
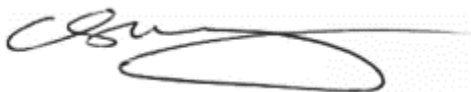


## 2025 Green Claims Policy

Last Update: February 2025

Next Update: February 2026

Signed: 	Signed: 
Print Name: Kelly Harrison	Print Name: Chris Murray
Position: Director, ESG Impact	Position: Director, Operations

Distribution: External

## Introduction

As signatories of The Anti-Greenwash Charter, Whitby Wood is committed to upholding good standards of responsible marketing and communications practice.

The purpose of this policy is to define the standards we adopt throughout our organisation to ensure green claims made about our services are fair and substantiated.

This policy applies to all the forms of marketing and communications Whitby Wood share, including materials on our website, social media or digital brochures, PR, physical branded material including our signage and events, speaking opportunities and other professional promotions.

In addition to this policy, all marketing and communications must comply with the relevant local laws and regulations.

Find out more about The Anti-Greenwash Charter at [www.antigreenwashcharter.com](http://www.antigreenwashcharter.com)

## Our Standards

We commit to the four standards of communication set out in The Anti-Greenwash Charter.

### Transparency

We commit to clear communication of what environmental benefit our product or service offers and won't conceal or omit information.

### Accountability

We substantiate our green claims with accurate, and regularly evaluated empirical evidence. We commit to sharing facts, figures and statements that can be checked.

### Fairness

We commit to using fair, clear and unambiguous language when providing comparisons with other products or organisations.

### Honesty

We will ensure we make specific statements about our organisation's environmental efforts and that our actions match those promises.

## Our Practices

We implement the following practices and procedures to ensure we uphold the aforementioned standards:

- Clearly define the green terms we use
- Provide third-party verified evidence for the claims we make
- Set standards for authentic and accurate visual representation
- Outline a clear editorial process
- Detail the training we provide our employees
- Introduce our escalation procedure
- Share our approach to customer education
- Explain how we support partners and collaborators
- Commit to regular reviews and effective governance
- Maintain strict legal compliance

In addition to this policy, we participate in Campaign Reviews conducted by The Anti-Greenwash Charter to ensure our marketing and communications align with the standards outlined in this policy.

## Definitions

We define the common 'green' terms we use to ensure transparency.

### **Embodied carbon**

Embodied carbon is the emissions that occur during manufacturing, delivering and installing the materials used to build, refurbish and fit-out a building, and their disposal at end of life.

Carbon figures are typically expressed in carbon dioxide equivalent (CO<sub>2</sub>e), a measure of the Global Warming Potential (GWP) of all emissions that contribute to global warming.

### **Operational carbon**

Operational carbon is the emissions generated by building operations, such as heating, cooling, ventilation, lighting, hot water, computers, servers and other equipment.

### **Route to zero**

By route to zero, we mean what we need to do as a company, and as an industry, to reduce our operational and embodied carbon emissions to net zero. At Whitby Wood, we are interrogating how we operate our businesses, and the way we design and specify building structures and urban infrastructure, and the materials used to form them.

### **Near-term target**

We mean our near-term science-based emissions reduction target set in line with climate science with the Science Based Targets Initiative (SBTi). We are committed to reduce our scope 1 and scope 2 Green House Gas (GHG) emissions 42% by 2030 from a 2023 base year, and to measure and reduce scope 3 emissions.

### **Net zero target**

We mean our net zero science-based emissions reduction target approved by the SBTi: To reduce scope 1+2+3 emissions 96% by 2040 from a 2023 base year.

### **Net zero building**

We refer to the definition provided by the UK Net Zero Carbon Buildings Standard: A building whose operational and embodied carbon performance is within limits which allow the UK built environment to stay within its own allocation of remaining carbon budget, in order to limit warming to 1.5 °C.

[www.nzcbuildings.co.uk/faqs](http://www.nzcbuildings.co.uk/faqs)

### **Optoppen**

Optoppen, meaning 'topping up' in Dutch, are lightweight roof extensions in mass timber and other bio-based materials. Whitby Wood has led a Built by Nature-funded consortium of UK and European partners in the development of an online viability tool that enables city planners and asset owners to quickly understand the vertical extension potential of their buildings.

The tool is part of a wider online platform.

[www.optoppen.org](http://www.optoppen.org)

## Verified Claims

We engage reputable third-party verifiers to scrutinise our green claims for specificity and relevance, ensuring that our practices are in alignment with global sustainability standards.

### Calculating embodied carbon

We calculate embodied carbon using figures from the *Inventory of Carbon & Energy version 3* (ICEv3) database. We extract quantity data for each structural system and multiply with the corresponding embodied carbon figures from the ICE database to produce a total embodied carbon figure for that project. Our calculations of materials use and embodied carbon for building frames are expressed in figures per square metre. The building dimensions we use to work these out are gross internal areas.

Third-Party Verifier: ICE database

[www.circularecology.com/embodied-carbon-footprint-database.html](http://www.circularecology.com/embodied-carbon-footprint-database.html)

### Our Emissions Reduction Targets

The Science Based Targets Initiative (SBTi) has approved Whitby Wood's near-term science-based emissions reduction target. Whitby Wood has also committed to set long-term emissions reduction targets with the SBTi in line with reaching net-zero by 2040. They commit us to:

- Near Term: Reduce scope 1 and scope 2 Green House Gas (GHG) emissions 42% by 2030 from a 2023 base year, and to measure and reduce scope 3 emissions.
- Net-Zero: Whitby Wood commits to reduce scope 1+2+3 emissions 96% by 2040 from a 2023 base year.

These science-based targets represent our approach and commitment to combating the climate crisis and have been calculated to ensure that we play our part in limiting global warming to 1.5°C above pre-industrial levels. Our targets were approved using a streamlined target validation route exclusive to small and medium-sized enterprises (SMEs).

Third-Party Verifier: Science Based Targets Initiative (SBTi)

[www.sciencebasedtargets.org/target-dashboard](http://www.sciencebasedtargets.org/target-dashboard)

## Imagery & Colour

Our visual content undergoes a review by the marketing team to ensure that imagery aligns with the policy's principles of authenticity and transparency. We uphold the following principles related to the responsible use of imagery and colour:

### Authentic Imagery

We use genuine and representative images of our services and initiatives.

We avoid the use of stock photos, generic or unrelated imagery that may mislead or give a false sense of our environmental impact or efforts.

We ensure that any imagery used respects the cultural, environmental, and socio-economic context of the regions or communities depicted.

There are occasions when typical photographic alterations are made, such as increasing brightness, we ensure through our sign off processes our images will not mislead or give an exaggerated impression of our green efforts.

### Avoidance of Greenwashing through Colour

The use of green or earth tones in materials can evoke feelings of environmental friendliness. We ensure that colours are used responsibly and are not misleading.

### Educative Infographics

We use infographics to simplify and convey data and concepts. These visuals will always be based on substantiated facts and are designed in a manner that is easy to understand without misrepresenting the information.

## Editorial Processes

Our editorial processes for green claims content follow the same as all our marketing and communications production.

At least two internal editors review our content, which would include a subject matter expert or technical member of the project or sustainability team, and a member of the marketing team.

We refer to the list of clearly defined terms and verified claims in this policy and update this list when using a new term or claim.

We encourage staff to challenge our use of language and our green claims by contacting the marketing team. Challenged content may be raised for discussion within our Sustainability Knowledge Share group.

## Training

All members of our marketing and sustainability teams will receive training on this policy and The Anti-Greenwash Charter so they fully understand the issues and benefits.

In addition, an annual CPD session will be held for all staff.

Details of this policy will be included in our staff handbook.

## Use of AI

We utilise AI tools to assist in the creation of written marketing and communications content, and we acknowledge the use of AI embedded within our standard business tools.

Any marketing or communication content significantly generated by AI will include a disclosure to maintain transparency with stakeholders.

To maintain the integrity of our green claims, all AI-generated content is rigorously reviewed by our editorial team before publication.

## Stakeholders

We promote sustainability and responsible marketing practices across our network of clients and academic and industry partners and collaborators.

We commit to answering any emails about our green claims within ten working days.

Our strategy for stakeholder education involves creating content that informs stakeholders about sustainability issues, including the environmental impact of the buildings we design. This content is designed to be engaging and adapted to the audience, helping to raise awareness and understanding of environmental issues. Examples include project case studies on our website, technical webinars, and presentations at industry events.

At Whitby Wood, we are working out our route to zero. The aim of gathering and sharing data is to build an understanding of embodied carbon emissions and encourage conversation and debate.

We actively engage with our stakeholders to encourage alignment with our sustainability values. This engagement involves referring them to The Anti-Greenwash Charter, whilst also sharing knowledge and resources to enhance their understanding and implementation of responsible practices.

Before entering into new partnerships with third parties, such as suppliers, we share our Green Claims Policy with them to encourage adoption of similar standards.

## Governance

As a committed signatory of The Anti-Greenwash Charter, we actively engage in an audit process to ensure compliance with our Green Claims Policy.

Our marketing team is responsible for ensuring compliance with this Green Claims Policy.

We will review our marketing practice annually to ensure we are still compliant with any changes to the Charter.

This process includes providing evidence of effective implementation of our practices and procedures during periodic independent reviews of our marketing campaigns by The Anti-Greenwash Charter.

We carry out quarterly internal audits of our content to check references and benchmarks are up to date.

We review our material before publication with those involved in the creation process and the content is based on that point in time. Where communications re-occur, we review it, to ensure it is up to date and meets legislative or industry benchmarks.

Our internal legal team works closely with our marketing and sustainability leads to ensure that content is both legally sound and aligned with our sustainability commitments.

Any non-compliance with this policy will be brought to the attention of the Marketing Director.

We appreciate feedback and are committed to continuous improvement. For any concerns or questions regarding the content of this policy, or if you believe we are not adhering to the standards set out, please email us at [comms@whitbywood.com](mailto:comms@whitbywood.com)

## Where we could improve

At Whitby Wood, we are working out our route to zero. The aim of gathering and sharing data is to build an understanding of embodied carbon emissions and encourage conversation and debate.

We published our thinking and the basic assumptions behind our 'route to zero' interactive tool on our website, however we acknowledge that there will be inaccuracies and that some of the assumptions will change over time. The starting point is the data we have about our current and recent projects, as well as research into external factors. We will update the tool and the assumptions as we gather more data.

Follow our route to zero journey at [www.whitbywood.com/plotting-our-route-to-zero](http://www.whitbywood.com/plotting-our-route-to-zero)