SKANSKA

Our Code of Conduct

Code of Conduct

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01

We Follow our Values and our Code

- A message from our CEO
- Our values
- Our Code
- Personal and leadership responsibility
- Guidance for decision-making

A message from our CEO

I have always been proud to work at Skanska. For me, one of our greatest strengths is the way we do business, and that is why our Code of Conduct is so important. It spells out the expectations on each of us, no matter what role or position we have, for the way we act inside and outside of Skanska.

Our Code is based on the values that define us as a company and provides a solid foundation for our decisions. These values are central to how we earn and keep trust – with our customers, partners, and other stakeholders – and they help attract talent and business. They are a great source of pride that unites us and makes us stronger as a company.

We also face the real risks that come with ethical and legal violations. We are all responsible for behaving ethically and legally. This means we each need to understand the principles of good conduct that apply to our work and know where and when to raise questions or report misconduct. Our Code guides us when the correct action is unclear.

We promote a "speak-up" culture at Skanska where everyone should feel comfortable raising concerns. We do not tolerate retaliation against anyone who, in good faith, reports suspected misconduct. Our speak-up culture is essential for living our values and protecting our business.

Please read the Code and refer to it frequently for guidance. Keep in mind that it cannot anticipate every situation, so use your best judgment and speak up or seek advice if you have any concerns.

I ask you to commit to live by the Code in your work every day. By making this commitment together, we are building a stronger Skanska.

Anders Danielsson - Group President and CEO

Our values

Since day one, our philosophy has been that what is good for people, society and our environment is good for business. As a learning, values-based organization, our future direction is firmly linked to our core beliefs. Our values not only guide us, they are integral to our success, to living up to our purpose of building for a better society and to delivering shareholder return. We also realize that continuous learning is a key part of maintaining our values and helping us to grow both as a team and as individuals.

Care for life: protecting people and the planet

Caring for the health and safety of people and our environment lies at the heart of what we do. In situations that are physically or psychologically unsafe, we refuse to be bystanders. We are changemakers and action takers. This applies to the environment and climate change too. We advocate for sustainable solutions and operate in this spirit, holding each other accountable for the legacy that we leave to future generations.

Act ethically and transparently: being a role model

Each of us honors our individual responsibility to lead by example and to act with the highest degree of integrity and transparency. We encourage different perspectives, creating a space in which everyone can speak freely and live by our Code of Conduct. Shortcuts are unacceptable.

Be better together: teaming up

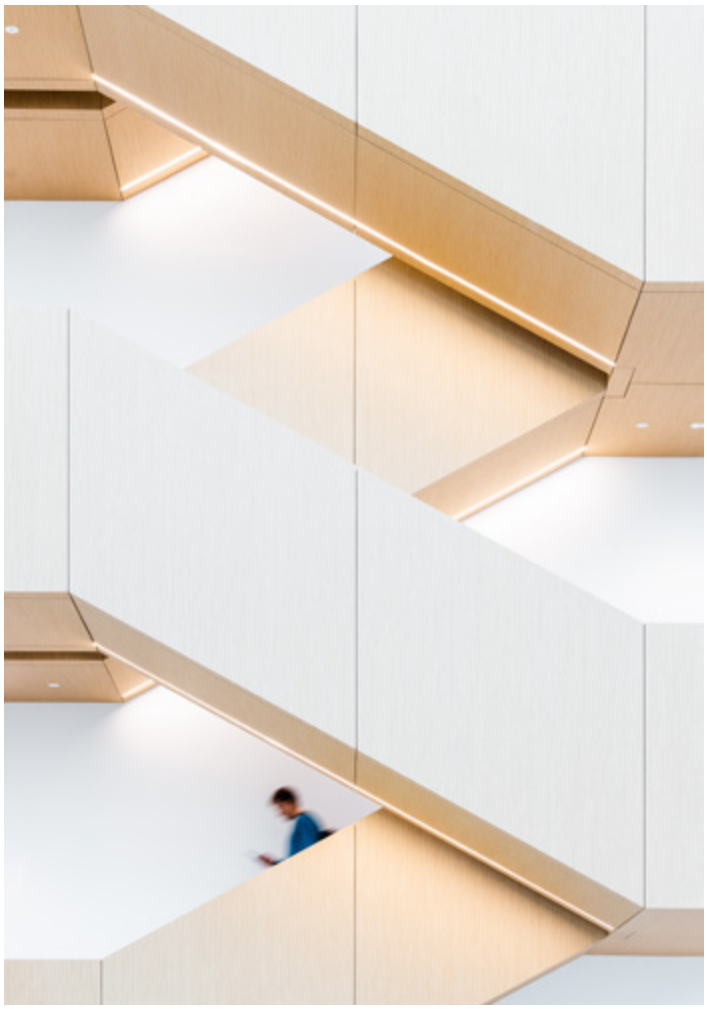
Everything we do, we do better together. We listen and learn with curiosity to move forward as a team, generously sharing knowledge along the way to successfully replicate best practices. We champion an inclusive culture of openness, fairness, trust and respect, where all people feel a sense of belonging regardless of who they are or where they come from. We innovate and deliver the best solutions by making the most of our own diversity, together with that of our customers, partners, and the communities in which we operate.

Commit to customers: having a customer-first mindset

Our customers' success is our success. We always listen closely to understand their needs and those of their customers, so that we can provide the tools they both require to reach their goals. Together, we look ahead to create smarter and more sustainable solutions that bring their visions to life.

Our Code

Our Code is based on our values and is a guide for our daily activities. It provides direction on how to conduct ourselves when we interact with each other, our customers, our business partners, and the communities in which we operate. We turn to this Code when we are unsure about the right course of action. It also provides information on whom to contact when we have questions or concerns.



We comply with all applicable legal requirements. Sometimes the standards in our Code are stricter than those requirements. In these cases, we apply the higher Code standard if it does not conflict with local law. Customs or local practices never take precedence over legal requirements or the requirements in our Code. If our Code appears to conflict with applicable law, consult with your manager.

To support our Code, we have more detailed policies, both at the Group and business unit levels, that apply the principles and expectations outlined in our Code.

Who must follow our Code?

All Skanska directors and employees – regardless of their role – must follow this Code.

Our Code applies to Skanska AB and all entities of which Skanska AB, directly or indirectly, controls 50% or more of the voting rights (Skanska Group). For joint ventures, we must ensure that either our Code is adopted or one that is comparable to our Code.

Other third parties, such as suppliers, subcontractors, consultants, brokers and agents, are also expected to adhere to the principles contained in our Code by committing to our Supplier Code of Conduct (Supplier Code).

What is a joint venture?

By "joint venture" we mean joint ventures, consortiums, joint operations, associations, alliances, teaming arrangements, as well as other arrangements established for a project in which we have an ownership stake.

Personal and leadership responsibility

Everyone plays a role in ensuring that we continue to be an ethical, compliant, and values-based organization. Our leaders have the additional responsibility of driving our culture of compliance.

This means that we:

- Are familiar with both the Code and the policies that apply to our work and are guided by them in our day-to-day decision-making
- Always act with honesty and integrity
- Ask questions and seek advice if we are uncertain of the right thing to do
- Speak up and report misconduct as soon as possible

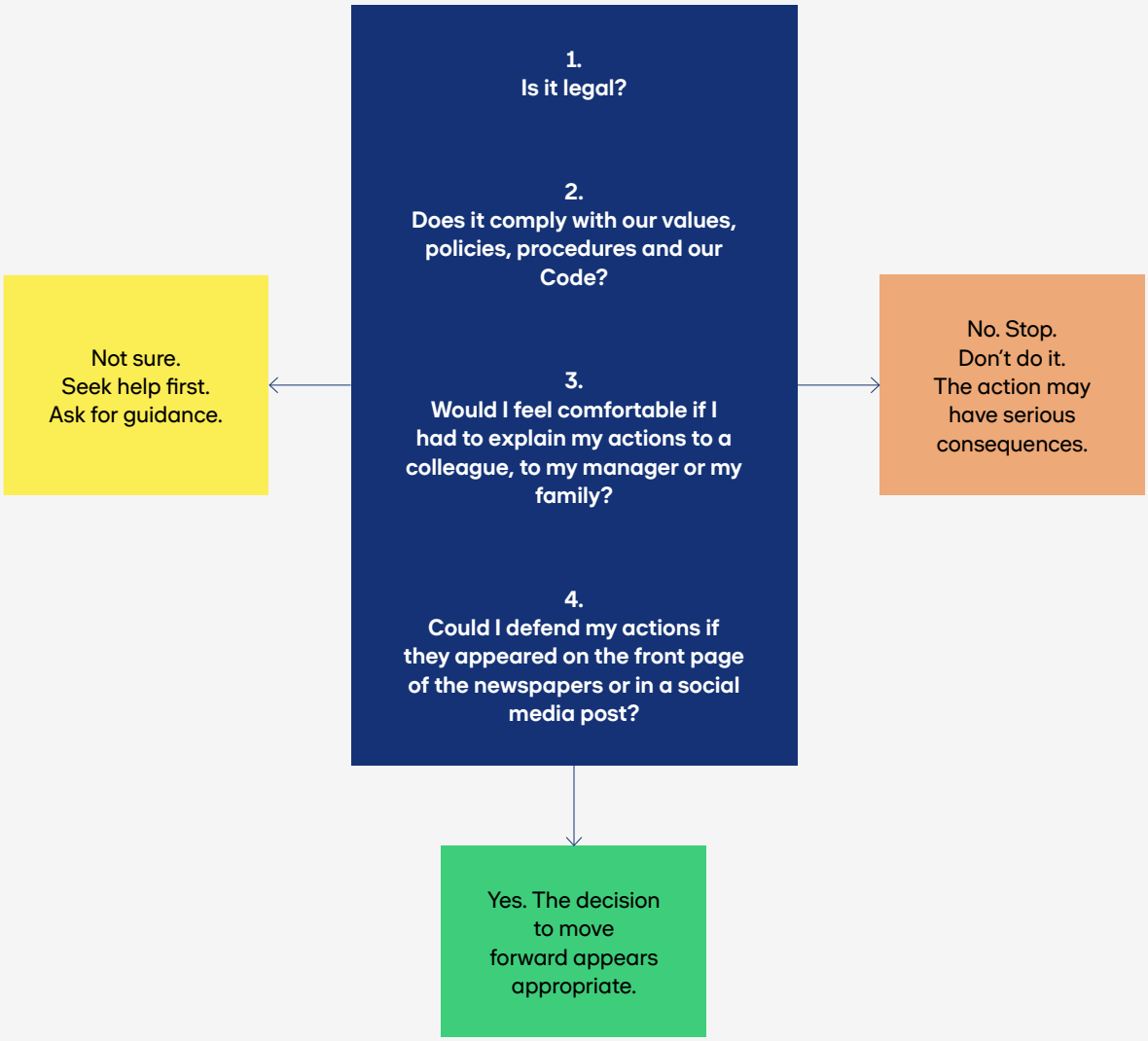
This means we expect our leaders to:

- Act as role models for ethical conduct
- Build inclusive teams and ensure psychological safety in the workplace
- Encourage employees to raise questions and concerns without fear of retaliation and ensure their concerns are handled appropriately

Guidance for decision-making

Our Code does not cover all relevant laws or internal policies, nor can it address every situation that may occur at work.

If you face a situation where the right thing to do is unclear, use your judgment and consider the following questions:



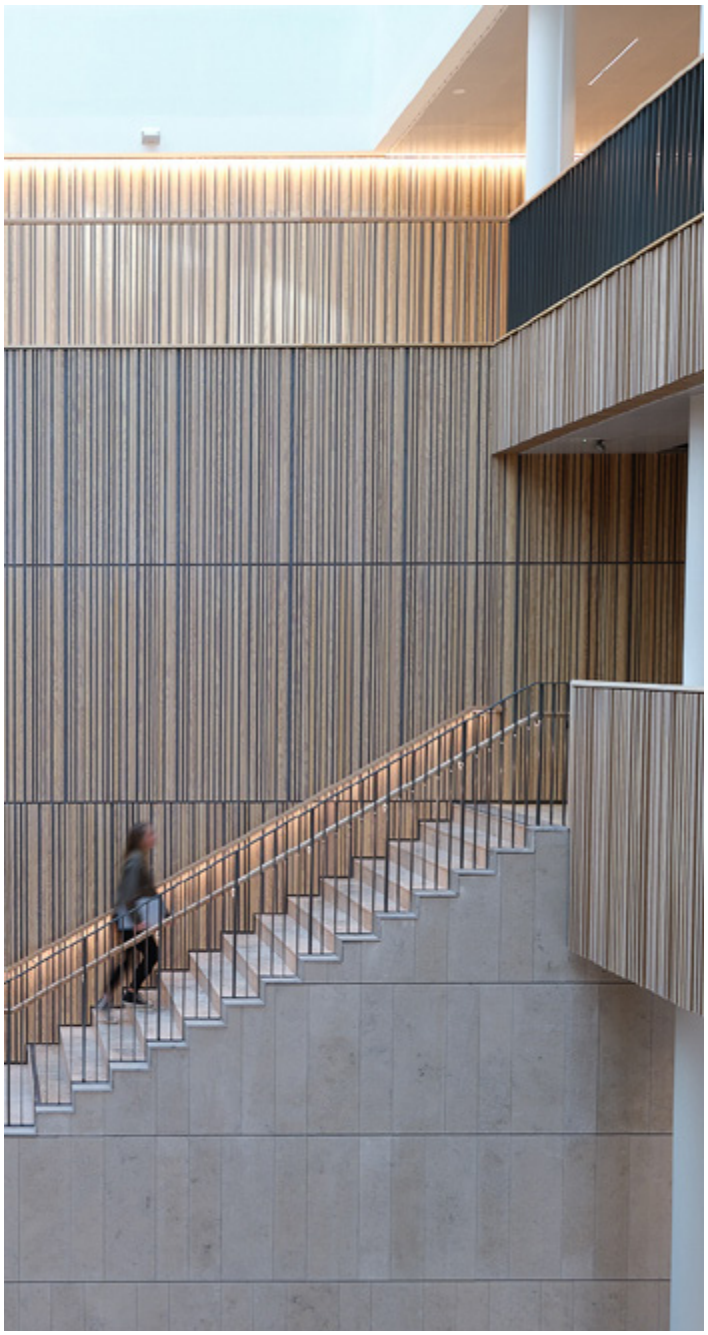
02

We Maintain a Safe and Respectful Workplace

- Fair working conditions
- Health, safety and well-being
- Inclusion and diversity
- Bullying and harassment

Fair working conditions

We respect labor rights. All employees should be adequately compensated for their work and treated fairly. We subscribe to international labor standards and require them for ourselves and for everyone working in our supply chain. We support professional development to drive engagement and performance, in line with our values and our attractiveness as a company.

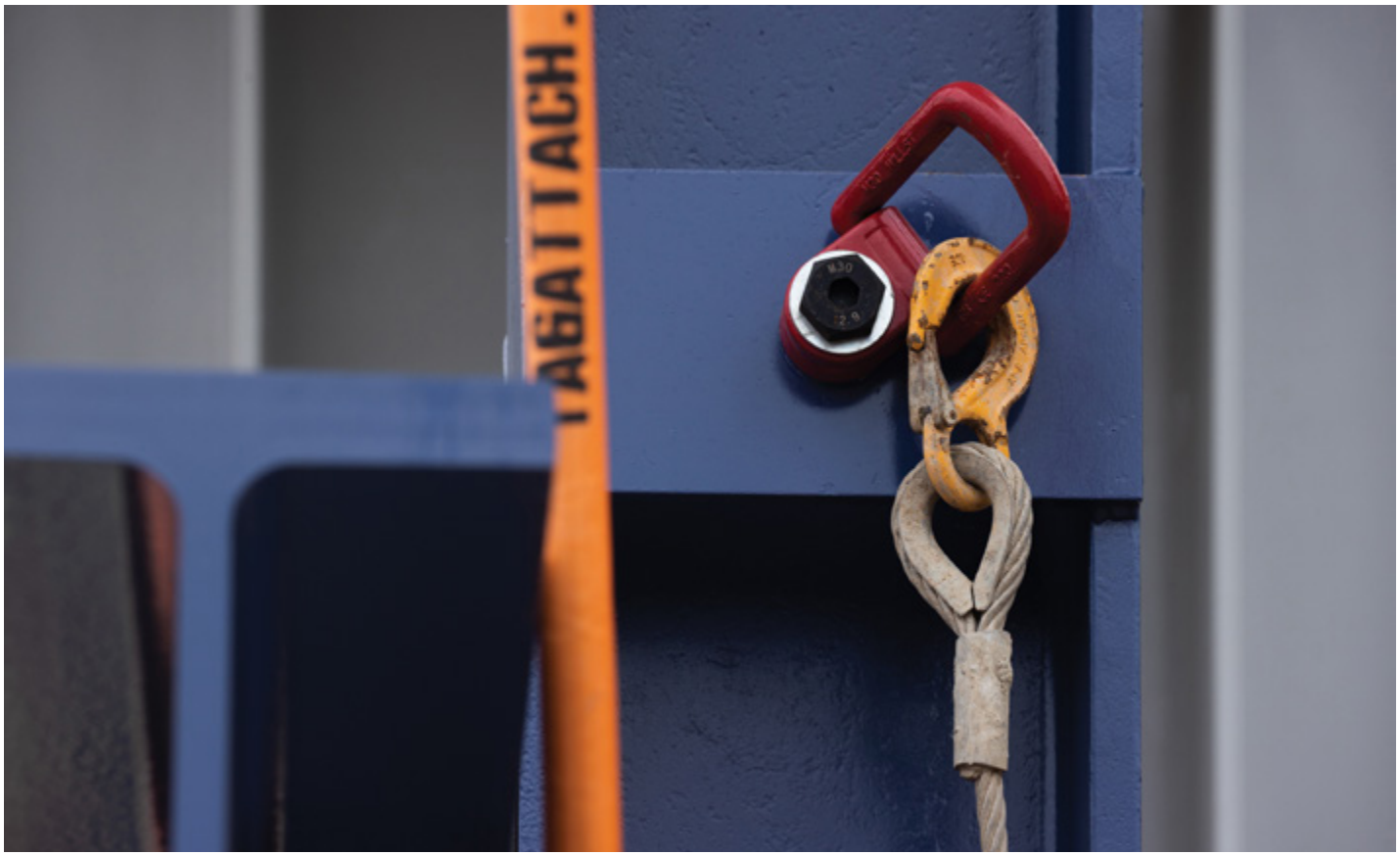


This means that we:

- Comply with all applicable laws regarding working hours, wages and benefits
- Uphold everyone's right to form and join trade unions and bargain collectively
- Maintain a dialogue with labor organizations, trade unions and workers' representatives
- Take responsibility for contributing actively to our own learning and personal development, as well as that of our colleagues, and for providing each other with constructive feedback
- Report any unfair working conditions at Skanska or any of our subcontractors or suppliers

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Human Resources (HR) team.



Health, safety and well-being

We care about the health, safety and well-being of everyone at Skanska. The safety of our employees and subcontractors is our highest priority. So, we set safety standards – and implement technical solutions and procedures – to reduce or eliminate risks to health and safety on our construction sites and in our operations.

This means that we:

- Never walk by any work activity that is unsafe or unhealthy without reporting it. We have the authority and responsibility to stop any activity that may be unsafe.
- Require sound personal safety and accident prevention practices on our worksites. We also promote and share them with our supply chain and throughout our industry.
- Require that subcontractor employees are adequately trained and provided with the proper equipment to carry out their work safely
- Care for our own mental health and that of our colleagues
- Never come to work under the influence of drugs or alcohol, or work when a health condition or medical treatment may cause a safety hazard for ourselves or others

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Health and Safety team.

Inclusion and diversity

We value our diverse workforce and teams. We believe that varied backgrounds, experiences and views strengthen our teams, drive innovation, and enhance business performance.

This means that we:

- Respect all individuals and work as one team regardless of our differences
- Provide equal treatment and opportunities to everyone, without regard to any characteristics, such as ethnicity, gender, sexual orientation, disability, and more
- Allow equal employment opportunities in all aspects of our employment relationship, including hiring, training, promotion and other terms of employment
- Promote and contribute to an inclusive and psychologically safe work environment where everyone feels respected, valued and empowered
- Encourage the expression of new ideas and opinions, even if they differ or contrast with our own

What do we mean by diversity?

Diversity is everything that makes us unique within a team – from backgrounds and personal characteristics to the different perspectives, ideas, and abilities each of us brings. Many of these aspects, for example ethnicity, age, gender identity, disability, and religion, are legally protected under national legislation.

What do we mean by inclusion?

Inclusion is the actions we take every day to ensure everyone feels respected, valued, and empowered to contribute.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your HR team.

Bullying and harassment

We do not tolerate bullying and harassment in our workplaces. Such negative behaviors harm people and the work environment, as well as stifling our productivity and creativity.

This means that we:

- Respect each other and care about how our actions affect others
- Do not participate in any form of disrespectful behavior, bullying, discrimination or harassment, whether we are at the workplace, representing Skanska elsewhere or online
- Choose our words with care and never use offensive or discriminatory language, nor resort to aggression, threats or violence in the workplace
- Do not bring sexually explicit or offensive material to work or overstep personal boundaries physically, verbally or online in a way that could be seen as sexual harassment

What is workplace harassment?

Workplace harassment is unwelcome conduct based on a person's race, gender, ethnicity, nationality, sexual orientation, age, disability, religion or other factors. It includes sexual harassment, offensive jokes or pictures, name-calling, physical assaults and threats.

What is bullying?

Bullying is abusive or offensive conduct that humiliates or causes physical or emotional harm.

Questions or concerns?

Talk to your manager or your HR team if you have any concerns about disrespectful behavior.

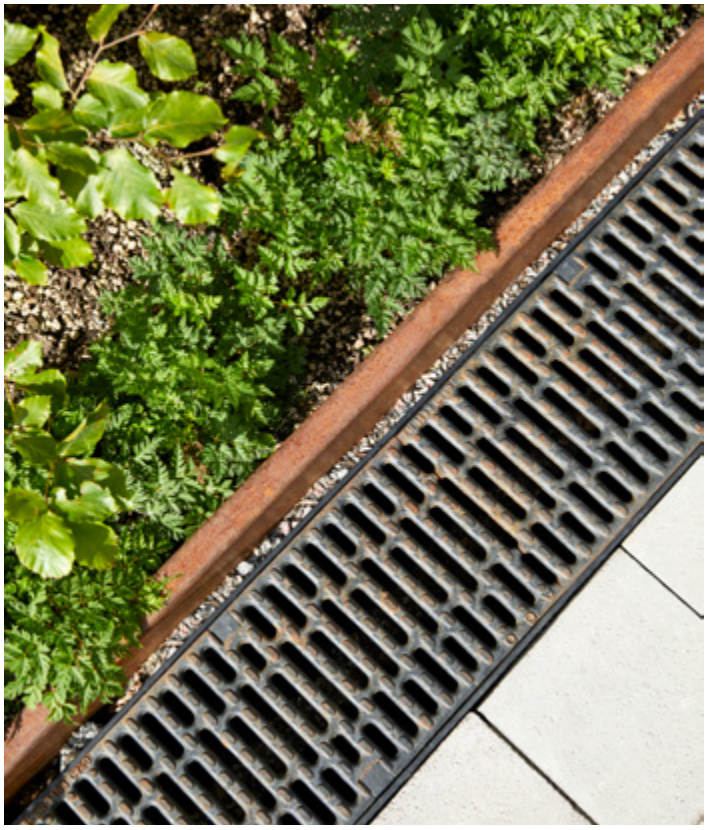
03

We Commit to a Sustainable Future

- Climate and environment
- Human rights

Climate and environment

We are committed to our goal of transitioning to low-carbon construction across all our projects and ultimately achieving net-zero carbon emissions by 2045 in our own operations and our value chain. We are also mindful that our industry affects the local environment, both where we operate and across our value chain. We work to reduce our environmental footprint and ensure a thoughtful use of materials.



This means that we:

- Work actively to improve the climate and environmental performance of our operations, projects, products and services during their entire life cycle
- Take environmental risks and opportunities into account when initiating or tendering for projects
- Engage stakeholders in environmental management. These stakeholders include employees, customers, our supply chain and local communities.
- Carry out due diligence where relevant, to identify the environmental impacts of our business, both in our own operations and in our supply chain
- Take care not to misrepresent efforts to reduce our environmental impact in external communications or marketing materials

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Sustainability team.

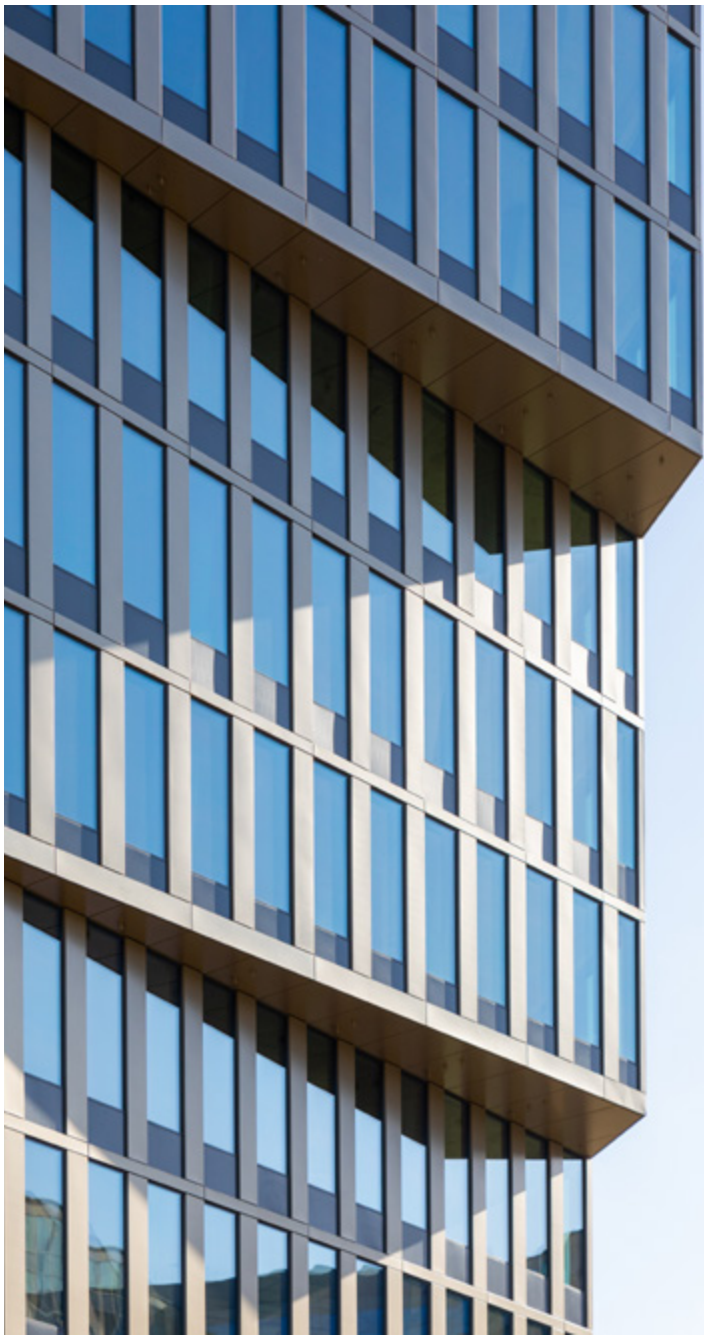
Human rights

We promote and respect all applicable, internationally recognized human rights. We take seriously our responsibility to protect the rights of people both in our own operations and in our value chain. We stand firmly against all forms of modern slavery, including forced labor, debt bondage, human trafficking and child labor.

This means that we:

- Carry out due diligence where relevant, to identify where our business may impact the rights of others, both in our own operations and in our supply chain
- Do not tolerate any form of forced or child labor on our work sites or in our supply chain
- Do not allow any practice that would restrict free movement. This includes requiring workers to pay recruitment fees or to hand over identification documents, passports or work permits as a condition of employment.
- Provide and expect our business partners to provide fair wages that align with national legal or industry standards as a minimum
- Report suspicions of forced labor or other forms of human rights abuse

Remember: Human rights also cover other topics such as environmental responsibility, anti-corruption, and other labor rights. Our principles related to such areas are described in other parts of this Code.



Questions or concerns?

Raise concerns with your HR, Sustainability, or Ethics teams.

04

We Manage our Relationships to Prevent Corruption

- Anti-bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Community investment
- Sponsorship
- Political activities

Anti-bribery and corruption

We are committed to conducting business with a high level of integrity and do not tolerate any form of bribery or corruption. We also ensure that we interact ethically with our stakeholders and third parties, including suppliers, consultants, and government officials.

This means that we:

- Never offer or accept bribes, either directly or indirectly or through third parties acting on our behalf
- Do not offer, promise or give anything of value to influence decision-making to secure ourselves or Skanska an undue advantage, either when interacting with government officials or representatives of companies
- Avoid situations that may give the appearance of bribery, corruption or other inappropriate behavior
- Do not make facilitation payments
- Engage third parties to represent Skanska (intermediaries) only for legitimate business reasons, with services that are properly documented and accounted for

Remember: Stricter bribery controls apply when dealing with public officials and the public sector. You will never face any adverse consequences for refusing to pay bribes, even if it means a loss of business.

What is bribery?

Bribery is the act of offering, promising, giving, accepting or asking for anything of value in return for an unfair or undue advantage. Bribery is generally illegal, unethical, and a breach of trust.

What is corruption?

Corruption is the abuse of entrusted power, often for private gain. It takes many forms, like bribery, embezzlement or fraud, and can occur in both the private and public sectors.

What is a facilitation payment?

It refers to a payment, often small, given to public officials to facilitate or speed up routine actions, such as issuing permits, and is generally considered a form of bribery.

What is "anything of value"?

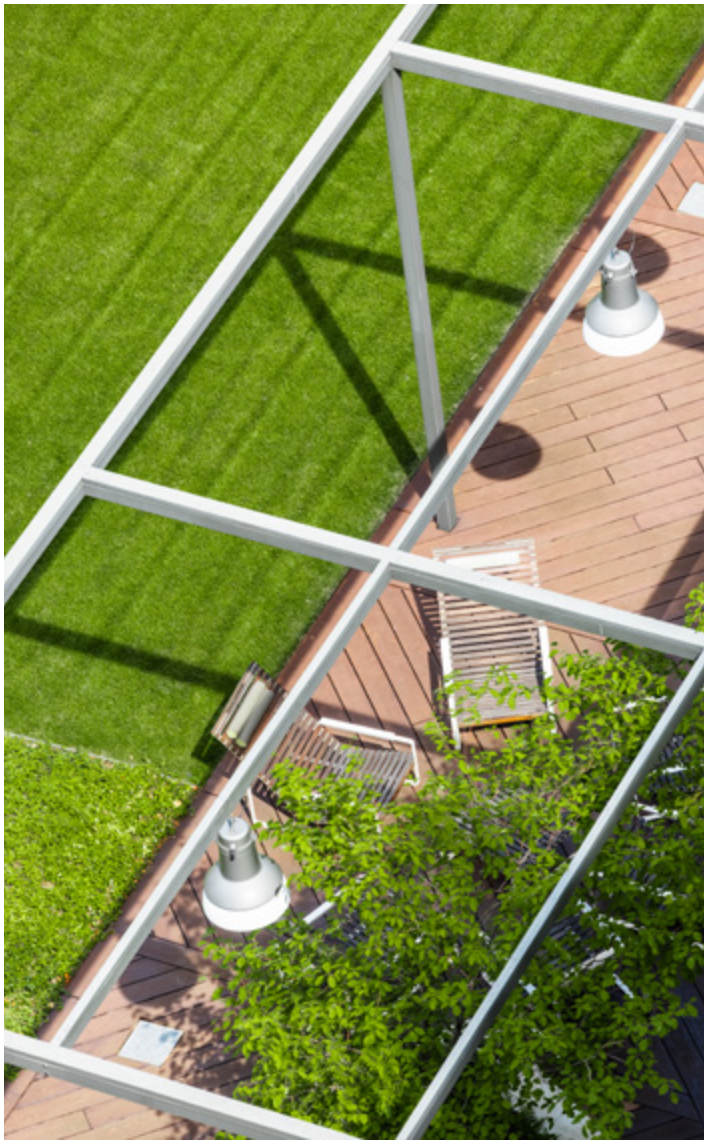
"Anything of value" could be money, gifts, favors, rebates, charitable donations, sponsorship, a job offer or anything else that could be directly or indirectly valuable to the recipient.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Ethics or Legal teams.

Gifts and hospitality

We only give or accept gifts and hospitality that are appropriate and proportionate as part of a legitimate business relationship. We do not give or accept anything that could lead to a conflict of interest or the appearance of bribery.



This means that we:

- Do not offer or accept gifts or hospitality to influence decision making and gain an undue advantage
- Ensure that any gift or hospitality given or received serves a valid business purpose and is openly disclosed, of modest value and allowed by the policies of both Skanska and the other party
- Do not offer or accept gifts in cash or cash equivalents, such as gift cards
- Follow the monetary limits and approval processes of our business unit's gifts and hospitality policy

Remember: Gifts and hospitality of modest value may appear improper when frequent or routine.

What is a gift?

It may be anything of value. Examples could include goods or any physical items, loans, favors and other benefits.

What is hospitality?

Business hospitality includes meals, entertainment (such as sporting events or concerts), accommodation, and travel.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Ethics team.

Conflicts of interest

Conflicts of interest occur whenever an employee's personal interests have the potential to influence their professional judgment or actions. Even the appearance of a conflict of interest can be as damaging as an actual conflict. We must disclose and manage all conflict-of-interest situations properly.

This means that we:

- Avoid situations that may create or appear to create a conflict of interest
- Make business decisions without regard to personal gain
- Transparently disclose potential conflicts of interest according to the rules of our business unit so that they can be managed

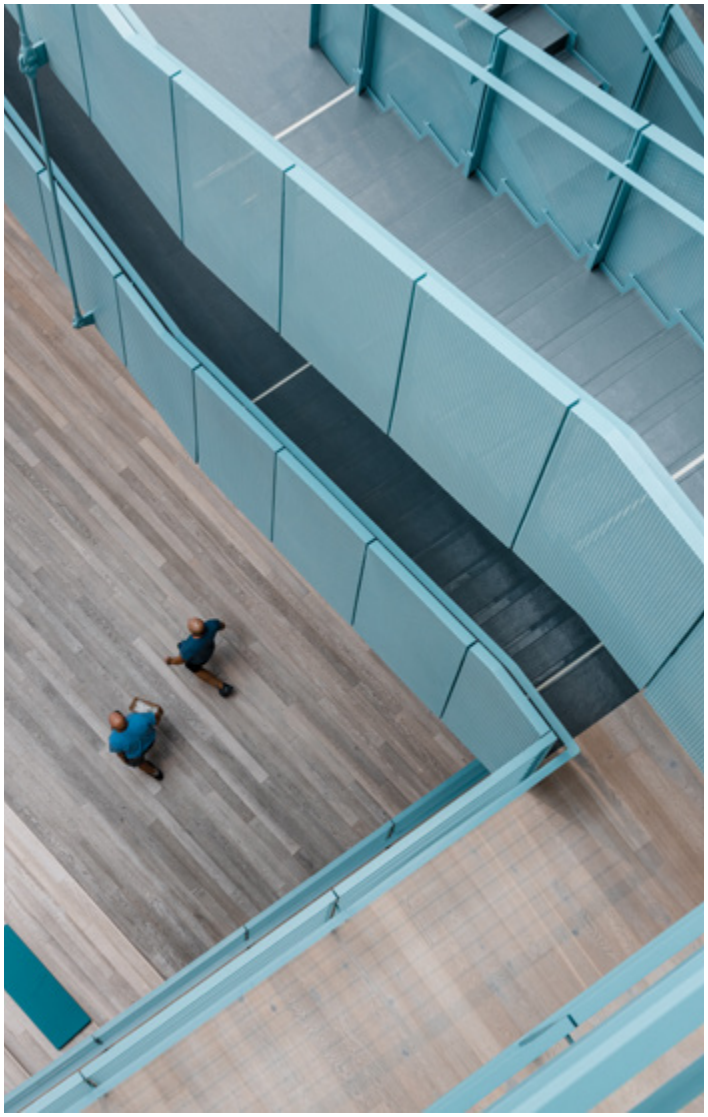
Remember: A conflict of interest may not be a problem in itself – it is how it is managed that makes the difference.

What is a conflict of interest?

Conflicts of interest arise when our private interests, personal relationships or activities outside Skanska influence, or appear to influence, our ability to make objective decisions, which could negatively affect Skanska. Conflicts of interest can develop in the offering, giving or accepting of hospitality and entertainment, gifts, charitable contributions, political contributions or sponsorships, and in cases where our close relationships could interfere with our responsibilities to Skanska. These conflicts may also arise when we are involved with a business that competes with or engages in business with Skanska.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Ethics or Legal teams.



Community investment

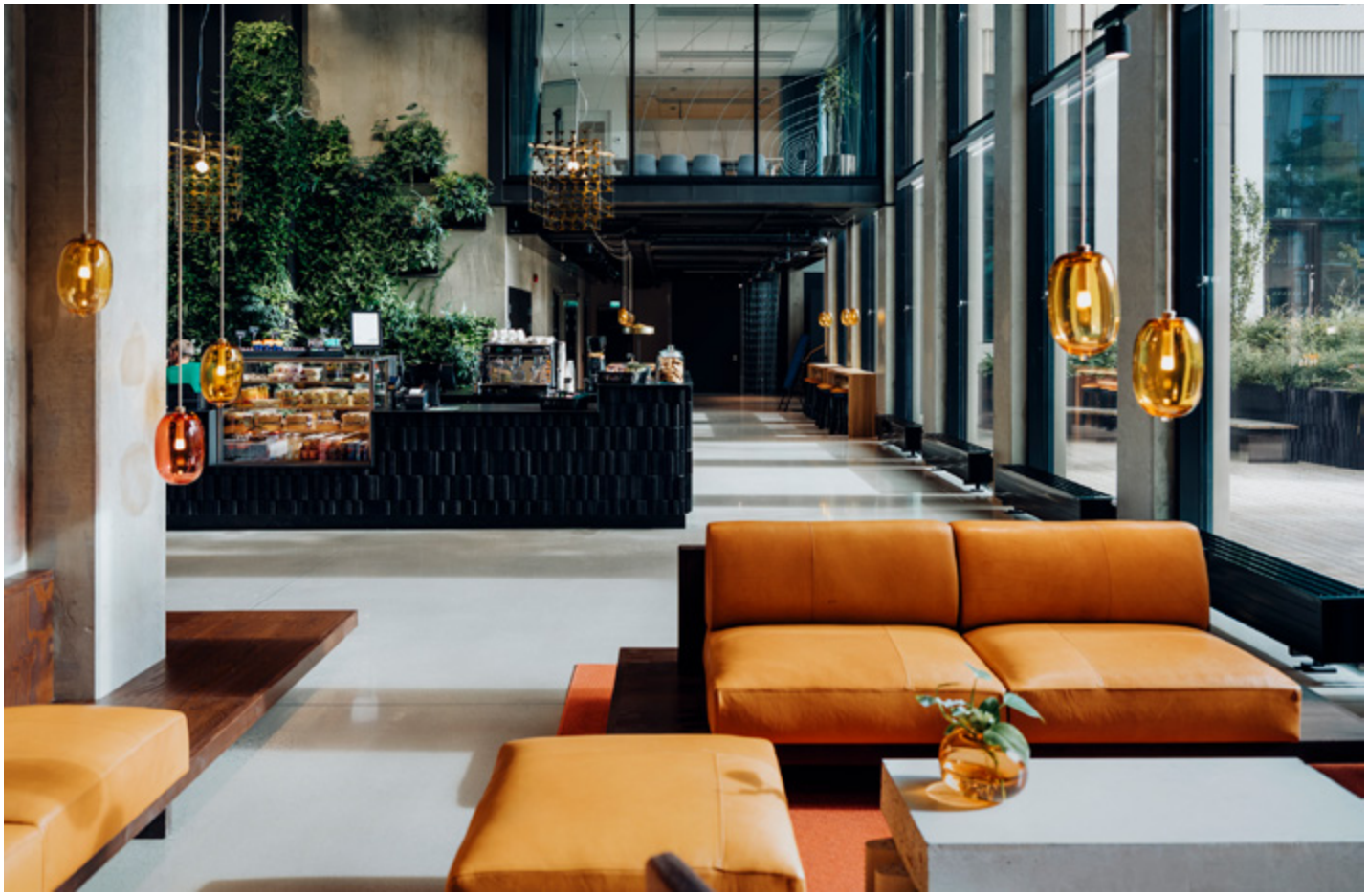
We invest in the communities where we operate to strengthen our stakeholder relationships and support our culture of conducting business in a responsible and sustainable way.

This means that we:

- Engage with communities to understand their needs and to minimize project impacts
- Never offer or commit to do something that establishes an undue expectation on any party
- Follow our business unit's procedures for the approval of community investments to avoid any risks, such as the appearance of bribery

Questions or concerns?

If you have routine queries, your manager is the place to start. For questions about appropriate activities, contact your Sustainability team. For concerns about potential conflicts of interest, speak to your Ethics team.



Sponsorship

We select sponsoring activities that focus on opportunities that are related to our business and align with our values and strategy. We make sure that we approach any sponsorship arrangements with integrity and transparency.

This means that we:

- Are careful when selecting sponsorship activities, ensuring the sponsored party and Skanska have similar values and the activity is related to our business
- Always consider the risk of bribery and never use sponsorship to improperly influence our business processes
- Obtain senior-level approval in accordance with the limits of authority set by our business unit before agreeing to a sponsorship on our behalf

What is sponsorship?

A sponsorship is a transaction made with the expectation of a commercial benefit. When we make a payment, in cash or in kind, to associate our brand with an activity or organization, that is considered a sponsorship.

Questions or concerns?

If you have routine queries, your manager is the place to start. For commercial questions, contact your Sustainability team. For concerns about potential conflicts of interest, speak to your Ethics team.

Political activities

We welcome interest in our projects and initiatives from politicians of all parties and engage with them in a transparent, responsible, and ethical manner. We aim to provide policymakers with accurate and relevant information about our industry so they can make informed decisions. When engaging in lobbying or making political contributions, we always follow applicable laws.

This means that we:

- Do not make excessive or inappropriate political contributions on behalf of Skanska and ensure that any contribution fully complies with our Anti-Corruption Policy and local legal requirements
- Always obtain prior, documented approval in line with our local authorization process before making any political contributions on Skanska's behalf
- Ensure that all lobbying activities are legitimate, transparent, accurately recorded, and do not negatively affect Skanska or our brand
- Where applicable, we follow the established protocols for engaging a lobbyist and verify that lobbyists act in accordance with our standards
- Always clarify whether we are acting in our personal capacity or on behalf of Skanska when engaging in political activity. Personal political views or actions must never be portrayed as those of Skanska.

Questions or concerns?

If you have routine queries, your manager is the place to start. For questions about appropriate activities, contact your Communications team. For concerns about potential conflicts of interest, speak to your Ethics team.

What is considered a political contribution?

It is any kind of contribution made to support political organizations, parties, candidates, or a position on a referendum. It may be made in cash or through services, materials, employee time, or the use of company facilities.

What is lobbying?

Lobbying describes activities aimed at influencing public policy decisions by providing information or expressing opinions to elected or appointed officials. Some countries regulate lobbying.

05

We Safeguard Information and Assets

- Data protection
- Confidential information
- Inside information and market abuse
- Company and stakeholder assets
- Information security

Data protection

We respect the right to privacy and take all appropriate precautions to protect the personal data entrusted to us. We process personal data responsibly and in accordance with data protection legislation.

This means that we:

- Ensure that our use of personal data complies with applicable laws. This includes activities such as collecting, recording, structuring, storing, retrieving, reviewing, disclosing, transferring, erasing or destroying data, or a combination of these.
- Ensure that those entrusting us with their personal data understand why we're using it and what we plan to do with it
- Do not retain personal data longer than is necessary to fulfill the specific purpose for which it was collected, and handle the data confidentially and securely
- Understand that personal data should be accessed only by those who are authorized to see it and have a legitimate reason to do so

What is personal data?

This is information relating to a living person, or that can be used to identify them, either directly or indirectly. It could include contact information (such as a phone number or email address), names of family members, healthcare information, passport or identity numbers, IP addresses, account numbers, or photos.

Questions or concerns?

Raise any queries about personal data with your Data Protection Manager or Legal team.

Confidential information

We keep our ideas, processes and other business information confidential so that we remain competitive and protect the interests of our stakeholders. Some of our confidential information consists of a type of asset known as intellectual property.

This means that we:

- Keep confidential all non-public information, whether it belongs to Skanska, another business or an individual
- Take all reasonable measures to protect confidential information from unauthorized disclosure, misuse, loss or theft
- Interact carefully with competitors so as not to disclose trade secrets or risk anti-competitive practices
- Do not act on confidential information that we receive by mistake. Instead, we contact the sender and report the incident to a manager immediately.
- Do not ask new colleagues for confidential information from their previous employers
- Maintain our confidentiality obligations upon leaving the ompany and do not take, use or exploit confidential Skanska information

What is confidential information?

Confidential information refers to non-public information such as business or strategic plans, marketing plans, financial information, project details and designs, customer and partner data, intellectual property and other information that is not known outside of our organization.

What is intellectual property?

It refers to creations of the mind over which a business or individual can claim ownership. Examples of these creations include brands, patents, trademarks, trade secrets, inventions and copyrighted materials.

Questions or concerns?

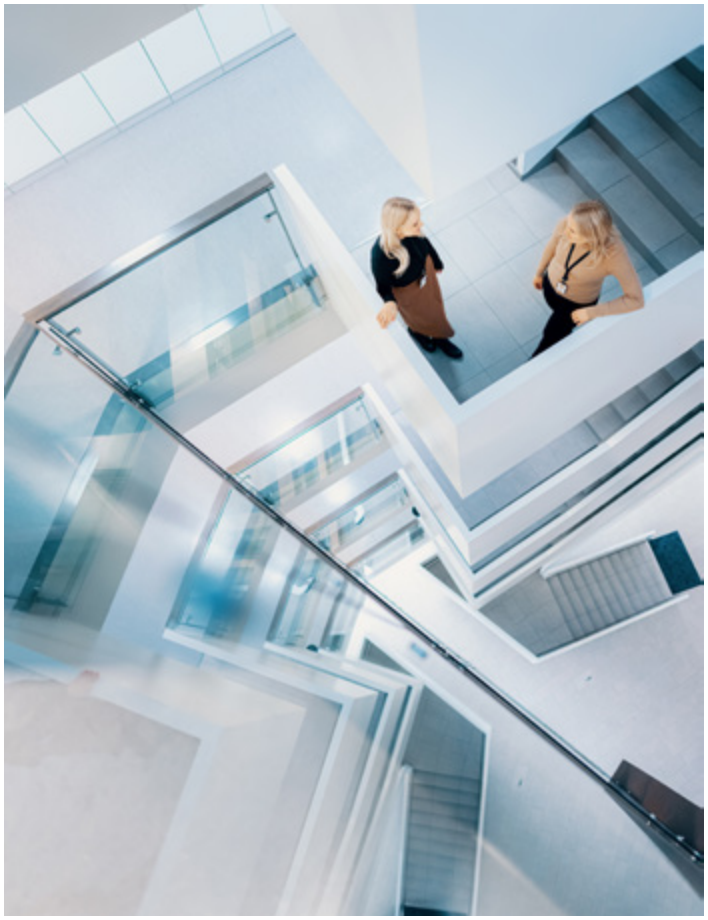
If you have routine queries, your manager is the place to start. For more complex matters, contact your Legal or Ethics team.

Inside information and market abuse

We comply with regulations regarding insider trading and the fair disclosure of information. We do not use inside information to make trading decisions, nor do we encourage others to do so. This applies to trading in Skanska's financial instruments (such as shares) or those of other companies.

This means that we:

- Do not trade in financial instruments of a company, including Skanska, when we have inside information about that company
- Never disclose confidential or non-public information to anyone who does not have a legitimate need and a right to know
- Do not take part in spreading false or misleading information or do anything to manipulate the price of publicly traded financial instruments
- Communicate any information that could affect our share price only through Skanska's Core Corporate Function Communications or Group Function Investor Relations teams



What is inside information?

This is information about a company that, if made public, is likely to have a significant effect on the value of shares or other financial instruments. Examples of possible inside information include financial results, material divestments, acquisitions, or projects.

What is insider trading and market abuse?

Insider trading refers to buying or selling financial instruments in a company while having inside information about that company. Making such trades is illegal, whether you are making the trade yourself or sharing the information with someone else who may trade using the information.

Market abuse includes unlawful disclosure of inside information and market manipulation.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Legal team.

Company and stakeholder assets

We use our company assets and those of our stakeholders responsibly. Assets include raw materials, money, products, real estate, equipment, computers, mobile devices, and data.

This means that we:

- Protect our assets and those of our customers and stakeholders from damage, theft, loss and misuse
- Refer to business unit policies before making personal use of company assets
- Do not use company assets for personal gain, such as for a side business
- Remove waste or surplus material only in accordance with our business unit's policies

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your workplace or site manager.

Information security

We safeguard and use our Information Technology (IT) assets properly. We also promote the appropriate use of our information systems to help prevent loss or theft of our assets. We foster a culture of cybersecurity and remain vigilant against all forms of cyber threats.

This means that we:

- Do not use our computers and electronic communications systems for inappropriate communication, such as fraudulent, discriminatory, offensive or harassing activity
- Are careful when opening attachments or links in emails, when visiting websites that are unrelated to our business or are from an unknown source, and when using external media (such as USB drives)
- Stay alert and avoid any suspicious activities, such as phishing and social engineering attacks
- Are extra careful when handling company information outside our workplace, and ensure it is stored only in approved Skanska technical solutions
- Follow the acceptable use terms and conditions for IT equipment
- Ensure the responsible and ethical use of artificial intelligence (AI) as a work assistant and use only authorized AI systems when handling Skanska information.

What are IT assets?

IT assets include both physical property, such as computers, phones and printers, and electronic media, such as email, network, and internet access and collaboration tools.

Questions or concerns?

Report security incidents or any other issues to your IT team.

06

We Promote Fair and Transparent Business

- Fair competition
- Relationships with business partners
- Trade sanctions and money laundering
- Records, reporting and fraud
- External communications

Fair competition

Competition and antitrust laws protect the marketplace by promoting free and fair competition. We are committed to fair competition and do not engage in anti-competitive behavior.

This means that we:

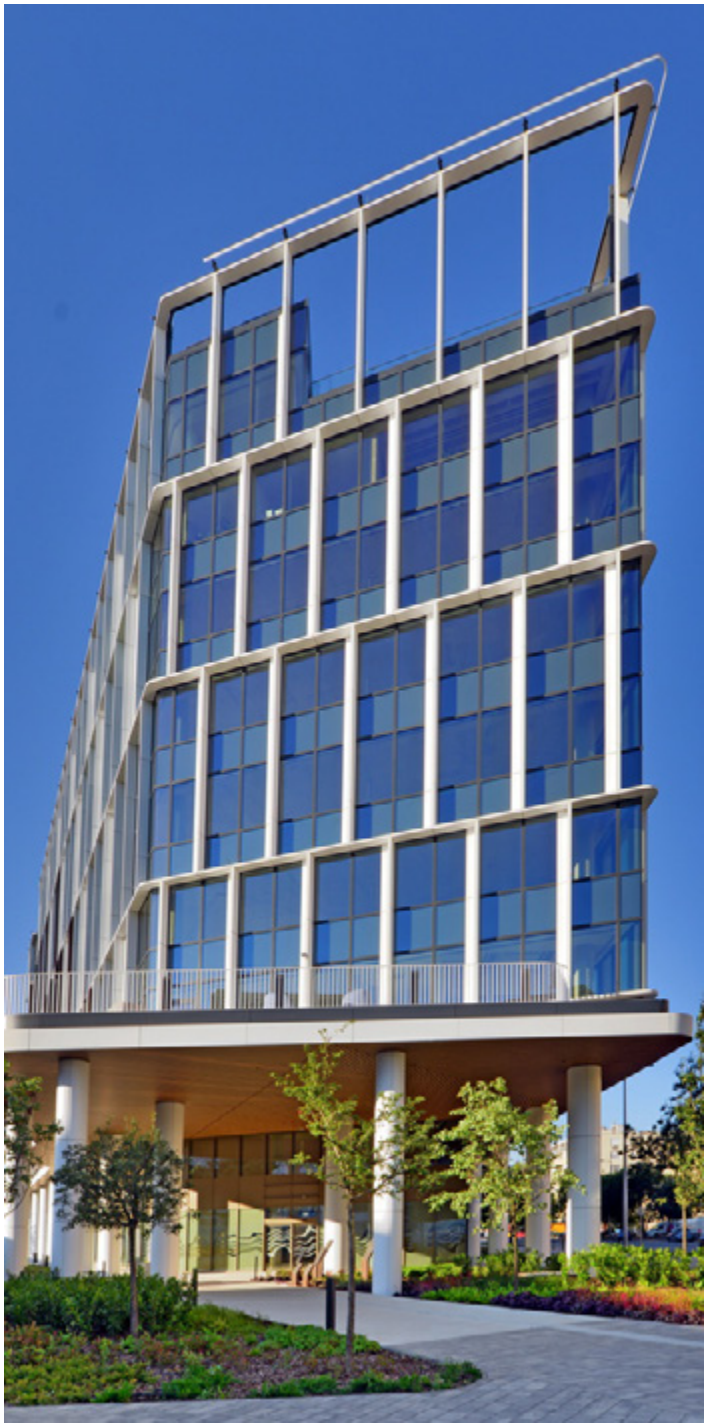
- Do not tolerate violations of competition and antitrust laws
- Do not make arrangements with competitors to restrict competition (either directly or indirectly through a third party)
- Do not discuss or exchange commercially sensitive information with competitors

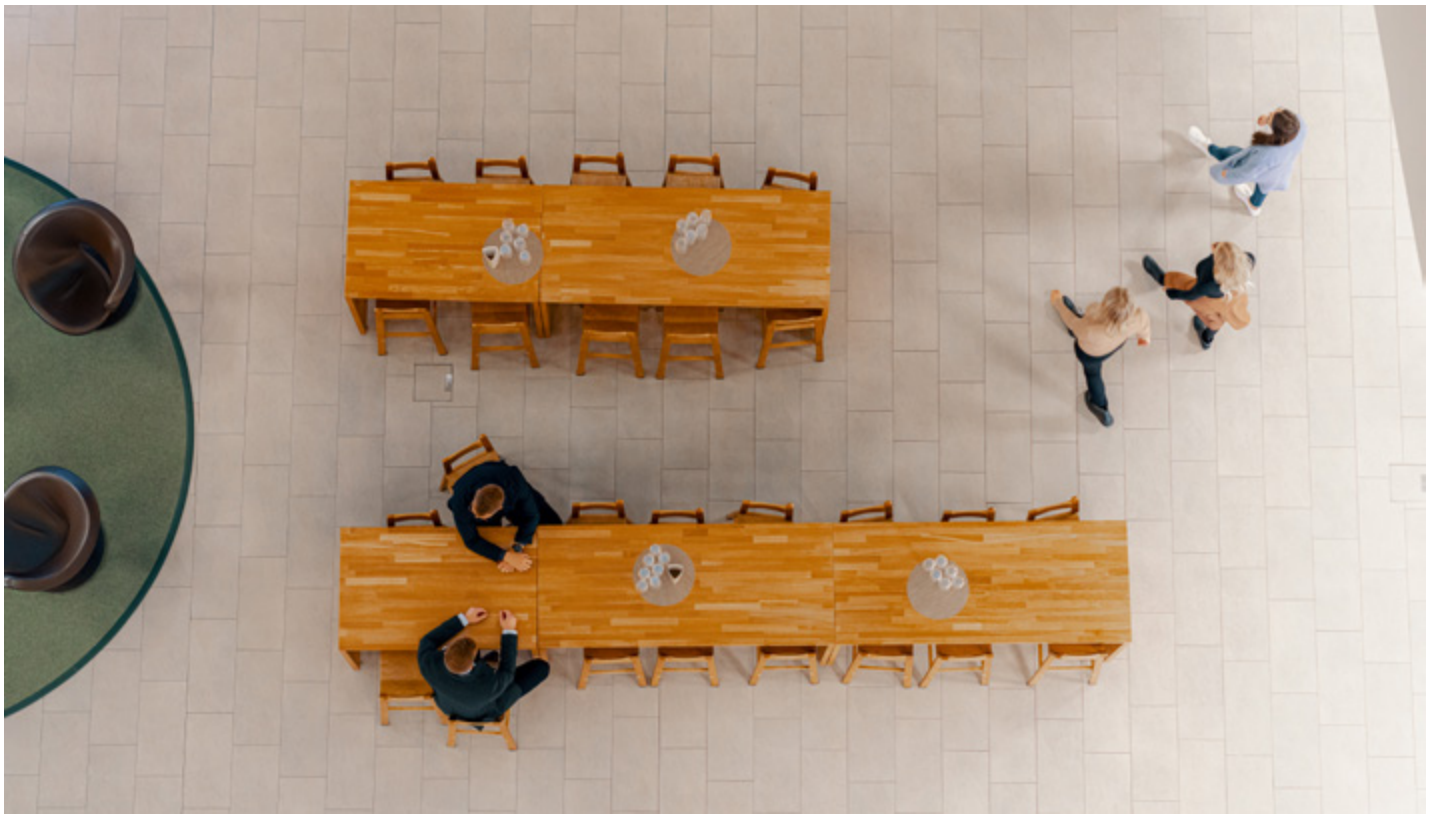
What is anti-competitive behavior?

Anti-competitive behavior means business practices that limit or prevent fair competition in the market. This can include agreements or understandings between companies not to compete in certain ways. Examples include competitors fixing prices, rigging bids, or dividing markets or customers between themselves. It can also include monopolization or the abuse of a dominant position.

Questions or concerns?

Consult your Legal team for guidance.





Relationships with business partners

We are committed to conducting business in a responsible and sustainable way. We have constructive and long-term relationships with business partners whose values align with our own. By business partners, we mean the organizations we collaborate with across our value chain, such as buyers and sellers of land, suppliers, subcontractors, consultants, joint venture partners, customers, and tenants.

This means that we:

- Act with integrity and fairness in our dealings with our business partners and expect them to do the same
- Conduct appropriate due diligence, including sustainability-related checks, on our business partners
- Ensure that our Supplier Code is part of our contractual agreements with relevant business partners
- Actively listen to our customers to understand their needs and expectations, working with them in an innovative and proactive manner

Questions or concerns?

Consult with your manager if you have concerns about a business partner's ethical conduct. For more complex matters, contact your Procurement or Ethics team.

Trade sanctions and money laundering

We adhere to applicable laws and regulations governing trade sanctions and anti-money laundering. We conduct business with reputable customers and business partners involved in legitimate business activities with funds derived from legitimate sources.

This means that we:

- Conduct appropriate, ongoing due diligence to understand the business and background of customers and business partners. This includes identifying the ultimate beneficial owner of the business.
- Follow appropriate sanctions processes to ensure we do not engage in any transaction with sanctioned countries, regions, companies, individuals, goods or services
- Never engage in a business transaction if we suspect that it involves funds derived from illegal activity

What are trade sanctions?

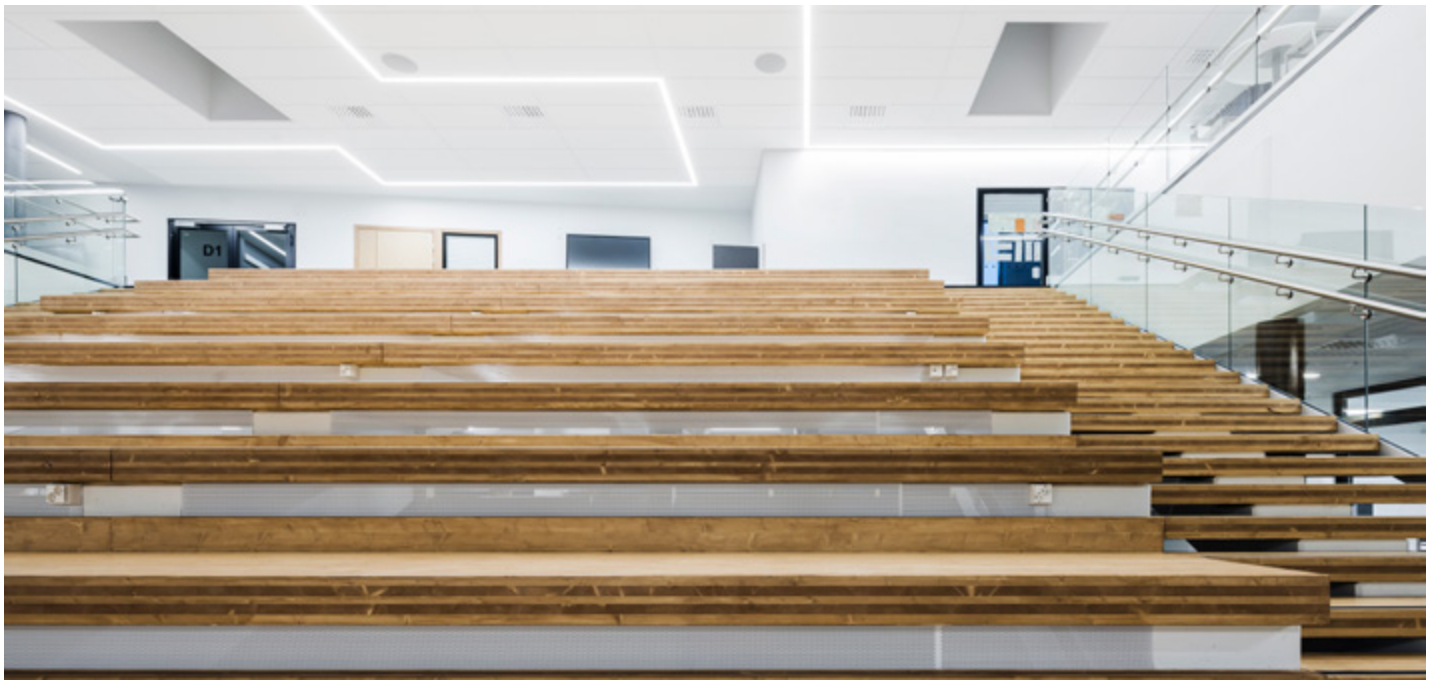
Trade sanctions are legal instruments used by governments and multinational bodies to influence foreign policy either by prohibiting business dealings with certain countries, individuals and entities, or by restricting the import or export of certain products or services.

What is money laundering?

Money laundering is the act of disguising the illegal source of money or assets to make them appear legitimate.

Questions or concerns?

Consult your Ethics or Legal teams for guidance.



Records, reporting and fraud

Doing business with integrity and transparency requires maintaining proper records. We record and report our business information fully and accurately. We do not tolerate any form of fraud or false claims, and comply with all applicable reporting requirements.

This means that we:

- Maintain accurate and complete records, ensuring that they are not false or misleading. This applies to both financial and non-financial records, such as time sheets, test results, or data related to quality, safety, or environmental impacts.
- Comply with applicable reporting requirements, including verification and auditing where applicable
- Never destroy or alter any records that must be kept for legal or contractual purposes, or that may be required for any subsequent audits or investigations
- Verify that our expense reports include only items that we are entitled to claim and that have been properly incurred while carrying out Skanska business
- Record the complete and accurate nature of all financial transactions in accordance with locally accepted accounting principles
- Do not engage in unlawful tax schemes

What is fraud?

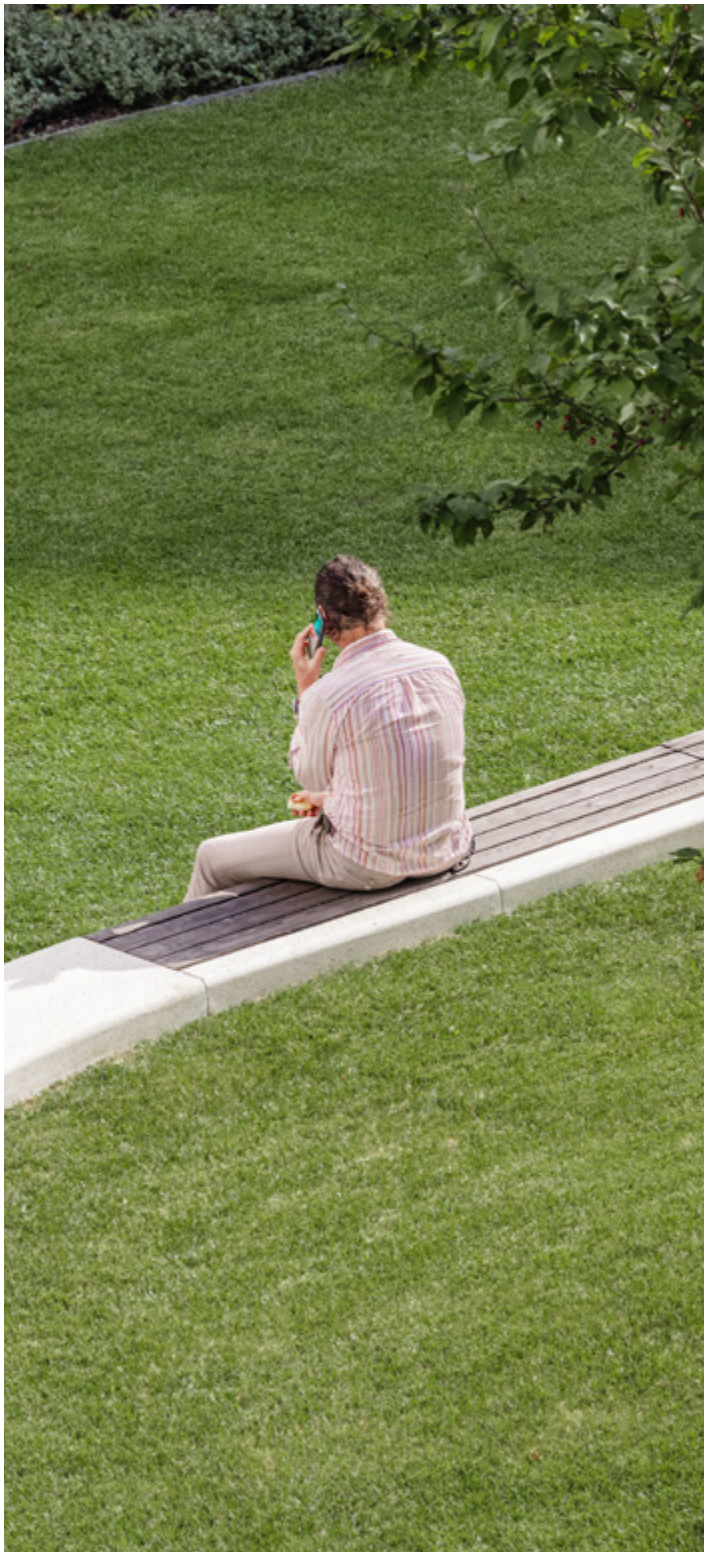
Fraud involves some form of deception, usually to obtain money, property or services, directly or indirectly. Making false claims is a type of fraud and includes misrepresenting the costs of providing materials or services, intentionally concealing defects or fabricating evidence.

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex accounting matters, contact your Finance team. Speak to your Ethics or Legal teams for fraud-related questions.

External communications

Communication is a key component of our business, and the way we communicate affects our reputation with our stakeholders and the public. We follow the formal communication rules for Swedish-listed companies.



This means that we:

- Respond in a professional manner and provide timely, accurate, relevant, reliable information when communicating with external parties
- Speak to the media on behalf of Skanska only when we are authorized to do so, and refer media requests for information to the designated spokespeople of our business units
- Always clarify whether we are speaking on behalf of Skanska or ourselves as individuals when communicating externally
- Protect the Skanska brand and remain respectful of others when using our personal social media accounts
- Refer media and capital market enquiries regarding Skanska shares or finances to Core Corporate Function Communications or Group Function Investor Relations

Questions or concerns?

If you have routine queries, your manager is the place to start. For more complex matters, contact your Communications team.

07

We Raise Concerns

- Our speak-up culture and no-retaliation policy
- Reporting a concern
- Contact details

Our speak-up culture and no-retaliation policy

We promote a "speak-up" culture at Skanska that encourages us to raise our questions and concerns without the fear of retaliation.

Our No-Retaliation policy

We want everyone to feel comfortable raising concerns without worrying about a negative reaction. Skanska does not tolerate any form of retaliation against an employee for making a good-faith report of suspected misconduct. "Good faith" means that, to the best of your knowledge and belief, everything you report is true and that you report everything you know. Retaliation can take many forms; some examples of retaliation in the workplace are termination, demotion, poor performance review, change of job duties, transfer of position or location, or reduced salary.

Any employee who engages in retaliation will be subject to disciplinary action. If you know or suspect that you or someone else has experienced retaliation, you should report it as suspected misconduct.

This means that we:

- Speak our minds respectfully without fear of retaliation or embarrassment
- Stand up for colleagues who may be experiencing retaliation, bullying, harassment or other conduct that does not align with our company values
- Avoid any conduct that might be retaliatory, being careful not to treat someone who has reported misconduct any differently
- Report any suspected retaliation as potential misconduct

This means that our managers must:

- Create a work environment that encourages an open dialogue
- Ensure that reports of suspected or known misconduct are adequately addressed
- Handle all concerns in a fair and unbiased manner

Reporting a concern

We do business with integrity and transparency. A key part of this is encouraging each other to report conduct we know or suspect to be illegal, unethical or otherwise in violation of our Code or policies. We depend on these reports to protect our business and our reputation.

This means that we are all responsible for reporting suspected or known misconduct at the earliest possible stage.

How to report a concern

Our internal options

It is generally best to talk to your manager (or, for example, if that's not possible or appropriate – your manager's manager) about your concern. They will be the best place to start with routine concerns.

You can also speak with your business unit's HR or Legal team. HR is the best place for matters concerning your employment.

If you want to report suspected misconduct or ethical issues, contact your business unit's Ethics Committee. See contact details below.

Our hotline

If you feel uncomfortable reporting misconduct in person, you can do so through our Code of Conduct Hotline, and may choose to do so anonymously, if preferred. The Hotline is operated independently and is available by telephone, online, and via the SpeakUp app.

Investigations

We will investigate all reported misconduct promptly and take appropriate action based on the findings of our investigation. Any information provided during investigations will be kept confidential unless disclosure is required by law or administrative decisions.

Contact details

To make a confidential report to the Group or a business unit Ethics Committee, email:	
Group	ethics.committee@skanska.se
Central Europe	komitet.ds.etyki@skanska.pl
Commercial Development Europe	cde.ethics.committee@skanska.pl
Commercial Development Nordic	Contact the Ethics Committee for the relevant Construction business unit. Denmark report to the Swedish Ethics Committee.
Commercial Development USA	usaethicscommittee@skanska.com
Finland	eettinenkomitea@skanska.fi
Norway	etiskrad@skanska.no
Residential Development Europe	rde.ethics@skanska.cz / rde.ethics@skanska.pl
Sweden	etiska.radet@skanska.se
UK	ethics.committee@skanska.co.uk
USA Building	usaethicscommittee@skanska.com
USA Civil	usaethicscommittee@skanska.com
USA Inc	usaethicscommittee@skanska.com

To make a report through our external Hotline you have several options to use:

The Skanska organization code is 109708. Please enter this if you are prompted to do so.

Report online

Use this QR code to connect directly to the Skanska SpeakUp reporting page, or click or paste https://skanska.speakup.report/skanska into your browser.

Report via SpeakUp app

If you have a Skanska phone, the SpeakUp app is preinstalled. If not, you can download it using this QR code or find it in your app store.

From inside the app, use this QR code for online reporting, or the organization code 109708 to connect to Skanska's SpeakUp reporting page.

Report by phone

Dial one of the phone numbers listed below. Enter the organization code: 109708

Czechia	800 050 833	Freephone
Denmark	+45 43 31 09 61	Call charged at local rate
Finland	0800 392912	Freephone
Hungary	06 809 845 89	Freephone
Norway	+47 24 14 06 01	Call charged at local rate
Poland	800012953	Freephone
Romania	0800 400653	Freephone
Slovakia	0800 113 418	Freephone
Sweden	020 160 4703	Freephone
United Kingdom	0800 022 4118	Freephone
United States	+1 (669) 288 7154 OR +1-888-808-5409	Call charged at local rate Toll-Free

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