



Princeton Plasma Physics Laboratory

Business Ethics and Compliance Program Description

Revision 1

Initiated by: _____
Head of Business Operations and Chief Financial Officer

Approved: _____
Deputy Director for Research

Approved: _____
Interim Deputy Director for Operations and Chief Operating Officer

Approved: _____
Interim 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,” October 2015
- PPPL Personnel Practices Manual
- PPPL Procurement Policies and Procedures Manual
- GEN-014: Small Business Innovative Research (SBIR)/Small Business Technology Transfer (STTR)
- GEN-015: Procedure for Research Sponsored by Non-DOE Entities

Policy

PPPL has implemented a comprehensive “A Commitment to Integrity; Ethics and Compliance Program” which is geared to assure 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 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 and organizational conflicts of interest 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 confidentiality agreement is executed with all 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 (Director, 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.
- Requiring that the Laboratory's financial staff annually review and sign, under a cover the annual confidentiality agreement.
- 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 self-assessments conducted by the Laboratory's operations activities.

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- 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, Contractor Code of Business Ethics and Conduct, requirements in all subcontracts that have a value in excess of \$5.5 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.