



Code of Ethics

Each Independent Contractor (“Contractor”) providing services for Spencer Renovation & Construction, LLC. and all its subsidiary companies (referred to as “SRC” from here on) shall strictly abide by this “Code of Ethics” and associated Compliance Principles as published in SRC’s Compliance Code and other manuals, procedures and Contractor Agreement. This Code of Ethics summarizes some of the key elements of the SRC Compliance Code. Contractors should familiarize themselves with the Compliance Code, which is available on the SRC website.

To ensure a clear understanding between the Contractor and SRC concerning this Code of Ethics, each Contractor is required to document their acceptance and understanding of this policy upon signing the Contractor Agreement and on a periodic basis thereafter.

The Code of Ethics under which SRC operates includes the following:

Integrity

1. SRC’s work shall be carried out in an independent and impartial manner, using appropriate methods and procedures.
2. Data, test results and other material facts shall be reported by SRC in good faith, will not be improperly changed, and shall correctly present the actual findings, professional opinions or results obtained.
3. No misrepresentation of financial data will be made. All financial reports will reflect accurately the current position and performance of SRC in accordance with SRC Policy and legal requirements.
4. All work shall be performed in compliance with applicable laws and SRC Policies. No Contractor is authorized, intentionally or by disregard of procedure, to violate any legal, environmental, health, or safety requirement.
5. All Contractors are required to inform SRC management of any condition that creates a danger to the environment, poses health and safety hazards, or may be a violation of law or ethical conduct. SRC provides facilities to enable confidential reporting of such conditions.

Confidentiality

6. All Contractors shall treat all information received in the course of the provision of their services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

Conflict of Interest

7. All Contractors shall be free from any conflict of interest. Conflicts of interest can include, but are not limited to, ownership or involvement in outside interests that could influence or adversely affect the Contractor’s performance or SRC’s reputation. In the event of a conflict that could influence Contractor’s actions on behalf of SRC, its affiliates, customers or other third parties, the Contractor shall reveal the conflict pursuant to the requirements of the Compliance Code.



Anti-Bribery

- 8. No reward, gift, or favour in return for, or dependent on, the outcome of any work will be accepted, and any offer will be reported.
- 9. SRC prohibits (a) the offer, giving, or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment, or (b) the use of other routes or channels including third parties for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers or employees of any such party or government officials.
- 10. While SRC is customer focused in providing its service, it will not tolerate any breach of ethics, law, or SRC policy in order to satisfy customer requirements, whether stated or implied. Any attempt to subvert this policy is to be reported to management either through normal channels or the confidential SRC hotline, details of which are on the SRC website.

Fair Marketing

- 11. All Contractors shall (a) conduct sales and marketing (including comparisons with, or references to, competitors, competitors' services or third parties) in a manner that is truthful, not deceptive or misleading, and is consistent with applicable laws; and (b) present SRC in a fair manner; and (c) ensure presentational information, including descriptions of SRC's network and affiliations, resources, capabilities and services, is accurate and unambiguous.

Code of Ethics Certification

This is to certify that I have read the above Code of Ethics and, to the best of my knowledge, I understand the intention and meaning and my responsibilities thereunder. I have had the contents explained to me and have had the opportunity to ask questions and seek clarification.

Independent Contractor Signature:	Date:
Independent Contractor Full Name (Printed):	
Office Location:	

Witness Signature:	Date:
Witness Full Name (Printed):	



Zero Tolerance Policy

SRC has zero tolerance for conduct that breaches the Compliance Principles summarized in the Code of Ethics.

Any contravention of the Code of Ethics by the offending Contractor will void the Contractor Agreement and the Contractor's services will be immediately discontinued. "Acting under instructions" from an SRC's employee will not be accepted as a defense to a contravention.

Any Independent Contractor engaging in work related criminal activity will lead to discontinuation of the Contractor's services and may be reported to the appropriate authorities. Any cost of defense will be borne by the Contractor.

Zero Tolerance Policy Certification

This is to certify that I have read the above Zero Tolerance Policy, and, to the best of my knowledge, I understand its intention and meaning and my responsibilities. I have had the contents explained to me and have had the opportunity to ask questions and seek clarification.

Independent Contractor Signature:	Date:
Independent Contractor Full Name (Printed):	
Office Location:	

Witness Signature:	Date:
Witness Full Name (Printed):	