

Code of Ethics

ATN International, Inc.

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A Message to Our Employees

Our continuing success depends in part on each of us acting ethically and with integrity every day in everything that we do. Simply put, we cannot be successful if any part of our success is achieved through dishonesty, fraud or other unethical or illegal behavior. Ethical conduct is not an impediment to business success; it is an essential element of such success.

Our Code of Ethics is the roadmap for how we should serve our mission and conduct our business. The Code spells out our commitment to pursue our daily activities ethically and transparently, with everyone from our customers, regulators, business partners and counterparties, to our vendors, co-workers and others. While our business has expanded significantly since our founding in 1987, the underlying values guiding our conduct have not changed. Act with integrity. Do the right thing. Don't cut corners. Treat others as you would like to be treated. If you face a situation not explicitly covered by the letter of this Code, take the high road and obey its spirit.

Each of us is required to confirm our understanding of this Code and its principles, so I urge you to read it carefully, become familiar with its principles and discuss it with your supervisor and co-workers. Of course, the Code cannot address every possible situation, and issues will continue to evolve as our company continues to grow and develop. Ask questions if you are uncertain about how to handle a situation, and report any compliance or ethics issues or concerns.

We are in business for the long term. Unethical behavior not only is wrong, it prevents us from achieving our long term goals. Please join me in upholding our commitment to ethics and integrity by following the standards outlined in this Code every day.

Michael T. Prior
President and Chief Executive Officer

1. INTRODUCTION

This Code of Ethics (or “Code”) is for the benefit of all employees of ATN International, Inc. and its subsidiaries, which we refer to throughout as the “Company” or “us” or “we”.

The Company expects and depends on each of its directors, officers, employees, agents and consultants at all times to act ethically, honestly, lawfully and with integrity. This **Code of Ethics** serves as a basic guide to help you make good choices in the course of your employment with us. We expect you to follow this Code and use good judgment in applying its principles to your conduct. Ethical decision making is not always easy, and this Code does not explain the appropriate ethical behavior for every situation. As a guide to assist you in making the right choice, ask yourself the following questions:

Does it feel right?
Will it reflect negatively on me or on the Company?
Would I be embarrassed if others knew about it?
How would this look in the newspapers?
Can I sleep at night?

Who Must Follow These Guidelines

This Code applies to every Company employee and to each member of the Board of Directors. In addition, all employees are encouraged to share this Code with third parties with whom the Company is doing business.

Your Responsibilities

You have an obligation to uphold and carry out the Company’s commitment to lawful and ethical business conduct. This obligation requires you to:

- fully understand and follow this Code, as well as all legal requirements and other Company policies and procedures that apply to your work responsibilities;
- treat and use Company property, confidential information and corporate opportunities solely for the benefit of the Company and not for personal gain;
- treat others with fairness, respect and dignity;
- report promptly any business practice or other activity that you believe may be a possible violation of law or this Code (and if you believe the concern has not been satisfactorily addressed, the Company encourages you to report your concern as described in the Company’s Whistleblower Policy and as set forth below); and
- cooperate fully in any Company investigation related to possible violations of law or this Code and maintain the confidentiality of such investigation.

Penalties for Violating the Code of Ethics Guidelines

You may be subject to disciplinary action, including termination of employment, if you violate this Code. The following are examples of conduct that violate this Code and may result in disciplinary action:

- any action that violates a Company policy or applicable law or regulation;
- requesting that another employee or third party violate a Company policy or applicable law;
- failure to report a known or suspected ethical or other violation of this Code;
- failure to cooperate in the Company's investigation of a possible violation; or
- retaliation against an employee for reporting an ethics violation.

Reporting Your Concern

Whenever you have any questions about what is or is not appropriate in any situation or if you believe any business practice or other activity undertaken by the Company or any director, officer or employee of the Company may possibly be illegal or violate this Code or other Company policies, **REPORT YOUR CONCERN!**

You may Report Your Concern in any one of the ways described below. You should do so, anonymously if you wish, in whichever way you are most comfortable or believe to be appropriate. What is most important is that the Company learns of your concern so that we can take action to address or correct it. To Report Your Concern, you may -

- Speak with your supervisor or local Human Resources department
- Call the ATN Ethics Hotline – 1-877-331-9079
- Send an email message to ethics@atni.com
- Contact the head of Human Resources: Mary Fairbairn – (978) 619-1335, or mfairbairn@atni.com
- Contact the head of the Company's Internal Audit Department: Sheila Hensley – (501) 448-1205, or shensley@atni.com
- Contact the General Counsel: Lee Slap – (978) 619-1324, or lslap@atni.com
- Complete and mail the Whistleblower Reporting Form included at the end of this Code of Ethics.

While it is Company's desire to address matters internally, nothing in this Code should discourage any employee or director from reporting any perceived illegal activity (including any violation of securities laws, anti-trust laws, environmental laws or any other Federal, state, local or foreign law) to the appropriate Federal, state, local or foreign authority.

What Happens When an Integrity Concern or Ethics Violation is Reported

The Internal Audit Department reviews each and every report of a possible violation of the law, this Code, or any complaints or concerns regarding auditing matters. It may also conduct an

investigation directed by the Company's Audit Committee under the Board of Directors.

The Company prohibits any employee from taking retaliatory action against anyone for reporting what they believed to be a possible violation of the law or this Code, or for assisting in an investigation of a possible violation. If you suspect that you have been retaliated against for reporting a possible violation or assisting in an investigation, you should Report Your Concern immediately.

2. INTEGRITY OF COMPANY BOOKS AND RECORDS

Most employees are involved with Company records of some kind, such as preparing time sheets or expense reports, approving invoices, signing for receipt of purchased materials, or preparing performance or production reports. Maintaining the integrity of all business records is essential to meeting the Company's financial, legal, regulatory, and operational objectives and requirements.

Financial and Public Reporting

As public company, we are required to follow the generally accepted accounting principles as prescribed by the regulatory authorities, as well as disclosure standards ensuring accurate and complete reporting of the Company's financial and other business information. We have appropriate systems and processes in place to ensure that the Company's financial and other disclosures comply with all of the laws, rules and regulations that apply to us. All employees with any responsibility for preparing our public reports, including all employees involved in drafting, reviewing, signing or certifying the information contained in those reports, have an obligation to ensure that our financial statements and disclosures are complete, accurate, timely and understandable.

Falsification or Alteration of Records

You may not under any circumstances, falsify or alter records or reports, prepare records or reports that do not accurately or adequately reflect the underlying transactions or activities, or knowingly approve such conduct.

Examples of prohibited practices include:

- making false or inaccurate entries or statements in any of the Company's books, records or reports that intentionally hide or misrepresent the true nature of a transaction or activity.
- manipulating books, records or reports so as to hide or misrepresent the true nature of a transaction or activity.
- failing to maintain books and records that completely, accurately and timely reflect all business transactions.

- maintaining any undisclosed or unrecorded company funds or assets.
- making a payment or approving a receipt with the understanding that the funds will be, or have been, used for a purpose other than what is described in the record of the transaction.
- improperly influencing the outcome of any external or internal audit of any financial statements or operations of the Company by, for example, providing misleading information to an auditor of the Company, offering incentives implicitly or explicitly linked to the outcome of an audit or purposefully providing an auditor with an inaccurate legal analysis or business rationale.

If you become aware of any action related to financial or public reporting that you believe may be improper, you should immediately Report Your Concern in accordance with this Code.

Expense Reporting

You are expected to act responsibly and in the best interests of the Company when incurring expenses in the course of your duties with the Company. Expense reports must never seek reimbursement of expenses that are not incurred in the course of, and related to, your duties with the Company. Expense reports must be completed accurately and in a timely manner, showing the true purpose and correct amount of each expense item and, if applicable, the persons in attendance.

Each supervisor is responsible for reviewing all expense reports submitted by the employees for which they are responsible, and verifying that such reports and the required receipts comply with this Code. No supervisor should engage in practices intended to circumvent the Company's management authorization process.

Authorization

You should not sign any document on behalf of the Company or otherwise bind the Company to any agreement unless you are authorized to do so, either specifically by your supervisor or generally in accordance with your job responsibilities and function. Consult with your supervisor if you have any questions about your authority to bind the Company.

Retention of Records

The Company has a Record Retention Policy for the systematic retention and destruction of internal and external documents prepared in the course of our business. Each employee who maintains any Company records, including contracts, emails, text messages, etc., is responsible for reviewing and complying with the Company's Record Retention Policy.

3. CONFLICTS OF INTEREST & APPEARANCE OF IMPROPRIETY

You should not engage in any conduct that creates either the appearance of impropriety or a conflict of interest with your employment with the Company.

A conflict of interest is any interest or activity that is incompatible or creates the appearance of a conflict with your responsibilities with the Company. Your conduct creates the appearance of impropriety whenever it would lead a reasonable observer to conclude that you are acting in a manner that may be dishonest, misleading, unethical, illegal, or otherwise not in furtherance of the Company's interests. Conflicts of interest may include relationships with suppliers, contractors, customers, competitors, regulators, other employees, directors or affiliates of the Company that affect your ability to exercise your independent judgment to choose what is best for the Company or preserve business opportunities for the Company's consideration. You should always perform your job duties based primarily upon what is in the best interest of the Company and in compliance with any applicable law or regulation, rather than upon personal considerations or personal or business relationships.

If you are unsure whether a proposed transaction or relationship should be reported, you should Report Your Concern. The Company's Related Person Transaction Policies and Procedures governs the review, approval and disclosure process relating to "related person transactions" involving the Company's executive officers, directors and director nominees.

Business Opportunities

In the event that you become aware of a possible business or investment opportunity (including business with vendors or new customers) in an industry or jurisdiction in which the Company (i) currently operates or has an investment, (ii) previously operated or invested or (iii) has considered operating or investing, you should consider such opportunities strictly for the Company's benefit and not your own personal benefit. This also includes business opportunities that may arise outside of the Company's industry, but within a jurisdiction or geography in which the Company has, may have had or may be considering investing or participating in. For example, while the Company is not in the real estate business, your purchase of property (or investment in a Company that purchases such property) in a location in which the Company may want to open a retail store may be deemed a conflict of interest. You must seek advice from the General Counsel as to whether pursuing any of these types of opportunities other than through the Company would present a conflict of interest under this policy or our Related Person Transaction Policies and Procedures before engaging in such an opportunity.

Direct Investments and Other Financial Opportunities

You may not have any direct investment or other financial interest in a supplier, contractor, or competitor of the Company. However, ownership of less than 1 % of the stock of a publicly traded company that competes or does business with the Company is permissible. It may also be a conflict of interest if you acquire an interest in an asset, such as real estate, stock or some other type of property, when the Company has acquired or has publicly disclosed that it will, or you are aware that it will, acquire an interest in that same asset. You may never accept any loan or

guarantee of an obligation from a supplier, contractor or competitor of the Company. In addition, any financial interest that you hold in an entity that intends to pursue business opportunities in the Company's industries may be considered to be a conflict of interest.

You should Report Your Concern if you acquire a profit or investment opportunity as a result of representing the Company in the course of your employment.

Employment and other Dealings with Family Members

Your hiring or engaging a family member as an employee, contractor or other agent of, or vendor to, the Company creates the appearance of a conflict of interest, if not a conflict in actuality. Accordingly, you may hire and make related employment decisions (including, among others, compensation, termination, scope of responsibility, reporting structure, performance assessment, etc.) only with the express written consent of a Vice President or higher ranking officer of the Company to whom you, directly or indirectly, report. Similarly, you may commit the Company to purchasing equipment, supplies or other items or services from a family member or from a family member's business only with such express written consent. No such officer (other than the Chief Executive Officer or Chief Financial Officer) may provide such consent other than in consultation with the Company's General Counsel.

Bribes, Kickbacks and Other Improper Payments

Bribes, kickbacks, payoffs and similar payments are unethical and illegal. You are not permitted to make or authorize any offer, payment, promise, charitable contribution or gift that is intended or appears to influence any person, government official, political party, candidate for political office or other person or entity to award business opportunities to the Company or to make a decision in the Company's favor. You are not permitted to accept any offer, payment, promise, charitable contribution or gift from a third party that is intended or appears to influence the Company to award business opportunities to that third party or to make business decisions in that party's favor. For additional guidance, see the table below and the Company's Anti-Corruption Policy.

4. GIFTS

You should never give to or receive from a competitor, customer, or potential vendor any gift, entertainment, benefit or privilege the value of which is not reasonable in its business context. Nominal gifts and ordinary business entertainment (generally those involving under \$250 in value and customarily offered for advertising or promotion purposes) are acceptable, as these gifts and events, whether you are on the giving or receiving end, do not place either party under any real or perceived obligation to the other. Gifts of cash, vouchers, gift certificates, loans or securities (including stock), regardless of the amount or value involved, should never, under any circumstances, be given to a competitor, customer, or anyone who conducts or seeks to conduct business with the Company. Examples of nominal gifts and ordinary business entertainment are noted below.

Nominal Gifts or Ordinary Entertainment	Not Appropriate
A holiday gift of a bottle of wine from a supplier, vendor or customer	A case of fine champagne
A business meal	An extravagant dinner and drinks
Tickets to a sporting or cultural event	Tickets to the Super Bowl or similarly prominent sporting or cultural event ; or airfare and/or hotel accommodations to any event
Attendance at the annual golf outing hosted by one of the Company's outside advisors	Attendance at the annual golf outing <u>plus</u> an offer to provide airfare and/or hotel accommodations
An invitation to a hospitality suite at a conference or trade-show	Weekend trip to a resort that offers little opportunity for benefit to the Company
A marble paperweight of modest value given by a supplier	Cash, monetary equivalents, regardless of the amount or value involved, or gift certificates from a supplier
Modest expressions of gratitude or gifts acknowledging personal events such as weddings or births	A lavish personal gift such as a piece of fine jewelry

If you have any questions regarding the guidelines for gifts and entertainment, please do not hesitate to contact the General Counsel.

5. FAIR EMPLOYMENT PRACTICES

The Company will not tolerate discrimination in employment on the basis of race, color, age, gender, sexual orientation, religion, disability, national origin, genetic information, veteran status or any status protected by applicable law.

The Company unequivocally prohibits all forms of harassment in the workplace. This prohibition applies to all employees, as well as to representatives of the Company's customers and vendors. Harassment includes behavior, whether in person or by other means, such as e-mail or mobile messaging, that is offensive and interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment. Harassment may take many forms, including unwanted physical contact, sexual advances, threatening behavior and demeaning comments, jokes or gestures.

If you believe that you have been discriminated against or harassed, you should report that discrimination or harassment to your supervisor, his or her supervisor, or Human Resources. The Company is committed to maintaining a workplace environment in which everyone is treated with fairness and respect.

6. USE AND PROTECTION OF COMPANY ASSETS AND CONFIDENTIALITY

We have both tangible (including physical equipment, real estate and office supplies) and intangible assets (such as intellectual property). You may not use Company property or information for personal gain, or for the gain of others outside the Company, such as friends or family members. You are allowed limited personal use of telephones and computers. Excessive personal use of Company assets is not allowed. In addition, you must use Company assets in accordance with any guidelines, policies or procedures implemented by the Company regarding their use.

Physical Assets

The Company's physical assets include but are not limited to cash, buildings, equipment, corporate credit cards, and office supplies. Theft, carelessness and waste have a direct impact on the Company's profitability.

- You should protect the Company's assets and ensure their efficient and proper use.
- You should immediately report the loss, damage, or unauthorized access of Company assets to your supervisor, Human Resources, or security.
- You should not leave your computer or other equipment in cars or unsecured areas.
- Misuse of Company assets is prohibited and may be considered theft.

Information and Communication Systems

Company assets also include information and communication systems made available to help you perform your job, such as telephone and facsimile service, Intranet and Internet access and e-mail.

- It is inappropriate to use these systems in a manner that interferes with your productivity or the productivity of others.
- It is not appropriate to give your personal passwords to coworkers other than the IT Helpdesk Staff for purposes of facilitating computer repairs.
- It is never acceptable to use Company assets or equipment to access or create material that could be viewed as obscene, derogatory, racially, sexually or otherwise offensive.

The Company reserves the right to monitor and review all Company - related information, whether transmitted over Company provided or personal equipment, including but not limited to, call records, call logs, call content, text messages, picture messages, voice mails, emails, Internet access, instant messaging logs, and other types of data transmission as deemed necessary.

Intellectual Property and Proprietary Information

Some of the Company's most valuable assets are its intellectual property and proprietary information. Examples of these assets include software, software licenses, trademarks, copyrights, trade secrets, business concepts and strategies, and financial data.

In the conduct of business, we will, from time to time, receive and use proprietary information of others, such as customer lists, technical developments or operational data, trade secrets and other material that is not publicly available. We may also be under confidentiality restrictions as to

information or knowledge belonging to an outside party or company that you gained through a previous employer or another external source. We expect you to follow these rules and hold all third party information in confidence. You must use it only in accordance with the agreements under which the information is received. You must not use the information for your own or someone else's benefit (see the Insider Information section below).

Company employees, contractors and consultants may disclose trade secrets in confidence, either directly or indirectly, to a federal, state or local government official, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law, or in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. Additionally, Company employees, contractors, and consultants who file lawsuits against the Company for the Company's retaliation arising from such individual for the reporting of a suspected violation of law may disclose related trade secrets to their attorney and use such information in related court proceedings, as long as the individual files documents containing the trade secret under seal and does not otherwise disclose the trade secret except pursuant to court order.

You should not engage in any improper use of the intellectual property rights of others. This includes, but is not limited to, the unlawful or unauthorized copying, revealing or use of the Company or a third party's intellectual property, such as its patents, trademarks, service marks, trade secrets and copyrights. You may not copy software or bring in software programs from home. Only software properly licensed by the Company is permitted on Company computers.

7. CUSTOMER PROPRIETARY INFORMATION

Customer account information is also considered proprietary and confidential in nature. Only employees who need to know such information to perform their job duties should access customer information and you should not disclose this information to any other employees unless they too need the information to perform their duties. Except as required to comply with law, you should never disclose this information to any party other than the customer or an individual whose access has been authorized by the customer. You may not engage in or allow anyone else to engage in unauthorized listening, recording or other disclosure of customer communications.

Falsifying or altering customer accounts or customer transactions is also prohibited. Examples of prohibited activities include adding features or secondary lines without the customer's permission and changing rate plans other than in accordance with Company policy. Accessing your own personal billing account information or account information of family members and friends is not allowed.

8. INSIDER INFORMATION

In the course of your employment, you may learn information about the Company or other publicly traded companies that is not generally known to the public, and that could affect a person's decision to buy, sell or hold ATN's or other company's stock. Such information is known as "material non-public information" and must be held in strict confidence. If you know material nonpublic information about the Company or another publicly traded company, you are prohibited from trading in ATN's or that other company's stock until such information has been

publicly disclosed. The Company's Insider Trading Policy outlines the specific compliance procedures designed to prevent the covered individuals from violating, or causing the Company to violate, the applicable securities laws, the violation of which might lead to large fines or possibly even jail time for the individuals involved.

9. INTERNATIONAL BUSINESS

Employees involved in international operations must know and abide by both the laws of the United States and the countries in which such operations are being conducted. Both United States and local laws prohibit you from giving, offering, or promising to give or offer anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to gain any improper or otherwise unfair advantage for the Company. For more information on this topic, see the Company's Anti-Corruption Policy.

10. POLITICAL CONTRIBUTIONS AND ACTIVITIES

The Company encourages employees to participate in the political process by voting or otherwise being involved in political activity. However, you may not conduct these activities during work hours or use Company resources such as telephones, computers, funds or supplies in doing so. Furthermore, you should never create the impression that you are speaking or acting on behalf of the Company when engaging in political activity or expressing a political opinion.

You may not make any contribution on behalf of the Company, or use its name, funds, property or services for the support of any political party or candidate, unless the contribution or activity is authorized in advance by the General Counsel.

11. AMENDMENTS AND WAIVERS

Dissemination

At the time of their initial employment with the Company or election to the Board of Directors and from time to time thereafter, all directors, officers and employees of the Company will be required to certify that they have read and understand this Code and agreement to abide by it.

Changes in or Waiver of the Code

The Company reserves the right to amend, alter or terminate this Code at any time for any reason. There shall be no changes in any part of this Code except by a vote of the Company's Board of Directors or a designated committee of the Board of Directors.

Any waiver of this Code for executive officers or directors of ATN or any change to this Code that applies to executive officers or directors of ATN may be made only by the Board of Directors of the Company and will be disclosed as required by law or stock exchange regulation.

Any waiver of this Code for any other officer or employee of the Company may be made by the General Counsel or in the General Counsel's sole discretion, may be referred to the Board of Directors or a designated committee of the Board of Directors for review and if appropriate, waiver of this Code.

12. CONCLUSION

Thank you for taking time to become familiar with the Company's Code of Ethics program. There will be instances in which this Code will not specifically address the circumstances in which you are involved. When this occurs, you may find it helpful to seek advice from your manager, next level of management, Human Resources, Internal Audit or the General Counsel. If ever in doubt, please Report Your Concern!

To ensure the Company's continued success, each of us, working together, must continue to establish and meet the highest standards of business ethics and personal integrity in all of our business endeavors.

**ACKNOWLEDGEMENT OF RECEIPT
CODE OF ETHICS**

I have received the **Code of Ethics** and have read and understand the material covered. I have had the opportunity to ask questions about the ethical guidelines contained in the **Code of Ethics**, and I understand that any future questions that I may have will be answered by my supervisor or Human Resources upon request.

I agree to and will comply with the policies, procedures, and other ethical guidelines set forth in the **Code of Ethics**. I acknowledge that nothing in this Code is intended to create a binding contract regarding my employment.

This **Code of Ethics** is the property of the Company and must be returned upon separation.

Employee Signature _____ Date _____

Employee Name: Printed _____

ATN INTERNATIONAL, INC.

WHISTLEBLOWER REPORTING FORM

All employees may use this form to report any suspected violations of the ATN International, Inc. Code of Ethics or other Company policies. Please complete the form and mail it to ANY ONE OF the following addresses:

ATN International, Inc. ATTN: General Counsel CONFIDENTIAL 500 Cummings Center Beverly, MA 01915	ATN International, Inc. ATTN: Head of Internal Audit CONFIDENTIAL 1001 Technology Drive Little Rock, AR 72223
ATN International, Inc. ATTN: Audit Committee TO BE OPENED BY THE ATLANTIC TELE- NETWORK AUDIT COMMITTEE ONLY 500 Cummings Center Beverly, MA 01915	via email to: <u>ethics@atni.com</u>

Your contact information:

You are not required to provide your name or other identifying information. However, if you choose not to identify yourself, we will not be able to consult with you regarding the details of your complaint. We will keep your identity confidential should you choose to identify yourself.

Do you wish to remain anonymous?	Yes	No
	(If yes, continue on to Information about suspected party below and leave the remainder of this portion blank.)	(If no, please complete the following information)
Name	Company you work for	Date
Home or mailing address	Department:	Day phone

	E-mail address	Night phone
	Current position	Best time and number to call

Information about suspected party:

Name	Company he/she works for:	Department:
Position	Location	Phone

1. Describe the suspected violation:

2. When and where did the improper action take place?

3. Where can we find, or can you provide, additional documentation to support your assertions? Please mail hard copies of documents to the address on Page 1 of this form.

4. Are there other witnesses? If so, please provide their contact information.

5. How do you know about the information you are disclosing here?

6. Have you already reported this violation to anyone? If so, please list when and to whom.
