**Scope**: This procedure applies to all PCB Depew facilities and the PCB Halifax, North Carolina location.

**Purpose**:

To assure that the proper authorization, screening, and recording of visitors to PCB, including suppliers, contractors, government officials, and foreign nationals (including, without limitation, employees of PCB affiliates who are foreign nationals) occurs prior to or at the time of their visit. This is important to us at PCB because we must comply with U.S. Export Administration Regulations (“EAR”) and International Traffic in Arms Regulations (“ITAR”), as well as protect our company trade secrets and company proprietary and confidential information (“Confidential Information”). A “foreign national” is a person who is not a U.S citizen or who does not possess a permanent resident card (Green Card).

In order to comply with EAR and ITAR, it is necessary to record the purpose and associated details of each visit to PCB in accordance with this policy. This procedure is designed to prevent any unlawful transfer of product and any “Deemed Export” of restricted technologies.

If PCB Confidential Information potentially may be disclosed to the visitor, then prior to the date of the visit, the PCB host employee shall coordinate with PCB’s Legal Department to ensure a Confidentiality Agreement is in place, as appropriate, with the visitor or the visitor’s company. The signed Confidentiality Agreement shall be forwarded to PCB’s Legal Department prior to the date of the visit. Having a Confidentiality Agreement in place is an important step in ensuring our company Confidential Information remains protected.

This policy applies to all types of scheduled or unscheduled visitors as defined in this procedure.

Depew Human Resources (HR) and Halifax HR employees (or representatives), shall control Visitor Notification Logbook(s) and badges. All completed logbooks shall be stored, filed, retrievable and protected as required by CS002 Document Revision Index (currently five (5) years minimum).

**Procedure**:

1. **Scheduled Visitors**
	1. Prior to the date of a visit to a PCB Facility, the PCB host employee shall:
		1. Forward form LC001 (Citizenship Verification Form) to the visitor(s) for completion. A single form may be completed for two (2) visitors from the same company. Additional forms should be completed for more than two (2) visitors from the same company or for visitors from multiple companies. For individual visitors not affiliated with a company, citizenship may be verified by review of the individual visitor’s birth certificate, passport, certificate of naturalization or certificate of birth abroad.
		2. Forward form LC1004 (PCB Facility Access Policy) to the visitor for review.
		3. Complete form SM013 (Visitor Notification Form) and forward it along with the completed form LC001 (Citizenship Verification Form) to the Export Manager. If a LC001 Citizenship Verification Form is already on file for a repeat visitor, the visitor confirms to the host that there are no changes to the information contained on the form, and the previously provided form is dated within the immediately preceding 12 months, then the previously provided LC001 form will be acceptable. The visitor is still required to complete logbook entry and any other documentation required by this procedure.
		4. The Export Manager will confirm approval of any visit based on preapproved information to the receptionist/HR representative.
		5. Consult with the Legal Department, if necessary, to determine whether a confidentiality agreement is needed in connection with the visit. If a confidentiality agreement is required, work with the Legal Department to ensure that the agreement is executed and in place prior to the visit.
		6. The Export Manager will document the visit and route the forms referenced above along with confirmation of approval of the visit to the receptionist at the facility being visited and any other applicable parties (e.g., Sales Administration for sales visitors).
		7. The PCB host employee will also comply with the following:
			1. Work with the Export Manager as may be requested, to provide any information needed in connection with a review of the Denied Party or Entity lists in accordance with SM1012 (Denied Party Procedure) to assure that the visitor(s) and/or organization(s) are not listed. If the Export Manager is not available, a member of the Legal Department should be contacted for assistance. If any questions arise (e.g., when a visitor or visitor’s organization is listed as a Denied Party or is on the Entity List, the Export Manager and/or Legal Department should be consulted prior to the visit going forward.
			2. Should it be determined that an export license is required prior to any visit, provide all requested information to the Export Manager.
	2. All visitors to PCB Depew’s buildings (including the Machining Center and Hermetic Connector building) and the Halifax facility shall enter at the main reception areas (i.e., 3425 Walden Avenue, Atrium entrance, and the main entrance to the Halifax facility). This includes suppliers, consultants, contractors, employees on medical leave, family members, former employees, employees of PCB affiliated entities who are foreign nationals, and employees from other PCB locations who do not otherwise have badge access, and any other non-PCB personnel. For any visit by a representative of a third party company other than a PCB affiliated entity, the requirements set forth in Section 1.1 above must be completed prior to the date of the visit.
	3. Upon arrival, the following information is to be entered into the visitor log and confirmed by the receptionist/HR representative at the facility as being consistent with pre-visit information provided:
		1. Date of Visit
		2. Badge Number
		3. Name
		4. Company and address (if applicable)
		5. U.S. Citizenship (yes or no)
		6. Identify the PCB host of the visit
		7. Purpose of Visit
		8. Time in.
	4. The Receptionist/HR Representative for the facility will also take the following steps:
		1. Verify identification of visitor identified on visitor list by reviewing driver’s license, passport, or permanent resident card. If another form of identification is provided, please contact the Export Manager or Legal Department.
		2. Notify the host that the visitor has arrived
		3. Provide a numbered badge to the visitor. U.S. citizens will be issued a blue colored badge and foreign nationals will be issued an orange colored badge.
		4. Contact the Export Manager or the Legal Department in the event of any discrepancy or if any questions arise.
	5. The PCB host is to meet the visitor(s) in the main reception area for the facility.
	6. The visitor may then enter the building with the PCB host for the visit.
	7. The PCB host is responsible for ensuring that visitors comply with the PCB Facility Access Policy (or, for visitors with badges issued pursuant to Section 1.9 below, PCB’s Long Term Contractor Facility Access Policy) and do not use cameras, audio recording equipment or video equipment in the facility unless prior documented approval is obtained from a member of the Senior Leadership Team and from the Export Manager/General Counsel – Sensors or Associate General Counsel – Sensors.
	8. After the visit, the PCB Host shall:
		1. Escort the visitor(s) to the main reception area of the facility.
		2. Obtain all visitor badges and provide them to the receptionist/HR representative.
		3. Ensure that the time out has been entered into the logbook.
	9. **Frequent Visitors** **- Facility**
		1. Contractors and Suppliers who visit PCB on a frequent basis and/or are scheduled to work onsite for an extended period may be approved to have facility access without an escort with the prior approval of the applicable Senior Leadership Team member and the Export Manager. They will receive a Contractor’s badge giving them appropriate facility access. Contractors are required to follow PCB’s Contractor Safety Policy (PE1023) and the PCB Long Term Contractor Facility Access Policy (LC1006). New contractors are required to follow the procedures outlined in Section 1.1 and 1.2 above. (this includes new employees or representatives of existing frequently visiting contractors/suppliers). Contractors and Suppliers under this Section shall be required to provide annual updates to their information and shall also be required to promptly provide any updates or changes to previously provided information.
		2. Visitors under this Section 1.9 are still required to enter through the main reception entrance of the applicable facility and sign in and out of the logbook for each visit.
		3. Human Resources shall provide on a periodic basis to the PCB Senior Leadership Team a list of frequent visitors with Badge Access granted pursuant to this Section 1.9. The SLT shall review the list and advise Human Resources to eliminate badge access for any contractors for which access is no longer required. Human Resources shall eliminate badge access as notified by the SLT or if notified by a contractor/supplier that an employee no longer requires access.
		4. Visitor badges issued under this Section must be renewed not less than annually.
		5. All badges issued under this Section 1.9 shall be appropriately limited as to the days and hours of access (in consultation with the applicable SLT member).
	10. **Visits by Foreign Nationals** **-** Consistent with Section 1.1 above, the Export Manager shall be consulted prior to the company visit by any foreign national (including employees of PCB affiliated entities who are foreign nationals) to ensure compliance with the Export Administration Regulations. When deemed necessary by the Export Manager, proper licensing will be required prior to the visit. In some cases, additional restrictions will be put in place by the Export Manager in connection with the visit.
		1. Within one week (or at such later time as may be approved by the Export Manager) following any visit by a foreign national, the PCB host employee shall provide a written visit report to the Export Manager summarizing details of the visit, including but not limited to:
			1. A summary of the topics discussed.
			2. Areas toured by the visitor(s).
			3. PCB employees who took part in the discussions.
			4. The report should also respond to the following items:
* Was there anything unusual that occurred with the visit?
* Was the visitor allowed any access around the building on an unescorted basis?
* Did they seek information or access to the building which was not a primary focus of the visit?
* Did they seem heavily interested in items not associated with the visit?
* Were there any other red flags or items about the visit which caused concern?
	+ 1. Visit reports relating to foreign nationals employed by PCB affiliated entities shall be required only upon the request of the Export Manager.
		2. The Export Manager will maintain a file of visits by foreign nationals to include, but not be limited to, the Visitor Notification form (SM013) and post visit report. The folder will be stored within the Export Manager’s working area/files.
1. **Unscheduled Visitors**
	1. In the event that the requirements of Section 1.1 above are not completed prior to the date of the visit, the visit may take place only in the Atrium Conference Room in Depew and the main reception area in Halifax. **An exception to this restriction may be made only with the documented approval of the Export Manager, General Counsel – Sensors, and the Senior Leadership Team member to whose function the visit relates. It is intended that such exceptions are to be rare.** Any employee entertaining visitors who does not follow the requirements of this Section 2.0 may be subject to disciplinary action.
	2. Unscheduled visitors must sign into the visitor log. Unless all requirements of Section 1.1 are satisfied to the satisfaction of the Export Manager prior to or upon arrival, the following restrictions shall apply to any such unscheduled meeting:
		1. The discussion may include only PCB information which is of a general nature, is publically available and is of a limited technical nature.
		2. Manufacturing processes or specific product details are not to be discussed.
	3. If the PCB host or the applicable conference room is not available, we should apologize to the visitor and ask that they schedule an appointment.
	4. Unscheduled visits by Government Officials are addressed in the Government Visitors User Guide (LC1005).
2. **Building Security**
	1. The facility HR representative shall question any individual attempting access who is not known by the HR representative as an employee or is not wearing a company ID badge. All non-employees must follow the visitor procedure as explained above.
	2. In the event an individual refuses to follow the instructions of the facility HR representative and enters the facility without authorization or clearance, the HR representative shall contact a Senior Leadership Team Member as soon as possible. If the receptionist or any PCB employee believes that there is any danger of harm or violence, the HR representative or the applicable PCB employee shall call 911 (to the extent that the employee feels that it is safe to do so and will not endanger the health or welfare of him/herself or any other PCB employee).

**Referenced Documents: CS002, LC001, LC1003, LC1004, LC1005, LC1006, PE1023, SM013, SM1012**