

Skanska Gifts & Entertainment Policy

With the holiday season upon us, please be mindful of our policies on giving and receiving gifts and entertainment.

All entertainment and gifts, both given and received (outside the Company), are covered by our [Code of Conduct](#). They should be modest, transparent, serve a legitimate business purpose, and be appropriate considering the circumstances. Most important, these gift-giving or receiving gestures must never be accepted or given if the gift can be perceived to be for improper influence (e.g., a gift given to a decision-maker during a pending procurement or negotiation).

a. Entertainment Limit: The limit for entertainment to or from another party is a maximum value of \$250 per person or the project owner's monetary limit, whichever is lower. Entertainment over the limit must have prior approval by the employee's supervisor and is subject to the reporting requirement.

b. Gift Limit: The limit for gifts to or from another party (including services and gift cards) is a maximum value of \$125 or the project owner's monetary limit, whichever is lower. Gifts over the limit must have prior approval of the employee's supervisor and are subject to the reporting requirement.

c. Reporting Requirement: Entertainment or gifts given or received in excess of the limits stated above must be reported to the BU E&C Officer by the employee's supervisor, who approves the gift or entertainment, within five (5) calendar days from the date of the supervisor's approval. An e-mail message suffices for the purpose of this reporting.

d. Government Owner: Beware that public owners typically prohibit gifts or entertainment of any kind between their employees and government contractors. Violation of that policy can bring serious consequences.

Our policies are contained in the [USA Avoiding Conflicts of Interest Policy for Construction Business Units](#), available in the [Ethics & Compliance Portal](#) on mySkanska. Also on the E&C Portal, we have two decision trees to assist you in deciding on the propriety of [giving](#) or [receiving](#) a gift or entertainment.

If you need additional guidance on these policies, contact your manager, the BU Ethics & Compliance Officer (Jeffrey.cruz@skanska.com), or a member of the [USB Ethics Committee](#).