

# Anti-slavery Policy Statement

## **INTRODUCTION**

This Modern Slavery and Human Trafficking Statement is a response to Section 54 (1) Part 6 of the Modern Slavery Act UK.

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

White Arkitekter AB UK Branch ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products and services.

White arkitekter AB UK Branch takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act UK.

## **ORGANISATION STRUCTURE**

White Arkitekter AB UK Branch has business operations in:

- UK
- Ireland
- Canada
- Netherlands

White's core business is architecture, design and urban planning. White offers 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.

The nature of our supply chain is as follows:

- Other consultancies (architects, engineers)
- IT support (consultants, hardware and software suppliers)
- Service Industry (catering, cleaning etc)
- Training services

White is a company owned by its employees; thus we view ourselves as a large and cohesive modern collective: out of 420 employees, there are 270 shareholders, including 90 partners. Our business model allows us to conduct the practice with a long-term perspective, affording us the power to determine what investments we want to make, what percentage of profits to reinvest in the company and how much is paid out to shareholders.

### Partners

To ensure that the partners we collaborate with act in accordance with our values, we have a *Code of Conduct* for Clients and Suppliers. Follow-up takes place through interviews with our major suppliers or random checks with various partners and collaborators. Deviations from the *Code of Conduct* can be reported to the Director of Human Resources.

This policy applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This policy is not part of any employee's employment contract, and we reserve the right to change it at any time.

### **STRONG VALUES**

Since its inception, White has had a strong sense of responsibility and commitment to society. Responsibility, respect, transparency and an ethical, democratic ethos are the core values permeating the company. White's *Code of Conduct for Corporate Sustainability* is our guide for how we as a company, along with our employees, take responsibility. The Code also helps us determine what expectations we have on ourselves and our partners. It is based on the UN Global Compact's ten principles on human rights, labour, environment and anti-corruption, as well as our policies: Employee Policy, Quality Policy, Sustainability Policy, Equal Opportunity Policy and Health & Safety Policy .

We live in a time that places even higher demands on ethics, democracy and risk management. Our *Code of Conduct* supports us in minimising risks in daily operations and simultaneously establish core values that enable us to influence the world around us.

*“White takes limited and controlled economic and operational risks.”*

*From White's Risk Policy*

Our *Code of Conduct* for Sustainable Business works as a guide for how we act and take responsibility – as individual employees and the company in its entirety. It also serves to define

what expectations and obligations we have on ourselves and our partners. Our Code of Conduct also covers the legislation in each country where we operate in favour of Equality and against Bribery, Slavery and Human trafficking. All Employees and Partners are obliged to follow these rules and legislation. Fundamental to these laws, rules and guidelines, we oppose all forms of corruption, strive for competition on equal terms, promote social responsibility, equality and that slavery and human trafficking is not taking place in our supply chains or in any part of our business in the value chain.

## **RESPONSIBILITIES**

White arkitekter AB is ultimately responsible for ensuring that this policy conforms with our legal and ethical commitments, as well as that all people under our control abide by it.

CEO is in charge of implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels is responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get proper and ongoing training on it and the subject of modern slavery in supply chains.

You are welcome to comment on this policy and offer ways to improve it.

Any comments, suggestions or queries are encouraged and should be addressed to HR Director.

Everyone must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our company or supply chains is the duty of everyone who works for us or is under our authority.

## **TRAINING**

Training on this policy, as well as the threat our company faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered through established channels of communication between the company and the employee/partner.

## **RISK ASSESSMENT**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its supply chain.

The company's comprehensive risk analysis is reviewed annually.

Primary risks identified are those associated with our employees, economic development and projects. Therefore, we perform continuous follow-ups of, for example, employee health, economical ratios and assignment results. Risk assessment, regarding sustainability and prevention of risk exposure, are presented in the Sustainability Report.

A risk analysis for projects is carried out in conjunction with tender and contract and is an overall assessment as to whether the assignment aligns with our business goals, Code of Conduct, sustainability objectives, and financial conditions. For projects outside our focus countries, a country risk analysis is carried out, based on the aspects of democracy, human rights, ant-slavery and human trafficking, corruption and business risks associated with the specific country. The analysis is based on evaluations conducted by Freedom House, EKN Export Credit Board SE and Transparency International. According to our assessment, there is a low risk that our business will

contribute to a direct negative impact from a sustainability perspective. The best opportunity for us to prevent negative sustainability risks, is through our projects. Therefore, a sustainability analysis must always be carried out to identify possible risks and prioritised sustainability issues.

### **QUALITY MANAGEMENT**

We have three fundamental company policies:

- White Personnel Policy
- White Quality Policy
- White Sustainability Policy
- We joined the UN Global Compact in 2014. Its 10 principles form the basis of the Code of Conduct.

Our business system, White Work, has been certified in accordance with ISO 9001 and ISO 14001 since 2006. White Work includes procedures for employment, training, operation, evaluating and approving delivery suppliers, health and safety, support functions, and the execution of projects. White Work secures that we in each country of operation comply with legal requirements, respect the rule of law in all jurisdictions and respect international norms and behaviour for the projects in which we operate.

We are committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act.

### **THE SUSTAINABILITY REPORT**

The Sustainability Report covers the White corporate Group. The report is based on the requirements of the Annual Accounts Act, which means that it contains information on sustainability needed for understanding the company's development, position, results, and consequences of the operations. The report includes information on the environment, social conditions, labour, respect for human rights, and anti-corruption. The report relates to the fiscal year from January 1 to December 31, 2025. The report refers to our commitment under the UN Global Compact and its ten principles. It also constitutes our annual report on Communication on Progress will be published on the UN Global Compact website, [www.unglobalcompact.com](http://www.unglobalcompact.com). The report is also published on the White's website, [www.whitearkitekter.com](http://www.whitearkitekter.com)

### **EMPLOYEE SUPPORT**

Employees who have questions about this policy or who observe anything that may conflict with this policy, or the Modern Slavery Act, should contact their direct manager and report the incident. The direct manager shall advise the employees on how to handle the matter. The Office Director is responsible for managing deviations from the policy or breaches of the law. Employees may also contact the CEO, HR or Quality Director. It is also possible to make contact anonymously via the Whistleblower Policy [Whistleblower Policy - White Arkitekter](#).

### **POLICY BREACHES**

Any employee who violates this policy may face disciplinary action, which might result in dismissal

for misconduct. If other people or organisations, working on our behalf, violate this policy, White Arkitekter AB reserve the right to terminate our relationship with immediate effect.

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White Arkitekter AB