THE VCC CODE OF CONDUCT
WORKING TOGETHER WITH OUR SUBCONTRACTORS & SUPPLIERS
Excellence in Construction
VCC has an excellent reputation for conducting business with integrity, fairness and in accordance with the highest ethical standards. Our Code of Conduct speaks to our culture and core values as a company. It sets out what we expect from ourselves, our employees and all who work with us.
CONTENTS

What if you have a serious concern? ........................................... 4

Discrimination, Harassment & Bullying ..................................... 5

Fraud ................................................................................. 6

False Claims ........................................................................ 7

Bribery & Gifts ...................................................................... 8

Conflicts of Interest ............................................................... 9

Compliance with VCC Code .................................................. 10

Excellence in Construction - vccusa.com
WHAT IF YOU HAVE A SERIOUS CONCERN?

Violations of the expectations outlined in this code may be reported:

- To the project manager of the project involved
- To VCC’s Director of Human Resources, Donna Bean
- To an independent third party. VCC maintains a confidential Ethics Hotline, administered by Global Compliance, an independent company.

At this time, concerns or complaints of any nature may be reported via the Ethics Hotline at 1-866-291-5366 or by logging in at vccethicalhotline.alertline.com.
We are committed to an inclusive work environment and treating everyone with professionalism and respect.

Discrimination includes treating someone differently because of race, national origin, gender, age, religion or sexual orientation. Harassment and bullying include behaviors that any individual or group finds unwelcoming, humiliating, intimidating, threatening, violent or inappropriate.

If you witness or are the victim of these types of behaviors, please report it.
始终诚实和公平行事。欺诈发生在个人试图欺骗他人，或以不诚实的方式行事，以某种利益为代价。鼓励、参与或强迫他人以不诚实的方式行事也视为欺诈。通常为了获利或获得金钱、财产或服务而不公正地加以利用。这包括从公司、分包商或任何公司财产的不当使用。我们的员工和分包商不应参与不诚实的商业行为，包括但不限于贿赂、勒索、欺诈、欺骗、共谋、卡特尔、滥用权力、挪用或洗钱。

FRAUD

Always act honestly and fairly. Fraud is committed when an individual tries to deceive someone, or acts dishonestly, for a gain of some sort. Encouraging, involving or coercing someone else to act dishonestly is also considered fraud. It is usually carried out for profit or to obtain money, property, or services unjustly. This included defrauding or stealing from the company, a subcontractor or any misappropriation of company property.

Our employees and subcontractors shall not participate in dishonest business practices, including, but not limited to, bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement or money laundering.
FALSE CLAIMS

All requests or demands for payment pursuant to any contract or business agreement shall truthfully and accurately reflect the value of the goods or services provided. Under no circumstances may an employee make a false claim. Examples of false claims include billing extra time not spent working on a project, charging for materials not used in a project, or artificially inflating a claim in order to negotiate additional compensation.
Any payment or providing of merchandise or service to obtain favorable treatment in securing or retaining business or to obtain special concessions is prohibited.

This is not intended to hamper the giving of common courtesies usually associated with acceptable business practices, including giving gifts of nominal value which are of such a nature as to indicate they are merely tokens of respect or friendship and are in a form that will not be construed as a bribe, payoff or secret compensation.
CONFLICTS OF INTEREST

Situations that create a conflict of interest, or even the appearance or perception of such a conflict of interest, must be scrupulously avoided. Therefore it is the policy to prohibit its employees from engaging in any activity, practice or act which conflicts with the interests of VCC, its partner and affiliates.

What Counts as a Conflict?

A conflict of interest arises when what is in a person’s best interest is not in the best interest of another person or organization to which the individual owes loyalty. For example, an employee may simultaneously help himself, but hurt his employer by taking a bribe to purchase inferior goods for his company’s use. A conflict of interest can also exist when a person must answer to two different individuals or groups whose needs are at odds with each other. In this case, serving one individual or group will injure the other.
We take this code very seriously as our reputation hangs in the balance. The consequences of not complying can be very serious, including damage to our reputation, significant fines and penalties, or discontinuation of our business partnership.

**Consequences may include:**

- Termination for Cause of contractual relationship
- Termination of Employment
- Referral for Prosecution of Criminal Acts
- Disgorgement of Damages to the Company
For more information please contact Donna Bean at:

Donna Bean
501-370-4733
DBean@vccusa.com