

Expectations for Suppliers and Subcontractors' Conduct

CCC works only with qualified suppliers and subcontractors who commit to safely and responsibly deliver quality goods and services—on time and within budget. Although quality, cost, and timeliness are important, we will not solicit and award purchase orders and subcontracts to suppliers and subcontractors that do not meet our standards for safety, ethics, conduct, and protection of human rights. CCC is committed to the highest safety, ethical, and human rights standards in the industry, and we expect the same dedication from our supplier and subcontractor organizations.

Our suppliers and subcontractors must comply with all terms of the purchase order and/or subcontract and will immediately notify CCC of any actual or potential violations. To the extent that the purchase order or subcontract does not contain specific requirements that append or modify the below, we expect our suppliers and subcontractors at all tiers of performance to commit to the following:

Compliance with Laws and Regulations

Our suppliers and subcontractors must be familiar with and follow all applicable laws and regulations at all times in the performance of the work. Our suppliers and subcontractors must also ensure that lower-tier suppliers and subcontractors give an identical representation in their subcontracts and purchase orders for any portion of the work. “Laws” include all applicable national, federal, state, and local laws, ordinances, and regulations of the United States of America and any other national or international laws with jurisdiction that cover the work.

Anti-Corruption Compliance

CCC is committed to full compliance with all domestic and international anti-bribery laws, regulations, and conventions that prohibit corrupt actions in obtaining or retaining business or obtaining any other improper business advantage. In addition, CCC policy prohibits making facilitating payments of any kind, that is, payments to secure or expedite the performance of routine government actions. CCC will not condone or tolerate suppliers or subcontractors engaging in or not reporting behavior that violates, or has the potential to violate, the standards set forth in the U.S. Foreign Corrupt Practices Act, or any other relevant anti-corruption laws.

Data Protection

CCC values and upholds the privacy of individuals whose personal information it collects, uses, and processes in the course of its business operations. Our suppliers and subcontractors are required to comply fully with all relevant data protection and privacy laws and regulations in the jurisdictions where they operate and where they provide services to CCC. This includes safeguarding personally identifiable information (PII), adhering to the OECD Guidelines, and the establishment of data processing agreements as requested by CCC or mandated by law.

Suppliers and subcontractors are also responsible for providing adequate training and resources to ensure understanding and compliance with data protection obligations. Any suspected violations of data protection must promptly be reported and CCC reserves the right to take any action it deems necessary.

Furthermore, suppliers and subcontractors must ensure that any lower-tier suppliers or subcontractors they engage also uphold these standards. This requirement extends to including identical data protection representations in their subcontracts and purchase orders related to any portion of the work. CCC reserves the right to request data processing agreements from these lower-tier entities as necessary.

Safety

CCC has a “Zero Accidents” policy at its construction sites. Our suppliers and subcontractors must comply with the site safety requirements of each CCC jobsite. At suppliers’ facilities, suppliers must operate facilities in a safe manner to protect CCC personnel, its agents, and suppliers’ employees at all times. In all locations, suppliers and subcontractors must provide a safe work environment in accordance with all applicable international and national laws, regulations, and standards.

Equal Opportunity

CCC is an equal opportunity employer and employment decisions are made without regard to race, color, gender, age, religion, national origin, ancestry, physical or mental disability, veteran status, sexual orientation, gender identity, caste, and other grounds for discrimination prohibited by applicable law. CCC expects that suppliers and subcontractors will have employment policies and practices that prohibit employment decisions being made with regard to any legally protected characteristics.

For work performed in the United States, and to the extent the supplier or subcontractor is not otherwise exempt, the suppliers and subcontractors must abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a), and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. Moreover, these regulations require that the covered parties take affirmative action to employ and advance individuals in employment, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability.

Ethics

CCC is committed to the highest standards of ethical conduct and seeks to do business only with suppliers and subcontractors who share these values. We conduct our business transactions fairly, properly, and impartially and expect the same from our suppliers and subcontractors. Any conduct that fails to meet our standard of ethics, integrity, and responsible conduct may preclude suppliers and subcontractors from being invited to participate in a solicitation.

Human Trafficking and Anti-Slavery

CCC is committed to respecting all human rights everywhere we operate, consistent with CCC’s values and the spirit and intent of the United Nations Guiding Principles on Business and Human Rights. To that end, CCC will not tolerate or condone any activities that support human trafficking, slavery, servitude, or forced or compulsory labor. We expect our suppliers and subcontractors to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. CCC expects suppliers and subcontractors to adhere to these standards and expects them to hold their own suppliers and subcontractors to the same standards. In addition, CCC expects suppliers and subcontractors to:

- Employ workers at or above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of a worker.

- Comply with applicable wage laws and, upon end of employment, pay for return transportation costs for workers recruited from outside the country.
- Not charge workers recruitment fees or utilize firms charging workers such fees, and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.
- Provide workers a process for escalating and reporting concerns without retaliation.

We fully expect that our suppliers and subcontractors will ensure that lower-tier suppliers and subcontractors give an identical representation in their subcontracts and purchase orders for the performed work.

Anti-Harassment

CCC is committed to providing a respectful and harassment free environment for its suppliers and subcontractors regardless of gender, sexual orientation, disability, race, ethnicity, age, or religion. CCC does not tolerate harassment of employees, suppliers, or subcontractors in any form. Any person or entity who receives CCC's Expectation for Suppliers' and Subcontractors' Conduct understands and accepts CCC's terms to its anti-harassment policy. It is the suppliers' or subcontractors' obligation to inform CCC whether it does not have an anti-harassment training course in place. CCC will issue any anti-harassment training upon request from supplier or subcontractor at the supplier or subcontractor's expense.

Harassment includes, but is not limited to the following:

- Inappropriate verbal comments related to gender, sexual orientation, disability, physical appearance, race, nation origin, religion, age, marital status, military status, or any other status protected by law.
- Deliberate verbal, physical intimidation, or bullying.
- Stalking, following, or tracking for non-work-related reasons.
- Inappropriate or unwanted physical contact including unwelcome sexual attention.
- Harassing or inappropriate photography, audio, or video recording, text or email messaging.

Harassment can occur when there is no deliberate intention to offend. Harassment committed in a joking manner or disguised as a compliment still constitutes unacceptable behavior. Sexist, racist, and other exclusionary jokes and comments are offensive and constitute harassment.

Suppliers, Subcontractors, or other personnel requested to stop any harassing behavior are expected to comply immediately.

If a someone engages in harassing behavior, CCC retains the right to take any actions. This includes warning the offender or possible termination. CCC will take any action it deems reasonable to redress any behavior or actions that are disruptive or create a hostile or uncomfortable environment.

Import/Export

Throughout the supply chain, our suppliers and subcontractors must comply with all applicable export and import laws and regulations, including the international sanctions programs administrated by the U.S. Department of Treasury as well as any other applicable government agency in the U.S. or abroad.

Restricted Parties

All suppliers and subcontractors must acknowledge that the U.S. Government, other country governments, and international organizations publish Restricted Parties Lists (“Lists”) that identify parties (such as known or suspected terrorists, money launderers, and drug traffickers) restricted from certain or all types of transactions. Our suppliers and subcontractors must review such Lists prior to initiating transactions with any lower-tier or subcontractor, including financial institutions, for all or any portion of the goods or services to ensure such lower-tier or subcontractor and any relevant owners are not identified on any applicable Lists.