



Skookum Compliance Program and Code of Ethics

Introduction

Skookum has built a reputation for delivering quality services to our clients. Our continued success depends on meeting our mission of “Creating Opportunities for People of all Abilities” and living and demonstrating our Core Values while ensuring our customers meet their missions.

Skookum is committed to complying with federal, state, and local laws and promotes an organizational culture that encourages a high degree of ethical conduct, professionalism, dedication, and integrity, as well as a genuine concern for the welfare of all our employees and our Community Employment Services (CES) clients. Skookum’s five Core Values drive this culture: Integrity; Diversity; Commitment; Quality; and Partnership.

Our Compliance Program and Code of Ethics are intended to provide guidance to our employees, management, executive members, CES clients, business partners, and others who act on behalf of Skookum and to promote:

- ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- compliance with all applicable federal, state, and local laws, rules, and regulations
- prompt reporting of violations/perceived violations of the Code of Ethics or Skookum policies
- accountability for adherence to the Code of Ethics and Skookum policies

Upholding Skookum’s Compliance Program, Code of Ethics, policies, and procedures is the responsibility of all employees, Managers, Supervisors, Executive members, Board members, CES clients, and others who act on behalf of Skookum. In addition, any subcontractors of Skookum are expected to read, understand, and abide by our Code of Ethics.

Skookum encourages individuals to address concerns to protect and promote our Core Values of Integrity, Diversity, Commitment, Quality, and Partnership.

The Compliance Program and Code of Ethics is not the sole source of guidance and information regarding the conduct expected at Skookum and is intended to supplement, not replace, the Employee Handbook, the CES Client Handbook, and other policies and procedures of Skookum. Much of the information described in our Code of Ethics is general and, therefore, may not address all situations that may occur. In these instances, we expect that individuals use good judgment to live our Core Values and comply with our Code of Ethics. If you have any questions, contact your Manager, Supervisor, Human Resources, your Employment Specialist, Workforce Development Director (if you are a CES client), or any management/executive team member.

This Program is organized along several key elements:



- Establishing compliance rules and procedures that are reasonably capable of reducing the prospect of wrongdoing, criminal, or unethical conduct
- Establishing a compliance committee and the assignment of Compliance Officer(s) to oversee the compliance program
- Establishing standards and procedures for effective communication of the Compliance Program and Code of Ethics to all employees through training programs and dissemination of the information
- Taking reasonable steps to achieve compliance with the policies by auditing systems reasonably designed to prevent and detect criminal conduct and establishing and publicizing a reporting system in which employees and employees can report conduct without the fear of retaliation
- Consistent enforcement of the standards through disciplinary actions, including the discipline of individuals responsible for the failure to detect and/or report an offense
- Skookum will take appropriate responses to substantiated violations, including updating the Program to prevent future offenses of the same nature

Skookum Compliance Program Oversight Responsibilities

A. Compliance Officer

The Compliance Officer shall be responsible for coordinating and implementing the Organization's Compliance Program, subject to the overall authority of Skookum's President and Chief Executive Officer, Jeff Dolven.

The Compliance Officer shall have a direct line of communication with all executives and functional directors of Skookum and shall have independent authority to seek the advice of legal counsel regarding compliance-related issues on an as-needed basis.

The Compliance Officer will be responsible for coordinating the regular review of the Compliance documents, recommending to the President and Chief Executive Officer, the Chief Operations Officer, and the Chief People Officer modifications of the Compliance documents as necessary and appropriate, and developing additional compliance procedures and training as appropriate.

The designation of a Compliance Officer in no way minimizes the responsibility of all personnel to comply with all policies and procedures, nor does it diminish every supervisor's responsibility to ensure that those personnel for which they have responsibility comply with the Code of Ethics and Skookum policies.

Skookum's Compliance Officer:
Viviana Gonzalez



Controller
(360) 475-0756 ext. 239
Viviana.gonzalez@skookum.org

B. Compliance Committee

The Skookum Compliance Committee shall be responsible for reviewing, evaluating, and acting upon matters that may be brought to its attention, including obligations of unethical or criminal conduct or violation of Skookum’s policies and procedures. The Skookum Compliance Committee shall hold regular quarterly meetings and additional meetings as necessary. The membership of the Skookum Compliance Committee shall include but not limited to the following:

Rob Ziegler	Chief People Officer
Rob Potter	CIO, VP Business Systems
Maurice Correia	VP Quality
Megan Mason-Todd	Workforce Development Director
Sierra Hinrichsen	Human Resources Manager
Tara Tulp	Benefits Manager/HIPAA Officer
Jackie Beemer	FSO/ITPSO

C. Dissemination of Information

A critical aspect of Skookum’s Compliance Program is effectively communicating the Code of Ethics and related policies to every employee. The Compliance Committee is responsible for establishing procedures to ensure that every employee has received, read, and agrees to comply with the Code of Ethics and the Compliance Program. These procedures shall include the following:

- Within 90 days following an update or modification to the Code of Ethics and the Compliance Program, all present employees and clients will be given a copy of the Code of Ethics, Compliance Program, and Employee Handbook. They will be expected to read them and sign an acknowledgment stating the employee has read and understands the policies and understands that this is a condition of continued employment at Skookum or to continue to receive client services.
- Every newly hired employee or new client will be given a copy of the Code of Ethics, Compliance Program, Employee or Client Handbook, and other relevant policies related to their employment or client services. The new employee or client must sign an acknowledgment during the onboarding or client intake process stating that they have read and understands the Code of Ethics, Compliance Program, Employee or Client Handbook, and other relevant policies and understands that such is a condition of continued employment at Skookum.

- Skookum Human Resources is responsible for ensuring that these acknowledgments are retained as a part of the employee's personnel record or client record.

D. Education and Training Programs

The Compliance Officer and Committee are responsible for collaborating with the CES, Human Resources, and Leadership and Organizational Development (LOD) teams in developing, updating, and implementing procedures to ensure that education and training programs, and appropriate supplemental materials, regarding the Compliance Program and Code of Ethics documents, are developed and made available to all employees and clients. Training procedures consist of the following:

- All employees and clients will receive, review, and acknowledge their understanding and agreement of the Code of Ethics, Compliance Program, Employee or Client Handbook, and relevant related policies upon commencing employment or services with Skookum.
- Supervisors and Employment Specialists are responsible for ensuring that employees or clients are made available for and receive the education and training established by the Compliance Officer and Skookum Compliance Committee.

2. Reporting of Violations

Every Skookum employee and CES client has a responsibility to report any violation of the Code of Ethics, Handbook, or related policies to their Supervisor or Manager, Human Resources, Employment Specialist, CES Manager, or Workforce Development Director (if a client) as indicated in Compliance Program or the Code of Ethics. Potential criminal activities should be reported immediately to the Compliance Officer or Human Resources. Employees and clients may not be subject to any reprisal for a good faith report of a suspected violation of the Code of Ethics or Skookum policy.

Skookum believes in a workplace that encourages and allows employees and clients to seek and receive prompt guidance before engaging in conduct that may violate the Code of Ethics or related policies.

To achieve these objectives, the Skookum Compliance Officer and Committee is responsible for ensuring that the following practices and procedures are implemented and publicized in writing to all employees:

- Employees and clients may consult their Supervisor, Manager, or Employment Specialist (if a CES client) about any questions regarding the Code of Ethics, Employee Handbook, CES Client Handbook, or employment-related policies. The Supervisor/Manager or



Employment Specialist should respond to any inquiry and/or refer the question to the appropriate personnel within Skookum.

- Employees and clients may report to their Supervisor, Manager, Human Resources, Employment Specialist (if a client), CES Manager, or Workforce Development Director any violation of the Code of Ethics or related policy. Reports received from employees shall immediately be reported to Human Resources and/or the Compliance Officer. Employees and clients may not be subject to any reprisal for a good faith report of a suspected violation of the Code of Ethics or related policies.
 - All Skookum Management shall have an “open door policy” that permits an employee to present any suspected violation of the Code of Ethics, Employee Handbook, or related policies.
 - The Compliance Officer and Committee has the responsibility to review all reports received of suspected violations of the Code of Ethics, Employee or CES Client Handbook, or related policies. The Compliance Officer, Compliance Committee, and Human Resources members of Skookum shall maintain the confidentiality of the identity of employees who submit reports of violations or suspected violations.
3. Skookum shall establish and publicize a confidential reporting mechanism that permits reports of violations of the Code of Ethics, Employee or Client Handbook, or related policies directly to the Compliance Officer, Human Resources Manager, and Workforce Development Director. The reporting mechanism shall also allow the individual to submit questions or statements which will be answered promptly. Confidentiality of the reporter’s identity will be maintained.
4. In addition, Skookum utilizes Lighthouse Services, Inc. to provide a confidential third-party system for employees to report suspected violations of the Code of Ethics, Employee or CES Client Handbook, or related policies. During new hire orientation, as well as through workplace postings, all Skookum employees will be made aware of this anonymous employee complaint hotline. The Compliance Committee will review these reports and any verification investigations conducted by the HR team on a regular basis.



Response to Allegation of Code Violations

A. Immediate Response Necessary

Skookum wants to know promptly of any potential or suspected violation of the Code of Ethics and Employee or CES Client Handbook policies. Any employee or client who is aware of a violation or perceived violation of the Code of Ethics or Employee or CES Client Handbook-related policies is responsible for reporting that information immediately to their Supervisor, Manager, Employment Specialist, CES Manager or Workforce Development Director, Human Resources or to the Compliance Officer.

The Compliance Officer may consult with Human Resources, Skookum's Workforce Development Director, Skookum Executive team, and legal counsel regarding the various question raised by the report of a violation of the Code of Ethics or Employee or CES Client Handbook-related policies. Among the issues that should be addressed when a violation is reported are the following:

- Should an internal investigation be conducted?
- Who should conduct the investigation?
- Should a disclosure be made to the appropriate government agency?

B. Investigations of Violations

All employees and clients are expected to cooperate in the investigation of an alleged violation of the Code of Ethics or Employee or Client Handbook-related policies. Preliminary investigation of any suspected violation should not be conducted without consultation with and direction from the Human Resources Manager, Workforce Development Director, and/or the Compliance Officer, who may seek the assistance and guidance of legal counsel.

Where employee or client interviews are necessary for an investigation, rights established by Collective Bargaining Agreements or under Skookum policies will be respected. To ensure that an investigation is based on all the relevant facts, an employee or client who is suspected of a violation will be informed of and permitted to respond to the allegations under investigation before the investigation is considered completed.

Skookum is a Federal Contractor that is subject to frequent government reviews and audits, many of which are routine. As a result, Skookum may receive requests for production of documents, requests for interviews, summons, search warrants, and subpoenas. It is Skookum's policy to cooperate in all government audits and investigations.

C. Decisions

Based on the results of the investigation, Skookum management will determine what actions are required, including consideration of the following areas:

- Whether to discipline the employee or employees involved in the conduct constituting the violation(s) and if so, what level of discipline
- Whether to terminate the employee involved in the conduct constituting the violation(s)
- Whether to terminate client services for clients involved in the conduct constituting the violation(s)
- Whether a report to a government agency should be made
- Whether any amount should be refunded to a government or third-party payor
- Whether other notices or disclosures are required
- And whether the Code of Ethics, Employee or Client Handbook, or other policies require modification

Discipline for Violations

Employees or CES Clients who have failed to comply with the Code of Ethics, Employee or CES Client Handbook, and related policies will be subject to discipline, up to and including termination of employment or services. Skookum will document all reasons for disciplinary action taken or termination of employment or services. The following considerations will be considered in determining the appropriate action:

- The nature of the violation and the ramifications of the violation to Skookum, our customers, and other stakeholders
- The disciplinary actions imposed for similar violations
- Any history of past violations
- Whether the violation was willful or unintentional
- Whether the individual was directly or indirectly involved in the violation
- Whether the violation represented an isolated occurrence or a pattern of conduct
- If the violation consisted of the failure to supervise another individual who violated the Code of Ethics, Employee or CES Client Handbook, or related policies, the extent to which the circumstances reflect lack of diligence



- If the violation consisted of retaliation against another individual for reporting a violation or cooperating with an investigation, the nature of such retaliation
- Whether the individual in question reported the violation
- The degree to which the individual cooperated with the investigation

Preservation of Documents

Skookum has developed a comprehensive document retention policy. Document destruction may only take place in accordance with this policy. Managers and Employment Specialists are responsible for monitoring compliance with this policy. Skookum must retain all documents if it has been served with a government subpoena or, if it has reason to believe that there is an impending investigation, it must retain all documents that may pertain to that investigation.

Monitoring Skookum Compliance in Specific Substantive Areas

The Code of Ethics and Employee or CES Client Handbook applies to all Skookum employees and clients. Each employee and client are personally responsible for their conduct in complying with Skookum's policies and procedures. In addition to policies concerning general employee conduct and the adherence by all employees and clients to the commitment and mission of Skookum, the Code of Ethics focuses on conduct with respect to the laws that most frequently and directly impact the business conduct of our employees and CES clients. A brief description of the policies discussed in the Code of Ethics and the procedures that must be followed to effectively monitor compliance with the laws that may impact the business conduct of Skookum employees and CES clients is set forth below.

A. Financial Accounting and Records

Skookum will develop policies and procedures for periodic auditing and monitoring of Skookum financial transactions that could raise concerns regarding compliance with laws regarding fraud and abuse. Skookum's financial records are audited annually by a contracted third-party auditor; in addition, governmental agencies can and have conducted audits of Skookum's financial records (e.g., payroll) for a particular operational site. Board-elected Finance and Audit Committees also provide oversight of Skookum's financial accounting practices.

B. Service Contract Act (SCA) Wage Compliance

Skookum's non-union contracts are based on Service Contract Act (SCA) wages set by the Department of Labor (DOL). These SCA wages are matched to each Skookum Job Description through the Performance Work Statement (PWS) for each installation. The Compliance Committee and its functional leadership members will partner with Skookum operations leadership to ensure that all Skookum sites are compliant with DOL wage determinations and labor categories. Compliance practices in this area will include, but



not be limited to, focused training on DOL requirements for Skookum managers and random internal audits of Skookum sites to ensure compliance.

C. Confidential Business Information

Policies regarding confidentiality and business information are set forth in the Code of Ethics. All Managers and Supervisors are responsible for ensuring their employees understand policies with respect to the disclosure to unauthorized persons of confidential business information, including trade secrets, commercially sensitive information, and financial information about Skookum.

D. Employee and Client Rights

Policies on employees' and client rights and obligations require a working environment free from harassment, drugs, and alcohol, and unlawful discrimination, harassment, and retaliation are set forth in the Code of Ethics and Employee or CES Client Handbook. In addition to policies, Skookum has procedures to ensure company-wide compliance with certain federal laws governing employment and the workplace, including but not limited to, the Equal Employee Opportunity Act, the Americans with Disabilities Act, and the Occupational Safety and Health Act.

All Skookum employees receive Respectful Workplace training that includes examples of harassment and disrespectful conduct.

E. Fraud and Abuse

Policies regarding fraud and abuse are set forth in the Code of Ethics and Employee or Client Handbook. The Compliance Officer is responsible for identifying and reviewing internal controls to detect improper financial transactions. The audit system is designed to discover any financial practices which violate Skookum policies, state and federal laws, and licensing requirements. The following are monitored on a continuous basis to prevent and detect violations of state and federal laws and licensing requirements:

- Reasonable and necessary services
- Coding of services and items
- Correctness of charge or reimbursement rates
- Billing to appropriate payer source
- Sufficiency of documentation

F. HIPAA and Protected Health Information



As an employer, Skookum must comply with all relevant aspects of the Health Insurance Portability and Accountability Act (HIPAA), the Americans with Disability Act (ADA), and the Family and Medical Leave Act (FMLA). These regulations have specific requirements for the handling of an employee's protected private health information (PHI). To preserve this confidentiality, Skookum's Information Technology (IT) Department constantly monitors the intentional/unintentional transfers of PHI through multi-media channels. In addition, access to an employee's PHI stored within Workday, Skookum's HRIS system, is restricted to select individuals on a need-to-know basis.

In rare and unique situations where PHI may need to be disclosed is on a limited basis to protect Skookum's workplace (e.g., positive COVID-19 diagnosis of an employee). Skookum only shares this information with individuals directly responsible for the safety of the specific workplace, as per 2020 Equal Employment Opportunity Commission guidance on this matter.

G. Security and Insider Threat Committee

Skookum holds a Secret Facility Clearance (FCL) and must comply with all the provisions of the National Industrial Security Program Operating Manual (NISPOM). These provisions are specific to handling, protecting, and safeguarding classified information. Skookum meets these requirements by appointing a Facility Security Officer to supervise and direct security measures necessary for implementing applicable requirements of the NISPOM. Other requirements include establishing an Insider Threat Program, written Standard Practice Procedures when the FSO believes them to be necessary for effective implementation of the NISPOM. The FSO is required to perform reviews of their security systems on continuing basis and shall conduct a formal self-inspection as stated in the NISPOM. Skookum shall cooperate with Federal agencies and their officially credentialed representatives during official inspections, investigations, interviews, and audits. Skookum is also required to provide initial, annual, and debriefing training to all cleared employees.

Skookum Aerospace Manufacturing is a U.S. International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR) compliant company. This means Skookum Aerospace Manufacturing can gain customer or project requests for articles that would fall under ITAR classifications as well as EAR-governed commercial items, technical data & technology, and dual-use commodities & technology. Initial and annual training regarding ITAR and EAR for all employees in an export compliance program. This is a requirement by both the Bureau of Industry and Security (BIS) and the Department of State Directorate of Defense Trade Controls (DDTC).

As a cleared federal contractor providing services to secured installations, Skookum's Insider Threat Program monitors the operating environment for personnel, facilities, information, equipment, networks, or systems from insider threats. Skookum's Insider Threat Committee is to gather, integrate, and provide for reporting of relevant and credible information indicative of a potential or actual insider threat to deter employees

from becoming insider threats; detecting insiders who pose a risk to classified information; and mitigating the risk of an insider threat. The Committee meets on a quarterly basis to review, discuss and mitigate reported incidents. The Committee is comprised of Skookum's Facility Security Officer/Insider Threat Program Security Officer (FSO/ITPSO), Security Specialists, Chief Information Officer (CIO), Benefits Manager, Human Resources Manager, Workforce Development Director, Chief People Officer (CPO) and a representative from business systems. The Chief Executive Officer (CEO) is briefed after each meeting, and meeting minutes are recorded and stored via secure access on Skookum's cloud-based file server.

H. Review of DHHS OIG List of Excluded Individuals/Entities

The U.S. Department of Health and Human Services (DHHS) Office of Inspector General (OIG) maintains a list of individuals and entities excluded from Federally funded health care programs for a variety of reasons, including a conviction for Medicare or Medicaid fraud. These excluded individuals and entities cannot receive payment from Federal healthcare programs for any items or services they furnish, order, or prescribe. Anyone who hires an individual or entity on the List of Excluded Individuals/Entities (LEIE) may be subject to civil monetary penalties. Skookum routinely checks the exclusions database to ensure that new hires, current employees, and CES clients are not currently excluded. This process is completed by Skookum Human Resources under the direction of Skookum's Workforce Development Director.