

## Policy

# Skanska UK Modern slavery and human trafficking

## 1 Statement

- 1.1 This statement is made in conformance with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Skanska has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.
- 1.2 Skanska's Code of Conduct prohibits modern slavery. We will comply with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.
- 1.3 Skanska will carry out appropriate due diligence to ensure that its own workforce, as well as that of its supply chain operating on its projects, is free from modern slavery.
- 1.4 Formal risk assessments will be carried out on our principal suppliers on each Skanska project. Staff are expected to report any concerns and management are expected to act upon them.
- 1.5 Skanska will carry out internal and external audits of selected projects in order to monitor and assess the risks of modern slavery. Skanska will ensure compliance through site induction due diligence, management meetings and site visits.
- 1.6 Skanska will ensure that its employees and members of the supply chain are actively made aware of the risks of modern slavery and how to identify them.

## 2 Policy application

- 2.1 Skanska has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.
- 2.2 The requirements made of the supply chain in regard to modern slavery are communicated and contracted upon through our Supplier Code of Conduct and Sustainable Procurement Policy. Skanska expects all suppliers to conduct right-to-work checks of their work-force in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction where their papers will be verified.

- 2.3** Skanska will seek to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern day slavery across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.
- 2.4** Skanska operates a Code of Conduct hotline, which provides an option for anonymity, and encourages employees and suppliers to report any suspected legal or ethical breaches.
- 2.5** In order to ensure the highest level of understanding of the risks associated with Modern Slavery and Human Trafficking in our supply chain, Skanska provides training for all staff members, and this training will be continued during 2019/20.
- 2.6** Skanska uses due diligence key performance indicators to measure effectiveness in ensuring that slavery and human trafficking is not taking place in the supply chain.
- 2.7** A Modern Slavery and Human Trafficking procedure has been produced to complement this policy.
- 2.8** This policy was signed off by the Board of Directors of Skanska UK Plc on 9 May 2019.



**Gregor Craig, CEO and Business Unit President**