SKANSKA

Our Supplier Code of Conduct

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Our Supplier Relationships

At Skanska, we base relationships with suppliers on mutual trust and common values. The Skanska Code of Conduct (our Code) outlines the expectations we have for our directors and employees. This Skanska Supplier Code of Conduct (our Supplier Code) contains relevant portions of our Code that apply to all our suppliers. We welcome constructive dialogue with you about our Supplier Code and doing business together in general.

The Foundation of our Supplier Code

We conduct business responsibly and sustainably, and we require our suppliers to do the same. We want to work with our suppliers to make improvements with respect to social, ethical and environmental performance.

Our Code and our Supplier Code are based on our Skanska Values. These values guide us and are integral to our success.

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 unsafe, we refuse to be bystanders. This applies to the environment and climate change too. We advocate for sustainable solutions and operate in this spirit.

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 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.

This Supplier Code also includes requirements that are based on internationally recognized standards to which Skanska is committed, such as the International Bill of Human Rights, the International Labour Organization (ILO) Core Conventions, the United Nations (UN) Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We have also signed the United Nations (UN) Global Compact and have agreed to follow its Ten Principles reflecting human rights, labor, the environment, and anti-corruption.

Together with our partners, we are building for a better society, creating innovative and sustainable solutions. Sustainability is an enabler for our business strategy – a key component for success for us and our customers.

Who Must Follow this Code?

This Supplier Code applies to any supplier that is under a contractual agreement with Skanska.

It applies not only to the supplier as an organization but also to the supplier's employees who are assigned to work with Skanska. Every supplier must ensure that the values and principles set out in our Supplier Code are adopted throughout its own supply chain when working with Skanska.

Who is a supplier?

A supplier includes any organization or person that supplies goods or services. The term also includes any subcontractors, service providers, consultants, intermediaries, and agents.

Compliance with our Supplier Code

Our Supplier Code requires that you comply with all applicable laws.

Where the requirements in the Supplier Code are stricter than local laws, the requirements of this Supplier Code must be applied. In the event of actual or potential contradictions between the Supplier Code and applicable laws and regulations, the supplier must notify the designated Skanska manager.

Monitoring and Consequences of Violations

Skanska reserves the right to monitor and audit suppliers to ensure compliance with our Supplier Code.

Such monitoring can include, for example, self-assessments, surveys, site visits, and audits of suppliers and subcontractors. These may be conducted by Skanska representatives or a third party. All suppliers must cooperate by providing relevant information that we request and making individuals accessible so we can conduct a meaningful audit.

Similarly, you should evaluate your own supply chain to ensure compliance with our Supplier Code and conduct audits of your supply chain upon our request. You should address any misconduct promptly, at no cost to us or our customers.

The auditing rights and requirements do not release or limit a supplier from its obligations or responsibilities under this Supplier Code.

When evaluating a supplier's compliance with this Supplier Code, we consider the scope and relevance of the Supplier Code requirements in relation to the supplier's business and associated risks.

Violations of the Supplier Code can have a serious impact on our business relationship. Skanska reserves the right to take appropriate measures against any supplier who does not comply with this Supplier Code. Where there are continuous deviations or material breaches, such measures may include termination of the business relationship.

Reporting Misconduct and No-Retaliation

A strong ethical culture depends on an environment in which employees, suppliers and other stakeholders feel free to report misconduct. Such misconduct may include actual or suspected illegal or unethical conduct, or any other conduct that violates this Supplier Code.

This Supplier Code requires that all suppliers and their employees and associates throughout their own supply chains report to us suspected or known misconduct.

We review all reports of suspected or known misconduct and investigate as appropriate. When misconduct is confirmed, we take appropriate action.

You should make a report by contacting the relevant Skanska manager or by contacting the Human Resources (HR) team, the Legal team or the local Ethics Committees. You can also use the Skanska Code of Conduct Hotline to make these reports anonymously. See contact details at the end of this Supplier Code.

We do not retaliate against anyone for reporting misconduct in good faith, nor do we tolerate retaliation by our suppliers. We consider retaliation a serious form of misconduct.

Human Rights and Fair Working Conditions

We promote and respect all applicable, internationally recognized human rights. We take seriously our responsibility to protect the human rights of everyone 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.

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.

This means that our suppliers:

- Carry out due diligence, where relevant, to identify where their business may impact human rights
- Have zero tolerance for any form of human trafficking, or child, forced, or compulsory labor, including practices such as unlawful or illegitimate withholding of wages
- Do not allow any practice that would restrict the free movement of employees, including, for example, requiring workers to pay recruitment fees or requiring employees to hand over identification documents, passports or work permits as a condition of employment
- Report suspicions of forced labor or other forms of human rights abuse using any of our reporting methods
- Ensure that working conditions, hours, wages, and benefits comply with applicable national and local laws and relevant ILO conventions
- Recognize and respect employees' right to freedom of association and collective bargaining
- Recognize the special needs of employees under the age of 18, and the duty of care towards them

Health, Safety and Well-being

We care about the health, safety and well-being of everyone working with Skanska. The safety of our employees and subcontractors is our highest priority. That is why 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 our suppliers:

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

Respect 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. We do not tolerate any form of unlawful discrimination, workplace harassment or bullying.

This means that our suppliers:

- Embrace diversity and promote an inclusive culture
- Provide equal treatment and opportunities for employees and do not discriminate based on background or personal characteristics, such as ethnicity, gender, sexual orientation, disability, and more
- Do not tolerate workplace discrimination, bullying, harassment (including sexual harassment) or other disrespectful conduct

Climate and Environment

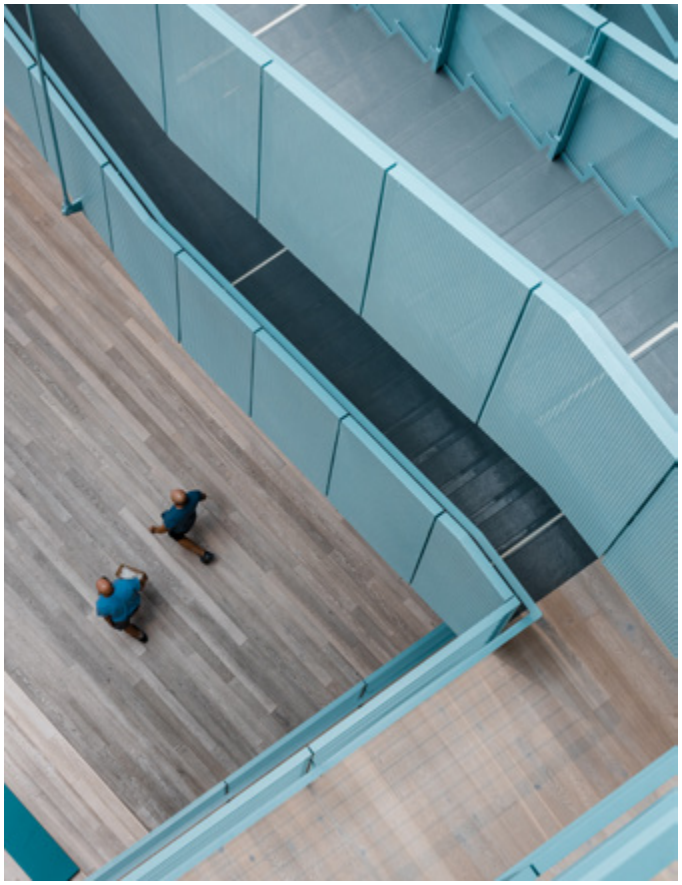
We are committed to our goal of transitioning to low-carbon construction across all our projects and ultimately achieving net-zero carbon emissions by 2045 in our own operations and our value chain. We are also mindful that our industry affects the local environment, both where we operate and across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

This means that our suppliers:

- Conduct operations in an environmentally responsible manner and in accordance with applicable environmental laws
- Carry out due diligence where relevant, to identify the environmental impacts of their business
- Contribute (where relevant) to Skanska's net zero target by performing activities that aim at reducing their climate impact
- Comply with standards required by Skanska's environmental management systems

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 our suppliers:

- Conduct business with integrity and do not tolerate any form of bribery or corruption
- Never request, accept, pay, offer or authorize bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a Skanska employee or customer, a government official (including foreign government officials) or any other individual or entity
- Do not offer or make facilitation payments, nor do they permit others to offer or make such payments on their behalf

Gifts and Hospitality

We only give or accept gifts and hospitality that are appropriate and in proportion to a legitimate business relationship. We don't give or accept anything that could lead to a conflict of interest or the appearance of bribery.

This means that our suppliers:

- Do not offer or accept gifts or hospitality that may improperly influence – or create the appearance of improperly influencing – their business decisions or those of Skanska, its customers or others
- Respect and observe the gifts and hospitality policy of the Skanska unit with which they are working
- Report to Skanska if a Skanska employee requests any type of gift, hospitality or personal service for free or at less than fair market value

Conflicts of Interest

When acting as a representative of an employer or other party, we all are responsible for making decisions in the best interest of that employer or party without regard for personal gain. At Skanska, we do our best to operate so that conflicts of interests are actively avoided, and we require our supply chain to do the same.

This means that our suppliers:

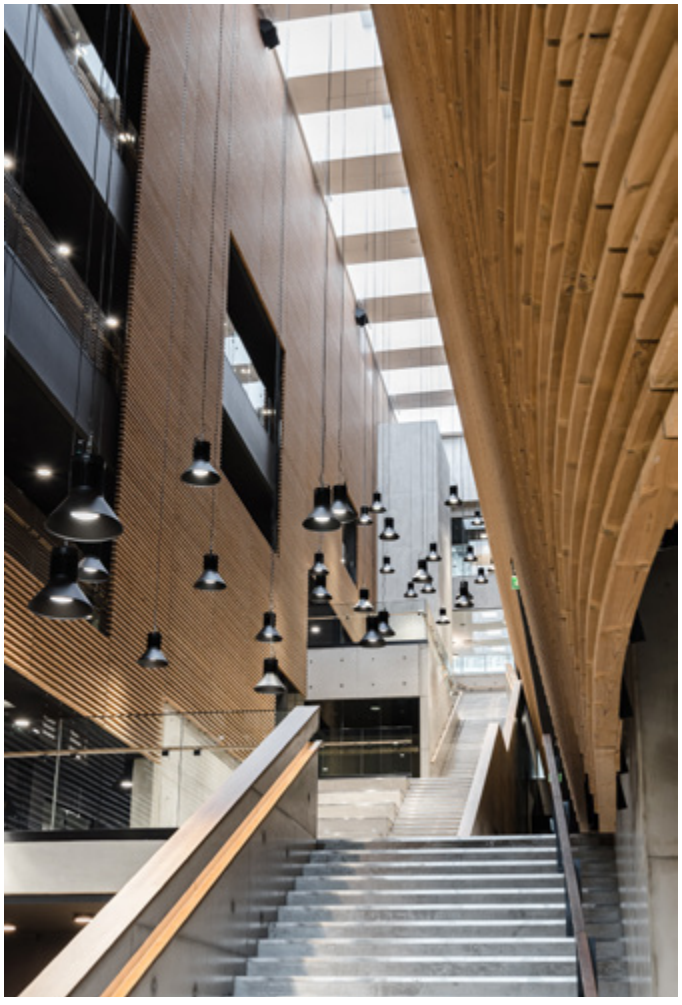
- Avoid situations in their work with Skanska that may present a conflict of interest or the appearance of one
- Notify Skanska if they become aware of a possible conflict of interest, whether real or apparent, in their work with Skanska. This would include, for example, if a supplier's employee has a personal relationship with a Skanska employee who is in the position to make decisions that may benefit the supplier's business

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 applicable data protection legislation.

This means that our suppliers:

- Ensure that all uses of personal data take place in accordance with applicable laws and regulations. This includes activities such as collecting, recording, structuring, storing, retrieving, reviewing, disclosing, transferring, erasing or destroying data, or a combination of these.
- Protect personal data in their care by taking appropriate technical and organizational security measures
- Immediately report to Skanska any actual or possible loss or breach of Skanska data



Confidential Information

We respect confidential information relating to Skanska and our stakeholders, and we 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.

Our intellectual property includes brands, patents, trademarks, trade secrets, inventions and copyrighted material and some types of intellectual property are also confidential information.

This means that our suppliers:

- Protect confidential information entrusted to them by Skanska, our customers and others from unauthorized disclosure or misuse
- Do not act on confidential information received in error, whether it has come from Skanska, our customers or others. If this happens, they contact the sender and disclose the situation to Skanska.
- Respect the intellectual property of Skanska and others

Protection of Assets

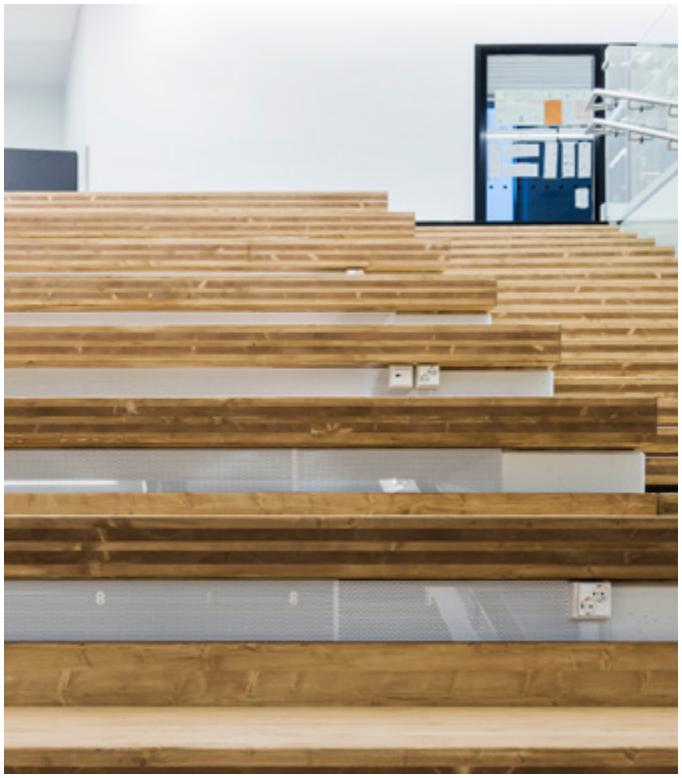
We use our company assets and those of our stakeholders responsibly, protecting them from damage, theft, loss and misuse. Our assets include raw materials, money, products, real estate, equipment, computers, mobile devices, electronic media and data.

This means that our suppliers:

- Respect the assets of Skanska and its stakeholders
- Use assets only as authorized to do so, whether they belong to Skanska or others
- Do not tolerate the theft of assets
- Where relevant, protect Skanska's assets from cyber threats and other unauthorized use by taking appropriate technical and organizational security measures

Fair Competition

Competition and antitrust laws protect the marketplace by promoting free and fair competition. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition law or related regulations.



This means that our suppliers:

- Do not engage in anti-competitive behavior or in any conduct that would violate competition or antitrust laws
- 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
- Do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers, or price fixing

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 our suppliers:

- Ensure their business is conducted in compliance with any applicable trade sanctions or anti-money laundering rules
- Respect that Skanska needs to know its business partners and are transparent about the identity of their ultimate beneficial owners or the origins of the products
- Respect and observe that Skanska is vigilant in watching for external parties who may be on a sanctions list, or who may have a related company in a country subject to sanctions, or may be involved in money laundering

Records, Reporting and Fraud

Doing business with integrity and transparency requires properly maintaining 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 our suppliers:

- Do not tolerate any form of fraud or false claims, comply with all applicable reporting requirements, and do not engage in unlawful tax schemes
- Respect and observe that Skanska is vigilant about keeping accurate records, detecting and reporting fraud, and reporting our business information accurately. We expect the same vigilance from our suppliers
- Speak to Skanska if they have questions or concerns regarding the accuracy of records, false claims or fraud

How Suppliers can Report a Concern

Suppliers can report concerns or misconduct by contacting a relevant Skanska manager, e.g., the operations manager or another senior manager on the project. Suppliers can also contact a relevant HR team, Legal team or local Ethics Committee. You can also use the Skanska Code of Conduct Hotline to make these reports, and you may do so anonymously if preferred.

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

You can download the SpeakUp app 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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