



Our Guide To Key Ethical And Business Standards

It is essential that we conduct all our operations in accordance with high ethical and business standards and that our employees act in compliance with all applicable laws as well as with our own policies. If you become aware of a situation that goes against our Code of Ethics, you should speak to your supervisor, a human resources representative, or the Company's legal counsel. As an alternative, you may use the confidential reporting procedure, through the Ethics Hotline, as outlined at the end of this handbook.

This document provides an overview of PSC's key ethical and business standards, and is also a reference document to help answer general questions regarding business ethics and conduct. When questions arise, employees are encouraged to seek assistance by speaking to their supervisor, a human resources representative, or the Company's legal counsel.

No supervisor or manager has the right to require or approve any action by a PSC employee that would violate the law or our Company's policies. Every employee has the right to be able to perform his or her duties in a safe and ethical environment free of discrimination and harassment.

PSC supports its policies and legal compliance standards on a consistent basis. Our open-door policy means you can bring concerns to the attention of management without fear of retribution. Each employee shall abide by this policy, and shall report any known or suspected violations of this policy. No employee will suffer retaliation because of a report he or she makes in good faith.

All PSC employees must comply with these policies and are asked to make a personal commitment by signing the attached pledge and acknowledgement form and returning to the local PSC Human Resources department.

Integrity In All Our Relationships

As a responsible corporation, we have an obligation to operate with high standards of integrity and to maintain and provide to our stockholders and the public accurate information regarding our business activities.

Our Employees

PSC values a work environment where employees are encouraged to be creative and productive, take pride in their work, and know that their contribution is vital. We support a positive work atmosphere that encourages teamwork and values diversity. Our supervisors and managers must lead by example, showing employees respect at all times. Learning from each other and respecting each other's views is an essential part of teamwork. We maintain an open-door policy at all levels throughout the Company so that employees can feel free to ask questions, express concerns, and make a positive contribution. Our employees are encouraged to:

- Communicate openly and honestly;
- Be supportive of their colleagues and treat them with respect;
- Value teamwork and support our shared goals and objectives; and
- Nurture an innovative and creative work environment.



Our Clients and Suppliers

Our success is based on building long-term profitable relationships with our clients, and by providing them with exceptional services that gain us their respect, trust, and loyalty. Our suppliers are essential to our ability to remain competitive, and we will treat them fairly and honestly. Building strong relationships with our clients and suppliers requires maintaining high ethical standards. At PSC we will:

- Meet or exceed our commitments to our clients and business suppliers;
- Ensure representations fairly and accurately reflect our business capabilities;
- Avoid misrepresentation in all sales and promotional efforts; and
- Compete fairly.

Our Industry

Fair competition benefits our clients, our suppliers, and our industry. PSC will not condone business practices that could be construed as being anticompetitive, unethical, or otherwise contrary to international, national, or local laws governing competitive practices. Our expectations of our employees are clear:

- Do not engage in price-fixing schemes or bid-rigging arrangements;
- Do not make defamatory comments about our competitors to our clients;
- Do not improperly seek competitor's trade secrets or other confidential information; and
- Do not disclose confidential information regarding the Company's financial performance, operations, proprietary technologies, and other activities that could impact our competitive advantage.

Our Communities

Our employees are our best ambassadors, and helping to make a positive contribution in the communities where we work and live is part of our commitment to ethical conduct. At PSC, we will safeguard the communities where we operate, by:

- Applying high standards of health, safety, and environmental compliance in all our business activities;
- Developing open dialogue and strong community relations;
- Encouraging our employees to participate in local public affairs and civic associations; and
- Recruiting qualified local personnel when practical.

Government

PSC complies with all applicable laws and regulations, and maintains an open and constructive relationship with applicable government agencies. When appropriate, the Company will provide constructive ideas for changes or improvements to these laws or regulations. PSC will not influence government decisions by unethical means. At PSC:

- Employees are forbidden from making false or misleading statements;
- We will abide by all laws regarding political donations; and
- We will not reimburse any employee for his or her personal political contributions.



Health, Safety, and Environment

PSC is committed to continuous improvement in our HS&E performance. We strive for an accident-free work environment to protect our employees and to make a positive contribution to our clients' safety and environmental programs. Employees must know, understand, and rigorously comply with all applicable safety and environmental laws and regulations and will:

- Strive to achieve “best in class” safety and environmental performance, and fully cooperate with environmental and safety audits;
- Report and record incidents fairly and accurately;
- Not perform duties that would endanger their health and safety or that of colleagues, or violate environmental regulations;
- Assist clients in making a positive contribution to their safety and compliance programs;
- Foster an organizational culture that has an exemplary attitude regarding health, safety, and the environment;
- Participate in training to expand understanding of our safety and environmental objectives and related operating procedures;
- Be proactive and work with their supervisors to alleviate any safety, health, and environmental concerns; and
- Apply the principles of reduction, recovery, and reuse in our business activities and seek to minimize the environmental impact of our operations and those of our clients.

POLICY EXPECTATIONS

Employee Discrimination

PSC expects fair and equal treatment of all employees, and will act in compliance with the laws of the locales in which we do business. The Company will not engage in or tolerate any form of discrimination or harassment. We are committed to providing equal employment opportunity for all qualified employees and applicants without regard to race, religion, sex, age, national origin, disability, or any other basis of discrimination prohibited by law. Decisions concerning hiring, performance appraisals, and promotions will be based upon factors such as knowledge, qualifications, skills, abilities, and achievements.

Employees are directed to advise their supervisor or a human resources representative if they believe they have been subjected to or have observed any discriminatory or harassing behavior. PSC will investigate such situations promptly and take action where warranted and will protect the employee from retaliation or other adverse consequences for having reported the matter in good faith. Our policy:

- Requires that employees be considered on the basis of merit in recruiting, hiring, training, promotion, and all other terms and conditions of employment;
- Forbids discrimination against any employee or applicant for employment because of his or her national origin, sex, religion, age, disability, or any other unlawful consideration;
- Prohibits any form of sexual harassment, including unwelcome sexual advances, or unwelcome and offensive verbal or physical conduct of a sexual nature that



creates an intimidating, hostile, or offensive work environment or that unreasonably interferes with an employee's work performance;

- Prohibits the display of objects or pictures at work (including but not limited to displays via computer) that are sexually explicit, discriminatory, or portray messages that contradict the Company's ethical standards; and
- Prohibits jokes, comments, or remarks based on a person's national origin, sex, religion, age, disability, or any other form of discrimination.

Drug-Free Workplace

PSC maintains a strong commitment to provide a safe and productive work environment. Employees are expected to perform their duties safely and efficiently in a manner that protects their interests and those of their co-workers. Inappropriate drug use and alcohol consumption puts everyone at risk and cannot be tolerated.

Consistent with our efforts to promote health and safety and protect the interests of our employees, clients, and the Company, we cannot allow anyone to use, possess, distribute, sell, manufacture, purchase, or be under the influence of alcohol, illegal drugs, or intoxicants at any time while conducting Company business. Our employees will:

- Comply with PSC's substance abuse policies;
- Report any violation of PSC's substance abuse policies; and
- Never sell, trade, or possess any controlled substance on Company-owned facilities or while conducting Company business.

Conflicts of Interest

It is important for all PSC employees to remain free of conflicts of interest or the appearance of conflicts in the performance of their responsibilities. Knowingly acting with a conflict of interest is prohibited.

Everyone at PSC will:

- Obtain approval from management prior to undertaking any commitment with a potential conflict of interest or the appearance of a conflict;
- Never take a position with or have a direct or indirect financial interest of greater than 5% in another business that receives or provides goods or services to PSC, or competes with PSC;
- Not use or permit others to use Company resources for personal use;
- Not provide or accept gifts from clients or suppliers of more than a modest value (\$75 or less – gifts over \$75 must be returned to the giver), or provide or accept entertainment outside the limits of generally accepted business practices;
- When a family member is also an employee of PSC, avoid situations where you are directly supervising such family member or have financial or operational control over such family member and ensure your supervisor is aware of such situations;
- Speak with your supervisor before engaging in any activity that you think may put you in an actual or potential conflict-of-interest situation;
- Report any violations of conflict-of-interest procedures to your manager; and
- Avoid owning or participating in side businesses that interfere with performance of your job at PSC or that present a conflict of interest with the Company or the appearance of such a conflict.



CONTROL AND FINANCE

Financial Records

A variety of laws requires PSC to record, preserve, and report financial information to investors and government agencies. Employees must record financial information accurately, completely, and in a timely manner in accordance with, to the extent applicable, SEC and international stock commission rules, Generally Accepted Accounting Principles (GAAP), and Company procedures. Entries which intentionally conceal or disguise the true nature of any PSC transaction are prohibited. Financial information must be kept confidential and only released with proper authorization. Our policy is clear:

- Financial data and business transactions must be recorded accurately;
- Conduct all accounting operations in accordance with SEC rules and GAAP;
- There can be no “special funds” or other accounts representing Company assets that are maintained outside normal financial accounts;
- Misappropriation of funds, no matter how small, is grounds for dismissal;
- Employee business expenses are to be incurred only for proper and authorized business purposes and be accurately described in such expense reports;
- The most senior employee in a group should pay for business expenses; exceptions require an explanation;
- Fees, commissions, or other amounts paid to consultants, agents, or other third parties must be legal, proper, and reasonable;
- Employees must immediately report any inaccurate, false, or misleading records to your supervisor; and
- Employees must not discuss financial and operating information of a confidential nature outside the scope of carrying out your responsibilities.

Company Property

PSC employees are responsible for protecting Company-owned or leased property and equipment. This extends not only to tangible assets such as equipment, money, physical materials, and real property, but also to intangible property such as technologies, computer programs, business plans, trade secrets, and other confidential or proprietary information. PSC employees must also safeguard the confidential and proprietary information of customers and suppliers. Precautions must be taken against theft, damage, or misuse of PSC property.

Generally, PSC property must not be used for any purpose other than for PSC business. Employees must not borrow, give away, loan, sell, or otherwise dispose of PSC property – regardless of condition – without specific authorization. This includes the unauthorized use or duplication of licensed or proprietary computer software. Our employees will:

- Exercise appropriate care, custody, and control of Company property (including supplies, equipment, facilities, files, documents, films, and electronically recorded data or images);
- Not use Company supplies or equipment, including computers, for personal use;
- Not duplicate Company licensed or proprietary software for personal use;
- Keep confidential information stored in its proper place when not being used; and
- Report any theft or misuse of Company property to your supervisors.



Antitrust and Competition Laws

The United States, Canada, and many other countries have enacted antitrust, monopoly, unfair competition, or cartel laws. The objective of these laws is to preserve free and open competition in the marketplace. We must conduct business in strict compliance with all applicable antitrust and competition laws. Employees may not discuss confidential information such as pricing, profit margins, what we pay for commodities or marketing strategies with competitors. PSC will not:

- Conspire with others to fix prices for goods or services;
- Conspire with others to illegally fix prices from suppliers;
- Divide up or allocate markets; and
- Join in an illegal boycott of customers, suppliers, or competitors.

Intellectual Property Rights

PSC's policy is to recognize and fully respect the legal rights of others on matters involving the ownership and use of intellectual property. At PSC:

- We are committed to complying with the copyright laws of all jurisdictions where we do business;
- We will not knowingly misappropriate, infringe, or make invalid use of a valid trademark, patent, trade secret, or proprietary technology belonging to another party; and
- We will not make use of and distribute copies of materials copyrighted by others unless appropriate authorization has been obtained.

International Operations

Managers and employees of PSC doing business in other countries are required to conduct their activities in compliance with the laws of the countries that apply to those activities. In addition, managers and employees engaged in international activities need to be aware of and comply with all laws that apply to business activities conducted within the host countries.

Employees involved in international operations will:

- Adhere to applicable government trade restrictions with certain countries;
- Comply with all legal regulations regarding the exporting and re-exporting of certain commodities, software, and technologies to various countries as specified in those regulations;
- Be governed by laws that prohibit the payment of money or lavish gifts to a government official in order to obtain or retain business; and
- Be governed by U.S., Canadian, and other international laws prohibiting participation in certain international boycotts.

VIOLATION OF POLICY

Disciplinary action will be taken against individuals who violate any Company policies, up to and including termination of employment. Further, PSC will report any breaches of this policy that contravene the law to the appropriate governmental or regulatory authorities. Any employee who authorizes or engages in acts that violate federal or state laws may be subject to substantial fines and/or imprisonment.



ASSISTANCE IS AVAILABLE

ETHICS HOTLINE. The most important thing for all of us to remember is that if you have a question or a problem there is assistance available. There are various routes available to help you deal with health, safety, and environmental issues, unethical business practices, violation of Company policies, breach of laws, drug or alcohol abuse, sexual harassment, or any related matters.

ASK YOUR MANAGER. Our *Open-Door Policy* means you can bring concerns to the attention of management without fear of retaliation. When faced with an ethical issue you are encouraged to express your concerns. Ask your immediate supervisor for assistance and the necessary support to resolve the matter. Every effort will be made to protect your privacy.

ASK YOUR HUMAN RESOURCES REPRESENTATIVE. A human resources representative can help employees deal with ethical questions and issues in a professional and constructive manner. If you have a problem or are aware of a violation of the Company's Code of Ethics and Business Conduct or policies, you may seek assistance from a Human Resources representative.

CALL THE ETHICS HOTLINE. If you don't feel comfortable speaking with your supervisor or a human resources manager or if anonymity is important, you can use a confidential reporting line. We have contracted with a professional outside agency – "The Network" – to provide this service seven days a week, 24 hours a day. All your questions or concerns are treated on a confidential basis using only a file number as a reference. Issues and concerns are brought to the attention of appropriate PSC management.

ETHICS HOTLINE:

1.800.241.5689

Any employee who retaliates against another employee for submitting, in good faith, a question about a suspected violation will face disciplinary action.