company's disclosure controls and procedures applicable to him or her so that the Company's public reports and documents filed with the SEC comply in all material respects with the applicable federal securities laws and SEC rules. In addition, each person having direct or supervisory authority regarding these SEC filings or the Company's other public communications concerning its general business, results, financial condition and prospects should, to the extent appropriate within his or her area of responsibility, consult with other Company officers and employees and take other appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely and understandable disclosure.

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

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 and Company Opportunities

All directors, officers 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 must 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 his or her 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, 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 or the Chief Ethics 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 to the Corporate Compliance Officer or Chief Ethics Officer. Any employee who reports any suspected violation of this Code in good faith will not be penalized or suffer any retaliation as a result of taking such action.

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

The Chief Ethics Officer and General Counsel will take all appropriate action to investigate any violations reported. If a violation affects the Company's accounting or system of internal controls or impacts financial reporting, the Chief Ethics Officer and General Counsel will notify the Chairperson of the Audit Committee.

Any violation or alleged violation involving a director or an executive officer will be investigated by the Chief Ethics Officer and General Counsel and reported to the Chairperson of the Nominating and Corporate Governance Committee. To the extent appropriate, the Chairperson of the Nominating and Corporate Governance Committee shall participate in any investigation of a director or executive officer. After the investigation of a director or executive officer, a report of the investigation will be presented to the Nominating and Corporate Governance Committee.

If the Nominating and Corporate Governance Committee determines that a director or executive officer has violated this Code, it will report its determination to the Board of Directors. The Board of Directors or the Chief Ethics Officer and 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 Chief Ethics Officer and 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 will be disclosed as required by SEC and NASDAQ rules.

Any questions relating to how these policies should be interpreted or applied should be addressed to the Chief Ethics Officer.