



Conflict of Interest Policy

POLICY

All PCA employees are prohibited from taking any actions that would create a conflict of interest and should avoid even the appearance of a conflict of interest. Company resources are to be used only for approved purposes; a PCA full-time employee's primary work obligation is to PCA.

DISCUSSION

A conflict of interest is a situation in which an employee's personal interest or benefit interferes with his or her responsibilities as an employee of PCA.

Employees must not accept payments, gifts, entertainment, or other favors that go beyond the common courtesy usually associated with good business practice or that might be regarded as placing them under some obligation to a supplier or customer.

Unless approved in advance, no PCA employee may hold a position with, or have a substantial financial interest in, any business that conflicts with or might appear to conflict with that employee's work on behalf of PCA. Likewise, prior approval is required for a PCA employee to conduct business with the Company for personal benefit or for the benefit of a relative.

YOUR RESPONSIBILITIES

1. Place compliance with laws and ethical principles above private gain.
2. Do not solicit or coerce anything of value in exchange for awarding PCA business.
3. Do not have a position with, nor financial interest in, another business that interferes or appears to interfere with Company duties or responsibilities, unless approved in advance.
4. Do not conduct/transact Company business with a relative unless it is approved by Corporate Counsel in advance. All employees must maintain impartiality and high standards of conduct for honesty and fairness.

5. Disclose any substantial financial interest in or position with any competitor (including work as a consultant or advisor).
6. Report any violations of this policy to the Legal Department.

For further information on Conflicts of Interest, consult with a representative of the Legal Department.