
Code of Conduct for Corporate Sustainability

**26th of August 2025
Third Edition**

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ABOUT WHITE

White Arkitekter was founded 1951 in Gothenburg and is an architectural firm with over 500 employees. We have offices in Sweden, Norway, United Kingdom and Germany as well as businesses in Canada, East Africa and many other countries. White's core business is architecture, design and urban planning. We offer a wide range of expertise and services related to these areas, such as Landscaping, Interior Design, Building Heritage, Sustainability and Project Management. Our projects cover all stages, from concept and feasibility studies to completed projects and management. We have projects in all market areas, such as housing, schools, healthcare and commercial properties, with both private and public clients.

White is an employee-owned company and approximately 80 percent of our employees are shareholders. All owners are active within White, which gives us a unique opportunity to decide how we want to run our company.

White's mission is to enable sustainable life through the art of architecture. A strong commitment to society has been an integral part of White's corporate culture since its inception. Through the projects we carry out and the way we act as a company, we take responsibility for further sustainable development.

Our Owner Directive sets out our core values and principles. White should be *exploratory, responsible* and act with *respect and participation*. These values should permeate everything from our vision and policies, to our business plan and how we conduct and carry out our projects.

This Code of Conduct for Corporate Sustainability clarifies White Arkitekter's position and how we take responsibility for running the company in a sustainable and ethical manner in all our operations.



Alexandra Hagen
CEO, White Arkitekter

OUR CODE OF CONDUCT

The Code of Conduct for Corporate Sustainability is our tool for how we as a company and as employees take responsibility and act, and what expectations we have on ourselves and our partners.

White is a member of the UN Global Compact and we are committed to comply with its 10 principles on human rights, working conditions, the environment and anti-corruption. Follow-up and reporting take place annually to the Global Compact. The ten principles are based on:

- *The UN Universal Declaration of Human Rights.*
- *The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.*
- *The Rio Declaration on Environment and Development.*
- *The United Nations Convention Against Corruption.*

This Code of Conduct for Corporate Sustainability is based on the Global Compact, our Owner Directives and our policies. The Code of Conduct for Corporate Sustainability and its guidelines must be followed by all White's employees and all parties with whom we have a business relationship within our value chain. Our expectations and requirements for clients and suppliers are summarised and clarified in the document "Code of Conduct for Clients and Suppliers".

THE UN GLOBAL COMPACT'S 10 PRINCIPLES

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

If there is a suspicion of a breach against this Code of Conduct for Corporate Sustainability, both employees and external stakeholders can report this via our anonymous Whistleblower procedure on our website, www.whitearkitekter.com.

IN DETAILS

- Code of Conduct for Clients and Suppliers
- Whistleblower Policy
- UN Global Compact, www.globalcompact.se

CORPORATE GOVERNANCE

White's Owner Directives set out the Company's Governing Values. These values must permeate the entire chain, from Vision, Business Idea and Policies to Business Plans and Action Plans. They also form the basis for how we conduct and carry out our projects.

Our Management System, White Work, is certified according to SS EN ISO 9001 Quality Management and SS EN ISO 14001 Environmental Management. White Work includes procedures, support and tools for the business, its support functions and the execution of projects.

We comply with and act in accordance with international and national laws, standards and directives.

IN PRACTICE

- White has five fundamental policies: Employee Policy, Quality Policy, Sustainability Policy, Risk Policy and Whistleblower Policy. In addition to these, we have guidelines/policies that have been established in accordance with specific national or international requirements.
- White's Business Plan describes the company's Mission, Vision, the overall goals and the strategies for developing the business over several years.
- Annual Action Plans for each office and supporting units describe detailed goals, initiatives and activities to achieve the overall goals of the Business Plan.
- Our environmental and quality work, in accordance with White Work, is followed up annually through internal and external audits. We work continuously on improvements, which are followed up during Management Reviews. Employees receive continuous training in Management Procedures and Requirements in accordance with White Work.
- White has identified and complies with applicable laws, regulations and guidelines for both its operations and projects. These are summarised in a List of Laws that is reviewed twice a year.
- White Work also includes procedures for collaboration, purchasing and risk mitigation.
- White prepares an annual Sustainability Report in accordance with the EU Non-Financial Reporting Directive (NFRD) and a Climate Report in accordance with the Greenhouse Gas Protocol (GHG).
- We have guidelines in accordance with the General Data Protection Regulation (GDPR) to protect personal data. We also have procedures for protecting digital documents and for managing security-classified projects.

IN DETAILS

- Employee Policy, Quality Policy, Sustainability Policy, Risk Policy and Whistleblower Policy
- Annual and Sustainability Report (including sustainability goals)
- White Work – Development and Management
- Privacy Guidelines (GDPR)
- BIM Policy

STAKEHOLDERS

As one of Europe's leading architectural firms, we are a company with significant leverage to influence our industry and contribute to a sustainable transition. We have the greatest leverage to contribute to change through our projects, but we also promote sustainable development in the built environment through industry organisations and networks, as well as by sharing expertise and participating in the debate.

Our stakeholders include individuals, companies and organisations that may be affected by our operations, or that may affect us.

Our **Business partners** are mainly clients, consulting firms, contractors and tenants. Our clients can be public or private actors, organisations or foundations.

Suppliers are companies and organisations from which we purchase goods and services, both for our own operations and for projects, such as sub-consultants.

Users are the end users of the projects to which we contribute. In most projects, the users are our client's client. Users may be people who live in homes, work in offices, students in schools or patients in hospitals. Users also include everyone who spends time in the public environments that we plan and design.

Producers are manufacturers of the materials and products we specify in our projects, based on the client's requirements. Guidelines in accordance with our Code of Conduct for Corporate Sustainability form the basis for the preferred choices and recommendations. White has no control over the materials and products that are ultimately procured for the projects.

Employees are our staff, most of whom are also owners of the company.

IN PRACTICE

- A minimum requirement we place on our clients, partners and suppliers is that they respect the 10 principles of the Global Compact. This is summarised in our Code of Conduct for Clients and Suppliers.
- We interact with our stakeholders in a comprehensive manner through personal contacts, social media, brand surveys, client surveys, supplier assessments, purchasing requirements, tender analyses, user surveys, employee surveys, employee interviews and a Whistleblower procedure.
- Comments or demands from stakeholders are handled on an ongoing basis. If they are deemed to be of a significant nature or have a significant impact on the business, they may contribute to adjustments to our operating procedures.

IN DETAILS

- Procedure and list of stakeholders (White Work)

HUMAN RIGHTS

Human rights imply that everyone is free and equal in value. Respect for human rights implies treating people fairly and equally. This can include everything from working conditions in the production of construction materials as well as to ensure that buildings and urban planning take into account the needs of each individual. It also includes the working environment and conditions for our own employees.

In our partnerships and in all our projects, we shall identify, prevent and manage actual or potential impacts on human rights. Child labour and forced labour are prohibited in all supply chains.

IN PRACTICE

- For projects outside our geographical focus areas (Sweden, Norway, United Kingdom, Germany, Canada and East Africa), a Country Risk Assessment is conducted regarding, but not limited to, human rights and anti-corruption. The assessment helps to identify whether there are risks associated with carrying out projects in the country and how identified risks can be mitigated. We will subsequently assess whether it is possible to carry out the work in compliance with this Code of Conduct for Corporate Sustainability.
- For each project a Project Analysis shall be carried out to ensure that the project can be carried out in accordance with this Code of Conduct for Corporate Sustainability.
- In our projects, we shall create conditions for inclusion and equal terms for both users and the local community. We advocate that different groups are involved in the planning, for example through citizen dialogues and user involvement.
- Suppliers of services and products, including sub-consultants, should confirm to White, by signing an agreement, that they do not violate human rights. Upon request, the company must be able to demonstrate procedures for ensuring that human rights are respected in its respective production and supply chains.

IN DETAILS

- Anti-Slavery Policy Statement (as required in the United Kingdom)
- Country Risk Assessment
- Code of Conduct for Clients and Suppliers

WORKING CONDITIONS

Our employees are our most important asset. Our goal is to be a workplace where employees feel secure and have a positive working environment. Our commitment to a sustainable workplace includes both physical and psychosocial aspects, as well as the working environment and equal treatment.

Our Employee Policy states that every employee should have the opportunity to develop in the best possible way in their work and as a person, based on their abilities, skills, knowledge and background, for the success of the company and the individual.

White shall be an equal workplace free from all forms of discrimination. Our working environment shall be safe and healthy, and we work to ensure secure, safe employment.

IN PRACTICE

- We have a Work Environment and Equal Treatment Plan that sets out guidelines preventing discrimination in our workplace. It is based on the Swedish Discrimination Act (Act 2016:828), the Work Environment legislation, including the regulation on organisational and social work environments (AFS 2015:4), the Parental Leave Act, the UN Conventions on Human Rights, and national Laws in the countries where we operate. The plan is reviewed annually, and any measures are handled both centrally and at each office. The experience of work environment, equality and culture are also reviewed individually and in employee surveys.
- We comply with national laws and guidelines regarding working conditions, working hours and benefits. In Sweden, we comply with the industry's collective agreement and have union representatives at all offices. Child labour and forced labour are prohibited.
- All parties with whom we have a business relationship must have the necessary permits to operate in the specific country and ensure compliance with work environment laws and regulations. This shall be agreed upon in the contract with the party.
- We have a systematic approach to health and safety, with central and local plans and safety representatives at all offices in accordance with national laws and guidelines. We also have guidelines for *Alcohol and drugs*, *Availability at work and rehabilitation*, as well as guidance for *Health and safety outside White's premises*.
- All employees are offered a Wellness Allowance, Study Allowance and Health Profile Assessment or equivalent.
- All employees have an Annual Development Review, during which their health and work situation are reviewed, and personal development goals are set.
- We ensure personal and professional development through White's Academy, which offers a wide range of training courses. White Research Lab gives all employees the opportunity to engage in research, development and innovation.

IN DETAILS

- Employee Policy
- Work Environment and Equal Treatment Plan
- White Work-Your Employment and Our Workplace
- Equal Opportunity Policy (United Kingdom)
- Health and Safety Policy (United Kingdom)

ENVIRONMENT

White Arkitekter works continuously to reduce our direct and indirect environmental impact, both in our own operations and in our projects. The UN Climate Agreement, Agenda 2030, the EU Green Deal and national and international targets form the basis for our business objectives and strategic initiatives.

We strive to create environments that contribute to reduce the impact on the climate and ecosystems, that reduce the use and spread of hazardous substances, that use the Earth's resources efficiently and that promote the conservation, reuse and recycling of materials, energy and water.

Our goals for 2030 are:

- 50% reduced greenhouse gas emissions from our operations (scope 2 and 3), compared to 2018. (includes energy, purchasing, travel and waste)
- 50% lower embodied carbon for materials in projects, compared to 2023.

IN PRACTICE

- White's Sustainability Policy clarifies the meaning of sustainability, both for our operations and our projects.
- White is certified according to SS-EN ISO 14001
- We prepare an annual Sustainability Report in accordance with the EU Directive on Non-Financial Reporting (NFRD) and a Climate Report in accordance with the Greenhouse Gas Protocol (GHG).
- In all projects, significant sustainability aspects and risks must be identified through a Sustainability Analysis. This is based on national and international goals, guidelines and directives and covers eight areas: Land use and Water, Ecosystems and Biodiversity, Climate adaptation, Climate change and Energy, Materials and Circularity, Health and Well-being, Equity and Social values, and Long-term Economy. The Analysis is followed up during the course of the projects.
- We impose environmental requirements when purchasing goods and services.

IN DETAILS

- Sustainability Policy
- Annual and Sustainability Report (including Climate and Environmental accounts)
- Roadmap Climate 2030
- Expertise and services in sustainability (www.white.se)

BUSINESS ETHICS AND ANTI-CORRUPTION

White has a strong social commitment; an ethical, democratic approach is an integral part of our corporate culture. We oppose all forms of corruption, strive for competition on equal terms and promote social responsibility in the value chain. We comply with and act in accordance with international and national laws, standards and directives. We refrain from projects and collaborations that risk not being carried out in accordance with this Code of Conduct for Corporate Sustainability, for example in relation to democratic rights or corruption.

IN PRACTICE

- All employees must comply with the Ethical Rules of the Swedish Construction Sector and the Ethical Rules of the Architects Sweden (Sveriges Arkitekter, SA), or equivalent guidelines in Norway, United Kingdom and Germany.
- We comply with sanctions imposed by the UN, the EU Sanctions Directive, and Sweden's Act on International Sanctions (2025:327).
- We do not accept bribes and have representation rules.
- We have a Whistleblower Policy. White's website has a whistleblower procedure where all employees and stakeholders can report deviations from this Code of Conduct or other irregularities at White. This may include corruption, bribery, conflicts of interest, fraud, financial irregularities, security breaches or serious misconduct.
- The company's overall risk analysis is reviewed annually and followed up by the Board of Directors. The analysis includes internal risks, external risks, financial risks, construction risks and sustainability.
- Our Code of Conduct for Clients and Suppliers, which is based on this Code of Conduct for Corporate Sustainability, sets out what we expect from our partners. When signing an agreement, the contractor must certify that they have understood the meaning of White's Code of Conduct for Corporate Sustainability and undertake to comply with it. Different types of initial evaluations are carried out, such as tender analysis, project analysis, purchasing criteria and client and consultant evaluation.
- A Risk Analysis for projects is carried out in connection with tenders and contracts. The assessment is based on our business objectives, Code of Conduct for Corporate Sustainability, sustainability goals and financial conditions.
- For projects outside our geographical focus areas, a Country Risk Assessment is carried out. This includes aspects of democracy, human rights, corruption and business risks associated with the specific country. The analysis is based on evaluations by Freedom House, EKN Exportkreditnämnden in Sweden and Transparency International.

IN DETAILS

- Whistleblower Policy
- Country Risk Assessment
- Code of Conduct for Clients and Suppliers
- Anti-Corruption Policy

SOCIAL ENGAGEMENT

For White, it is fundamental to take people's different needs into account when designing the built environment. This is central to White's Owner Directives, Business Idea, policies and Business Plan. We also want to contribute to equal and norm-creative environments characterised by security and participation, where all citizens can find their place and develop, regardless of age, gender, background, circumstances and interests. This is a prerequisite for a sustainable society.

We engage in many ways, both globally, nationally and locally. In addition to financial support for various organisations and projects, we contribute through our employees' commitment and expertise.

IN PRACTICE

- In our projects, we work interdisciplinary and involve our specialists in social sustainability to design equal, inclusive and healthy environments.
- We offer strategic advice on social sustainability and impact assessments in urban planning and architecture. The perspective of children is a starting point in all our projects and is examined in the Sustainability Analysis.
- White Research Lab (WRL) is White's platform for the company's network within 15 areas of expertise. Through White Research Lab, we develop our knowledge and invest in practical research, development and innovation. This enables us to deliver cutting-edge expertise in our projects and continuously contribute to the development of architecture, the industry and society.
- Through White Research Lab, we have carried out several development projects focusing on equal and norm-creative planning, such as: *Norm-creative urban planning*, *Libraries as democratic spaces* and *Inclusive skate parks*.
- We have methodologies for dialogue processes, inclusive design and co-creation in our projects, for example with children and young people.
- White contributes financially to various organisations, primarily focusing on children, young people, the environment, culture, sports and humanitarian aid.
- We undertake international projects that can contribute to strengthen the social, cultural or ecological conditions in the local community. The Go Down Art Centre in Nairobi, Kenya, and the extension of the Panzi Women's Hospital in the Democratic Republic of Congo are examples of projects to which we have also contributed financially.
- White is a member of and involved in several industry organisations and networks, such as the Green Building Council in Sweden and United Kingdom, Federation of Swedish Innovation Companies (FSIC), Circular Sweden, CC Build and Architects Declare.
- We have an Internship Programme at all our offices. We encourage increased diversity in the architecture industry by, for example, collaborating with schools and offering practical work experience. In Malmö in Sweden, we are part of the industry initiative Urban Academy, which aims to contribute to a building industry that reflects the whole of Malmö within one generation.

IN DETAILS

- Annual and Sustainability Report

CONTACT

If you have any questions, please contact Sustainability Director Anna Graaf, anna.graaf@white.se, telephone +46-31-60 86 00.

To report any deviations from this Code of Conduct for Corporate Sustainability or other irregularities, please use the Whistleblower procedure on our website. [Whistleblower Policy - White Arkitekter](#)

Signature: *Alexandra Hagen*

Email: alexandra.hagen@white.se

Title: CEO

Company: WHITE ARKITEKTER AB