



Calibration, Commissioning & Consulting  
an FCX Performance Company

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## Policy

### POL011 Ethics Policy\_v00\_4

Supersedes: POL011 Ethics Policy\_v00\_3

Effective Date: 06/14/2018

Author: Wm. Andy Ferrell Date: 6-14-18  
Wm. Andy Ferrell, President, PCI

Approver: Steve Hilker Date: 6-14-18  
Steve Hilker, Corporate Quality & Training Manager, PCI

Document Type: Policy	
Document ID and Title: POL 011_Ethics Policy_00_4	
Effective Date: 6/14/2018	Page: 2 of 6
Company: PCI	

**TABLE OF CONTENTS**

PURPOSE ..... 3

SCOPE..... 3

DEFINITIONS ..... 3

RESPONSIBILITY..... 3

POLICY ..... 3

REFERENCES..... 4

ATTACHMENTS ..... 4

REVIEW CYCLE..... 4

REVISION HISTORY ..... 4

ATTACH A, PCI POLICY POL-011 ..... 5

Document Type: Policy	
Document ID and Title: POL 011_Ethics Policy_00_4	
Effective Date: 6/14/2018	Page: 3 of 6
Company: PCI	

## Purpose

The purpose of this policy is to define the ethics, principals, and standards expected of all PCI representatives. Every individual associated with PCI must conduct his or her relationships and activities, individually and on behalf of the Company, in accordance with the ethical standards denoted within this document

## Scope

This policy defines the ethics, principles, and standards of conduct for PCI Associates and anyone providing services for or representing PCI in any capacity.

## Definitions

NONE

## Responsibility

The President is responsible for establishing and implementing the Ethics Policy. Senior Management is responsible for ensuring effective communication regarding the furthering these objectives to personnel at all levels in the organization. Senior Management is also responsible for conducting periodic reviews and for ensuring compliance to this policy. Quality Assurance is responsible for ensuring PCI approved service vendors comply with this policy.

## Policy

### Principles and Standards for conducting business with PCI:

1. **Know** and abide by PCI's Core Values: Integrity, Accountability, Unified Team (Teamwork), and Creativity (Innovation).
2. **Raise** concerns and report violations. PCI policy requires all associates and clients to promptly report any suspected ethics or policy violation by contacting the PCI project manager for a client site, or by emailing [integrity@pci-llc.com](mailto:integrity@pci-llc.com).
3. **Comply** with laws and regulations. Know and stay up-to-date on all applicable laws and regulations, including (for example) laws concerning fair competition (antitrust), employment practices and environmental protection regulations.
4. **Avoid** conflicts of interest. Anyone who works with or for PCI should avoid any action or circumstance that conflicts (or appears to conflict) with PCI interests. Vendors who provide the same goods or services to PCI competitors are not considered to have a conflict of interest.
5. **Maintain** confidentiality. Avoid inappropriate disclosure of any confidential information, including trade secrets, to unauthorized individuals, within or outside of PCI.
6. **Refrain** from accepting business courtesies. PCI associates and their families are not permitted to accept any business courtesy or other benefit, regardless of cost, if they are offered in connection with PCI business.
7. **Uphold** diversity and inclusion. PCI is committed to creating and sustaining a culture of inclusion, fairness and socially diverse practices. Similarly, clients are expected to respect diversity within PCI and their own companies.
8. **Preserve** our reputation for integrity, professionalism, and quality workmanship in our dealings with clients, associates, and suppliers. Including but not limited to providing and maintaining a drug-free and harassment free workplace for our associates, clients, and suppliers.

Document Type: Policy	
Document ID and Title: POL 011_Ethics Policy_00_4	
Effective Date: 6/14/2018	Page: 4 of 6
Company: PCI	

### Where and whom to go to with questions and concerns

This document is not intended to encompass all areas of business conduct, but to establish general guidelines. For more information and questions, or to report a possible violation, please call:

Wm. Andy Ferrell, PCI President  
**(919) 781-7787**  
 Or email: [integrity@pci-llc.com](mailto:integrity@pci-llc.com)

### References

NONE

### Attachments

Attachment A, PCI Ethics, Principles, and Standards Declaration

### Review Cycle

This document will be reviewed every three years for accuracy.

### Revision History

Rev #	Date of Revision	Change(s)
00	06-01-10	Original.
v00_1	5/18/16	Formatting updates to align document with POL003.
v00_2	6/15/16	Revised section 4 to clarify that vendors supplying the same goods and services to PCI competitors are not considered as having a conflict of interest.
v00_3	7/15/16	Revised section 4 in Attachment A to match section 4 of the policy. Corrected the year in the revision date for v00_2
v00_4	6/14/2018	Changed company name from Pharmaceutical Calibrations and Instrumentation, LLC to PCI and revised core values.

END OF DOCUMENT

Document Type: Policy	
Document ID and Title: POL 011_Ethics Policy_00_4	
Effective Date: 6/14/2018	Page: 5 of 6
Company: PCI	

## Attach A, PCI Policy POL-011

### **PCI** **Ethics, Values, and Standards Declaration**

PCI is committed to promoting fair and ethical treatment in our transactions with clients, vendors, and our associates. We believe that a mutual commitment to conducting business in a manner consistent with high ethical standards will continue to enhance our business relationships.

#### The purpose of our Principles and Standards is to:

- Promote honest and ethical conduct, including fair dealing and the ethical handling of possible conflict of interests;
- Promote full, fair, accurate, timely, and clear disclosure;
- Ensure compliance with applicable laws and governmental rules and regulations;
- Protect the reputation and brand of PCI and its valued clients;
- Re-affirm PCI's commitment to a drug-free and harassment-free workplace;
- Deter wrongdoing.

*We will strive to  
preserve our  
reputation for  
integrity,  
professionalism, and  
quality  
workmanship.*

Every individual associated with PCI must conduct his or her relationships and activities, individually and on behalf of the Company, in accordance with the ethical standards denoted within this document.

#### Principles and Standards for conducting business with PCI:

1. **Know** and abide by PCI's Core Values: Integrity, Accountability, Unified Team (Teamwork), and Creativity (Innovation).
2. **Raise** concerns and report violations. PCI policy requires all associates and clients to promptly report any suspected ethics or policy violation by contacting the PCI project manager for a client site, or by emailing [integrity@pci-llc.com](mailto:integrity@pci-llc.com).
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Document Type: Policy	
Document ID and Title: POL 011_Ethics Policy_00_4	
Effective Date: 6/14/2018	Page: 6 of 6
Company: PCI	

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Wm. Andy Ferrell, PCI President, **(919) 781-7787**, or email: [integrity@pci-llc.com](mailto:integrity@pci-llc.com)

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

*Thank you for your commitment to uphold the PCI Principles and Standards.*