



Supplier Code of Conduct

Purpose and Scope

Compliance to this code and our high ethical standards is a mandatory requirement of being a supplier to PCI, and as such any failure to comply with this code or the laws and regulations of the country in which the supplier operates will be fully investigated and appropriate action taken. In return, PCI commits to afford like and the same, all aspects of the code to the suppliers with whom we conduct business.

Code of Conduct Responsibility

Every supplier commits to put in place, maintain and comply with adequate procedures to support the requirements within this code. Suppliers, by mutual agreement, will allow PCI to audit their supporting policies and compliance to this code of conduct. Suppliers commit to ask questions of, and promptly report any observed, suspected or known violations of laws, regulatory rules or this code.

Confidentiality

Suppliers will be committed to maintaining the highest degree of integrity in their dealings with PCI both in terms of normal commercial confidentiality, and the protection of all sensitive information received in the course of providing the business services concerned.

Ethics

Suppliers commit that, in the administration and delivery of their services, they conduct themselves honestly and honourably. Our suppliers approach will take proper account of ethical considerations, together with the protection and enhancement of the moral position of our and their business concerns.

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Sustainability

Both new and existing suppliers to PCI must be compliant with their national EHS legislation and all applicable environmental and labor laws, regulations and standards to ensure ethical and sustainable practices are upheld at all times. PCI reserves the right to request evidence of this by the provision of policy statements, procedures and certification to global standards such as ISO 14001 and ISO 45001 or similar. Suppliers must actively seek opportunities to reduce harmful impact to the environment and practice responsible water/waste/energy management. In addition, we encourage our suppliers to commit to our Responsible Sourcing Standard, which is detailed on our website. This standard is designed to further align our suppliers with our commitment to sustainability and ethical practices. The full text and guidelines of this standard can be found in the reference below. We will prioritize environmentally and socially responsible suppliers who operate in a manner consistent with our ESG standards: fostering environmentally sustainable performance, honoring a diverse and inclusive culture, and creating positive impact on our employees, supply partners, customers, investors, patients, and the communities in which we live and work.

Duty of Care

PCI expects its suppliers to protect human rights, uphold labor and social standards in accordance to International Labor Standards, and ensure anti-discrimination and anti-corruption policies are in place across their business operations. Suppliers will comply with all national laws on wages and working hours as well as international standards regarding child labor and minimum age.

Conflict of Interest

Suppliers and those acting on their behalf will remain free from conflicts of interest that may adversely influence their business relationship with PCI. Suppliers commit to disclose any potential conflict of interests promptly to PCI Senior Management.

Suppliers will not offer to any employee, be they permanent, temporary, working under contract from PCI or instructions from PCI, full or part-time, any discount, inducement or reward other than that specifically documented in a signed contract or Terms and Conditions of business.

Examples of things we ask suppliers to avoid (not exhaustive);

- Inappropriate gifts or hospitality that exceeds very modest limits. This includes any hospitality that involves sporting, theatre, music or other entertainment.
- Any personal discounts or other benefits that is not available to all PCI employees.
- Sharing our sensitive information with a competitor.
- Not disclosing a direct financial relationship with a competitor or supplier to PCI.
- Taking part in any business decision that involves family interests between our businesses.
- Using non-public information for their gain or advantage.

Contracts

Supplier contracts will usually be in the form of a purchase order covered by our standard terms and conditions or a signed and legally binding supply agreement. Suppliers will always use their best endeavors to meet the obligations they commit to under these agreements.

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Payment

Suppliers will not offer to pay or accept receipt of any payment for more than a contractually agreed, market rate for goods and services. All payments sent and received will follow our strict financial control procedures.

Bribery and Corruption

Suppliers commit to adhere to the requirements of the Bribery Act 2010 in that, they will not engage in, consent to or connive in any activity, practice or conduct which would constitute an offence under the Bribery Act 2010, and shall put in place, maintain and comply with adequate procedures to prevent any person associated with it committing an offence under the act.

Competition and Anti-trust

Suppliers commit to only seek competitive advantage through lawful means. Suppliers will not stifle the free market or exchange information, agreements or understandings with competitors, customers, suppliers or other third parties in any way that could be judged as anti competitive.

Intellectual Property and Moral Rights

PCI retains the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our suppliers. In return we respect the moral and intellectual copyright vested in our supplier's intellectual property.

Professional Conduct

We expect suppliers to conduct their activities professionally, with integrity, courtesy, respect and dignity. They will take great care to be objective in their judgement, so that issues are never influenced by anything other than the best and proper interests of our business relationship.

Equality and Discrimination

Suppliers shall put in place, maintain and comply with adequate procedures that create a fair and objective employment environment and mean that they are never influenced in their decisions, actions or recommendations by issues of gender, race, creed, color, age or personal disability.

Harassment

Suppliers will not participate in any form of harassment toward a PCI employee or anyone we come into contact with whilst engaging in our business. Any circumstances where we believe harassment or discrimination may have taken place will be acted upon.

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Supplier Pledge

Suppliers to PCI commit to be accountable for and to continuously review their activities, actions and behaviors in line with this code of conduct and take the appropriate decisions and corrective actions where necessary. Suppliers will act with honesty, integrity and respect in the normal course of their dealings with PCI.

Suppliers commit to ask questions of and promptly report any observed, suspected or known violations of laws, regulatory rules, this code or any other associated PCI agreements.

Other References

The following agreements (where they exist) and policies should also be read in connection with this over-arching code of conduct:

- PCI Quality Policy
- PCI Health Safety and Environment Policy
- Any Supply or Master Service Agreement in force at the time.
- Any Technical Agreement in force at the time.
- PCI's standard Terms and Conditions of business.
- PCI's Responsible Sourcing Standards

Kenny Yarberry

Kenneth Yarberry
Global Head of Procurement, PCI

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