

CDE

Hospitality and Gifts Policy

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Policy Approver: CDE Senior Leadership Team

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Policy Holder: Karolina Sulma CDE Ethics Officer

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Primary Audience: CDE SLT, CDE Directors and Managers, CDE Ethics Committee, CDE

Ethics Officer, CDE Legal Team, CDE HR Team,

Interest Holders: CDE employees

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1 Policy statement

Building and maintaining the best, in the given circumstances, relations with clients and other business partners is one of the significant goals for Skanska employees. On no account, however, should Skanska employees forget that although corporate Hospitality and Gifts are common aspects of building good business relations, our values and rules of running the business in an ethical and fair way and with professional diligence allow Skanska employees to use such forms in a restricted manner. By no means should they be treated as a basic method of establishing and maintaining good business relations.

2 Scope of application

The requirements of this Policy apply to all CDE entities and employees. Any exception to this Policy requires prior written approval by the Employee's manager. Even though this policy applies to all entities and employees, the Primary Audience of this Policy is CDE BUP. CDE SLT, CDE Head of Divestment, CDE Directors, CDE Managers, CDE Ethics Committee, CDE Legal Team.

3 Accountability

The Policy Holder, together with the Primary Audience, is responsible for ensuring that this Policy is implemented throughout CDE. Violations of this Policy can be reported to the Policy Holder, CDE SLT, CDE Ethics Committee or any other appropriate corporate body. Anyone reporting a violation shall, to the extent legally permissible, have the possibility to remain anonymous. If an Employee deviates from a mandatory requirement in this Policy, the consequences for the Employee will depend upon the consequences of the deviation. Depending on the facts and circumstances, flagrant and/or repeated deviations may lead to disciplinary action, up to and including dismissal.

4 Definitions

Business Functions	Comprise Project Management and Leasing & Sales functions, participating in business process, led by a respective CDE Executive Vice President, being members of SLT
CDE Directors	All directors in CDE BU
CDE Ethics Committee	Group of CDE representatives appointed by CDE SLT. Its main task is to respond to queries relating to Skanska Code of Conduct, to deal with ethical issues and dilemmas raised by CDE employees
CDE Managers	All managers in CDE BU
Contractors	Entities cooperating or negotiating to start cooperation with Skanska, e.g. suppliers, partners
Corporate Functions	Comprise of Finance, Marketing & Communications, Legal, HR & Administration, Centre of Excellence functions, supporting main business process and central corporate processes, led by a respective CDE Executive Vice President, being members of SLT or Head of Function reporting directly to BUP

Employee	Person employed at CDE or cooperating with CDE on another legal basis, in particular on the basis of civil-law contracts or similar
Gift	A gift is something given voluntarily without anything expected in return. When given appropriately, gifts do not create the impression of improperly influenced business decisions
Hospitality	Companies provide hospitality to their customers and business partners to promote business. Forms of hospitality may include entertainment, meals, sporting events and travel
Interest Holders	A specific function or group of people that can be assumed to have significant interests in the content of this Group Policy
Policy Approver	The persons or functions who approved this Group Policy
Policy Holder	The ultimate responsible holder at group level of this Group Policy
Primary Audience	The persons or functions who, together with the Policy Holder, are responsible for implementing this Group Policy
Project Unit, PU	a separate profit generating unit within CDE BU, developing projects in one of four geographically grouped locations. PU comprises project management and is serviced by relevant central functions, with use of relevant holding, service entities and special purpose vehicles (SPVs). A respective CDE Executive Vice President of Operations holds Profit and Loss responsibility for each Project Unit

5 Requirements

Skanska's Code of Conduct does not forbid Skanska employees to offer or receive Hospitality or Gifts, as long as:

- They comply with the provisions of local law and customs,
- They do not make the recipient obliged to the donor or make such impression,
- They serve a valid business purpose, and
- They are not prohibited by the policies of the recipient's employer.

Skanska aims to build a culture where employees act in line with the Skanska commitment to sustainability. It means that all employees are expected to protect the environment and make major contributions to a more sustainable world. It is recommended to follow the sustainable idea of offering gifts. The production of waste and carbon dioxide, as well as the consumption of energy, water, materials, and other resources, should be taken into consideration when it comes to the idea of a gift.

5.1 Monetary Limits

Additionally, in terms of corporate Hospitality and Gifts, Skanska employees, whether recipients or donors, shall be limited financially to the amounts stipulated below:

- Corporate Hospitality: EUR 100 per person (gross), in accordance with market value;
- Gifts: **EUR 40** per person (gross), in accordance with their market value.

Giving or receiving Gifts, or organizing or participating in Hospitality, that exceeds the abovementioned monetary limits shall be basically prohibited. Any exception to this Policy requires written approval by the Employee's manager (Appendix 1).

5.2 Restrictions

Apart from the abovementioned rules, Skanska employees must refrain from taking the following actions:

- Offering or accepting Gifts in the form of cash, securities or other equivalents of money, which have no utility but, as a result of simple and available procedures, can be exchanged into money;
- Offering or accepting Gifts or Hospitality which are ethically or socially disputable, or infringe personal rights of any third person, including her/his reputation;
- Making any private purchases from Skanska suppliers for a price that is lower than the price agreed for Skanska, if the purchasing Employee is engaged in the decision-making process relating to the supplier or direct cooperation with the supplier;
- Ordering services offered by Skanska suppliers for private purposes, regardless of the price, if the ordering Employee is engaged in the decision-making process relating to the supplier or direct cooperation with the supplier.

5.3 Reporting and monitoring

In case of Hospitality or Gift given or received over the monetary limits, the Employee must obtain written approval from his/her manager preferably prior to giving or receiving, and stipulate what s/he has received, from whom, and for what value or what s/he has offered, to whom and for what value (Appendix 1). It is recommended to return the gift

which exceeds the monetary limits with a kind explanation that it is prohibited by Skanska Hospitality and Gifts Policy. If the donator is unknown, the gift should be reported by the Employee to the manager with a stipulation of what s/he has received, and for what value (Appendix 1). It is recommended to transfer the gift for indicated by CDE aim, e.g. Christmas lottery. The Employee's manager must keep records of such approvals.

5.4 Questions and doubts

If an Employee has any doubts whether or not to accept the offered corporate Hospitality or Gift, s/he should discuss the matter with a manager. Moreover, ethical questions regarding corporate Hospitality or Gifts may be addressed to CDE Ethics Committee in order to receive appropriate guidelines (cde.ethics.committee@skanska.pl).

6 Appendices, references and further guidance

6.1 Appendices

- Appendix 1 Template report of Hospitality and/or Gift above monetary limits
- Appendix 2 Alcohol consumption in Skanska CDE

6.2 References and further guidance

- Skanska Code of Conduct
- Skanska Group Anti-Corruption Policy
- Procedure for the Code of Conduct Program
- Skanska Group Sustainability Policy
- Skanska CDE Environmental Policy
- CDE Hospitality and Gifts Policy
- CDE Community Investments and Sponsorship Standard
- CDE Procurement Policy
- CDE Travel, Meetings & Expense Policy

Appendix 1

Approval of the Hospitality and Gifts above corporate limit

Skanska CDE Hospitality and Gifts Policy stipulates as follows: “In case of Hospitality or Gift given or received over the monetary limits, the Employee must obtain the written approval from his/her manager preferably prior to giving or receiving and stipulate what s/he has received, from whom and for what value or what s/he has offered, to whom and for what value. The Employee’s manager must keep records of such approvals.”

What did you receive/offer?	From/To whom?	When?	For what value?	Approving Manager

Your first and last name
Data.....
Your team.....
Your signature.....
Your manager’s signature.....

Appendix 2

Alcohol consumption in Skanska CDE

Skanska CDE employees act according to Skanska Values and Code of Conduct which comply with all legal requirements applicable to our operations. According to our standards we are obliged to promote a healthy and safe work environment for our employees, people working with us and general public who come into contact with our project. An alcohol-free workplace is the healthiest, safest and most productive place to work. Preventing the misuse of alcohol concerns us all and means that we have a shared responsibility to achieve good health and a safe and secure work environment. The following questions were raised in connection with Value Moment dedicated to alcohol consumption during a ceremony on Skanska site - Skanska CDE Ethics Committee recommendation was: No alcohol at Skanska CDE workplaces. Alcohol consumption regulations can be found in employment contracts, H&S standards and labor law regulations in each country.

1. How much alcohol consumption is acceptable at Skanska offices and project sites?

No alcohol is acceptable at Skanska offices and Skanska project sites regardless of the event or hours.

2. Is it acceptable to drink a symbolic amount of alcohol after working hours in our office to celebrate a good transaction?

The ceremony associated with any symbolic toast which is going to take place at Skanska CDE office or construction/project site is forbidden. It makes no difference if it happens during or after working hours. The fact of stopping/suspending the operation of the construction site during the ceremony or the symbolic amount of alcohol is no exception.

3. What are Skanska CDE principles of consuming alcohol outside our offices and project sites during working hours?

Skanska employees are not allowed to consume alcohol outside offices and project sites during working hours. After working hours (working hours from 7 to 18:30) it is acceptable to consume a symbolic/reasonable amount of alcohol in situations when an employee represents Skanska company but outside Skanska offices and project sites.

4. What are Skanska CDE principles of serving and consuming alcohol at the events organised by the company for external clients during working hours?

It is forbidden to serve and consume alcohol on the events organised by Skanska for external clients during working hours regardless of the place and the event. We expect our clients to respect and follow our standards. After working hours it is allowed to serve and consume alcohol but not in Skanska offices and project sites.

5. What are Skanska CDE principles of serving and consuming alcohol in buildings which are not officially Skanska offices, like Ilmet in Warsaw?

See the recommendation for serving and consuming alcohol at Skanska offices and project sites (Q - no 1).

6. What consequences shall I expect as a result of drinking alcohol at Skanska workplace?

Employees who violate legal provisions and internal work regulations may be subject to disciplinary action, from an official warning to dismissal, depending on the facts and particular circumstances.

7. Why do we drink during our BU meetings wine or beer or alcohol drinks, not vodka?

It is highly recommended to drink low alcoholic beverages as i.e. wine or beer during company meetings organised after working hours and outside the Skanska localizations. However, the amount of consumed alcohol should be reasonable so that an employee's behavior (after consumption) does not affect the image and company interest. Alcohol free options are always offered on such occasions.

8. What are Skanska CDE principles of consuming alcohol during internal and external business events outside working hours?

It is allowed to drink alcohol during internal and external entertainment after work and outside Skanska CDE offices and project sites. However, the amount of consumed alcohol should be reasonable so that an employee's behavior (after consumption) does not influence the company's image and interest.

9. Is it acceptable to drink alcohol e.g. during plane travel to and from a conference? Is this plane travel to and from the conference regarded as working hours?

The working time is the period in which the employee performs his/her work, performs his/her tasks and duties, and is at the disposal of the employer. The term "working time" includes not only the time at which work is actually performed but also the time at which the employee is "at the disposal of the employer". It is, therefore „working time“, those periods in which he/she does not perform the operations specific to his/her work, but, for example, awaits service duties, raw materials, goods, customers, beneficiaries, etc. Therefore, in case an employee is delegated to attend a conference, the time that he/she spends traveling to and from the conference is not assimilated with the working time because the above-mentioned conditions are not cumulatively met. From CDE Ethics Committee's perspective, alcohol consumption in such a situation may be allowed, but the amount of consumed alcohol should be reasonable so that an employee's behavior (after consumption) does not damage the employee and/or corporate interest.

10. I can see that my colleague from the site/office shows signs of hangover or alcohol abuse. What shall I do?

All employees should be sober in Skanska sites and offices. CDE employees have a responsibility to react and report if someone shows signs of hangover or showing signs of alcohol abuse. A person suffering from the effects of a hangover or showing signs of alcohol abuse may pose a risk to themselves and their colleagues and should immediately be removed from the workplace. We react and act because we care.

11. Where can I find information that alcohol consumption is prohibited at Skanska CDE offices and project sites?

The company does not have a specific written procedure for alcohol consumption at Skanska CDE offices and project sites but see Q&A dedicated to alcohol consumption. This Q&A document is a result of CDE Ethics Committee recommendation based on Value Moment discussions conducted in CDE in April and May 2020. The company does not have a specific written procedure for alcohol consumption at Skanska CDE offices and project sites but Appendix 2 is dedicated to alcohol consumption. This Appendix is a result of CDE Ethics Committee recommendation based on Value Moment discussions conducted in CDE in April and May 2020.