

H.E. António  
Guterres Secretary-  
General United  
Nations  
New York, NY  
10017 USA

Dear Mr. Secretary-General

I am pleased to confirm that Snøhetta AS supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. Snøhetta AS will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the UN Global Compact, and annually thereafter according to the UN Global Compact COP policy.

This includes:

A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.

A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).

A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely yours,

Isabella Alveberg  
CEO  
Snøhetta AS

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## Snøhetta Sustainability ambitions

The aim of this document is to build a condensed platform for describing Snøhetta's long term sustainability ambitions, short term activities to attain these and how we measure our progress through corporate governance. Snøhetta has built their purpose on a broad understanding of sustainability and these are embodied in how we work:

- As a global practice, we play a central role in creating cultural, societal, and economic value for our clients and for society at large.
- We create architectural and design solutions with lasting functional, technical, sustainable, and aesthetic qualities that meet today's needs, whilst also contributing to the long-term cultural quality of the built environment.
- The buildings and landscapes we design now will have long lasting impacts in the future because of their long lifespans.

## Snøhetta Sustainability fundamentals

The Snøhetta Sustainability Philosophy is built on the three fundamentals of sustainability as per the United Nations Brundtland Commission report of 1987. We have updated the third axis and combined financial sustainability and governance to encompass an understanding for company ownership.

### Our ambition



## Environmental sustainability

We are committed to conduct our business in accordance with the United Nations Sustainable Development Goals and the Paris agreement.

Our ambition is to **reduce our carbon emissions by 50% within 2029** as well as strengthen our position worldwide within sustainable architecture and design.

Through extensive transdisciplinary collaboration and research projects, we

constantly strive to find new ways of doing business to reach UNs global warming goal of 1,5 C. Our ambition is to contribute to a sustainable circular economy model, based on the reuse of building components, sustainable material usage and renewable energy.

In 2029, our ambition is that all projects in the design phase shall be carbon neutral. **By 2039, our ambition is that our collective portfolio shall be carbon neutral.**

#### Key corporate environmental sustainability activities in 2021

1. Snøhetta foundation or equivalent to promote research in environmental sustainability
  - By Dec 31, 2021, set up autonomous foundation or company.
2. Sustainability ambition statement in all new projects in all studios
  - Description of sustainability ambition in MOMENT for 100% of all new projects
3. Competency plan to increase sustainability knowledge for all employees
  - Managing Director to set qualitative and quantitative goals for individuals and teams.
4. Reduce carbon footprint through reducing work related travel
  - To be determined in 2022

#### Our Social Sustainability ambitions

Snøhetta is committed to **promoting and sustaining human well-being** in terms of physical environments, health promoting designs, providing psychological respite, gender equality, dignity, a sense of belonging, collective ownership and public space in our architecture and design.

In our internal operations, we are committed to **building a diverse and inclusive workplace**. We actively pursue an environment where all ideas, perspectives and styles are valued, and a creative process which is built on transdisciplinary and inclusive principles.

Snøhetta is founded on humanistic values which permeate our company from design, operations to company culture. Social responsibility, integrity and ethical behavior are the core of our business and behavior.

#### Key corporate social sustainability activities and KPIs

1. Our employees
  - Equal employment opportunities

- i. Ensure educational diversity – tbd with HR and MD or CEO and MD
  - ii. Maintain healthy diversity to mirror the markets we operate in –
    - 1. 50/50 gender overall gender balance
    - 2. 50% gender balance in 2&3 level management
- Employee health
  - i. Added insurance, in addition to government regulated insurance (Life, pension, maternity / paternity leave of absence)
  - ii. Sports, Bike, Public transportation benefits
- Safe and healthy workplace
  - i. Contracted work agreements defining working hours and overtime
  - ii. Employee representatives in all studios to assist in work, health, and safety issues
  - iii. Established conflict management and whistleblowing policies
- 2. Our Projects
  - Design with broad social inclusivity at core

Our financial and governance ambition

We are committed to **providing healthy workplaces** where our employees can develop and thrive in an inclusive environment.

We will run a **fiscally sound business**, built on good corporate governance focused on transparency, accountability, responsibility, and fairness. Our aim is to reinvest any financial gains in equal measure to our people, our methodologies, our studios, and our owners.

#### Key financial and governance sustainability activities

- 1. Fiscal KPIs
  - Group earnings before tax average goal 10%
  - Annual dividends to shareholders
- 2. Governance
  - Employee representation at board level
  - Internal stock market available for all employees after one-year employment

### 3. Transparency

- Transparent annual report with sustainability progress documentation
- Transparent annual results and report sharing with employees
- Transparent results from companywide pulse survey

## Code of Conduct

### Introduction

Code of Conduct defines describes the standard of professional behaviour undertaken by the Snøhetta companies and those employed by any Snøhetta companies

We are proud of the ethical business practice we have established. This Code defines the core principles and ethical standards that form the basis on how we create value in our company.

Code of Conduct is owned and approved by the Snøhetta Group AS Board of Directors in Oslo, Norway and can be applied to Snøhetta offices within the regulations of individual countries where other Snøhetta offices exist. The document is key element in our way of doing business. How we want to achieve our ambitions is constituted in this Code as our ethical foundation, our values for driving the right behaviour and our leadership attitudes for stretching our corporate culture in the desired direction.

Snøhetta's Code of Conduct applies to members of the Board of directors, managers and employees as well as those acting on behalf of the company. This Code does not apply directly to the company's business partners. However, Snøhetta does not want to be associated with business partners that do not have appropriate ethical standards.

Corporate ethics are about how we behave towards each other and the outside world. The Code is the foundation of our corporate culture. Everybody associated with Snøhetta shall comply with the rules and guidelines that build on Snøhetta's basic values.

The Code influences how we think about our actions and what we should and should not do. Every employee is expected to read, understand and live by the Code.

By doing this, Snøhetta will stay a strong and long viable company.



Craig Dykers



Kjetil Trædal Thorsen

## 1 Our Community

### 1.1 Human rights

*Background: Human beings are entitled to be treated with respect, care and dignity. Snøhetta's business practices are not sustainable unless we base relationships on basic human rights with and between employees, customers and collaborators, and appreciate diversity, cultural and other differences.*

#### Our standard:

Snøhetta supports and respects internationally proclaimed human rights including the UN Declaration and conventions on human rights.

#### Our conduct:

We shall respect the personal dignity, privacy and rights of each individual you interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

If you become aware of any situation in breach with Snøhetta's standards, you shall notify Managing Director.

### 1.2 Working conditions

*Background: Snøhetta is committed to create working conditions which foster fair employment practices and where ethical conduct is recognized and valued.*

#### Our standard:

Snøhetta shall be a professional workplace with an inclusive working environment, and shall respect the International Labour Organisation's fundamental conventions.

Snøhetta shall not employ or contract child labour or any form of forced or compulsory labour, as defined by ILO fundamental conventions.

Snøhetta is opposed to discriminatory practices and shall do its utmost to promote equality in all employment practices.

#### Our conduct:

Our working environment standards shall be extended to every member of our diverse community and exemplified by all leaders and employees.

We shall act with integrity and treat our colleagues and others that we meet through our work with respect.

No direct or indirect negative discrimination shall take place based on race, colour, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status.

We do not tolerate degrading treatments towards any employee, such as



mental or sexual harassment or discriminatory gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

### **1.3 Health, safety and employee security**

*Background: Snøhetta is committed to protect the health and safety for our employees.*

#### Our standard:

Snøhetta strives to create and maintain a healthy and sustainable work-life balance for all employees.

Hazards shall be identified, risk assessed, mitigated and monitored to prevent accidents and occupational diseases.

Necessary employee security protection shall always be given the outmost attention. Employee security measures shall be based on risk analysis and mitigating actions.

#### Our conduct:

We shall do our utmost to identify occupational risks, establish controls and monitor performance. Our performance will be reported in a transparent and accurate manner.

It is the responsibility of all of us to adhere to the prescribed safety rules and to act by example as well as to raise and react to any concerns which may represent a potential threat to health and safety.

## **2 Our Relationships**

### **2.1 Environment**

*Background: Our environment faces challenges and threats that may negatively impact climate, resources and quality of life.*

Snøhetta is committed to conduct its operations with due regard for our environmental impact.

#### Our standard:

Snøhetta is committed to minimise the impact on the environment of its operations.

Snøhetta shall adhere to relevant local and internationally recognized standards, minimize its environmental impact and continuously improve its environmental performance by implementing sustainable sourcing. We shall support development and diffusion of environmentally friendly technologies and projects.

#### Our conduct:

We will contribute to reduce the use of finite resources, including energy, water and raw materials.

We will contribute to reduce harmful emissions to environment, including waste, CO2 emissions and other air emissions and discharges to water.

## 2.2 Customers

*Background: Our vision is influencing, enabling and designing cultural life qualities*

Our standard:

The success of Snøhetta depends on the quality of the relationships between ourselves, our employees and our clients and consultants. Our clients impression of Snøhetta and their interest and willingness to use our services is greatly formed by the people who serve them. We look to create a healthy balance between our needs and desires and those of our clients, and those that experience the product of our work.

Our conduct:

We will meet customers with insight, respect and understanding. The key to achieving our vision is a mindset where everyone works together with common values, keep promises, be inspiring and be respectful.

You shall always try to guide and meet the needs of the customer in the best possible manner, whilst complying with laws and regulations.

## 2.3 Collaborators

*Background: Our collaborators are essential to our ability to operate and develop both projects and knowledge. As Snøhetta will be associated with its collaborators, their conduct may have an impact on Snøhetta's reputation.*

Our standard:

Collaborators shall be treated fairly and equally.

Collaborators in competition for contracts with Snøhetta shall be able to trust

Snøhetta's processes. Collaborators to Snøhetta shall adhere to Snøhetta's principles for collaborators conduct.

Our conduct:

When selecting collaborators you shall follow the established guidelines and procedures.

You shall also be alert to activity by collaborators that may be in breach of our principles for collaborators conduct and report it to the Managing Director.

## 2.4 Competition

*Background: Fair and level competition is important to society and contributes to increased welfare as well as creating business opportunities for Snøhetta.*

### Our standard:

Snøhetta supports fair and open competition in all markets.

### Our conduct:

We will always meet Snøhetta's competitors in an honest and professional manner.

We will not cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behaviour that is in breach of relevant competition laws.

## 2.5 Corruption and bribery

*Background: Corruption is a threat to business and society in all countries. In addition to unfair competition it can also result in individuals being subject to blackmail and imprisonment. For Snøhetta, anti-corruption is not only a legal obligation and an ethical standpoint. It is in our own interest to take a firm stand against corruption.*

### Our standard:

Snøhetta has zero tolerance and is firmly opposed to all forms of corruption.

### Our conduct:

We will never offer, give, ask for, accept or receive any form of bribe. A bribe occurs when someone attempts to influence a decision by offering some form of undue or improper advantage, favour or incentive. We will not use agreements with middlemen to channel payments to anyone to facilitate corruption.

## 2.6 Gifts and business courtesies

*Background: The distinction between corruption and gifts and business courtesies can be difficult to draw and due care must therefore be exercised.*

### Our standard:

In the course of our business, conflict of interest can arise in a variety of circumstances, and you must avoid accepting, soliciting or offering personal gifts, or entertainment of significant value from competitors, clients, customers, consultants, vendors, suppliers or potential suppliers.

### Our conduct:

We will always exercise caution in relation to offering or accepting gifts and business courtesies.

We will not accept gifts or other remuneration if there is reason to believe that its purpose is to improperly influence business decisions. If in doubt, always consult Managing Director.

## **2.7 Money laundering**

*Background: Criminal activity is harmful to society. Money laundering in this context means to convert proceeds from criminal activities into assets which appear to be derived from legitimate sources.*

### Our standard:

Snøhetta is firmly opposed to all forms of money

laundering.Our conduct:

We will only conduct business with partners involved in legitimate business activities with funds derived from legitimate sources.

We will take reasonable steps to prevent and detect any illegal form of payments, and prevent Snøhetta's financial transactions from being used by others to launder money.

## **2.8 Political activity**

*Background: Snøhetta does not want to take political positions or be associated with specific political movements. However, Snøhetta may participate in public debates which are of importance to Snøhetta's strategies and business performance.*

### Our standard:

Snøhetta does not support political parties, neither in the form of direct financial support nor paid time.

Employees may participate in legitimate political activities without reference to Snøhetta or to the employment with Snøhetta. Employees who take part in such activities will be granted leave from their work in accordance with law and applicable agreements.

### Our conduct:

You shall notify your leader in advance if you want to take such leave of absence.

Any leave granted shall be within a reasonable timeframe and with due regard to the implications for the ongoing business activities, in accordance with law and applicable agreements.

## 3 Our Assets

### 3.1 Conflict of interest

*Background: Conflict of interest is when we have a personal or outside interest that conflicts with the best interest of our company. A personal interest could be a financial interest in another company or in a transaction, a personal relationship, including but not limited to immediate family, or any interestor relationship that could improperly affect our judgement and decision making.*

*Even if we believe that our judgement will not in any way be affected by an outside interest, if others might reasonably think the interest is substantial, the appearance of a conflict may exist.*

#### Our standard:

Service to Snøhetta shall never be subordinated to personal gain and advantage. Any decision on behalf of Snøhetta shall be based on objective and fair assessment of Snøhetta's interest without being impacted by any other considerations. Existence of actual or perceived conflict of interest shall be disclosed to the Managing Director or other supervisory bodies as appropriate.

Disclosed conflicts shall be processed in accordance with Snøhetta's governing documents.

#### Our conduct:

You shall never take an active role or try to influence a decision if you have an actual or possible conflict of interest, or other circumstances exist which could give grounds to question your judgement unless prior written approval has been granted by your leader. Such approval can only be given if it is deemed to be in the best interest of the company.

If a conflict of interest arises, you shall at your own initiative evaluate circumstances that may imply a conflict of interest or your impartiality and promptly notify your leader of such circumstances.

### 3.2 Confidentiality

*Background: Information may have value for Snøhetta or may need to be kept confidential because it involves employees or third parties. Unauthorized access to such information may impair the value and have a negative impact on Snøhetta's reputation.*

#### Our standard:

In Snøhetta we safeguard information that is of a sensitive nature or which is classified as confidential due to other reasons.

Information from external parties shall be treated with minimum the same level of confidentiality as our own information.

The duty of confidentiality also applies after the conclusion of employment

or contractual relationship with Snøhetta for as long as the information is confidential.

Our conduct:

It is your duty to ensure that information you create or receive is correctly classified and only disclosed in accordance with Snøhetta's guidelines.

Caution shall be exercised when discussing internal affairs to avoid being overheard by unauthorized persons. If confidential information is to be shared with external parties, it is your duty to ensure that a written confidentiality agreement is in place.

### **3.3 Personal data and privacy**

*Background: Customers, employees and other related parties need to feel confident that personal data is processed in such a way that data is only used for legitimate business purposes.*

Our standard:

Snøhetta's processing of personal data shall be subject to the care and awareness which is required according to laws and regulations. Processing of personal data shall be limited to what is needed for operational purposes, efficient customer care, relevant commercial activities and proper administration of human resources.

Our conduct:

You shall only collect, process, and store data for legitimate business purposes and keep such data no longer than necessary for the purposes for which any data was collected.

### **3.4 Intellectual property**

*Background: Intellectual property such as trademarks, copyrighted works, inventions and know-how, are valuable and are important to Snøhetta's success in the market.*

Our standard:

Snøhetta's intellectual property shall be safeguarded from unauthorized access, sharing and illegitimate use.

Snøhetta shall respect the intellectual

property of others. Our conduct:

You shall protect and process intellectual property in the best interest of Snøhetta.

In particular you shall not make unprotected intellectual property available to external parties without prior authorization and a signed confidentiality agreement from such parties.

You shall not infringe the intellectual property of others. In particular you shall comply with all confidentiality obligations regarding trade secrets disclosed by third parties.

### 3.5 Properties and assets

*Background: Snøhetta's assets, including our valuable brand, represent significant values and are of importance to its success in the markets Snøhetta operates.*

Our standard:

Snøhetta's property and assets, e.g. buildings and equipment, shall be managed and safeguarded in a manner which protects their values.

Our conduct:

You shall use Snøhetta's properties and assets with due care and in such a manner that the values are safeguarded.

## 4 Handling breaches

### 4.1 Reporting

Snøhetta is determined to nurture a culture where employees feel confident to share ethical dilemmas and speak up about possible breaches. It is important to Snøhetta that you speak up!

An important part of the Code of Conduct is to manage breaches of this Code, including relevant laws and regulations.

We will report any act that is likely to constitute a breach of the Code of Conduct. Consult your Managing Director if you need advice concerning the reporting of breaches, and in accordance with Snøhetta's guidelines.

All reports will be handled confidentially. You may choose to remain anonymous, and no information from your computer (like IP address) or your telephone number is recorded.

Snøhetta does not allow reprisals of any kind against those who, in good faith, report a possible breach of the Code of Conduct.

### 4.2 Sanctions

Those who breach the Code of Conduct must be prepared to face the consequences that reflect the type and scope of the breach. Serious breaches may lead to termination of the employment.

Misconduct that may result in disciplinary action includes (but is not limited to):

- Breach or request others to breach this Code
- Failure to promptly raise a known or suspected breach

- Failure to cooperate in Snøhetta`s investigations of possible breaches
- Retaliation against any employee for reporting integrity concerns in good faith

The Board of Directors shall take all action it considers appropriate to investigate any breaches. If a breach has occurred, Snøhetta will take such disciplinary or preventive actions, as it seems appropriate.



Sustainability Scorecard 2021									
Sustainability Pillar	Actions	Sub actions	KPIs	Status Q1	Status Q2	Status Q3	Status Q4		
Environmental Sustainability	1. Snøhetta Foundation or equivalent to promote research in environmental sustainability		By Dec 31, 2021, set up autonomous foundation or company	●	●				
	2. Sustainability ambition statement in all new projects in all studios		Description of sustainability ambition in MOMENT for 100% of all new projects	●	●				
	3. Competency plan to increase sustainability knowledge for all employees		Managing Director to set qualitative and quantitative goals for individuals and teams. To be determined in 2022	●	●				
	4. Reduce carbon footprint through reducing work related travel			●	●				
Social Sustainability	5. Our Employees:	Equal employment opportunities	Ensure educational diversity – tbd with HR and MD or CEO and MD	●	●				
		Maintain healthy diversity to mirror the markets we operate in	Maintain healthy diversity to mirror the markets we operate in	●	●				
		Employee health	Added insurance, in addition to government regulated insurance (life, pension, maternity / paternity leave of absence)	●	●				
		Safe and healthy workplace	Sports, Bike, Public transportation benefits	●	●				
			Contracted work agreements defining working hours and overtime	●	●				
			Employee representatives in all studios to assist in work, health, and safety issues	●	●				
			Established conflict management and whistleblowing policies	●	●				
	6. Our Projects		Design with broad social inclusivity at core	●	●				
Financial and Governance									
	7. Fiscal KPIs		Group earnings before tax average goal 10% (2020)	●	●				
			Annual dividends to shareholders (2020)	●	●				
	8. Governance		Employee representation at board level	●	●				
			Internal stock market available for all employees after one-year employment	●	●				
	9. Transparency		Transparent annual report with sustainability progress documentation	●	●				
			Transparent annual results and report sharing with employees	●	●				
			Transparent results from companywide pulse surveys	●	●				