

Skanska UK

Section D.5

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# Modern slavery and human trafficking

Responsibility: BU President

## 1. Statement

- 1.1** This statement is made in conformance with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Skanska has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.
- 1.2** Skanska's Code of Conduct prohibits modern slavery in line with the Universal Declaration of Human Rights, the Core Labor Standards of the International Labour Organisation, the UN's Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Adherence to the Code is compulsory.
- 1.3** Skanska has identified the following areas of its business where there is a risk of slavery and human trafficking taking place:
- Construction is one of the economic sectors most prone to labour exploitation as it is heavily reliant upon outsourcing and subcontracting
  - Pressure on delivery teams could lead to missing vital signs and checks
  - Unskilled migrant workers may not be initially detected as such
- 1.4** Skanska will carry out appropriate due diligence to ensure that its own workforce, as well as that of its supply chain operating on its projects, (and, to the extent that Skanska can enforce application, to joint venture projects) is free from modern slavery. Breaches of the policy by employees may result in disciplinary action and in the case of Suppliers may result in contract termination.
- 1.5** Formal risk assessments will be carried out on our principal Suppliers on each Skanska project. Members of our direct supply chain are expected to apply our standards to their own supply chains, as per Section 2 below.
- 1.6** Skanska will carry out external audits of selected projects to monitor and assess the risks of modern slavery. Skanska will seek to avoid any instance of modern slavery in its operations through site induction, due diligence, and management proactivity including meetings and site visits.
- 1.7** Skanska will ensure that its employees and Suppliers are actively informed of the risks of modern slavery and how to identify them. Everyone is expected to report any concerns, without fear of reprisal, and managers are expected to act upon these reports.

## 2. Policy application

- 2.1** Skanska has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.
- 2.2** The responsibility for the Skanska UK anti-modern slavery programme lies with the Executive Management Team (EMT). The EMT has appointed a Modern Slavery Group made up of specialists in several disciplines, to actively define and carry out the programme.
- 2.3** The requirements made of Suppliers regarding modern slavery are communicated and contracted upon through our Supplier Code of Conduct and Sustainable Procurement Policy. Skanska expects all Suppliers to conduct right-to-work checks of their workforce in accordance with HMRC IR35 rules and the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction.
- 2.4** Skanska uses due diligence key performance indicators and third-party project audits to measure effectiveness in ensuring that slavery and human trafficking is not taking place in the supply chain.
- 2.5** Skanska will work in partnership with Suppliers to tackle and combat the threat of modern slavery and human trafficking across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.
- 2.6** Skanska operates a Code of Conduct hotline, which provides an option for anonymity, and encourages employees and any other concerned parties to report any suspected legal or ethical breaches (0800 022 4118, entering organisation code 109708 when prompted).
- 2.7** To ensure the highest level of understanding of the risks associated with modern slavery and human trafficking in our supply chain, Skanska provides training for all staff members, and this training will continue during 2026/27.
- 2.8** A Modern Slavery and Human Trafficking procedure has been produced to complement this policy.
- 2.9** This policy was signed off by the Board of Directors of Skanska UK Plc on 2 June 2026. It is reviewed and published on an annual basis. Readers are invited to comment on this policy via the Code of Conduct hotline at any time.



**Katy Dowding, CEO and Business Unit President**