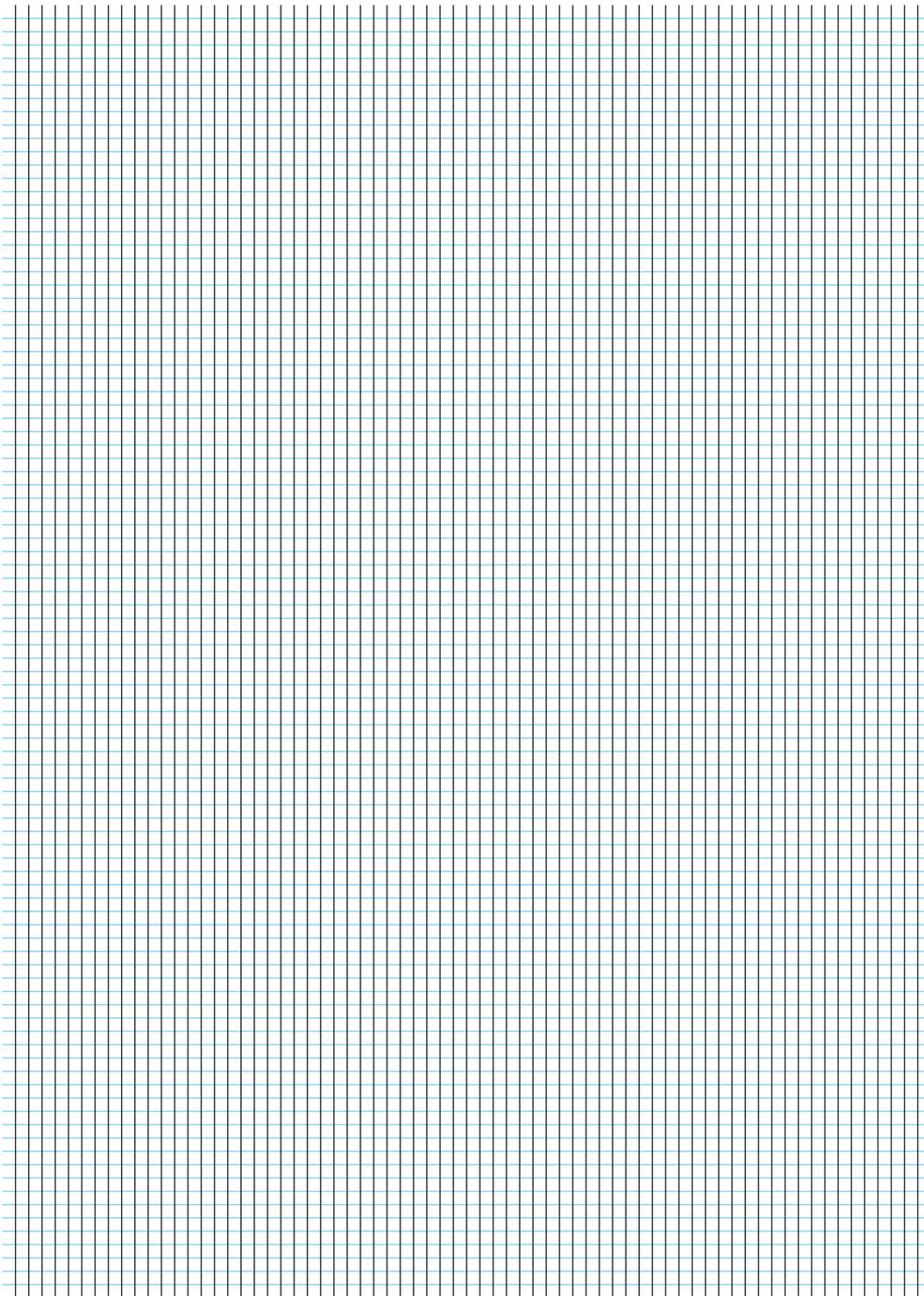


SKANSKA

Code of Conduct





Code of Conduct

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**“Living our values
builds trust among
colleagues, partners
and customers.
It builds pride
and strengthens
our business.”**

**Johan Karlström
President and CEO**

Strong values build a great company

Our Code of Conduct defines how all Skanska employees work. We are proud of the ethical business practices that we have established and the values we live by.

Dedicated colleagues who share our strong values make us a great company – and this is essential when it comes to attracting employees and being chosen by customers for their projects. It builds trust among colleagues, partners and customers. It also builds pride and strengthens our business and company.

Our business and reputation are strong and we continue to build our culture, as manifested in our Code of Conduct. With a world-leading position comes increased responsibility.

However, ethical breaches are our number one business risk – in the worst-case scenario we risk being excluded from business. Therefore, we cannot accept unethical behavior and will take immediate action against all such behavior – no compromises.

Our values and the Code of Conduct guide us in doing the right thing – but they don't replace thinking. There will always be gray zones in decision-making and the Code cannot provide the answer to every question.

Naturally, we must also guide each other in the right direction. I expect each and every one of you to live by our values, nurture an open dialogue and take part in our ethics training.

Based on strong and shared values, we are building a great company.



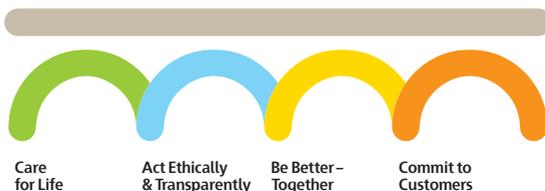
Introduction

Why we have the Code of Conduct

Skanska's Code of Conduct (our Code) is a guide designed to help all Skanska Group companies (Skanska) to connect with our values and provide expectations for our everyday behavior. The Code is where we find direction on how to conduct ourselves as Skanska employees when we interact with each other, our customers, the communities in which we operate, and other stakeholders. It is the place to start when we face an ethical dilemma, and it provides information on whom to contact when we have questions or concerns.

Foundation for the Code of Conduct

Our Code is based on our values, which are a set of beliefs that govern our actions. Our values commit us to acting with the highest levels of ethics, and to conduct business in a responsible and sustainable way. Everything we do should reflect our values:



Care for Life

We care for life of people and the environment. We work safely or not at all. We never walk by if we notice unsafe actions. We support health and well-being. We promote green solutions and conduct our operations in a green way. We are accountable to

future generations.

Act Ethically and Transparently

We do business with a high degree of integrity and transparency. We live by our Code of Conduct and never accept shortcuts. We foster a working climate where everyone can speak their mind.

Be Better – Together

We always strive to be better in all we do. We are a learning organization and generously share our expertise. We take pride in quality and innovation. We build One Skanska teams together with customers, partners and communities. We leverage diversity to deliver the best solutions. We foster an inclusive culture where we are open and fair, showing trust and respect for each other.

Commit to Customers

We help our customers to be successful in their business. We strive to understand their needs and their customers' needs. We are here to help our customers turn their visions into reality.

To support our Code we have more detailed policies that apply the principles and expectations outlined in our Code. Such policies include those at the Group and Business Unit (Units) levels. In some cases, the policies contain stricter standards than those described in this Code. To help you identify supporting policies and documents, throughout this document we refer to them under the "For more information" headings.

Who the Code applies to**Global commitments**

Our Code is also influenced by the commitments Skanska has made as part of progressive external agreements. We are a signatory to the United Nations (UN) Global Compact, and we adhere to its Ten Principles reflecting human rights, labor, the environment and anti-corruption. We also support the rights of all people as described in the Universal Declaration of Human Rights adopted by the UN, and in the conventions of the UN's International Labour Organization.

In addition, as a founding and participating member of the World Economic Forum's Partnering Against Corruption Initiative (PACI), we subscribe to the principles supported by PACI.

All Skanska employees – regardless of status or category – must adhere to the principles and requirements contained in this Code. This includes part-time, contract and temporary employees. If you are a manager or supervisor, you have a particular responsibility to lead by example and act according to the spirit of our Code.

We give our Code the highest priority. Should you breach our Code or relevant policies, you will be subject to corrective or disciplinary action, which may include, but is not limited to, termination of your employment.

External parties

This Code extends beyond Skanska, as external people and companies are essential to the work we do. Subcontractors, suppliers, consultants, interme-

diaries and agents must follow the relevant portions of our Code in their dealings with us. Skanska's Supplier Code of Conduct (our Supplier Code) is intended to be included in agreements with these parties.

In addition, our Code applies to joint ventures and to other entities in which we have an ownership stake. By "joint venture" we mean joint venture partners, associations, consortiums, alliance members, teaming arrangements and other agreements established for a project. For joint ventures, we must ensure that either our own Code or a comparable code is adopted by each party to the joint venture. For certain projects, the partners may decide to adopt a code that represents the strictest requirements from each partner's code.

Compliance with laws

We comply with all legal requirements applicable to our operations. Furthermore, we apply our Code even when our standards – such as minimum employment age – are stricter than legal requirements, as long as our standards do not conflict with local laws. Customs or local practices never take precedence over legal requirements. If you find that our Code is in conflict with applicable legal requirements, you must inform your manager.

Reporting a concern

Skanska's commitment to doing business with a high degree of integrity and transparency depends on a culture in which everyone feels empowered to report instances of non-compliance with our Code, including suspected illegal or unethical conduct (col-

Introduction

lectively called misconduct).

You are responsible and accountable for reporting suspected or known misconduct to your manager or your manager's manager. If you feel uncomfortable doing this, speak with your Unit's Human Resources or Legal Department, or your Unit's Ethics Committee. If you prefer, you may report suspected or known misconduct confidentially and anonymously to the Skanska Code of Conduct Hotline, either by telephone or on OneSkanska (instructions on how to report a concern are provided on page 68).

If you are a manager, you have a responsibility to ensure that reports of suspected or known misconduct are adequately addressed. For some reports, the most appropriate course of action may be to direct the matter to your Ethics Committee.

We will promptly investigate any concerns or issues you report, and take appropriate action based on the findings of our investigation.

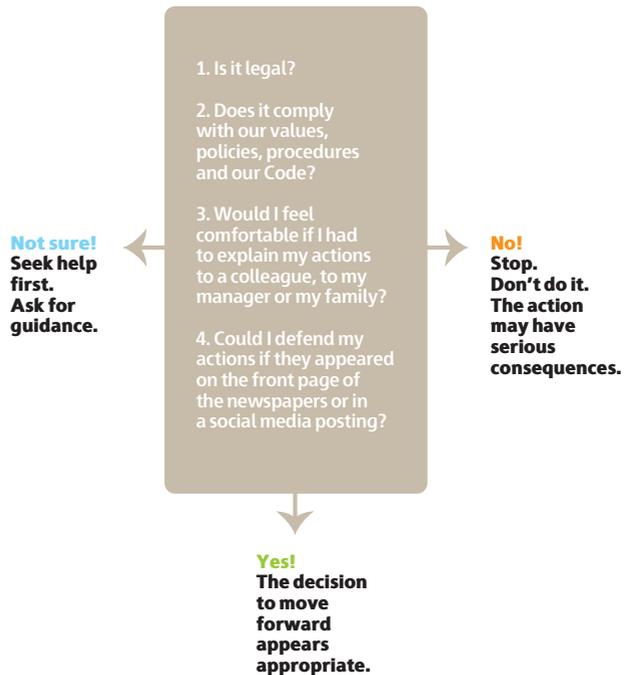
No retaliation policy

Skanska does not tolerate any form of retaliation against an employee for making a good faith report of suspected misconduct. "Good faith" means that, to the best of your knowledge and belief, everything you report is true and that you report everything you know.

Any employee who engages in retaliation will be subject to disciplinary action. If you believe that you have experienced retaliation, you should report it as suspected misconduct.

Guidance for decision-making

If you are faced with an ethical dilemma and are unsure how to proceed, use this chart to help guide you to the best course of action.



Chapter 1

Our commitment at our workplace

Working at Skanska is not only about delivering the best solutions and helping our customers to be successful. It is also about managing Skanska's assets responsibly and creating a fair, healthy and safe workplace where we all can develop our professional skills and grow as individuals. You must do your part by conducting yourself professionally, and by helping promote an inclusive culture in which everyone feels welcome.

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Our commitment at our workplace

Health, safety and well-being

What is it?

Health and safety is about preventing accidents and promoting a healthy and safe work environment for our employees, people working with us and the general public who come into contact with our projects. This is a fundamental priority for Skanska and our goal is clear: an Injury-Free Environment.

Well-being is a feeling of contentment, something often affected by the workplace environment. It includes supportive supervision, having a sense of purpose and a feeling of physical security.



Skanska's principles

- We care for our people and the people affected by our workplaces.
- We continuously strive to develop a work environment that promotes health, safety and wellbeing.
- We believe that visible leadership is essential for a strong health, safety and well-being program.
- We promote and share sound personal safety and accident prevention practices with our supply chain and throughout our industry.

What does it mean for you?

- We provide health and safety training and education relevant to our employees' work situations and environments.
- We ensure that subcontractor employees are adequately trained and provided with the proper equipment to safely carry out their work.
- We aim to lead our industry in health and safety performance, with continuous measurable improvements toward our goal of an Injury-Free Environment.
- You have the right to a secure and safe workplace.
- You take personal responsibility for helping to ensure a healthy and safe work environment.
- You care for the health of your colleagues and report all workplace incidents and any unsafe or unhealthy work conditions to your manager or local safety manager.
- You never walk by any work activity you believe is unsafe or unhealthy. On the contrary, you have the authority and responsibility to stop any activity – including your own – that you believe is not being conducted in a healthy and safe way.
- Regardless of your role, you can contribute to a safe workplace by demonstrating active, courageous and visible leadership in health and safety matters.

Example

You are working to complete a task but the sequence of work has changed, and you realize that your original work plan is no longer valid. There are now different hazards from when you began the task. What should you do?

Never compromise the health and safety of yourself and others to accomplish a task. If conditions change, stop what you are doing and adjust your plan.

For more information

Skanska Global Safety Policy and Guidelines
 Skanska Global Safety Standards
 Skanska Safety Road Map

Our commitment at our workplace

Fair working conditions

What is it?

A working environment that is tolerant and free from injustice underpins Skanska's reputation as an industry leader. Our standards are based on our values, as well as the UN's Universal Declaration of Human Rights, the conventions of the UN's International Labour Organization (ILO), and the UN's Guiding Principles on Business and Human Rights.



Skanska's principles

- We recognize human rights on a global basis.
- We take care not to cause negative impacts on human rights, and address any such impacts if they occur.
- We do not tolerate any form of child, forced or compulsory labor on our work sites or in our supply chain, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.
- We do not allow any practice that would restrict free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.

What does it mean for you?

- We recognize the special needs of employees under the age of 18 and our duty of care towards them.
- We only permit working hours, wages and benefits that are in compliance with national and local laws and relevant ILO conventions.
- We recognize and respect collective bargaining agreements and our employees' right to freedom of association and collective bargaining, where permissible by law.
- We promote good relations with labor organizations, trade unions and workers' representatives.
- We maintain a dialogue with our employees to ensure their rights are respected.
- You have the right to be treated with respect and dignity. In turn, you should respect the dignity, privacy and rights of each individual you interact with and those affected by our business operations.
- You have the responsibility to raise a concern if you become aware of any unfair working conditions at Skanska or by any of Skanska's subcontractors or suppliers.

Example

You overhear someone saying that subcontractor employees on your project are being paid less than minimum wage and are working excessive hours without appropriate compensation. What do you do?

We are committed to ensuring that working hours and wages are in compliance with applicable legal requirements. Taking action is your only option; you must report your concern to ensure that any violations of wage or labor laws are remedied.

For more information

UN Global Compact
 UN Universal Declaration of Human Rights
 Conventions of the International Labour Organization (ILO) of the UN
 UN Guiding Principles on Business and Human Rights

Our commitment at our workplace

Diversity and inclusion

What is it?

Diversity is everything that makes us unique as individuals, such as age, gender, sexual orientation, ethnicity, generation, religion, beliefs, language, education and marital status.

Inclusion is when the richness of ideas, unique views, perspectives and opinions of a diverse group are valued and encouraged.



Skanska's principles

- We respect all individuals and strive to work as one team and to foster open, straightforward and respectful communication.
- We believe that a diverse and inclusive workplace delivers better customer solutions.
- We provide equal treatment and opportunities to everyone, without regard to appearance, ethnicity, national origin, religion or belief, gender, sexual orientation, gender identity or expression, age, disability, marital or family status, or any other characteristics protected by laws and regulations.
- Our policy of equal employment opportunity encompasses

What does it mean for you?

all aspects of the employment relationship, including training, promotion and all other terms and conditions of employment.

- We do not accept any form of disrespectful behavior, bullying, discrimination, harassment, or unwanted sexual advances.
- You promote and contribute to a positive work environment where everyone feels appreciated, respected and valued for his or her differences.
- You are open-minded, promote teamwork and encourage new ideas and opinions from others.
- You do not participate in any form of harassment, bullying or discrimination, and speak up and take action if you notice it in the workplace.
- You do not introduce materials or engage in activities that are inappropriate, illegal, sexually explicit or otherwise offensive, whether in the workplace or while representing Skanska, including during business travel.

Examples

While working on a project site, you witness a senior Skanska employee verbally harassing a less experienced Skanska employee. The harassment includes using offensive language and telling sexually oriented jokes. What do you do?

We do not tolerate any form of harassment, discrimination or offensive behavior. You have a duty to stop this behavior and, if appropriate, to report this to your manager or through the reporting channels described in the Introduction of this Code.

What would you do if there was a subcontractor continually harassing and threatening his or her workers with their jobs if they do not complete a certain portion of the work by the end of the work day?

We do not tolerate any form of harassment, discrimination or disrespectful behavior by our subcontractors. You have a duty to address this unacceptable behavior with the subcontractor.

Our commitment at our workplace

Personal growth and development

What is it?

Opportunities for personal growth and development help Skanska's employees develop their talents and potential, and use their new skills and abilities to further improve our high-performing teams.



Skanska's principles

- We believe our people are our greatest asset.
- We support our employees in growing and developing both personally and professionally.
- We offer training and development opportunities to improve our employees' knowledge and skillsets.
- We encourage our employees to develop and learn through networking and sharing of best practices.

What does it mean for you?

- You take responsibility and actively contribute to your own learning and personal development.
- You have the right to receive feedback from your manager.

Example

There have been opportunities for you to attend training that you know would advance your development, but your manager keeps saying that you are too busy with your current project to

leave work and attend the training sessions. What should you do?

There will be occasions when participating in training opportunities is not possible due to deadlines or other circumstances. However, if you feel like you are not being provided with opportunities to develop, speak to your manager and express your concern. If you do not feel comfortable speaking to your manager, speak to your local HR manager.

For more
information

Skanska Leadership Profile

Our commitment at our workplace

Protection of personal data (data protection)

What is it?

Data protection is about safeguarding your personal integrity when processing personal data about you. The definition of personal data, and the legal requirements for safeguarding it, vary by country. It could include someone's birthdate, contact information, family member names, personal healthcare information, photographs or identity number.



Skanska's principles

- We ensure that all uses of personal data – such as collection, registration, comparison, storage and deletion, or a combination of these – take place in accordance with applicable laws and regulations.
- We respect everyone's right to the protection of his or her personal data.
- We safeguard the personal information of our employees and other stakeholders.
- We ensure that only persons who need access to personal data in order to perform their job responsibilities have access to such personal data.
- We ensure that all persons who have access to personal

What does it mean for you?

- data take appropriate precautions to protect it.
- We ensure that personal data is not retained for a longer time period than necessary to achieve the purpose for which it was obtained.
- You always act respectfully and consider the privacy of others. You only access personal data if you are authorized to do so and only to the extent necessary for your job responsibilities.
- If you have permission to access personal data, you protect and keep the information confidential.
- You only grant others access to personal data on a need-to-know basis, with appropriate authorization and according to legal requirements.

Example

You ask HR to keep a list of all craft workers and production supervisors in a specific geography to be able to better coordinate these resources. You add some personal details like age, address and special skills on each person in the list. How do you do this to protect the personal data of the individuals and ensure compliance with applicable data protection regulations?

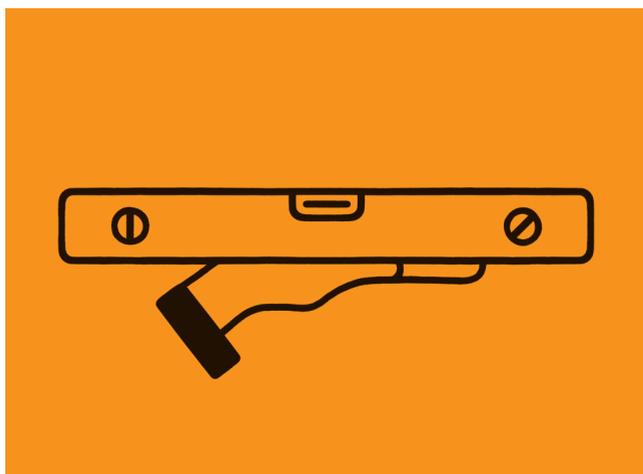
The best solution is to consider the relevance of the information included on the list. Only the personal data necessary for the purpose of the list should be included. Age is irrelevant and may lead to discrimination. Years of experience is perhaps more relevant for the purpose of the list. A phone number to contact the person may be relevant, but what is the significance of the person's address if you have limited the list to a specific geography? Also, note that it may be prohibited or additional protective measures may be required to include certain personal data on the list in some countries (such as race or ethnicity, religious beliefs, sexual orientation, etc.). The list should only be shared with individuals who need to know, such as managers responsible for making assignments.

Our commitment at our workplace

Reporting and maintaining records

What is it?

Skanska fully and accurately records and reports business information, which means that our records and financial reporting must always represent the true state of the business.



Skanska's principles

- We believe that properly maintained records are an essential part of doing business with integrity and transparency.
- We record the complete and accurate nature of all financial transactions in accordance with locally accepted accounting principles. Furthermore, all Group reporting follows the International Financial Reporting Standards (IFRS) and relevant Skanska policies and rules.
- We maintain accurate non-financial records, including for quality, safety, health, environment, human resources, time sheets and training.

What does it mean for you?

- You ensure that all reports and records are complete and accurate and not false or misleading.
- You never falsify tests or test results.
- You never destroy or alter any information or data that must

be kept for legal or contractual purposes, or that is required for any subsequent audits or investigations.

Examples

For the December monthly report, you are considering whether large claims for extensions of time and compensation from two subcontractors should be reflected in the project's profit forecast. You are convinced the claims are inflated and you are thinking it would be better to wait and report them in the new year instead. Is this acceptable?

No. Regardless of the timing and when claims could affect the project's profit, it is important to maintain accuracy in reporting at all times. Speak to your manager, together determine the most probable outcome of the claims, and include this amount in your current monthly report. Transparency is important.

You are the crew leader working on a project that is not achieving the costs estimated in the tender. It is obvious that the conditions are not the same as the conditions considered at the time of the tender. Your supervisor suggests that some of the hours worked could be charged to activities that have not started so the losses to date are not reflected in the profit forecast. What should you do?

Tell your supervisor that you are required to accurately report hours and costs relating to the activities actually performed. You should not be asked to do something which is improper, and you should report your supervisor's request.

Our commitment at our workplace

Company assets

What is it?

Skanska's assets are both tangible and intangible. Examples of tangible assets include raw materials, money, products, computers, real estate, and machines and equipment. Examples of intangible assets include our brand, patents, trademarks, know-how, trade secrets and copyrights.



Skanska's principles

- We use our assets responsibly.
- We protect Skanska's assets from damage, theft, loss and misuse, as they are vital to our business.
- We do not use our computers and electronic communications systems for inappropriate communication. This includes any illegal activity as well as behaviors that could be considered discriminatory, offensive or harassing.
- We safeguard the assets of our customers and other stakeholders from damage, theft, loss and misuse when entrusted to our care.

What does it mean for you?

- You exercise good judgment with respect to company assets when you use them in connection with the work you perform for Skanska and our customers.
- You only use company assets for personal use if and when allowed by your Unit's policies.
- You do not use company assets for personal gain, such as for a side business.
- You are forbidden to inappropriately use company assets, including through fraudulent behavior, data security violations, harassment, or consumption of offensive or obscene content of a sexual nature or related to ethnicity.

Example

The project you are working on is coming to an end, and there are surplus paving slabs that will be thrown away. Some colleagues ask you if they can have the slabs to use at home. What should you do?

Surplus materials are considered company assets. Refer to your Unit's policy on surplus or scrap materials. In all cases, company assets should be used first for the benefit of Skanska projects and cannot be taken or used without the required approval.

Our commitment at our workplace

Confidentiality

What is it?

Safeguarding our ideas, processes and business information is important for our competitiveness and for maintaining the trust of our stakeholders. For this reason, certain information is protected company property and is considered confidential.

Confidential information includes trade secrets, know-how and proprietary information. It also includes business plans, financial records, customer information, details of projects we are tendering for or executing, pricing information, personnel files and matters, allegations and investigations of reported misconduct, financial and accounting data, and other business affairs and methods.



Skanska's principles

- We respect confidential information relating to Skanska and our stakeholders.
- For new employees, we do not ask for confidential information of their previous employers.
- We take all reasonable measures to prevent confidential

What does it mean for you?

information from being disclosed to any person who does not need and have a right to that information in the course of his or her work.

- You do not access, use, store or share confidential information without the appropriate authorization.
- You protect confidential information from loss or theft. This includes protecting mobile computing devices, such as laptops and tablets.
- If you receive confidential information by mistake – whether it comes from an external party, colleague, customer, competitor, or otherwise – you contact the sender, disclose the situation to your manager, and do not act upon the information.

Example

You receive an email during the tendering phase of a project that contains price information from the customer. You know this information should not be in your possession. What should you do?

This is considered confidential information, and under no circumstances should you act upon it. You must contact the sender to disclose the situation, and inform your manager and your Unit's Legal Department because this situation could affect Skanska's position with respect to a contract award. Do not forward the email unless instructed to do so by your Unit's Legal Department.

Chapter 2

Our commitment in the marketplace

We believe the best business relationships are founded on respect and mutual benefit. This is why we always strive to understand and anticipate the needs of our customers, suppliers, partners and other stakeholders, why we conduct ourselves with integrity, and why we act responsibly and fairly. As Skanska employees, we are expected to do our best when it comes to delivering on quality, on time and on budget. In fact, we always strive to do better than expected.

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Our commitment in the marketplace

Relationships with stakeholders

What is it?

How the marketplace perceives us is determined by how we handle ourselves in our daily dealings with stakeholders. When we are straightforward, fair and behave in accordance with Skanska's values, we become the company we want to be. We all must help to achieve this.

Stakeholders include employees, customers, shareholders, external parties with whom we have contracts, and the communities in which we work.

External parties include joint venture partners, subcontractors, suppliers, intermediaries, consultants, and other parties with whom we have a contractual relationship to provide goods or services.



Skanska's principles

- We are committed to positive, constructive and long-term business relationships with organizations that have values aligned with our own.
- We believe stakeholders conducting business with Skanska are entitled to the same level of conduct and ethical behavior

What does it mean for you?

that we expect from them.

- We do not compromise our values for any stakeholder.

For customers

- We strive to anticipate their needs and exceed their expectations by acting in an innovative and proactive manner.
- We strive to make them successful by understanding their business.
- We strive to solve their problems, both simple and complex.
- You act with integrity and fairness in all your dealings with our stakeholders, which you always treat in a professional and respectful manner.
- You ensure that our Code or the Supplier Code is part of our contractual agreements with external parties (refer to the Introduction of this Code for further information regarding joint venture partners).
- You work with external parties to ensure that they understand our ethical standards before entering into any relationships with them.
- You actively listen to our customers and make sure that you understand their needs and expectations.

Example

You are working on a project near a residential area. The local residents are concerned about the construction's potential effects, including noise, dust and decreased parking. How should you proceed?

It is important for us to respect and consider the communities in which we develop and build. This includes maintaining an open dialogue with the community, and seeking to address their concerns. Speak with the customer and then develop a plan for interacting with the residents.

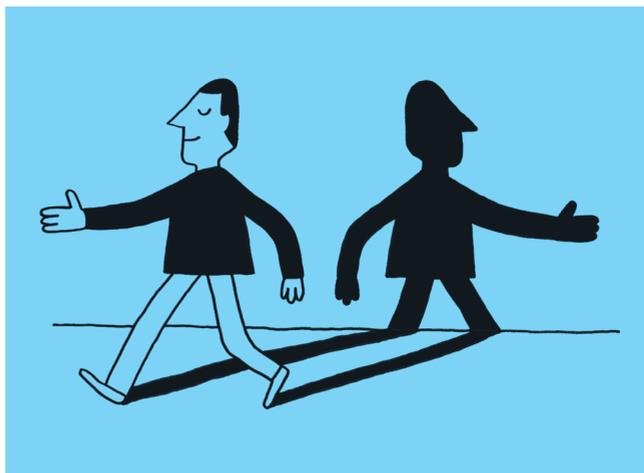
Our commitment in the marketplace

Conflicts of interest

What is it?

Conflicts of interest occur when there is a conflict between our personal interests and our responsibilities as employees or representatives of Skanska. Even the appearance of a conflict of interest can be as damaging as an actual conflict.

Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close relationships or other forms of involvement with an entity that competes with or engages in business with Skanska.



Skanska's principles

- We have a responsibility to our stakeholders to make decisions without regard to personal gain.
- We disclose potential conflicts of interest as required by relevant Skanska Global and Unit-level policies, and our contractual obligations.

What does it mean for you?

- You do not engage in activities that create a conflict or a perceived conflict between your personal interests and Skanska's interests.
- You avoid situations that may create or appear to create a conflict of interest.
- When a potential conflict of interest exists, you are required to report the potential conflict by the means established by your Unit.

Example

Your relative owns an excavating company and would like to tender for the project on which you are working. You are not directly involved with the tender or managing the scope of the project's excavation, but you are concerned that the relationship gives the appearance of a conflict of interest. Can your relative still tender for the project?

Your relative can tender for the project, but you must report the relationship to your manager so he or she is aware of the potential conflict of interest and can deal with it appropriately. You must also remove yourself from any decision-making process to award a contract or approve change orders or payments involving this company.

For more information

Related sections of the Skanska Code of Conduct including:
 Hospitality and gifts, Political activities, Corporate Community Investment (CCI) and Sponsorship
 Skanska Group Corporate Community Investment Policy
 Skanska Group Sponsorship Policy
 Skanska Grandparent Policy

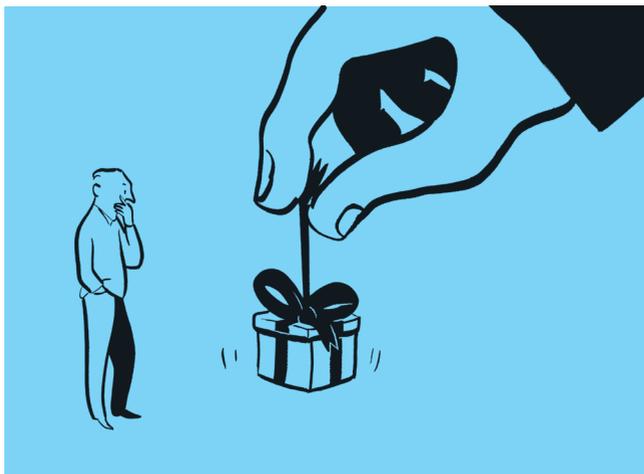
Our commitment in the marketplace

Hospitality and gifts

What is it?

Hospitality: Companies provide hospitality to their customers and business partners to promote business. Forms of hospitality may include entertainment, meals, sporting events and travel.

Gifts: 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. When inappropriate, hospitality and gifts may create a conflict of interest or the appearance of bribery.



Skanska's principles

- We do not request, accept or offer hospitality or gifts that may influence – or create the appearance of influencing – our business decisions or those of others with whom we work. Whether giving or receiving, hospitality and gifts must be appropriate and:
- Conform to local laws and customs.
- Not place the recipient under any obligation to the donor or appear to do so.

What does it mean for you?

- Serve a valid business purpose.
- Not be of an immoral nature nor harm the dignity of others.
- Be allowed by the policies of the recipient's employer.
- For hospitality, be of moderate value (refer to your Unit's policy for specific monetary limits).
- For gifts, be of nominal value, such as pens, diaries or other low-value corporate merchandise (refer to your Unit's policy for specific monetary limits). Keep in mind that promotional items are gifts.
- Each Unit is responsible for establishing a hospitality and gift policy with monetary limits for Skanska AB to approve. Additionally, each Unit must establish a process for approving and recording hospitality and gifts given or received over the approved limits.
- You use your best judgement when deciding to offer or receive hospitality or gifts. If it feels wrong, it probably is.
- You never offer or accept any gift of cash or cash equivalents.
- You avoid offering or accepting any form of hospitality or gifts that may influence the objectivity of either you or the recipient regarding making business decisions.
- You also consider that gifts or hospitality can have the appearance of impropriety when they are frequent or routine.
- You report any hospitality or gifts given or received over the approved limits, in accordance with your Unit's Hospitality and gift policy.
- You are responsible to know and follow the hospitality and gift policies of our customers.
- You never ask for any form of hospitality or gifts from a customer, supplier or other external party.

Example

A tool supplier invites you and several other Skanska employees to a dinner with entertainment after your project made a big tool purchase. Can you accept the invitation?

First, refer to your Unit's policy to determine whether you can consider accepting the hospitality. Then, evaluate the

Specific guidance
for accepting
an invitation to
and participating
in a supplier
conference

reason that the supplier is offering the hospitality. Is there a business purpose? Is it in the best interest of Skanska? Will the supplier expect more orders from Skanska? Although hospitality may be appropriate in many contexts, the conclusion in this case may be that we should not accept such an invitation because it sets up expectations of more business on the part of the supplier and it may give the appearance of impropriety to the supplier's competitors.

- Attending a supplier-sponsored conference should be clearly for business purposes.
- Ask yourself if the agenda is meaningful and relevant to Skanska's business.
- Your manager must always be notified and approve your attendance.
- The costs for travel and accommodation are to be paid by Skanska.
- Attendance must not create an expectation of favorable business treatment on the part of the supplier.
- Any planned extracurricular activities during a supplier conference must be modest, appropriate and reasonable, and within the limits provided by the hospitality and gift policy of your Unit. For example, if a conference held in London includes tickets to Wimbledon, those tickets would not have a conference-related business purpose.

For more
information

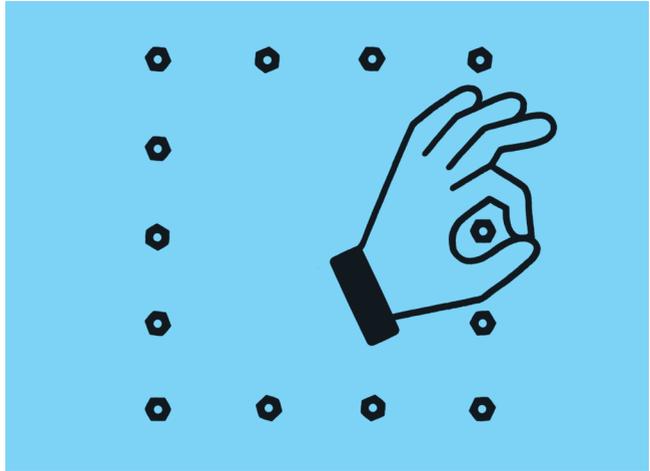
Related sections of the Skanska Code of Conduct including
Conflicts of interest, Anti-corruption and anti-bribery
Skanska Group Anti-corruption Policy
Skanska Decision Tree for Accepting a Business Courtesy
Skanska Decision Tree for Giving a Business Courtesy

Our commitment in the marketplace

Commitment to quality

What is it?

We take pride in quality and innovation, and we understand that delivering high-quality work benefits both our customers and Skanska.



Skanska's principles

- We aim to deliver quality work in all that we do, with a focus on continuous improvement.
- We work together with our stakeholders to provide products and services that meet or exceed their expectations.
- We acknowledge and seek to resolve defects in our work in accordance with our contractual obligations.

What does it mean for you?

- You seek excellence in every aspect of your work.
- You work with our customers and external parties to understand their expectations and the required levels of quality.
- You report to your manager any suspected defects that have not been addressed in a timely manner.

Example

One of the buildings in the residential development where you are working is nearly completed. A colleague makes you aware that a rainwater downpipe is not properly connected to the

underground pipework. Your colleague suggests that this is not a problem because the customer will not discover it. What should you do?

Even if the water does not accumulate, construction has not been completed in accordance with the design. Inform your site manager and ask him or her to arrange for the pipework to be properly connected. Finally, speak with your manager about your colleague's suggestion because such behavior contradicts our commitment to quality and should be addressed.

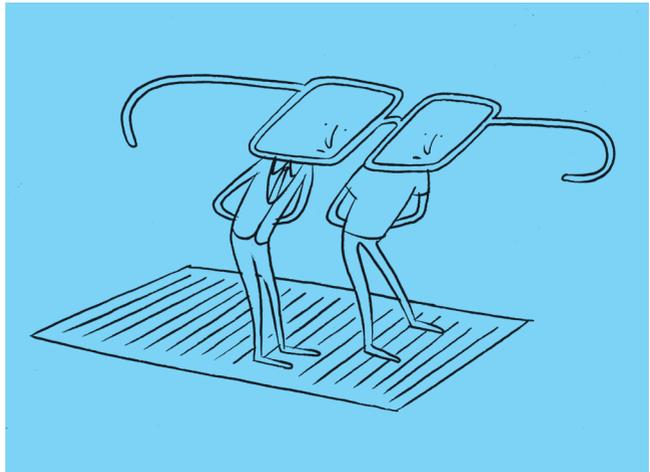
Our commitment in the marketplace

Fraud

What is it?

Fraud is when someone deliberately tries to deceive another person, acts dishonestly or abuses his or her position to gain any kind of material advantage, or involves anyone else in such activity. Fraud is usually carried out to unjustly obtain money, property or services. It is a criminal offense in most countries.

One potential type of fraud is false claims, including knowingly or recklessly misrepresenting or inaccurately recording costs of providing materials or services, intentionally concealing defects or fabricating evidence.



Skanska's principles

What does it mean for you?

- We always act fairly, truthfully and with integrity.
- You make sure that your books and records are accurate, complete and not misleading, and you carefully check or inspect things that are your responsibility.
- You verify that your expense reports only include items

you are entitled to claim and have been properly incurred while carrying out Skanska business.

- You only submit legitimate invoices to our customers and ensure that contractual claims can be substantiated by adequate and truthful documentation.

Examples

We are buying aggregate from a local supplier. You notice that some of the truck numbers and weights on the invoices from the supplier are duplicates from other dates. What should you do?

You need to first determine whether the duplicate numbers are an error or whether the supplier is trying to invoice Skanska more than once for the same work. We could get in trouble if, for example under a unit price contract, we submit our invoices to the customer based on false invoices from a supplier. As in this example, we need to be thorough to detect fraudulent activities.

You overhear your manager telling a subcontractor that he listed them on a receipt for a dinner over the weekend. You also know that your manager's spouse celebrated a milestone birthday over the weekend. Your manager submits the receipt with his or her expense report for reimbursement.

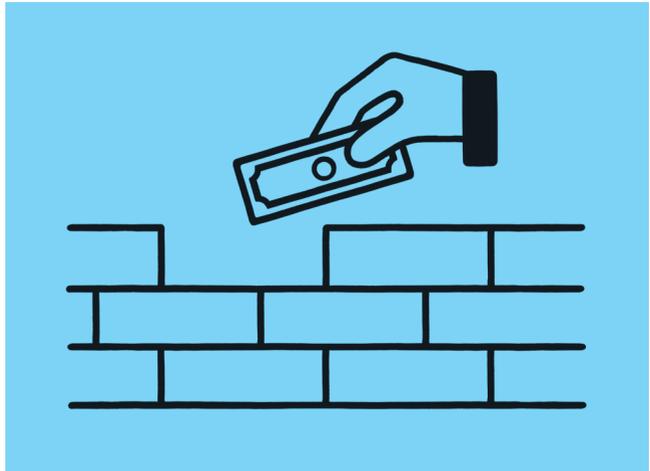
You have good reason to believe that your manager submitted a receipt for a family dinner as a business expense. This behavior is dishonest, contrary to our values and needs to be reported.

Our commitment in the marketplace

Sponsorship

What is it?

Sponsorship is a transaction done with the expectation of a commercial benefit and where Skanska makes a payment, in cash or in kind, to associate our brand with an activity or organization. In consideration of the sponsorship fee, Skanska receives rights and benefits such as the use of the sponsored organization's name, advertising credits, use of facilities or opportunities to promote Skanska's name, products and services.



Skanska's principles

- We select sponsoring activities that focus on opportunities related to our business and our values. A sponsoring activity should connect directly to the business; our business streams, the sectors we work for (infrastructure, healthcare, education, housing etc.), our sustainability agenda and other business-oriented topics like public relations, human resources etc. We sometimes select sponsoring activities related to completed Skanska projects.
- We never use sponsorships when they could have, or be perceived to have, improper influence on someone.

What does it mean for you?

- We avoid the appearance of impropriety that sponsorships may create with respect to business opportunities.
- You are careful when selecting sponsorship activities, ensuring that the sponsored parties and Skanska have similar values.
- You understand that sponsorships entail a degree of risk such as the perception of bribery.
- You ensure that we never offer a sponsorship as an incentive or reward for obtaining or retaining business, or for any other improper purpose.
- You understand the Sponsorship Policy and authority limits established by your Unit. Sponsorships require senior level approval.

Example

A customer asks you whether Skanska is willing to sponsor his or her daughter's soccer team. What should you do?

This sponsorship could have the appearance of undue influence. Initiate a dialogue with the customer to politely explain Skanska's approach to sponsorships which prohibits the sponsorship of sports activities connected to individuals and with no connection to our business.

A sponsorship is not:

- A Corporate Community Investment activity such as a charitable contribution.
- Advertising in magazines, newspapers, radio, TV, the Internet and social media.
- Any form of political contribution.
- Any form of lobbying.

For more information

Skanska Group Sponsorship Policy
 Skanska Group Corporate Community Investment Policy
 Skanska Group Anti-corruption Policy

Our commitment in the marketplace

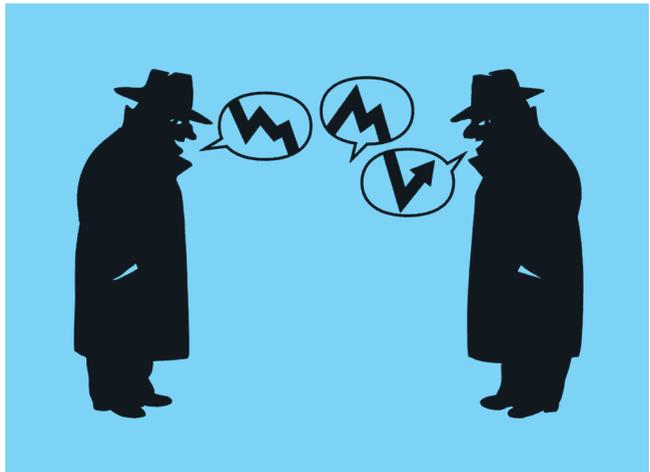
Insider information and market abuse

What is it?

Insider information is information about a company that has not been publicly disclosed and that is likely to influence the price of financial instruments such as shares in Skanska, including options and American Depository Receipts (ADR). Examples of what might constitute insider information include financial results, material acquisitions or material projects.

Insider trading is prohibited, meaning that it is forbidden to use insider information when buying or selling financial instruments, whether it is done by you or if you are passing on the information to someone else. In other words, insider trading is attempting to benefit by using insider information.

In addition to insider trading, other market abuse offenses include unlawful disclosure of insider information and market manipulation.



Skanska's principles

- We abide by all applicable laws and regulations when dealing with Skanska shares and other financial instruments.
- All employees are prohibited from using insider information about Skanska or other companies to purchase or trade in financial instruments.
- We communicate information that could affect our share price through Group Staff Unit Communications or Investor Relations.

What does it mean for you?

- You never disclose any confidential or non-public information to anyone who does not have a legitimate need and right to know.
- You do not take part in market manipulation by spreading false or misleading information, or engaging in other activities designed to manipulate the price of publicly traded securities.
- You never use insider information to deal in shares in Skanska or any other company with which Skanska does business, or inform others so that they may do so.
- You refer requests for information relating to Skanska shares to Skanska's Investor Relations team.

Examples

You find out that Skanska has been selected for a very large project that has not been publicly announced. You suspect this information could have an effect on Skanska's share price, and think this could be a good opportunity to buy Skanska shares. What should you do?

Since this could be insider information, you may not purchase Skanska shares or advise others to purchase Skanska shares based on the information received. Do not disclose this information to anyone other than your Unit's Legal Department. All external communication must go through the proper channels; reference the External communication section of this Code.

You are working on a project making improvements to a customer's research and development laboratory. You overhear

their executives discussing the results of some recent testing that will put the customer well ahead of its competitors in the market. The customer is a publicly traded company. Should you buy shares in the customer's company?

You should not act on the information you overheard, nor should you give the information to another person such as a friend. The rules on insider information are applicable to all publicly traded shares. It is most likely that the executives did not intend for you to hear their conversation.

For more
information

Group Staff Unit Investor Relations (IR)
regarding external communication
Group Staff Unit Communications
regarding external communication
Group Staff Unit Legal Affairs regarding insider information
Skanska Group Information Policy
Skanska Group Press Release Policy
Skanska Group Insider Guidelines

Chapter 3

Our commitment to society

We are not only a leader in project development and construction. We are an integral part of society, and what we do goes beyond the projects we complete for our customers. Ways that we benefit society include finding new means of minimizing our environmental footprint, promoting fair competition, and improving the communities in which we live and work.

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Money laundering 61

Fair competition 63

Political activities 65

Our commitment to society

Environment

What is it?

Our environmental commitment relates to the impact of our operations and processes, and the long-term environmental performance of the products and services we provide.



Skanska's principles

- We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world.
- We actively work to improve the environmental performance of our operations, projects, products and services during their entire life cycle.
- We consider environmental opportunities and risks when tendering projects.
- We engage stakeholders in environmental management; these include employees, customers, suppliers and those who live and work near our operations.
- All Skanska Group companies operate under an environmental management system registered and certified to the international ISO 14001 standard, and this system must cover all activities in which Skanska has management con-

What does it mean for you?

trol or a majority shareholding. New businesses must comply with this requirement within two years of acquisition. When we do not have management control, we aim to maintain comparable environmental management standards.

- You take the time to understand the environmental risks and impacts associated with your daily work and actively look for opportunities to reduce them. This includes the production of waste and carbon dioxide, as well as the consumption of energy, water, materials and other resources.
- You follow the requirements and procedures for using, storing, labeling, transporting and disposing of chemicals and hazardous materials.

Example

You are about to lock up the project site for the night when you notice a pool of hydraulic fluid under one of the excavators. If it were during work hours you would take care of it immediately, but you are in a hurry and think someone can deal with it in the morning. What should you do?

Managing an equipment leak in the right way is not just part of our ISO 14001 certification, it's also the right thing to do. Make arrangements for the spill to be properly and promptly cleaned up and documented, or contact your project's environmental manager or site manager to ensure the leak is immediately addressed.

For more information

Skanska Group Environmental Policy
 Skanska Color Palette
 ISO 14001 Environmental Management System

Our commitment to society

Corporate Community Investment

What is it?

Corporate Community Investment (CCI) is an important way that we engage with and invest in the communities where we operate.



Skanska's principles

- We believe that Corporate Community Investment builds our reputation as a good corporate citizen and it helps form long-lasting relationships with our stakeholders.
- We support communities using our time, expertise and resources (in-kind contributions), along with monetary contributions. We never use charitable contributions – a type of Corporate Community Investment – for undue gain or influence.
- We focus on educational opportunities that have a clear and long-term benefit to community members.

What does it mean for you?

- You are encouraged to support the community activities identified by Skanska.
- You understand that Corporate Community Investment entails a degree of risk, such as the perception of bribery, and therefore requires senior level approval. You seek the

proper approval before committing to a Corporate Community Investment on behalf of Skanska.

- You never offer or commit to do something that establishes an undue expectation on the part of either party.

Example

During a team meeting, your colleagues offer the following ideas for investing in the local community:

- Providing training and work experience to local residents and students.
- Providing safety education to students in primary schools near Skanska project sites.

These are both good examples of Corporate Community Investment.

For more information

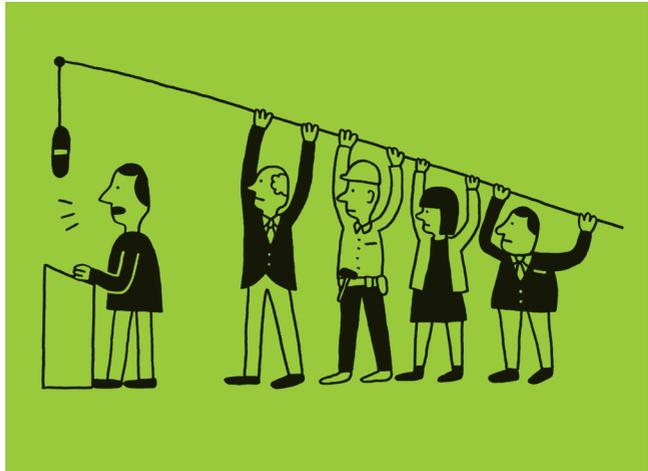
Skanska Group Corporate Community Investment Policy

Our commitment to society

External communication

What is it?

External communication is a significant part of our marketing and branding efforts, and includes all communication targeting customers, potential customers, partners, suppliers, investors, shareholders and other stakeholders. This includes media, press releases, statements, social media, publications, advertising and public presentations.



Skanska's principles

- We follow the communication rules for Swedish-listed companies.
- We speak with integrity and our communication should be accurate and reliable to maintain a high level of trust.
- We keep an open mind in dialogue with those affected by our operations.
- We respond to inquiries and communicate with the parties concerned in a professional manner.

What does it mean for you?

- You should provide timely, accurate, relevant and reliable information when communicating with external parties.
- You are an important part of communicating who we are

and how we affect our stakeholders, and you are aware that the way you communicate and to whom affect Skanska.

- You only speak to the media on behalf of Skanska when you are authorized to do so and refer media requests for information to your Unit's designated spokesperson(s).
- You refer media questions regarding our shares and other financial questions to GSU Communications or Investor Relations.
- You should be clear whether you are speaking on behalf of Skanska or yourself when communicating externally.

Examples

You get a call from a journalist asking about Skanska's financial performance in connection to a specific project. What do you do?

Only designated spokespersons are authorized to speak with the media on behalf of Skanska. Nevertheless, it is important to be polite and helpful. Explain to the journalist that you are not the right person to speak on behalf of Skanska in these matters, and put him or her in contact with your Unit's appropriate spokesperson.

You've just reached a milestone on a project and you post a comment and picture on your Facebook page showing your colleagues celebrating on site. A friend comments on your post asking about the use of recycled materials in the construction process. This is not within your area of expertise and you are unsure of whether they were used. What do you do?

We should always encourage an open dialogue, be transparent and respond to inquiries from external parties in a professional and accurate manner. If you do not know the answer, contact the relevant Skanska expert before providing a response.

For more information

Skanska Group Information Policy
 Skanska Group Press Release Policy
 Skanska Group Social Media Policy

Our commitment to society

Anti-corruption and anti-bribery

What is it?

Corruption is the abuse of power, often for private gain. This includes conflicts of interest, embezzlement, bribery, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

Facilitation payment is another example. This is a bribe, often small, paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.

Corruption undermines legitimate business activities, distorts competition, ruins reputations, damages brands and exposes companies and individuals to risk.

Bribery is an attempt to influence someone in the conduct of his or her duties by providing, offering or promising an improper benefit. Bribery can also be accepting, accepting a promise of or demanding an improper benefit. Such a benefit may include a payment in cash or cash equivalent, but could also be anything of value, such as an unpaid internship.



Skanska's principles

- We are committed to conducting business with a high level of integrity and do not tolerate any form of bribery or corruption.
- We avoid situations that may give the appearance of bribery, corruption or other inappropriate behavior.
- We do not request, accept, pay, or offer to pay bribes, either directly or through external parties acting on our behalf. Through our agreements, we compel external parties to follow the same rules and procedures for anti-corruption and anti-bribery as apply to Skanska.
- We do not make facilitation payments and we do not allow external parties acting on our behalf to make them, even when permitted by law.

What does it mean for you?

- You 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 public official, including foreign public officials, nor any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf.
- You ensure that intermediaries are retained only for legitimate business reasons, fees paid to intermediaries are reasonable in relation to services actually performed, payments to intermediaries are recorded properly and supporting documentation is obtained.
- You do not use charitable contributions or sponsorships to circumvent our Code or our Anti-corruption Policy.
- You never attempt to influence a public official's conduct of his or her duties by offering, promising, providing or authorizing any improper benefit. This applies regardless of whether the advantage is offered directly or through another person.

Special note regarding public officials

Examples

There is a new hire on your project. This person does not seem to have the qualifications for the position and you know this person is a close relative of a customer to whom Skanska has just submitted a tender. What should you do?

Offering the position could be a personal benefit to the customer, which is a form of corruption. You should talk to your manager and raise the concern. If you do not feel comfortable doing this or suspect your manager is involved, use the other reporting channels described in the Introduction to our Code.

In the municipality in which you work, it is possible to pay a published fee for a building permit to be expedited. Is this acceptable?

Facilitation payments are unacceptable. However, payment of a fee that is officially published, transparent, payable to a public authority and available to all applicants is not a facilitation payment and is therefore acceptable. Consult with your Legal Department whenever you are in doubt.

For more information

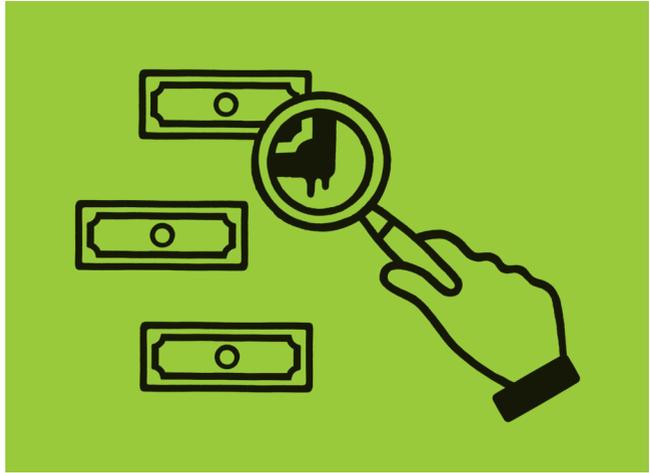
Skanska Group Anti-corruption Policy

Our commitment to society

Money laundering

What is it?

Money laundering is the act of disguising the origin of criminal money or assets to make them appear as if they came from a legal source.



Skanska's principles

- We only conduct business with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate resources.
- We notify the relevant authorities of any reasonable suspicions of money laundering, as required under relevant laws.
- You conduct appropriate due diligence to understand the business and background of prospective customers and business partners, and you determine the origins and destinations of their money.

What does it mean for you?

Example

Typically, money laundering involves irregularities in transferring money. You should be especially cautious in these cases:

- Payments by or to someone who is not a party to the contract.
- Payments to or received from offshore accounts, or accounts

in countries outside our home markets.

- Requests to make payments to accounts other than as specified in the relevant contracts or agreements.
- Requests for cash payments.
- Requests for overpayments.
- Requests to split payments into individual batches.

If you are suspicious of a possible money laundering scheme, speak with your manager and local finance/accounting manager.

Our commitment to society

Fair competition

What is it?

Competition and antitrust laws protect and promote free and fair competition. These laws apply to all of Skanska's home markets and they combat such illegal practices as price fixing, market sharing and bid rigging, as well as other practices with an anti-competition intent or effect.



Skanska's principles

- We believe that fair and open competition is best for our company, our shareholders, our customers, our employees and society at large. Fair competition drives efficiency and innovation, which are the basis of a well-functioning market economy.
- We do not tolerate any violation of antitrust laws, competition laws or related regulations.
- When employees are at higher risk due to their roles and responsibilities, we provide training to help them identify situations in which antitrust and competition law considerations are relevant.

What does it mean for you?

- You have a responsibility to understand how Skanska's antitrust (US) and competition (EU) laws relate to your daily work.
- You do not make any arrangements with competitors in order to restrict competition.
- You do not discuss or exchange sensitive commercial information with competitors.
- You consult your Unit's Legal Department if you have questions or concerns regarding compliance with antitrust and competition laws.

Examples

You attend an industry event where many of Skanska's competitors are also present. Two of these competitors start discussing an upcoming project that is already out to tender and they seek to engage you in that discussion. What should you do?

Discussing upcoming tenders with our competitors potentially violates competition law and must always be avoided. You must announce that you are leaving the discussion, excuse yourself and contact your Legal Department to report the occurrence.

You are a bid manager leading a tender for a large complex project in the upcoming year. What needs to be considered in deciding whether to form a joint venture for a project?

Skanska forms joint ventures with partners who complement our capabilities and competencies and can provide resources for the project. Joint ventures are an effective way to reduce our exposure to operational, financial and other risks. We do not form joint ventures to reduce or eliminate competition.

For more information

Skanska Compliance Guide – Skanska Group
 Skanska Competition Law Compliance Manual (EU)
 Skanska Antitrust Law Compliance Manual (USA)

Our commitment to society

Political activities

What is it?

Political contributions: Cash or non-cash payments made to support political organizations, parties, candidates or referendums. Non-cash contributions could include providing services, materials, employee time or the use of company facilities.

Lobbying: An activity aimed at influencing public policy decisions by providing information or expressing opinions to elected or appointed officials.

Lobbying activities include both direct communication with such officials and providing support to any person who engages in such communication. In some countries, lobbying is regulated.



Skanska's principles

- We do not make political contributions on a scale or with an association that might be seen as excessive or inappropriate.
- We understand that lobbying is one way that we can positively affect our industry and/or business opportunities for Skanska.
- We ensure that all lobbying activities performed on our

What does it mean for you?

behalf are appropriate to Skanska's business and do not adversely reflect upon us.

- You must always obtain the appropriate approval prior to promising, making or authorizing any political contributions on behalf of Skanska. Political contributions require approval by the CEO of Skanska AB, except in the US, where approval by the President of Skanska USA Inc. is required to comply with US law. All political contributions must be reported to the Senior Executive Team (SET) on a quarterly basis via Group Staff Unit Ethics.
- You never use political contributions to circumvent our Anti-corruption Policy.
- You have the right to make political contributions out of your own pocket, but you must never seek reimbursement from Skanska for such expenses.
- You have the right to participate in politics in your personal capacity.
- You understand that a lobbyist is an intermediary and you always follow the protocols for engaging an intermediary.

Examples

Your regional manager engages a marketing consultant to educate local government officials on the benefits of the Public Private Partnership (PPP) delivery method, which is not authorized under current legislation. Skanska's goal is to have the lawmakers pass a law to recognize and allow PPPs which could be beneficial to us. Is the marketing consultant a lobbyist?

In general terms, the marketing consultant is conducting lobbying activities and is therefore a lobbyist. However, it is important to consider this in light of local laws which sometimes define which activities are considered lobbying. In some countries, lobbyists are required to register with the government and may be required to file financial reports including their clients' names.

The Mayor of a town asks to use Skanska's office to hold a fundraising event to help his or her re-election campaign. Would this

be a political contribution?

Yes, under our Code, the use of a Skanska office would be considered a political contribution and all political contributions require the approval of the CEO of Skanska AB (in the US, political contributions require the approval of the President of Skanska USA Inc.). Important questions to ask: Is the political contribution legal? Does the political contribution need to be reported? Would the use of the Skanska office for a political fundraiser reflect unfavorably upon Skanska?

For more
information

Skanska Group Anti-corruption Policy

How to report a concern

You are responsible and accountable for reporting suspected or known misconduct to your manager or your manager's manager. If you feel uncomfortable doing this, speak with your Unit's Human Resources or Legal Department, or your Unit's Ethics Committee. If you prefer, you may report suspected or known misconduct confidentially and anonymously to the Skanska Code of Conduct Hotline either by telephone or on the website using the information provided below.

Czech Republic

Toll free phone: 800 900 538

Web: www.speakupfeedback.eu/web/xwrsyft/cz

Access code: 88364

Language: Czech or English

Denmark

Toll free phone: 8088 5638

Web: www.speakupfeedback.eu/web/xwrsyft/dk

Access code: 95919

Language: Danish or English

Finland

Toll free phone: 08001-13031

Web: www.speakupfeedback.eu/web/xwrsyft/fin

Access code: 34397

Language: Finnish or English

Hungary

Toll free phone: 0680 981 359

Web: www.speakupfeedback.eu/web/xwrsyft/hu

Access code: 15388

Language: Hungarian or English

Ireland

Toll free phone: 1800-55 2136

Web: www.speakupfeedback.eu/web/xwrsyft/ie

Access code: 55064

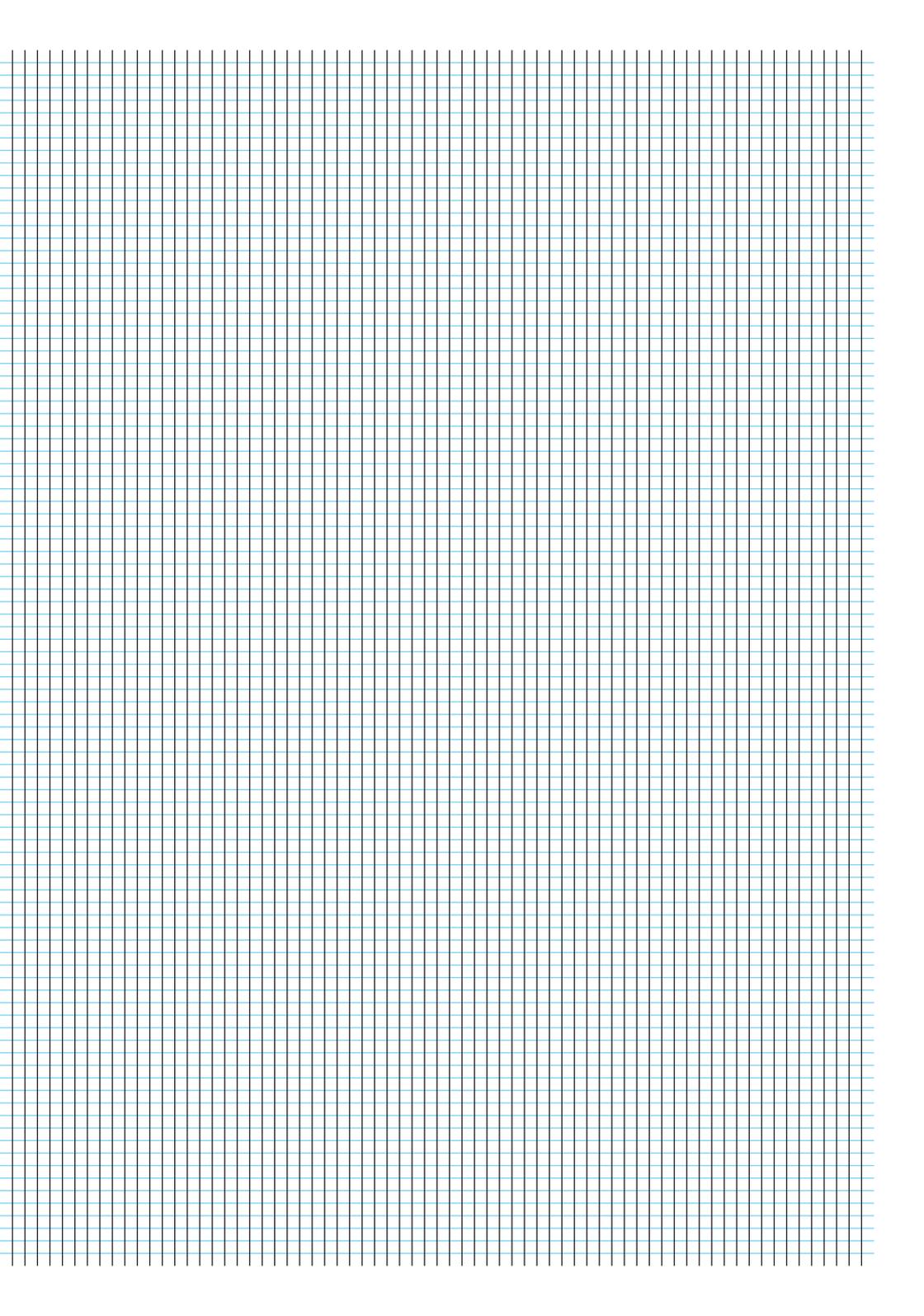
Language: English

Norway	Toll free phone: 800-18 333 Web: www.speakupfeedback.eu/web/xwrsyft/no Access code: 47789 Language: Norwegian or English
Poland	Toll free phone: 00800 4411 739 Web: www.speakupfeedback.eu/web/xwrsyft/pl Access code: 12462 Language: Polish or English
Romania	Toll free phone: 0800 894 540 Web: www.speakupfeedback.eu/web/xwrsyft/ro Access code: 98071 Language: Romanian or English
Slovakia	Toll free phone: 0800 00 4529 Web: www.speakupfeedback.eu/web/xwrsyft/sk Access code: 98351 Language: Slovak or English
Sweden	Toll free phone: 020-798 813 Web: www.speakupfeedback.eu/web/xwrsyft/se Access code: 46798 Language: Swedish or English
United Kingdom	Toll free phone: 0800-169 3502 Web: www.speakupfeedback.eu/web/xwrsyft/gb Access code: 08239 Language: English
USA	Toll free phone: 866 250 6706 Web: www.speakupfeedback.eu/web/xwrsyft/us Access code: 71447 Language: English or Spanish

Colophon

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