

Snøhetta 

Code of Conduct



Introduction

Snøhetta is founded on humanistic values which is embodied throughout our company from design, operations to company culture. Social responsibility, integrity and ethical behavior are the core building blocks of our business, and we are proud of the ethical practice we have established.

This Code of Conduct defines the fundamental principles and ethical standards that make up the foundation of our company's value creation.

As employees of Snøhetta, we are all representatives of our values whether we are working with each other, clients, collaborators or other stakeholders.

The Code of Conduct informs of the guidelines that we expect all employees to follow in their daily behavior and decision making, to guarantee that our actions are consistent with Snøhetta's values and high ethical standards.



Isabella Alveberg

CEO
Snøhetta AS

Our Code of Conduct is owned and approved by the Snøhetta AS Board of Directors. It is applicable in all Snøhetta-owned studios and other companies using the Snøhetta brand within the boundaries of legal compliance of the individual countries.

It is the responsibility of each employee to make themselves familiar with the Code of Conduct and other applicable laws relevant to their work. Make sure to seek guidance if you are unsure whether a decision is legally or ethically acceptable and report any concerns or misconduct to your nearest manager or Managing Director.

1. Our community

1.1. Human rights

Snøhetta supports and respects internationally proclaimed human rights in accordance with the UN Guiding Principles on Business and Human Rights.

www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

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

What you can do as an employee:

- Familiarize yourself with the UN Guiding Principles on Business and Human Rights.
- If you should experience any breach, please speak with your nearest manager or Managing Director.

1.2. Working conditions

Snøhetta is committed to creating working conditions that foster fair employment practices and where ethical conduct is recognized and valued. We are committed to equal employment opportunities, ensuring educational diversity and maintaining a diverse and inclusive workplace.

Snøhetta shall be a professional workplace with an inclusive working environment and respect the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work www.ilo.org/declaration/lang--en/index.htm.

Snøhetta does not employ or contract child labor or any form of forced or compulsory labor.

Discrimination will not be tolerated based on race, color, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status.

1.3. Health, safety and employee security

Snøhetta is committed to protecting our employees' health and safety and strives to create and maintain a healthy and sustainable work-life balance.

We shall do our utmost to identify occupational risks, establish controls and monitor performance and internal practices. Our performance will be reported transparently and accurately.

2. Our relationships

2.1. Environment

Snøhetta is committed to minimizing the environmental impact of our operations and our designs.

Snøhetta shall adhere to relevant local and internationally recognized standards, minimize its environmental impact and continuously improve its environmental performance.

We will contribute to reduce the use of finite resources, including energy, water and raw materials, reduce harmful emissions to the environment, including waste, CO2 emissions and other air emissions and discharges to water.

What is expected of you:

- Get to know local standards and regulations in your market for every project.
- Take part in your studio's sustainability training programs
- Take part in company sustainability talks, presentations and knowledge-sharing platforms.
- Stay updated and agree with your manager on how you want to keep developing.

2.2. Customers

We strive to create a healthy balance between our needs, those of our clients, and those who experience the product of our work.



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

What is expected of you:

- Keep an open, transparent and courteous dialogue with our clients and contractors throughout the project or working relationship.

2.3. Collaborators

All of Snøhetta's collaborators shall be treated fairly and equally.

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

What is expected of you:

- Treat all collaborators fairly and equally and avoid any conflict of interest.
- Disclose any conflict of interest which may affect your decision making.

2.4. Competition

Snøhetta supports fair and open competition in all markets. We will always meet our competitors honestly and professionally. 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 behavior that is in breach of relevant and/or local competition laws.

What is expected of you:

- Do not enter into any anti-competitive agreements or conduct.
- Adhere to any and all applicable local laws.

2.5. Corruption and bribery

Snøhetta has zero tolerance for all forms of corruption. 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, favor or incentive. We will not use agreements with middlemen to channel payments to anyone to facilitate corruption.

What is expected of you:

- Never offer, pay or accept bribes, kickbacks, or anything of value for yourself, your family or for Snøhetta.
- Refuse any payment to public officials without a proper legal basis.
- Always ensure the nature of the transaction is apparent
- Report any actual or suspected request for bribes.

2.6. Gifts and business courtesies

We will always exercise caution with offering or accepting gifts and business courtesies.

We will not accept gifts or other remuneration if there is reason to believe its purpose is to influence business decisions improperly.

What is expected of you:

- Do not accept or give gifts that have the effect or appearance of impacting an independent decision.
- Modest gifts for special occasions, low-value giveaways and invitations with a business purpose are acceptable.
- Never give or accept monetary gifts.

2.7. Money laundering

Snøhetta has zero tolerance for all forms of money laundering. We will only conduct business with partners involved in legitimate business activities with funds derived from legitimate and traceable 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.

If you experience anything, contact your nearest leader.

2.8. Political activity

As a company, Snøhetta does not support any political parties. Employees may privately participate in legitimate political activities without any reference to Snøhetta or their employment with Snøhetta.

What is expected of you:

- Do not use your Snøhetta email address or signature when communicating about any political activities.
- Never contribute Snøhetta funds or resources to any political party, official or candidate for public office.

3. Our assets

3.1 Conflict of interest

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.

What is expected of you:

- Never get involved with decisions pertaining to any recruitment or financial compensation to a family or person within a close relationship.
- Disclose any interest that may be perceived as affecting Snøhetta's decision making.
- Treat job-related tasks in a professional, independent and impartial manner.

3.2 Confidentiality

In Snøhetta, we safeguard information that is of a sensitive nature or classified as confidential.

Any confidential information from external parties shall be treated with 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.

3.3. Personal data and privacy

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

3.4. Intellectual property

Snøhetta's intellectual property shall be safeguarded from unauthorized access, sharing and illegitimate use. Intellectual property must not be made available to external parties without prior authorization and a signed confidentiality agreement from such parties.

Snøhetta shall respect the intellectual property of others.

3.5. Properties and assets

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



4. Handling breaches

4.1. Reporting

Snøhetta is determined to nurture a culture where all employees feel confident sharing ethical dilemmas and speaking up about possible breaches.

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

We will report any activity 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 whistleblowing guidelines. (Routines for HSE, conflict management and whistleblowing)

All reports will be handled confidentially, and you may choose to remain anonymous.

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

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 deemed appropriate.