

SKANSKA

Supplier Code of Conduct



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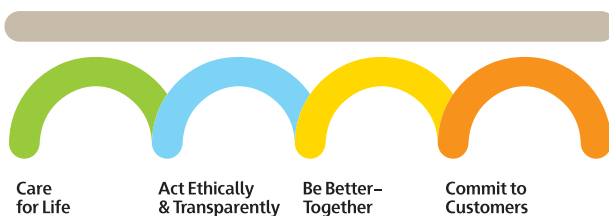
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Introduction

Skanska strives to achieve mutually beneficial supplier relationships built on common values and expected behaviours. The Skanska Code of Conduct (our Code) outlines the behaviours we expect from our employees. This Skanska Supplier Code of Conduct (our Supplier Code) contains relevant portions of our Code that apply to you as an important part of our supply chain. We encourage our suppliers to engage in constructive dialogue with us regarding our Supplier Code and doing business together.

Foundation of the Supplier Code

Skanska is committed to conducting business in a responsible and sustainable way. We require the same of our suppliers. Our Code and our Supplier Code are based on our Skanska Values, described here:



Care for Life

We care for life of people and the environment. We work safely, or not at all. We never walk by if we notice unsafe actions. We support health and wellbeing. We promote green solutions and conduct our operations in a green way. We are accountable to future generations.

Act Ethically and Transparently

We do business with a high degree of integrity and transparency. We live by our Code of Conduct and never accept shortcuts. We foster a working climate where everyone can speak their mind.

Be Better – Together

We always strive to be better in all we do. We are a learning organisation and generously share our expertise. We take pride in quality and innovation. We build One Skanska teams together with customers, partners and communities. We leverage diversity to deliver the best solutions. We foster an inclusive culture where we are open and fair, showing trust and respect for each other.

Commit to Customers

We help our customers to be successful in their business. We strive to understand their needs and their customers' needs. We are here to help our customers turn their visions into reality.

Importantly, Skanska is a signatory to the United Nations (UN) Global Compact, and we adhere to its Ten Principles reflecting human rights, labour, the environment and anti-corruption. We further support the rights of all people as described in the Universal Declaration of Human Rights adopted by the UN and in the conventions of the UN's International Labour Organization.

In addition, as a founding and participating member of the World Economic Forum's Partnering Against Corruption Initiative (PACI), we subscribe to the principles supported by PACI.

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Who the Code applies to

This Supplier Code applies to providers of goods and services – and their employees – in their work with Skanska through a contractual agreement. It is not applicable to single transactions such as a taxi ride, dinner at a restaurant, purchasing a railway ticket or any similar type of transaction not subject to a framework agreement.

The group that we collectively call “suppliers” includes suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries and agents. As a supplier, you must ensure that the practices and principles outlined in Skanska’s Supplier Code are flowed down throughout your own supply chain.

Compliance with laws

You are required to comply with all applicable laws and with our Supplier Code, including when our Supplier Code sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements. If you find that our Supplier Code is in conflict with applicable legal requirements, you should inform the relevant Skanska manager.

Reporting misconduct

Skanska believes that a strong ethical culture depends in part upon creating an environment in which employees feel free to report instances of non-compliance with our Code or Supplier Code. Such non-compliance might include suspected illegal or unethical conduct (collectively called misconduct). We are committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings.

Similarly, you – including your employees

and your supply chain – are obliged to report to us suspected or known misconduct. Suspected or known misconduct must be reported by speaking with the relevant Skanska manager, or to the Ethics Committee of the Business Unit or Reporting Unit (Skanska Unit) for which you are working. If you prefer, you may report suspected or known misconduct confidentially and anonymously to the Skanska Code of Conduct Hotline, either by telephone or online (instructions appear near the end of this Supplier Code).

No retaliation

Skanska does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. “Good faith” means that to the best of a person’s knowledge and belief, everything reported is true and that everything known is reported.

Auditing

Skanska reserves the right to monitor and audit each supplier’s compliance with our Supplier Code. Accordingly, you must cooperate by providing relevant information that we request, and by making individuals accessible so Skanska can conduct a meaningful audit.

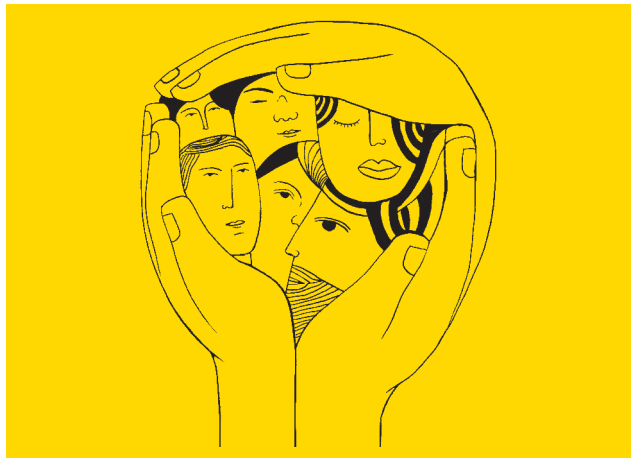
Similarly, you are required to evaluate your supply chain to ensure compliance with our Supplier Code and to conduct audits of your supply chain when requested by Skanska. Any non-compliance by you or your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers.

Breaches of the Supplier Code may negatively

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impact your business relationship with Skanska. Potential consequences may include but are not limited to contract termination. This provision for auditing does not relieve or limit a supplier's obligations or responsibilities.

Health, safety and wellbeing

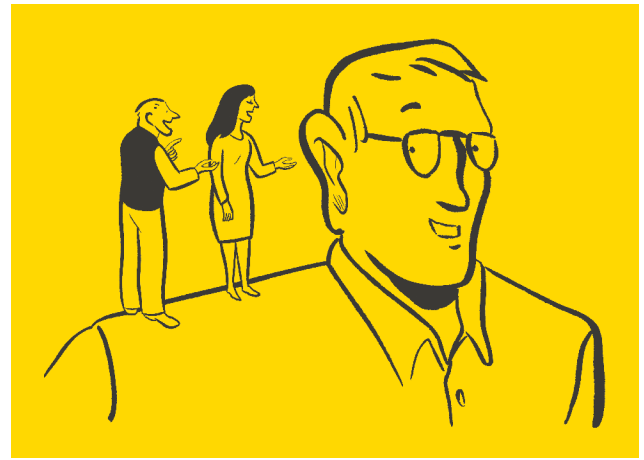


We care for our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety and wellbeing. We aim to lead our industry in health and safety performance, with continuous, measurable improvements towards our goal of an injury-free environment. We promote and share sound personal safety and accident prevention practices with our supply chain and throughout our industry.

What does it mean for you?

- You work together with Skanska and other suppliers to ensure a healthy and safe working environment.
- You ensure that your employees and others in your supply chain are adequately trained and provided with the proper equipment to safely carry out their work.
- You recognise that all employees have a right and an obligation to stop unsafe work.
- You report to Skanska all health and safety incidents related to our project sites and in our workplaces.

Fair working conditions



We support recognised global human rights and fair working conditions for persons working on our projects, in our workplaces and in our supply chain.

What does it mean for you?

- You ensure that working conditions, hours, wages and benefits comply with applicable national and local laws and relevant UN's International Labour Organization (ILO), conventions.
- You have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.
- You do not allow any practice that would restrict free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.
- You recognise and respect employees' right to freedom of association and collective bargaining, where permissible by law.
- You recognise the special needs of employees under the age of 18, and your duty of care towards them.

No discrimination or harassment



We respect all individuals and strive to work as one team, and to foster open, straightforward and respectful communication. We provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination.

What does it mean for you?

- You do not tolerate disrespectful behaviour, bullying, discrimination, harassment or unwanted sexual advances.
- You do not discriminate, and you provide equal treatment and opportunities for employees and job applicants.
- You embrace and promote an inclusive culture.

Environment



We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world. We actively work to improve the environmental performance of our operations, projects, products and services during their entire life cycles.

What does it mean for you?

- You conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws.
- You comply with standards required by Skanska's environmental management system.

Protection of assets, property and equipment



We safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business.

Assets are either tangible or intangible. Examples of tangible assets are raw materials, money, products, machines and equipment, computers and real estate. Examples of intangible assets are our brand, patents, trademarks, know-how, trade secrets and copyrights.

What does it mean for you?

- You respect the assets of Skanska and our stakeholders.
- You only use assets belonging to Skanska and others as and when appropriately authorised.
- You do not tolerate the theft of assets.

Confidentiality



We respect confidential information relating to Skanska and our stakeholders, and take all reasonable measures to prevent confidential information from being disclosed to any person who does not need and have a right to that information in the course of their work.

What does it mean for you?

- You ensure the protection of confidential information entrusted to you by Skanska, our customers and others.
- You do not act on confidential information received in error, whether it has come from Skanska, our customers or others. You contact the sender and disclose the situation to Skanska.

Protection of personal data (data protection)



We respect everyone's right to the protection of his or her personal data and the right to his/her integrity in connection with processing of personal data. The definition of personal data, and the legal requirements for safeguarding it, vary by country. It could include someone's names, personal healthcare information, photographs or identity number.

What does it mean for you?

- You ensure that all uses of personal data – such as collection, registration, comparison, storage and deletion, or a combination of these – take place in accordance with applicable laws and regulations.

Anti-corruption and anti-bribery



We are committed to conducting business with a high level of integrity and we do not tolerate any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

What does it mean for you?

- You conduct business with integrity, and you likewise do not tolerate any form of bribery or corruption.
- You never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a Skanska employee, customer, or public official (including foreign public officials) or any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf. Facilitation payments are bribes – often small – paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.
- You ensure all reports, records and invoices are complete and accurate and not false or misleading.

Fair competition



We believe fair competition benefits Skanska, our stakeholders and society as it drives efficiency and innovation, which are the basis of a well-functioning market economy. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations.

What does it mean for you?

- You practise fair competition.
- You do not participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations.
- You do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

Conflict of interest

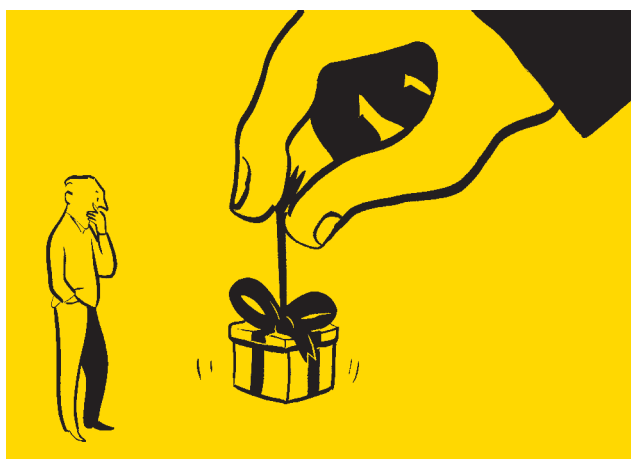


When acting as a representative of an employer or other party, we all are responsible for making decisions in the best interests of that employer or party without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close personal relationships. Skanska strives to operate in a manner in which conflicts of interests are actively avoided, and we require our supply chain to do the same.

What does it mean for you?

- You avoid situations that – in your work with Skanska – may present a conflict of interest or appear to do so.
- You notify Skanska if you become aware of an actual or perceived conflict of interest in your work with Skanska.

Hospitality and gifts



We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – our business decisions, or decisions by our customers or others with whom we work. Each Skanska Unit has established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.

What does it mean for you?

- You do not offer or accept hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – your business decisions or those of Skanska, our customers or others.
- You respect and observe the hospitality and gifts policy of the Skanska Unit with which you are working.
- If a Skanska employee requests any type of hospitality, gift or personal service for free or at less than fair market value, you report it to Skanska.

Sanctions



Sanctions are legal instruments used by governments and multinational bodies to influence foreign policy by prohibiting business dealings with certain countries, individuals, entities or sectors. Sanctions lists are maintained by the United Nations, the EU, and the United States among others.

What does it mean for you?

- You know the external parties and their real (beneficial) owners with whom Skanska conducts business.
- You are vigilant in watching for external parties who may be on a sanctions list or may have a related company in a country subject to sanctions.
- You consult your Unit's Legal Department or Ethics representative if you have questions or concerns regarding sanctions laws and regulations or a particular external party.

How to report a concern

You can report a concern to the relevant Skanska manager, or the following information can be used to report suspected or known misconduct to the respective Skanska Ethics Committee (email addresses). Alternatively, you can confidentially and anonymously submit a report to the Skanska Code of Conduct Hotline, either by phone or online. The Hotline is available globally and is independently administered by an external organisation.

Czech Republic

Email: eticky.vybor@skanska.cz
 Freephone: 800 900 538
 Web: www.speakupfeedback.eu/web/xwrsyft/cz
 Access code: 88364
 Language: Czech or English

Czech Republic Residential Development

Email: rde.ethics@skanska.cz
 Freephone, web etc: Refer to country.

Denmark

Freephone: 8088 5638
 Web: www.speakupfeedback.eu/web/xwrsyft/dk
 Access code: 95919
 Language: Danish or English

Finland

Email: eettinenkomitea@skanska.fi
 Freephone: 08001-13031
 Web: www.speakupfeedback.eu/web/xwrsyft/fi
 Access code: 34397
 Language: Finnish or English

Hungary

Email, Construction: eticky.vybor@skanska.cz
 Email, CD: komitet.ds.etyki@skanska.pl
 Freephone: 0680 981 359
 Web: www.speakupfeedback.eu/web/xwrsyft/hu
 Access code: 15388
 Language: Hungarian or English

Ireland

Freephone: 1800-55 2136
 Web: www.speakupfeedback.eu/web/xwrsyft/ie
 Access code: 55064
 Language: English

Norway

Email: etiskrad@skanska.no
 Freephone: 800-18 333

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| | <p>Web: www.speakupfeedback.eu/web/xwrsyft/no Access code: 47789 Language: Norwegian or English</p> |
| Poland | <p>Email: komitet.ds.etyki@skanska.pl Freephone: 00800 4411 739 Web: www.speakupfeedback.eu/web/xwrsyft/pl Access code: 12462 Language: Polish or English</p> |
| Romania | <p>Email, Construction: eticky.vybor@skanska.cz Email, CD: komitet.ds.etyki@skanska.pl Freephone: 0800 894 540 Web: www.speakupfeedback.eu/web/xwrsyft/ro Access code: 98071 Language: Romanian or English</p> |
| Slovakia | <p>Email: eticky.vybor@skanska.sk Freephone: 0800 00 4529 Web: www.speakupfeedback.eu/web/xwrsyft/sk Access code: 98351 Language: Slovak or English</p> |
| Sweden | <p>Email: etiska.radet@skanska.se Freephone: 020-798 813 Web: www.speakupfeedback.eu/web/xwrsyft/se Access code: 46798 Language: Swedish or English</p> |
| United Kingdom | <p>Email: ethics.committee@skanska.co.uk Freephone: 0800-169 3502 Web: www.speakupfeedback.eu/web/xwrsyft/gb Access code: 08239 Language: English</p> |
| USA | <p>Email: usaethicscommittee@skanska.com Freephone: 866 250 6706 Web: www.speakupfeedback.eu/web/xwrsyft/us Access code: 71447 Language: English or Spanish</p> |
| Infrastructure Development | <p>Email: idethics@skanska.se Freephone, web, etc: Refer to country.</p> |
| Skanska AB | <p>Email: ethics.committee@skanska.se Phone: +46-20-798 813 Web: www.speakupfeedback.eu/web/xwrsyft/se Access code: 46798 Language: Swedish or English</p> |

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