

# Skanska Central Europe Hospitality & Gifts Policy

SCE Hospitality & Gifts Policy  
 Policy Approver: SCE Management Team  
 Policy Owner: SCE Ethics & Compliance Team  
 Implementation Group: SCE Management Team, SCE Ethics & Compliance Team, SCE Ethics Committee, SCE Communications Team, SCE HR Team, Directors and Managers  
 Target Group: All SCE Employees

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## 1. Policy statement

Building and maintaining the best relationships with clients and other business partners in any given circumstances is one of the main goals of SCE Employees. However, on no account should SCE Employees forget that although corporate Hospitality and Gifts are common aspects of building good business relations, our Values and Code of Conduct allow SCE employees to use these means in a restricted manner. Skanska never offers any excessive form of Hospitality or Gifts; these shall not be used as a basic method of establishing and maintaining good business relations.

## 2. Scope of application

The rules resulting from this SCE Policy apply to all SCE Employees.

The Implementation Group of this Policy is the SCE Management Team, SCE Ethics & Compliance Team, SCE Ethics Committee, SCE Communications Team, SCE HR Team, Directors and Managers.

The Policy Owner is SCE Ethics & Compliance Team.

## 3. Definitions

Unless explicitly stated otherwise in this SCE Policy, capitalized terms have the meaning assigned to them in the SCE Internal Regulation Policy.

<b>Skanska Central Europe (SCE)</b>	Business unit within the Skanska Group consisting of the following companies: Skanska S.A., Skanska a.s. and its subsidiaries, Skanska SK a.s. and its subsidiaries, Skanska Építő Magyarország Kft and Skanska Construction Romania SRL
<b>SCE Employees</b>	Individuals employed at Skanska S.A., Skanska a.s. and its subsidiaries, Skanska SK a.s. and its subsidiaries, Skanska Építő Magyarország Kft and Skanska Construction Romania SRL or individuals cooperating on a regular basis with the abovementioned SCE companies or their subsidiaries on a different legal basis, in particular on the basis of a civil/commercial law contracts
<b>SCE Management Team (SCE MT)</b>	An internal management body at SCE consisting of the BUP, EVPs, CFO, General Counsel and HR Director
<b>Hospitality</b>	Entertainment events, meals, shows or travel offered by companies to promote business without the expectation of payment or anything in return
<b>Gift</b>	An item of a value given to someone or received without the expectation of payment or anything in return
<b>Promotional items</b>	Promotional objects, goods or products of an insignificant value typically used for promotional purposes in relation to marketing or communication projects which bear the company logo

## 4. Requirements

### 4.1. Gifts

Skanska Central Europe applies **zero gift policy** to external parties (clients, suppliers, subcontractors, authorities, private persons or any other third parties). It means that neither SCE nor SCE Employees shall offer or receive Gifts from external parties and their representatives in relation to work activities or as SCE representatives.

### 4.2. Promotional items

Offering or receiving Promotional items is allowed provided that the following conditions are met:

- The value of a Promotional item shall not exceed **EUR 20** (twenty euros) **per item**, incl. VAT, or equivalent in local currency
- Promotional items must be usual, justified for business purposes and compliant with applicable laws
- Promotional items must not make the recipient feel obliged to reciprocate nor make such an impression
- Promotional items offered or received by Skanska must be aligned with Skanska Values, meet sustainability criteria (e.g. no drugs, alcohol or harmful items) be marked with relevant logo. Skanska's promotional items always must be approved by the SCE Communications Team

### 4.3. Hospitality

- a) Corporate Hospitality offered to or received from external parties **must serve justified business purposes** such as: professional development, business networking & associations, product or services presentations, knowledge sharing, business awards celebrations. If the justified business purpose exists, the following conditions must be met:
  - The value of the Hospitality event shall not exceed **EUR 100** (one hundred euros) **per person**, incl. VAT, or equivalent in local currency
  - The Hospitality offered or received must not evoke the obligation to reciprocate
- b) If SCE is an inviting party, the Hospitality event must meet the following conditions:
  - Include a relevant business agenda (must not include only entertainment activities)
  - The SCE shall not cover the travel costs of participants
  - The invited representatives should be selected by their company's management without any influence of personal preference or friendships
- c) Offering any form of Hospitality to a public officer is only possible if the relevant laws and internal regulations applicable to the public officer allow participation in such events. The events must be approved by the relevant member of SCE MT and SCE Ethics & Compliance Manager (BUP and SCE General Counsel if the member of SCE MT is an inviting party).
- d) SCE Employees are permitted to travel in relation to Hospitality offered by a third party only if a justified business purpose (specified above) exists and is approved by the SCE

Employee's manager. Skanska shall always cover the costs of travel and accommodation.

#### **4.4. Prohibited actions**

- a) Skanska never offers or accepts Hospitality or Gifts to encourage or reward a business decision. Gifts or Hospitality shall not be offered to or received from any third party during any negotiations, tendering or process of applying for administrative decisions involving this third party and Skanska.
- b) Offers of Gifts to public officials and foreign public officials are prohibited and subject to stringent rules or laws. If in doubt, SCE Employees must always consult local lawyers or the SCE Ethics & Compliance Team.
- c) Gifts or Hospitality must never be offered or accepted where it might create an appearance of being inappropriate or where prohibited by the policies of the giver's or recipient's employer
- d) It is prohibited to offer or accept Gifts in the form of cash, credit cards, securities or other equivalents of money that do not have useful value but may be exchanged for money through simple and available means
- e) It is prohibited to offer or accept Gifts or Hospitality, participate in events which are ethically or socially questionable, infringe upon the personal rights of any third person, including their reputation, or are discriminatory in nature
- f) It is prohibited to participate in trips organized by clients, subcontractors, suppliers and other business partners for pure entertainment purposes
- g) It is prohibited to demand any form of Hospitality or Gifts from Skanska business partners

#### **4.5. Internal Hospitality and Gifts**

Although internal Skanska events or internal team-building activities organized for SCE Employees do not fall under the definition of Gifts or Hospitality received from and offered to external parties, these shall also follow the principles of appropriateness, serve a justified business purpose and meet the following criteria:

- a) Gifts or Hospitality offered to an SCE Employee must be usual and justified and comply with applicable laws, including local tax regulations
- b) Gifts or Hospitality offered to an SCE Employee must be aligned with Skanska Values and meet sustainability criteria
- c) Hospitality events or team-building activities for SCE Employees should include a work-related agenda for at least 50% of the time allocated (subject to local tax regulations)
- d) Events must not be ethically or socially questionable, infringe upon the personal rights of any person, including their reputation, or be of a discriminatory nature

#### **4.6. Reporting and maintaining records**

- a) Gifts or Hospitality exceeding limits or which do not comply with the above criteria must be refused and returned to the donors with a polite justification
- b) If the value of Hospitality or Gift offered or received by an SCE Employee exceeds the limits stipulated above and cannot be returned to the donor, the SCE Employee

shall report this to her/his Director or Manager (or relevant member of the SCE MT if a notification is submitted by Director) and specify what she/he has received, from whom, and the estimated value of the item, or what she/he has offered, to whom, and the value of the item, and agree with the notified person how to proceed with the item. The SCE Employee may not keep such a Gift for private use.

- c) The Director, Manager or member of the SCE MT of a particular team or unit shall keep records of such events and report them to the SCE Ethics & Compliance Team which maintains the register
- d) If in doubt, we recommend requesting advice from the SCE Ethics & Compliance Team or SCE Ethics Committee or use a “front page” test, i.e. answer the following question yourself: “How would you feel if the information about the Hospitality or Gift offered or received by you appeared in popular newspapers or web pages?”

#### **4.7. Exemptions**

- a) Any exemptions from the principles of this SCE Policy must be approved by the relevant member of the SCE Management Team and SCE Ethics & Compliance Manager and be duly documented in an email or written approval
- b) If the Gift or Hospitality offered by or received from the member of the SCE Management Team exceeds the limits or does not comply with the above criteria, it must be approved by the BUP and SCE General Counsel and be duly documented in an email or written approval
- c) If the Gift or Hospitality offered or received by the BUP or SCE General Counsel exceeds the limits or does not comply with the above criteria, it must be approved by the Group General Counsel and duly documented in an email or written approval
- d) A copy of the approval of any exemptions must be sent to the SCE Ethics & Compliance Manager

#### **4.8. Legal requirements & internal controls**

- a) SCE Employees must observe all applicable local laws in the areas regulated by this SCE Policy. If any principle of this SCE Policy is stricter than a local legal regulation, the stricter policy prevails.
- b) All SCE Employees must be trained in this SCE Policy at least every 2 years and confirm acknowledgement of its principles in electronic or written form. This confirmation must be kept in the relevant HR files (or HR systems for electronic forms). The type of training is determined by the SCE Ethics & Compliance Team.
- c) The SCE Ethics & Compliance Team has a right to monitor and audit compliance with the principles of this SCE Policy in certain teams or units and may recommend corrective measures to the SCE Management Team

## **5. Accountability**

Violations of this SCE Policy may be reported to the Policy Owner, SCE Management Team, Compliance Officer or any other appropriate corporate body, either directly or via a superior, internal auditor or any other appropriate corporate body. Anyone reporting a violation may remain anonymous to the extent permitted by law.

Any violation of the rules set out in this SCE Policy is considered a violation of employee duties. Depending on the circumstances of the case, a violation of the provisions of this SCE Policy may lead to the application of measures provided for in applicable employment law up to termination of employment or result in liability under other legal provisions, including contractual liability. Acting in violation of this SCE Policy may result in disciplinary measures and does not deprive the relevant SCE company of the right to take other action under the general provisions of applicable law, including seeking compensation.

## **6. References and further guidance, final provisions**

### **6.1. References and further guidance**

For additional information and guidelines, SCE Employees may refer to:

- Skanska Code of Conduct
- Skanska Supplier Code of Conduct
- SCE Anti-Corruption Policy

### **6.2. Final Provisions**

This SCE Policy shall replace the SCE Hospitality & Gifts Policy approved on 22.09.2020.