



Code of Ethics for Executive Officers and Principal Accounting Personnel

PCA has a Statement of Business Principles applicable to all employees of PCA. In addition, the executive officers of PCA and the primary individuals at PCA directly responsible for financial reporting, must:

- Exhibit and promote the highest standards of honesty and ethical business conduct including acting in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated.
- Establish, maintain and support policies and procedures that encourage and reward professional integrity in all aspects of PCA's organization.
- Ensure an environment exists within PCA which eliminates inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal, or alienation from other employees within PCA.
- Endeavor to avoid all conflicts of interest, including any actual or apparent conflicts of interest between personal and professional relationships.
- Disclose to the Corporate Counsel and to the Audit Committee any material transaction or relationship that could be interpreted to give rise to such conflict.

DISCLOSURES IN PERIODIC REPORTS

- Recognize and accept responsibility for full, fair, accurate, timely and understandable disclosures in the reports and documents that PCA files with, or submits to, the Securities and Exchange Commission and other regulators, and in other public communications made by PCA.
- Recognize their responsibility to promptly bring to the attention of the Chief Financial Officer, or the Audit Committee of the Board of Directors, any material information of which they become aware that affects the disclosures made by PCA in its public

flings or otherwise, and to assist in fulfilling the responsibilities as specified in PCA's policies and procedures regarding financial reporting and disclosure.

Code of Ethics. All such waivers or amendments shall be disclosed promptly as required by law, rule or regulation.

Each individual subject to this Code of Ethics shall annually certify his or her compliance with this Code of Ethics, and such certification shall be provided to the Corporate Counsel.

ACKNOWLEDGEMENT

I am in compliance with and fully understand the Code of Ethics. I am not aware of, nor do I suspect, any violation of this Code of Ethics by any individual covered by this Code of Ethics.

Name

Date

Adopted March 11, 2004