

# TEMPORARY CHANGE REQUEST

TCR NO. TCR-BE&CP, R0-002

(e.g., TCR-ENG-021,R0-001)

The Temporary Change Request (TCR) Form is to be used to process urgent or minor changes for PPPL Policies, Organization/Mission Statements and Procedures. The TCR should be used when changes are:  
1) urgent, and can not wait the 2-4 week period for Department Head review/comment, or  
2) minor, and do not warrant Department Head review.

Person Requesting Change: Edward Winkler Phone Ext: 2218

Department Name: Business Operations Department

Document Number: BE&CP Revision No.: 0-002

Document Title: Business Ethics and Compliance Program Description

## Reason for change:

**Minor changes to update document.**

## Change description: (Summarize and attach changed pages, with changes clearly indicated)

1. Added requirement for Laboratory staff to annually review and sign Conflict of Interest and Conflict of Commitment Annual Disclosure Form.
2. Deleted requirement that each member of Lab Senior Management team provide written certification of briefing of ethical responsibilities and understand and agree to abide by the policy guidance provided.

1. Does this TCR significantly alter the intent or scope of the document? YES:      NO: X

2. Does this TCR significantly impact ES&H? YES:      NO: X

If 1 or 2 is YES, Explain why the changes should not be routed for Department Head review:

Edward H. Winkler  
Department/Division Head Approval

March 12, 2013  
Date

John DeLooper  
Head, Best Practices and Outreach/designee

March 12, 2013  
Date

Release/Effective date of this TCR: 3/20/2013

Incorporate this TCR into next revision of this document? YES: X NO:



TCR-BE&CP, R0-002

# Princeton Plasma Physics Laboratory

## Business Ethics and Compliance Program Description

Revision 0

January 2009

Initiated by: SIGNATURES ON FILE  
Head of Business Operations and Chief Financial Officer

Approved: \_\_\_\_\_  
Deputy Director for Research

Approved: \_\_\_\_\_  
Deputy Director for Operations and Chief Operating Officer

Approved: \_\_\_\_\_  
Director

## **Applicability**

The PPPL Business Ethics and Compliance Program applies to all PPPL staff.

## **References**

- Federal Acquisition Regulation (FAR) 52.203-13, “Contractor Code of Business Ethics and Conduct,” April 2010
- PPPL Personnel Practices Manual
- PPPL Procurement Policies and Procedures Manual
- GEN-014: Small Business Innovative Research
- GEN-015: Procedure for Research Sponsored by Non-DOE Entities
- P-021: Small Business Innovative Research

## **Policy**

PPPL has implemented a comprehensive “Ethics and Compliance Program” which is geared to ensure that Laboratory staff adhere to the standards of ethics and conduct published in the Employment Section of the Laboratory’s Personnel Practices Manual and the Procurement Policies and Procedures Manual. The Laboratory is committed to the highest standards of integrity. Through our policies, procedures, and actions, we seek performance and a reputation reflecting the very best that we can achieve: a Laboratory that both performs excellent science, engineering, and operations and acts by ethical principle.

It is a managerial responsibility to make ethical behavior and efficient performance complementary. Good managers motivate employees to “do the right thing” while “doing things right.” Managers must encourage employees to be alert to ethical ambiguity and must respond promptly to employee concerns about possible violations of laws and policies. Laboratory management is expected to uphold Laboratory policies and standards, and to set the example by complying with the Laboratory’s code of ethical conduct and instilling a spirit of honor in the workplace.

The Laboratory’s Ethics and Compliance Program is comprised of the following components:

## **Written Documentation**

- A written summary, published to all Laboratory staff as an attachment to the Director’s Annual “A Commitment to Integrity” letter which consolidates the various elements of PPPL’s business ethics/ OCI guidelines into a single document.
- A written code of business ethics and conduct published in the Employment Section of the Laboratory’s Personnel Practices Manual and the PPPL Procurement Policies and Procedures Manual.

- A written Financial Manager's Code of Ethics provided to the Laboratory's senior financial staff.
- A PCard Manual provided to Laboratory employees who have been issued a procurement credit card.

### **Awareness Program**

- Annually publishing, to Laboratory staff, the Director's "A Commitment to Integrity" letter, including attachments providing excerpts of the Employment Section of Laboratory's Personnel Practices Manual and the PPPL Procurement Policies and Procedures Manual, and guidance on labor charging. This letter, including attachments, is distributed via email.
- Designating senior management personnel (Head, Human Resources and the Chief Financial Officer) as being available to answer any questions staff may have with respect to the Laboratory's code of conduct.
- Requiring each level of Laboratory Management to discuss the Director's "A Commitment to Integrity" package at their staff meeting, offering staff the opportunity to ask questions.
- Requiring that Laboratory staff annually review and sign a Conflict of Interest and Conflict of Commitment Annual Disclosure Form.
- Annually publishing to the Laboratory's senior financial managers, under a cover letter signed by the Chief Financial Officer, the Financial Manager's Code of Ethics.
- Requiring the Laboratory's Chief Financial Officer to annually meet with the Laboratory's senior financial managers in order to discuss the Financial Manager's Code of Ethics.
- Requiring that the Laboratory's senior financial managers annually provide a written certification representing that they have performed their duties consistent with the Financial Manager's Code of Ethics.
- Requiring that the Laboratory's Head, Procurement Division annually meet with the members of the Procurement Division to review the Laboratory's code of ethics with respect to placing procurements. (The Laboratory's Chief Financial Officer and a member from Princeton University's Office of General Counsel also participate in this meeting).
- Requiring that each member of the Laboratory's Procurement Division annually provide a written certification that they have been briefed on their ethical responsibilities, and that they understand and agree to abide by the policy guidance provided.
- Requiring that the Laboratory's Head, Procurement Division meet with the members of the Laboratory's senior management team, as required, to review the Laboratory's code of ethics with respect to placing subcontracts and other procurements. (The Laboratory's Chief Financial Officer and a member from Princeton University's Office of General Counsel also participate in this meeting).

- Providing annual refresher training to all Laboratory employees who have been issued Laboratory credit cards.

### **Internal Control System**

- Audits conducted by Princeton University's Office of Audit and Compliance.
- Annual Audit conducted by Procurement Division staff of a selected random sample of PCard transactions. Each PCard holder is audited once per year.
- Annual self-assessments conducted by the Laboratory's operations activities.
- Hotline numbers published on bulletin boards throughout the Laboratory, and periodically in the Laboratory's monthly newsletter.
- Selected senior managers designated as contact points for compliance and ethics related matters.
- The Laboratory's "Standard of Ethics and Conduct Committee," which is comprised of senior Laboratory and University managers, is responsible for coordinating investigations of waste, fraud, and abuse allegations, and is responsible for determining what discipline is appropriate for violations of the Laboratory's code of business ethics and conduct.

### **Subcontracts**

The Procurement Division will include the substance of FAR 52.203-13 requirements in all subcontracts that have a value in excess of \$5 million and a performance period in excess of 120 days, unless the subcontract is for the acquisition of commercial items or is to be performed entirely outside of the United States.