

Skanska UK Plc

Bribery Act compliance form

Please refer to page 2 overleaf for guidance on how to complete this form.

| | Likelihood | Impact | Control | Risk | Action |
|---|------------|--------|---------|------|--------|
| 1. Bribery: To what extent is your business at risk of Bribery (meaning offering, promising, giving, requesting, paying or receiving a bribe) i.e. a financial or other advantage of any type, including but not limited to political or other donations, facilitation payments, hospitality, permits or permits to secure licences ? | | | | | |
| 2. Types of contracts: How exposed is your business currently and in the future to Bribery based on the type of contracts that your business carries out with regard to the sector, value and duration of the project.? | | | | | |
| 3. Locations: How exposed is your business currently and in the future to Bribery based on locations (both within the UK and overseas) in which your business operates? | | | | | |
| 4. Contracting Parties: How exposed is your business to Bribery based on the types of clients, sub-contractors, consultants and suppliers ? | | | | | |
| 5. Other Relationships : How exposed is your business to Bribery based on involvement with third parties (i.e. joint venture or consortium partners, intermediaries and agencies)? | | | | | |
| 6. Due Diligence: To what extent do you carry out checks on potential Contracting Parties and Other Relationships with regard to Bribery. | | | | | |
| 7. Procedures: With regard to Bribery, to what extent does your business have in place transparent procedures to monitor any business activities taking place either within the UK or overseas (e.g. procedures relating to how officials, local business communities, overseas governments operate)? | | | | | |
| 8. Supply Chain: To what extent do you require your supply chain (whether in the UK or overseas) to follow a procurement procedure which reflects a zero tolerance culture towards Bribery? | | | | | |
| 9. Recruitment and Training of Staff: To what extent do you have a programme in place (i.e. training, whistleblowing and sanctions for offenders) to ensure that your current and future employees are aware of the risks of Bribery and what actions they can take? | | | | | |
| 10. Internal Controls: To what extent do you have transparent financial and organisational checks over accounting and record keeping practices, which are regularly reviewed in order to detect actual and potential Bribery? | | | | | |

Skanska UK Plc – Bribery Act compliance form

- Please complete the form and return with other contract docs.
- If you have already completed this for Skanska, please send a copy of the initial form
- You may wish to return a Bribery risk assessment carried out by your organisation in addition to or instead of this form

Marking

Please complete each of the three columns Likelihood, Impact and Control with a score from 1-5 based on the following guidance. The Risk column is the multiplication of the first three columns and can be used by Skanska and yourselves to highlight particular areas of concern. You may wish to detail in the Actions box any steps you are taking to mitigate risks. Please note there are no right or wrong answers or benchmark scores as every business is different.

Likelihood score:

- 1- *improbable* - all products from UK source from known# approved* supplier
- 2- *unlikely* - all products from UK source from approved supplier
- 3- *possibly* - EU source from approved supplier
- 4- *likely* - EU non approved supplier or Non-EU approved supplier
- 5- *probable* – Non-EU supplier not approved

known - worked with supplier on at least two previous contracts in past two years

* approved - compliance inspection checks/audit have been completed

Impact score:

- 1- consequence contained within project
- 2- consequence contained within company
- 3- company reputation impact
- 4- risk of prosecution
- 5- likely prosecution

Control score:

- 5- No policy
- 4- Policy in place
- 3- Individuals trained
- 2- Regular management checks of compliance
- 1- Independent audit of compliance

Signed _____ Name _____ Position _____

Company _____ Date _____