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Social Washing in Architecture, Engineering, and Construction Firms

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ABSTRACT

The growing importance of social sustainability fosters firms to communicate their social impact, e.g., through Environmental, Social, and Governance (ESG) reporting. Unfortunately, firms' actions are often not consistent with their communication. When action and communication on social sustainability are incongruent, social washing emerges. This paper aims to provide an exploratory analysis, based on multiple case studies, to investigate the dimensions and practices of social Washing in Architecture, Engineering, and Construction (AEC) firms. The results reveal that the main social washing practices in AEC are misleading assessment of impacts, cherry-picking, inadequate or absent involvement of the local community, and concealment of modern slavery. We propose a framework for operationalizing the analysis of social washing practices in AEC firms. Finally, we provide an overview of the dimensions and practices of social washing, laying the groundwork for future studies on the topic.

1 Introduction

The discourse on malpractices and scandals related to social sustainability is a growing topic of discussion in business ethics and management (Pope and Wæraas, 2016). Riera and Iborra (2017) introduced the concept of firm social irresponsibility, criticizing firms' self-declared practices, policies, controls, and procedures. Scholars investigated the Environmental, Social, and Governance (ESG) dimensions of Architecture, Engineering, and Construction (AEC) firms (Lin et al., 2017; Zhou and Mi, 2017; He et al., 2019; Zhang et al., 2024) and the social sustainability of construction projects (Shen et al., 2010; Valdes-Vasquez and Klotz, 2013). Yet, recently, scholars such as Bontempi et al. (2023) and Wang et al. (2024) highlighted the social controversies and misconducts surrounding construction projects. Comparing the ESG narratives of AEC firms with evidence collected by third parties such as NGOs shows the deep discrepancy between what is being told and the facts, i.e., social washing.

Williams (2022) defines **social washing** as "*the practice in which firms make misleading, exaggerated, or unsubstantiated claims about the management of social risk or social issues. …Social Washing occurs when there is a disconnect between perceived commitments to issues and genuine action. The practice can come in the form of brand activism or firm statements about a wide range of social issues including diversity, equity and inclusion; labor standards; racial justice; human rights; product safety; and data privacy*."

Therefore, social washing is not about the project or the firm per se but about the distance between firms' actions and firms'communication. Social washing practices include hiding negative information, spreading false positive information, and misleading advertisements on topics concerning human rights, work conditions, gender equality, and local community empowerment (Emerick, 2021). Social washing damages both people and firms. Williams (2022) claims that if firms make exaggerated claims without taking any action, they run the risk of experiencing increased operational costs, decreased productivity, and higher employee turnover. However, the potential damage to a firm's reputation and the challenges in attracting and retaining customers and employees are more pressing concerns when their proclaimed commitments lack substantiation. When corporate social initiatives (CSIs) conflict with the rest of the firms' business practices or values, "*the firms suffer status loss and discrimination and then experience stakeholder backlash, which may entail losing customers, suppliers, and investors*" (Warren, 2022, pp.178). In addition, if firm commitment toward social sustainability issues proves to be false, there is a risk of reputational damage (Goldman and Zhang, 2022). The negative publicity on social media and loss of credibility among consumers and investors may lead to a decrease in revenue and profits, increased operational costs, and difficulty in retaining and attracting employees and customers (Williams, 2022). Moreover, firms that engage in social washing practices may also face legal liability if they are found to violate any laws (Emerick, 2021).

Despite the empirical and academic relevance of social washing, this topic is still under-investigated, particularly in AEC firms. The washing phenomenon is relevant for AEC firms because of their growing social impact and the accusation of social washing by stakeholders such as NGOs. Yet, while many researchers have already explored the phenomenon of greenwashing in AEC firms (He et al., 2020; He et al., 2022), the topic of social washing is far less studied. Therefore, this paper aims to provide an explorative analysis of the dimensions and practices of social washing in AEC firms.

2 Literature Review

2.1 Washing and social washing

Warren (2022) provides an insightful analysis of the criticisms moved toward firms for the inconsistencies between corporate social initiatives and firms' internal practices, values, or objectives. Corporate social initiatives are voluntary activities aimed to improve or address a social issue usually not correlated to the firms' core business (Hess and Warren, 2008). When corporate social initiatives conflict with a firm's practices, firms are criticized for "*Woke Washing*". "*Woke Washing*" indicates a firm presenting itself as being involved or concerned with social issues even though some or all of its activities are inconsistent (Vredenburg et al., 2020). Because of the misalignment between communication and action, critics blame firms for being superficial or inauthentic (Warren, 2022). Woke Washing extends to a broad range of social inequality and justice, including discrimination based on gender, nationality, and religion. The inconsistencies between firms' social commitments and practices promote business hypocrisy, leading to boycotts and divestments (Warren, 2022). Bernardino (2021, p.7) clarifies this concept: "*washing occurs when the content is empty or means nothing, it's just words, when there is missing information or no context, or when it's lies*."

Social washing emerges from poor management of social risks and fake brand activism about social sustainability issues such as human rights, decent work and gender equality (Williams, 2022). Social washing practices include deceiving stakeholders by hiding negative information, spreading false positive information, communicating misleading advertisements and using deceptive certifications and labels regarding social issues (Emerick, 2021). Social washing mostly emerges in vague and empty firm statements included in firm ESG reports or via social media posts (Williams, 2022).

Responsible green and social marketing practices used in firm websites, advertising campaigns and ESG reports have been the subject of study and analysis in the field of communication and are receiving growing interest (Murphy, 2023; Chen et al., 2024). According to Bernardino (2021, p.7), responsible ESG communication means "u*se and include facts, be transparent by not only communicating the positive actions but also discussing risks and misses, being authentic by showing the alignment with the business mission and values*." However, credible communication and social washing do not necessarily exclude each other. Firms can disclose their true commitment to one dimension of social sustainability to cover the poor or negative performance in other areas. Scholars use the term "*cherry-picking*" to describe firms that focus only on a few dimensions where they achieve positive social sustainability results and draw attention away from unethical performance in other dimensions (Missimer and Mesquita, 2022). Cherry-picking is a common practice, especially for ~~what concerns~~ SDG-washing, when firms pick just those sustainable goals they feel more comfortable with (Heras-Saizarbitoria et al., 2022). Recently, new notions have emerged to indicate the different ways firms exploit the concepts of social sustainability and good firm social responsibility to wash their image: SDG-washing, bluewashing, pinkwashing, DEI-washing and rainbow washing.

SDG-washing refers to the firm practice of reporting the adoption and alignment with the SDGs, hiding a symbolic rather than substantial commitment to the Sustainable Development Agenda (Izzo et al., 2020; Beyne, 2020). Heras-Saizarbitoria et al. (2022) analyzed 1370 sustainability reports explicitly linked to SDGs published by firms from across the world and revealed that most firms studied have an extremely superficial engagement with SDGs. "*In the best cases, there is a cherry-picking use of the SDGs in which firms identify, in a very superficial and rather elastic way, strategies, lines, actions and/or results—most frequently already embedded in the CSR practices for years—linked to a set of SDGs. In the majority of the cases, the SDGs only serve to add color and fancy icons to the reports in a trend towards "SDG icon-picking" that may point to impression management and SDG-washing*" (Heras-Saizarbitoria et al., 2022, p.324).

Bluewashing: Recently, voluntary public policy programs and business networks, such as the United Nations Global Compact (UNGC), have emerged to support corporations in the implementation of sustainability principles. In this context, the term **bluewashing** refers to firms attempt at increasing their reputation by agreeing to the United Nations initiatives, washing their image regardless of how well they implement the principles in the business operations (Rasche, 2009; Heras-Saizarbitoria et al., 2022).

Pinkwashing: According to Lubitow and Davis (2011, p.139), **pinkwashing** describes "*the activities of firms that position themselves as leaders in the struggle to eradicate breast cancer while engaging in practices that may be contributing to rising rates of the disease*." In a broader sense, the term pinkwashing is often used to indicate a firm's apparent and fake effort towards women's emancipation or gender equality (Dahl, 2014), although new terms such as "*fempower washing*" are also used here (Sterbenk et al., 2022).

DEI-washing and rainbow washing: Diversity, equity, and inclusion (DEI) refers to fair treatment and full work participation of all people, regardless of their gender, race or sexual orientation (Hickey and Cui, 2020; Gandy et al., 2023; Heydari et al., 2024). Over the past few years, firms have increasingly changed and adopted new firm policies and hiring practices in line with diversity, equity and inclusion principles. Nevertheless, scholars highlighted cases of incongruence between firms' DEI external communication and DEI internal commitment (Hong, 2024). For example, in the study entitled "*Diversity Washing*", Baker and colleagues (2022) document that many firms have significant discrepancies between voluntary DEI disclosure and their actual workplace racial and gender diversity rate. According to the authors, **diversity or DEI-washing** occurs when firms provide misleading communication about diversity, equity and inclusion policies, with a mismatch between disclosed DEI commitments and actual hiring practices. In this context, **rainbow washing** depicts firms' instrumental use of rainbow patterns and symbols to appear aligned with the LGBTQ+ community without leading meaningful change or even obfuscating human rights abuses (Sterbenk et al., 2022; Zheng 2021).

2.2 Drivers of social Washing

Delmas and Burbano (2011) organized greenwashing drivers into external, internal, and individual-level drivers. This categorization can be extended to social washing drivers. Both "*internal and external stakeholders are placing increasing importance on the management of social issues, and firms are being forced to address these causes*" (Williams, 2022).

External drivers include both market actors (e.g., consumers, investors and competitors) and non-market actors (e.g., regulators and NGOs). Over the past decade, there has been a relevant increase in consumer demand and investor interest in firms' ESG impact (Chava et al., 2021), and firms can undertake social washing practices to respond to competitive and institutional pressures (or competitive and institutional isomorphism forces). Firms are tempted to adopt false and empty social façade images not to lose market share, to reinforce organizational social legitimacy (Castelblanco et al., 2022) or as a mode of impression management rather than to improve sustainability practices and performance significantly. Overall, "*impression management practices are intended to enhance the positive aspects of a firm's achievements and obfuscate more negative aspects in order to influence their image among stakeholders*" (Heras-Saizarbitoria et al., 2022, p.325). Additionally, the legal context of social sustainability plays a key role in encouraging or curbing the practice of social washing. The lack of regulation and monitoring of social sustainability practices and voluntary reports allows for social washing and creates confusion (Caporale et al., 2022). Social washing derives either from a failed attempt to comply with the regulations or the choice to keep on with the business-as-usual path (Meisinger, 2022). Delmas and Burbano (2011) note the significant role of activists, NGOs and social media in monitoring firms' actions. These actors are beneficial for discouraging firms from engaging in social washing practices.

Internal drivers refer to the internal organizational structure of the firm. By this perspective, social washing practices may arise from bad or poor intra-firm communication, a firm's inertia, or an incentive structure dominated by a profit-first orientation. These drivers include the individual psychological sphere, making the role of leaders and managers of paramount importance in determining the firm's coherence with the firm's values. Leadership is also a key driver of firm ethics and CSR performance (Basu and Palazzo, 2008).

2.3 Three dimensions of social washing

Human rights

The increasing concern over the impact of multinational corporations and the proliferation of firm scandals has led academics to investigate firm communication regarding human rights and ethical codes. Preuss and Brown (2012) analyze the content of the human rights policies of the FTSE 100 firms, and they find that across the sample, the overall level of firm commitment to human rights issues is rather shallow and weak. The authors conclude that "*firm engagement* *with human rights appears to be driven not so much by the significance of the issue for an industry or firm but by the degree of exposure to public pressure the industry or firm experiences*" (Preuss and Brown, 2012, p.298). Schrempf-Stirling and Wettstein (2017, p.545) study on firm human rights litigation revealed that "*most corporations adjusted their human rights policies and adopted additional measures to cope with human rights issues only during or shortly after the legal proceedings*." These results demonstrate the central role of NGOs, activist groups and journalists in documenting human rights abuse scandals and in suing firms involved in these crimes. According to Maher's (2022) research, the majority of firms respond to accusations of human rights violations issued by the Business of Human Rights Resource Centre (BHRRC) with neutralization techniques, mostly adopting self-promotion and evasion. Boiral (2016) defines techniques of neutralization as "*the release of information aimed at rationalizing and legitimizing, through different types of socially acceptable arguments, the occurrence of unethical behaviors, negative impacts or issues that could undermine the image of the firms, managers, or employees… and are used when firms or individuals must release information on negative or compromising aspects*" (Boiral, 2016, p.5). At the organizational/corporate level, techniques of neutralization are clear examples of social washing. Ultimately, the literature tends to agree that firms decide to design and adopt human rights policies only in response to external pressures, to provide a firm image that best suits social and legal expectations but does not necessarily reflect the firm's true intentions and commitments.

Labor and Decent Work

Local employers, especially in Developing Countries such as Asia and Latin America, have little incentive to improve their conduct voluntarily through self-regulation, and they often do not have the financial capacity to make the necessary improvements to adhere to the codes of conduct of the multinational mother firm (Venkatesan, 2019), so they risk to fall in labor-washing practices. The literature on labor rights and decent work does not explicitly explore the issue of labor-washing if not limited to specific topics such as sefetywashing (Ninan and Clegg, 2024). Nevertheless, it provides an interesting analysis of codes of conduct, which are often adopted by multinational corporations to regulate working conditions and used to communicate their sensitivity to labor rights. Codes of conduct can become a channel for labor washing by large corporations due to ineffective monitoring or weak alignment of labor values and policies between different suppliers and affiliates.

Gender Equality

Over the past decade, new waves of feminism, mostly in the United States, have led to the rise of marketplace feminism, where firms started using feminist language and values to increase their sales and investing in marketing campaigns communicating that they support women's empowerment in order to attract thousands of gender-sensitive consumers (Zeisler, 2016). In this context, the term *femvertisement* refers to firm advertising that focuses on women's issues, celebrates women, and seeks to reduce gender stereotypes (Zeisler, 2016). Femvertising awards are popular in the USA, and firms engaging in gender equality marketing campaigns often attract many customers. Sterbenk' explores the phenomenon of gender-washing, which relates to firms promoting gender equality and supporting female empowerment through femvertising. Sterbenk and colleagues (2022) conducted a quantitative content analysis to compare 61 American firms, half of which were femvertising award winners and half of which were non-winners. The research findings show that there is no significant difference concerning external efforts or representation of female leadership between the two categories of firms. "*Most of the award-winning firms engaged in firm hypocrisy because, beyond their ad campaigns, they did little to contribute to gender equality within their firm. Just as firms engaged in greenwashing ads due to consumer trends in environmentalism, so have firms engaged in femvertising due to trends for equality*" (Sterbenk et al., 2022, p.503).

If gender equality advertising has become a way to attract more consumers and increase sales, gender diversity of the firm workforce has become a way to increase competitiveness and attain more talented employees. Windscheid (2018) investigates the firm websites of 99 major German firms to understand better how gender diversity is depicted and which impression management tactics are mostly adopted by firms in communicating gender-diversity issues. Firm websites are one of the most widely used means of communicating firm values and policies, and recently, many large European firms have also started to include diversity statements on their websites as the expression of a firm commitment toward DEI issues (Singh and Point, 2006). Windscheid and colleagues (2018, p.998) found that "*sometimes firms intentionally create false impressions in order to appear more socially responsible than they really are*" and that the most adopted gender diversity-related communication strategy is ingratiation as "*a form of counter-communication to persuade key stakeholders from potential candidates*" (Windscheid et al., 2018, p.1009).

3 Methodology

This research leverages an exploratory multiple-case study**.** According to Yin (2009) exploratory case studies are appropriate to explore and gain an extensive description of a social phenomenon not widely understood yet. The phenomenon of social washing is the content and domain of this research, and the unit of analysis is two AEC firms (anonymized as firms A and B). AEC firms' websites, Sustainability and ESG Reports, NGOs publications, and newspaper articles are the main sources for the data analysis. We collected data on two levels. Firstly, we looked for articles, news and books about firms' scandals concerning human rights, labor and decent work and gender equality issues. Then, we went through the firm's official websites and collected documents on the firm social sustainability policy: ESG/Sustainability Reports and website claims. Table 1 shows the documents collected for our analysis, while Table 2 provides the key information about the AEC firms considered in our research.

We conducted an **inductive qualitative thematic analysis,** a method for processing qualitative information using coding and identifying patterns or themes within qualitative data (Braun and Clarke, 2006). We conducted an inductive analysis because there is not an adequate set of premises or a relevant theoretical background to conduct a deductive analysis. In the data analysis, we distinguished between the two main units of observation: Observation (a proxy of action) and communication. We label "*Observation*" the relevant data extracted from third parties' documents (i.e., NGO publications, newspapers' articles, and researchers' reports) criticizing the firm's social sustainability behaviors. We label "*Communication*" the relevant data extracted from firm documents (i.e., firms' websites' quotations and ESG/Sustainability Reports) with firms' commitments and values towards social sustainability. Table 3 presents the four themes and the codes identified.

3.1 Cases

3.1.1 Firm A

Firm A has been embroiled in numerous scandals and criticized by various NGOs for the controversial effects of its operations and the negative impacts of the firm's projects on people and the environment. We analyzed a specific scandal of *Firm A* concerning the delivery of *Project A (a dam construction in the global South)*, where Firm A played a central role. Tasked with the responsibilities of an Engineering, Procurement, and Construction (EPC) delivery model, Firm A embarked on this project under the auspices of Client A, a key player in Country A's electrical power industry. For the initial phases, Contractor A1, contracted by Firm A, provided comprehensive engineering services, spanning from feasibility studies to technical supervision during construction. Additionally, a joint venture comprising Partner A1 and Partner A2 acted as Client A's representative, ensuring quality control throughout the design and construction.

Client A engaged Contractor A2 and Contractor A3 to review the design, facilitate EPC tendering, and serve as the owner's engineer for the project. In 2006, Firm A secured the contractor role through a turnkey contract with Client A, sanctioned by the laws of Country A. The scope of work encompassed constructing the dam, powerhouse, diversion tunnels, access tunnels, pumping tunnels, cofferdams, intake structures, and various other vital components.

The negative direct impacts of *Project A* reported by NGOs' publications and researchers' papers refer to the dramatic decrease in the volume of rivers and the lowering of lake levels has resulted in the devastation of the traditional ways of life, including pastoralism, agro-pastoralism, and fishing, for hundreds of thousands of indigenous individuals. Reduced livelihoods, coupled with the failure of the national government's resettlement plan for the agro-pastoral population in the area, have led to competition for agricultural land and conflicts among resettled indigenous groups. *Firm A* defends itself against the criticism by stating that the social and environmental impacts have been "*properly*" assessed. Furthermore, the firm says it has provided the necessary support to implement a valve system to guarantee the livelihoods of indigenous communities.

With regard to impact assessment, although the firm declares that transparency and involvement are the core of its sustainability strategy, many researchers raise critiques on the veracity, completeness, and transparency of the utility Environmental and Social Impact Assessments (ESIA) document. According to the criticisms, the credibility of the downstream impact assessment is undermined due to significant omissions, misrepresentations, and fabrications. NGOs further highlight that the inclusion of quantitative and qualitative data in the report Downstream ESIA was deliberately biased to align with the predetermined objective of validating the completion of *Project A* hydro dam. Consequently, the impact assessment selectively incorporates information and data that support the project's implementation and its perceived benefits while disregarding crucial concerns and any potential adverse effects.

Concerning the mitigation of negative impacts, stakeholders reported uncertainties and doubts regarding the firm's commitment beyond the short term to ensure the operation of the valve system that creates artificial flooding so as to guarantee livelihoods for indigenous peoples. *Firm A* intervention is, therefore, not effective in alleviating the dam's negative impacts on indigenous peoples, and there is no information on further compensatory actions or mitigation measures.

3.1.2 Firm B

Firm B has been involved in numerous scandals. A case in point is *Firm B's* operations in Qatar since 2007 through a joint venture with the Qatari Government called *Subsidiary B*, one of the country's main building firms. *Subsidiary B* wins contracts worth millions of dollars for projects related to the Football World Cup 2022 and key transport infrastructure, employing thousands of workers onsite both directly and via numerous subcontractors incorporated in Qatar. Firm B played a pivotal role in various infrastructure projects across Qatar through its Subsidiary B. Some examples are the following:

1. In the Infrastructure B1 project, Subsidiary B operated under a design-build delivery model, collaborating with Partner B1 and Partner B2. The scope encompasses constructing underground stations, switch boxes, emergency exits, and cross passages, ensuring smooth rail operations and passenger safety.
2. Subsidiary B contributes to the Infrastructure B2 project, operating under a design-build delivery model alongside local Partner B3. The scope of the project involves building a 47-kilometer motorway with multiple lanes, interchanges, civil structures, utility services, and pedestrian/bicycle paths, which will significantly enhance Qatar's transportation infrastructure.
3. In the Infrastructure B3 project, Subsidiary B partnered with Partner B4 to deliver a turnkey design-build solution covering four lines, 28 kilometers, and 28 stations. This project,

overseen by Client B1, facilitates efficient urban mobility and connects key destinations within Lusail.

4. Subsidiary B undertakes the construction of the Infrastructure B4 project, a design-build delivery model project commissioned by Client B2. The scope of the project involves creating four underground parking facilities, each accommodating 560 vehicles, with provisions for disabled access, pedestrian comfort, landscaping, and essential infrastructure.
5. In the Infrastructure B5 project, Subsidiary B operates under a design-build model, delivering infrastructure for Client B2 urban development plans.

In 2014, the human rights organization Sherpa collected testimonies on the working conditions at that time on some of the construction sites operated by *Firm B* and *Subsidiary B.* After several months of investigations, with support from the General Confederation of Labor (GCT) and the Building and Wood Workers' International (BWI), Sherpa shows evidence of inhuman and dangerous working and living conditions which include the withholding of passports, unsafe working and living conditions, low wage salaries and high recruitment agencies fees, etc. These practices are typical of modern slavery. In March 2015, Sherpa filed a legal complaint against *Firm B* and the managers of *Subsidiary B.* According to Sherpa, *Firm B* confiscates the passports of its workers and employs threats to discourage them from asserting their rights for better working and living conditions, as well as from resigning or changing employers. *Firm B*, on the other hand, refutes these allegations and asserts that it has not violated the rights of migrant workers in Qatar. The company defends itself by stating that all its *subsidiary B* employees have the freedom to retrieve their passports at any time, and it strictly adheres to working hours and rest periods.

Additionally, *Firm B* claims to be committed to enhancing employee working and living conditions worldwide, as mentioned on its website. In 2018, Sherpa, with the support of the Comité Contre l'Esclavage Moderne (CCEM) and six former Indian and Nepalese workers, filed a new complaint against *Firm B* and *Subsidiary B* for forced labor, human trafficking, and work incompatible with human dignity. Further investigations allow the NGO Sherpa to gather new testimonies and proofs confirming the facts of 2014 in Qatar. The migrant workers interviewed reported receiving wages between 50 cents and 2 euros per hour worked, less than 2% of the average Qatari wage. In addition, new investigations uncovered a lack of equipment necessary to protect workers from safety risks and heat waves, which are the cause of many workplace deaths during construction work for the World Cup. In 2022, seven years after the first complaint and more than three years of investigation, *Firm B* was found guilty of labor and human rights violations that occurred in 2014 in relation to its construction sites in Qatar. Just before the start of the 2022 World Cup, a judge officially charged *Firm B* with modern slavery and maintaining working and living conditions that are incompatible with human dignity. The judge's ruling considers both *Firm B* and its *subsidiary B* to have committed or participated in these offenses until 2014.

Remarkably, Firm B represents a case where, after an initial phase, social washing was averted through transparent communication. After facing allegations of human and labor rights violations, Firm B acknowledged the intricate nature of workers' rights issues in Qatar. Consequently, the firm took proactive measures to adopt fair and responsible labor practices, striving to attain high standards of transparency in its communication. In 2014, in response to press articles highlighting the plight of migrant workers in Qatar, Firm B took the initiative to invite a delegation comprising trade union representatives and civil society organizations to assess the living and working conditions prevailing at the Group's construction sites in Qatar. Since then, Firm B has consistently engaged external third parties to conduct audits of its subsidiaries' accounts. In 2015, the firm enlisted the services of Business for Social Responsibility (BSR) to carry out a Human Rights Impact Assessment (HRIA) to evaluate the efficacy of the measures implemented by Subsidiary B in Qatar. In 2016, Subsidiary B introduced a grievance reporting system that caters to both collective and individual concerns, ensuring employee confidentiality. Additionally, the firm organized elections to appoint employee representatives, a significant milestone as it was the first such instance in the country. Building on these efforts, in 2017, Firm B and Subsidiary B agreed with Building and Wood Workers' International (BWI) to guarantee decent work, safety, health, and welfare standards for their workers. This comprehensive agreement encompasses various critical areas, such as occupational health and safety, fair wages, worker representation, accommodation, and the supervision of subcontractors. The companies also implemented measures to enhance the recruitment process by ensuring that workers are informed about the terms and conditions of their employment, eliminating employment fees, and pledging not to retain their passports. Furthermore, Subsidiary B committed to exercising due diligence when dealing with labor suppliers to ensure strict compliance with the agreement. This agreement marked a significant milestone, being the first of its kind between a union federation and a Qatari firm.

In May 2018, a partnership agreement was signed between Partner B5 in Qatar and Subsidiary B to pilot a fair recruitment intervention between Bangladesh and Qatar to ensure a transparent and fair recruitment process for migrant workers hired by Subsidiary B's agencies and subcontractors. This had a positive impact, including a reduction in the workers' burden of paying recruitment fees and related costs, improved working conditions, increased protection of workers' interests, and enhanced perceptions of their migration experience. In 2019, a report published by the NGO Business and Human Rights Resource Centre (BHRRC) ranked Firm B as the top-performing construction firm out of 50 evaluated in Qatar. The evaluation was based on several factors, such as ethical and transparent recruitment practices, fair wages, health and safety standards, freedom of movement, workers' representation, and the presence of effective grievance mechanisms for migrant workers. Firm B takes a proactive approach to sharing its experiences and knowledge with other companies in the same sector. Since 2016, Firm B has been a member of multiple associations and initiatives, including "Entreprises pour les droits de l'homme," the "Global Deal," the "Working Group on Human Rights and Forced Labour" established by "Business for Inclusive Growth", and "Building Responsibly." The latter is a global business initiative co-founded by Firm B, which brings together construction companies to develop common approaches and standards, share best practices, tools, and experiences, engage stakeholders, and find concrete solutions to the most pressing challenges facing the construction sector. All these efforts demonstrate that a shift from mere social washing to genuine social sustainability is possible, and collaboration with NGOs can effectively drive positive transformations within construction companies.

Yet, despite our effort, we could not find counterfactual examples of social washing, i.e. cases where a firm transparently communicates corrective actions while acknowledging the challenges that originated them. Only in very few selected cases, firms provided short descriptions of how they acknowledged in their sustainability reports corrective measures following actions under their responsibilities. Here we provide two examples *"Ongoing major ethics cases Firm X subsidiaries in Brazil, Argentina and Finland are involved in legal proceedings related to corruption allegations. There is also ongoing cartel investigations in Brazil. Details on these proceedings are provided in Note 33 to the Annual and Sustainability Report. In July 2014, and prior to the start of the Brazilian proceedings, Firm X decided to exit the Latin American market, following several years of financial losses. Firm X has had no ongoing projects in Latin America since March 2016." (Firm X, 2018).* Slightly differently, considering environmental impacts: *"Firm Y establishes compensation nature in Denmark and in Germany, as compensation for the nature areas that are affected by the project. By the end of 2022, 20 ponds had been established and 80.7 ha compensation nature out of a total of 116.9 ha, which must be established on Lolland by the end of the construction phase. In Germany, preparations for the establishment of around 42 ha of reefs as compensation for the project's impact in the marine area are ongoing." (Firm*

Y, 2022). These two examples, with their inherent limitations, provide a reference of how companies should comunicate to maintain integrity and avoid the pitfalls of social washing.

4 Findings

4.1 Social Washing on Human Rights

Numerous human rights organizations have criticized *Firm A* for lacking a transparent, comprehensive, and truthful impact assessment. *Firm A* has concealed the negative impacts on the local communities of the *Project A* dam. The project has reduced the flow of the River and Lake, which provided primary sources of livelihood for many indigenous peoples, causing food insecurity, migration and conflict. The firm's commitments to implement corrective measures were found to be ineffective and misleading. In addition, social washing emerges when a firm reports just the positive impacts of the project and does not transparently communicate the negative impacts. *Firm A* focuses its communication on local development interventions and does not communicate human rights violations occurring in the area. NGOs have reported many cases of human rights abuses for the new national plantation project (implemented by the local government in coordination with *Project A*).

4.2 Social Washing on Labor and Decent Work

Social washing on labor rights emerges from the *Firm B* case study. The human rights organization Sherpa showed evidence of inhuman and dangerous working and living conditions of migrant workers on some of the construction sites operated by *Firm B* and *Subsidiary B* in Qatar. The allegations relate to modern slavery practices against migrant workers, such as confiscation of passports, inadequate remuneration, high recruitment agency fees, and lack of health and safety standards in working and living conditions. *Firm B* has continued to deny malpractices related to modern slavery, even after the French tribunal acknowledged the events and indicted the firm in 2022. *Firm B*'s social responsibility statement and commitments to respect human and labor rights are contradicted by evidence and testimonies collected by the

NGO Sherpa on the firm's practices in Qatar. Concealing information about the involvement of modern slavery practices of migrant workers is a social washing practice.

The analysis of the data shows that since the 2015 scandal, the firm's communication on social responsibility has strongly increased. *Firm B* implemented new policies and initiatives to improve the living and working conditions of migrants and adopted stricter practices to monitor labor rights in Qatar. The firm began to collaborate with many NGOs to promote workers' rights in Qatar, and today, it actively participates in collaborative initiatives by partnering with various firm networks and international institutions to foster social sustainability practices in the construction sector. So, it seems that the scandal over labor rights violations and abuses in Qatar has incentivized the firm to collaborate with NGOs and to adopt more consistent social sustainability practices.

4.3 Practices of Social Washing

Since the earliest stages of its design, the construction of the *Project A* dam by *Firm A* has been the subject of controversy by environmental and indigenous rights groups. Many NGOs and researchers assessed the dam's environmental, social and economic impacts on the local environment, bringing to light many critical issues on the project sustainability. The analysis of the documents reveals that the *Project A* dam and plantation projects in the country present major negative social impacts for the indigenous communities, including degradation and loss of livelihoods, food insecurity, migration and conflict, expropriation of land without compensation, force and violent displacement, and human rights abuses. When a firm conceals or fails to communicate any negative impacts (direct or indirect) of its projects, it does social washing. In addition, many authors and human rights firms denounce serious deficiencies and irregularities in impact assessment, such as the falsification, omission, and distortion of information, i.e., cherry-picking, a social washing practice.

The data analysis also reveals inconsistencies concerning compensation and consultation of the indigenous population. *Firm A* was also found guilty of failing to consult and communicate with the affected communities in a timely manner. *Firm A* claims that one of its core sustainability values is open dialogue with all its stakeholders, including local communities, but even after the scandal, there is no clear evidence of any involvement of the local population affected by *Project A*. The management of stakeholders' engagement is a critical and relevant issue in AEC firms (Valdes-Vasquez and Klotz, 2013), and providing false information on the consultation and involvement of local communities is a social washing practice. Moreover, when a firm communicates to be committed to implementing mitigation measures to alleviate negative impacts on stakeholders (e.g., the valve system for the creation of artificial floods), but these measures turn out to be temporary remedies, which suggests that the information provided by the firm is misleading or at least incomplete and aimed at creating a positive image of the firm that does not reflect the truth of the facts, this is a social washing practice.

In 2015, Sherpa filed a complaint against *Firm B* and *Subsidiary B* for modern slavery practices and unsafe working conditions against migrant workers employed on *Firm B*'s construction sites in Qatar (Sherpa, 2015). *Firm B* has continued to deny the accusations, even when the tribunal of the home country acknowledged the events and indicted the firm in 2022. An analysis of the documents shows that the allegations of human rights and workers' rights violations refer to facts that occurred before 2015, when *Firm B* claims to have implemented policies supporting human rights in all its firms operating in different parts of the world. *Firm B*'s social responsibility statement and commitments to respect human and labor rights are contradicted by evidence and testimonies collected by the NGO Sherpa on the firm's practices in Qatar. Denying or concealing information about the involvement of modern slavery practices of migrant workers is a social washing practice. However, the analysis of the data shows that since 2015, the firm's communication on social responsibility has strongly increased. In particular, the firm has started to devote ample space to the issue of labor rights in Qatar, implementing new policies and initiatives every year to improve the living and working conditions of migrants on its construction sites. There are numerous examples of *Firm B*'s concrete commitment to social responsibility after the 2015 scandal. To promote labor rights, the firm has developed a new recruitment process and conducted audits of subcontractors on working conditions. *Subsidiary B* is recognized to be the first Qatari firm to allow free elections of migrant workers' representatives. *Firm B*'s operations in Qatar are audited by external third parties. Finally, *Firm B* actively participates in collaborative initiatives by partnering with various firm networks and international institutions to promote labor and decent work practices in the construction sector.

5 Discussion

5.1 Toward a better understanding of social washing

Only a few authors investigated social Washing in AEC firms (Bontempi et al., 2023). Over the last decades, firms' instrumental use of green and social claims has become a central topic in the public and academic debate (Gatti et al., 2019). The frameworks designed by Delmas and Burbano (2011) for what concerns greenwashing and Ginder et al. (2021) about CSR-washing pose attention to the core of the washing phenomenon: the misalignment between what firms communicate to do and what they actually do regarding environmental and social topics. However, credible communication and social washing do not necessarily exclude each other. Firms can disclose their true commitment to one dimension of social sustainability to cover the poor or negative performance in other areas. Firms that do cherry-pick adopt superficial and symbolic communication, focusing only on those few actions and topics where they achieve the best social sustainability results and lack communication on those where they do not perform so well. Firm communication is transparent only when it reports the positive impacts but also discusses the risks and potential negative impacts of firm practices and strategies (Bernardino, 2021). The framework presented in Figure 1 operationalizes the concept of social washing, highlighting four possible cases of social washing occurrence.

In the first two cases (i.e., the Televangelist[1] and the Magician[2]), firms either communicate false information[1] or voluntarily do not communicate and hide information[2] about the firm's social sustainability in an area where all practices result in having negative social impact on stakeholders. In these cases, social washing emerges clearly: when statements are lying, the communication is easily contradicted by facts, and when firms lack transparent communication, concealed information comes to light, causing serious scandals.

In the second two cases (i.e., the Car Seller[3] and the Lazy Husband[4]), firms either communicate misleading information[3] (i.e., exaggerating the positive and minimizing the negative) or do cherry-picking[4] about the firm's social sustainability in an area where some actions resulted in having negative social impacts and one or few actions have positive social impacts on stakeholders. In misleading communication, social washing may emerge through more flagrant situations, such as the adoption of dubious certifications and social labels, or very subtle and difficult-to-disguise situations, such as the use of claims that cannot be easily substantiated by facts or accessible information. In cherry-picking, firms adopt superficial and symbolic communication focusing only on those few actions and topics where they achieve the best social sustainability results and lack communication on those where they do not perform so well. Usually, firms adopt misleading communication or cherry-picking practices to distract stakeholders from the comprehensive social impact of their actions.

When discussing controversial topics, such as social washing, it is essential to remember the relativism of ethical and legal standards. Locatelli et al. (2022) discuss the dark side of projects, acknowledging the difference between local and international standards and why elements such as the Kafala (Alzoubi et al., 2023b; Alzoubi et al., 2023a), which is a legal system in some countries, could be illegal and even unethical in others. Yet, the situation for social washing is somehow different, moving the discussion forward. Following Williams (2022) definition of social washing, the merit of social washing is not on the project or the firm per se but on the distance between observations (i.e., what the stakeholders see or perceive the firm's doing) and communications. Paradoxically if a firm commits unethical and illegal acts (with a local or international perspective) but does not provide any communication, there is no social washing. In other words, social washing is not concerned with the "observation per se", but on the observations vs. communication. So, let's consider the following case: an AEC firm is hired to execute a project that encompasses unethical environmental or social elements resulting from inadequate planning by the public sector. Should the firm be held accountable for this oversight? If that is the case, what strategies can be employed to avoid social washing? To address these questions, the key crucial element is scrutinizing the communication from the AEC firm. If the AEC firm does not provide any communication, there is no social washing (despite unethical or illegal behaviors). Similarly, providing a realistic and honest account of the events won't generate social washing. Obviously, this latter option is far from being ideal since the firm might see its reputation damaged. So, to avoid social washing the reasonable choice would be to avoid projects where honest communication won't be feasible. If, following the framework in Figure 1, the firm communicates false information (e.g., praising the supposed excellent environmental and social performance), we are in the case of social washing – False information and, therefore, "The televangelist". If the firm does not provide false information but just omits the most relevant elements of the story (the dramatic social and environmental information), presenting for that case only a few positive highlights (e.g., "we built a school for 30 poor children") we are in the case of social washing – Selective Disclosing and therefore "The Magician". So, as clear from this example, the social washing does not refer to projects per se or their ethical/legal content but to the distance between the observations and the narrative about the project or firm.

5.2 Social washing in the context of AEC firms

Valdes-Vasquez and Klotz (2013) framework identifies six categories of social sustainability in construction projects: stakeholder engagement, user considerations, team formation, management considerations, impact assessment, and place context. In line with this categorization, our data reveal that AEC firms practice social washing in Social Impact Assessment, Community Engagement and Human Resource Management.

Social washing related to Impact Assessment occurs in reference to both negative impacts, which are hidden, denied, or about which false information is provided, and positive impacts, about which exaggerated, unverifiable, or incomplete information is provided. It also occurs with both types of impacts, when, for example, only positive impacts are communicated and not negative ones (cherry-picking practice) or if the negative impacts are minimized compared to the positive ones. Cherry-picking is usually performed by the firms in an effort to align with the SDGs Agenda (Heras-Saizarbitoria et al., 2022), ending in the superficial approach of focusing only on those few dimensions where they achieve the best social sustainability results, drawing the attention of stakeholders away from unethical performance in other dimensions (Missimer and Mesquita, 2022). Sergeeva and Winch (2021, p.274) argue that "*narratives have important implications for shaping the internal identity and external image of projects*". Maintaining a coherent project narrative throughout its life cycle is often necessary to align the perceptions of different stakeholders and share a common legitimacy.

Another result of our analysis reveals that AEC firms tend to practice social Washing in Community Engagement. According to (Martinsuo et al., 2019; Locatelli et al., 2023; Paravano et al., 2024), the success of AEC projects cannot be evaluated merely in terms of objectives reached at the completion of the project, but it requires the assessment of benefits and value created for the different stakeholders over the infrastructure lifecycle. The assessment of the infrastructure's impacts should involve both the user and the community levels (Valdes-Vasquez and Klotz, 2013). However, the results of our research show that often, the social impacts of the project on the communities are manipulated by AEC firms. In the AEC sector, controversies are often connected to stakeholders' management (Maddaloni and Sabini, 2022). Stakeholders' engagement is a vital driver for achieving the "*sustainability of the project*" (Keeys and Huemann, 2017; Baba et al., 2021). Maddaloni and Sabini (2022) suggest that a broader inclusion of secondary stakeholders that could be harmed by AEC activities, such as local communities, is a key aspect of AEC firms' performance. As demonstrated by many cases (the North-South Metro Line in Amsterdam, the World Cup in Brazil, the HS2 in England, the Trans Adriatic Pipeline, and the Turin-Lyon High-Speed Rail), local communities have a great influence on the project and its success. However, due to complexity, temporality, social and organizational dynamics, and heterogeneity of stakeholder audiences, AEC projects are likely to lack adequate stakeholder engagement (Maddaloni and Sabini, 2022). The findings of our research confirm the poor involvement of local communities in AEC activities. Results demonstrate that AEC firms lack an effective consultation of the local population affected by the project even if they promote stakeholders' engagement to be a key principle of their sustainability strategy.

Moreover, we found that AEC firms practice social washing by communicating misleading information about mitigation measures aimed at preventing or alleviating negative impacts of the project on the local communities. Maddaloni and Sabini (2022) propose, as one cause of the marginal inclusion of external stakeholders in projects, the *means-end* decoupling between what AEC managers perceive as moral (including communities) and what AEC firms actually do (not including them). In response to divergent internal and external project pressures, stakeholder management attempts turn out to be ineffective. The authors conclude that the cause of the failure to include the local community in AEC decision-making emerges from an instrumental approach to stakeholder management.

Finally, our findings show that social washing may trigger a transformation of social washer firms into lead social performers. Glavas et al. (2023) show that greenwashing can become a valuable tool for different stakeholders (e.g., citizens, NGOs and regulators) to push AEC firms towards a more sustainable future. The greenwashing leverage mechanism works especially for AEC firms that are exposed to credible threats or are more sensitive to stakeholder influence. The *Firm B* case is an example of this positive change from social washing to social sustainability. After being accused of human and labor rights violations, *Firm B* began committing and adopting fair and responsible labor practices, achieving high standards of transparency recognized by various civil society bodies. Scholars have recognized the key role of civil society firms in effectively leveraging firm social sustainability (Austin, 2000; Lin, 2012; Yan et al., 2018). Collaborations and partnerships with NGOs can help firms to ensure that AEC firm sustainability initiatives are translated into sound practices, providing both theoretical knowledge on social issues and technical expertise in the implementation and management of social actions (Cramer-Montes, 2017). Thus, a change of trajectory from social washing to social sustainability can happen, and collaboration with NGOs could effectively leverage a positive transformation of AEC firms towards more sustainable operations.

5.3 Environmental Impact Assessments and Environmental and Social Impact Assessments

In the last decade, social and environmental concerns have gained significant attention in AEC projects (Chatzimentor et al., 2020). Scholars and practitioners have explored new ways to involve external stakeholders in strategic planning (Tang et al., 2021). Sustainability is also considered in discussions of resilience (Liu and Song, 2020) and urban planning (Salimi and Al-Ghamdi, 2020). Social aspects in AEC projects are typically addressed during the Environmental Impact Assessments (EIA) and ESIA (Sierra et al., 2017). The ESIA process requires careful consideration of various issues to protect environmental and broader sustainability interests

(Faith-Ell and Arts, 2009). In Western countries, environmental aspects are traditionally given greater priority than economic and social considerations (Heinma and Põder, 2010; Brink et al., 2016). Conversely, in some Asian countries, environmental assessment is given lower priority due to a focus on poverty alleviation, economic growth, development, and political stability (Alshuwaikhat, 2005).

Remarkably, social impact assessment (SIA) goes beyond the scope of EIA by providing a comprehensive view of the social impacts that might arise from projects (Noble, 2009; O'Faircheallaigh, 2009; Khan, 2020). SIA involves analyzing, monitoring and managing the social consequences of development (Noble and Storey, 2001). EIA and SIA are mandatory for certain types of public infrastructure projects in some countries (Aguilar-Støen and Hirsch, 2017; Broniewicz and Ogrodnik, 2020). Organizations and donors (e.g., development banks) may require EIA/SIA to grant funding, even when not mandatory, especially in developing countries (Annandale et al., 2001; Noble, 2002; Momtaz, 2002; Briffett et al., 2003).

Many scholars (Briffett, 1999) suggest that despite good ESIA/SIA guidelines, environmental degradation continues to be a significant concern in some countries. ESIAs don't assure environmental sustainability in these countries for various reasons: it is sometimes employed as a tick box exercise (Alshuwaikhat, 2005), or the mitigations considered are not properly implemented (Goodland and Mercier, 1999). EIAs and SIAs are the project owner's responsibility under the guidance of the relevant public agency (Aguilar-Støen and Hirsch, 2017). Typically, the project owner hires specialized consultancy firms to conduct these assessments. Public offices, such as environmental agencies or relevant ministerial departments, are usually responsible for reviewing and approving EIAs/SIAs and enforcing any violations with civil fines if necessary. In some cases, EIAs/SIAs may also be associated with public concessions or licenses.

The enforceability of ESIAs and SIA depends on the type of infrastructure and legislation. Every country has its regime for environmental and social protection. Relevant examples include Spain's Integrated Value Model for Sustainability Assessment (Cruz et al., 2015), China's "Sustainability Appraisal in Infrastructure Projects" (Ugwu et al., 2006), and Canada's "Technical Sustainability Index" (Dasgupta and Tam, 2005; Sierra et al., 2017). There are also provisions at a broader regional level, such as the EU's "Strategic Environmental Assessment" (Broniewicz and Ogrodnik, 2020).

The ESIA and SIA have been criticized in the literature for their inability to guarantee a project's positive impact on social and environmental matters (Matthews et al., 2015). Several inherent weaknesses of ESIA include inadequate consideration of cumulative impacts caused by multiple projects, irreversible decisions taken before preparing the EIA, and time constraints that lead to conducting EIA in a short period (Goodland and Mercier, 1999; Alshuwaikhat, 2005). Public participation is not always guaranteed, and the transparency of the process is questionable in some instances (Aguilar-Støen and Hirsch, 2017). Public participation can be biased or false if a clear survey methodology and standard are not mandatory (Aguilar-Støen and Hirsch, 2017). Public involvement might take place too late, after the planning consent and awarding of the contract (Faith-Ell and Arts, 2009). These issues are more significant for the social components of ESIA and SIA, as they often have a lower enforceable status and methodological standard than ESIA (Khan, 2020). EIA, SIA, and ESIA are usually conducted following countries' specific rules or rules of international organizations (e.g., the EU). Rigorously distinguishing between these documents depends on the country considered; therefore, for the sake of simplicity, we consider ESIA to reflect both the environmental and social dimensions.

Therefore, ESIA are useful processes for decision-makers to anticipate, understand, and mitigate potential environmental and social impacts of proposed projects. They promote informed decision-making, stakeholder engagement, and sustainable development by identifying risks and opportunities early in the planning process. Yet, there is a significant debate concerning the ESIA of Project A, that led NGOs and scholars to social washing claims. In this instance, the conversation does not pertain to the specific responsibilities of the AEC firms regarding the ESIA but rather focuses on the timing of such analyses. Specifically, in Project A, an initial ESIA was conducted by Assessment company A1 in 2006, coinciding with the start of the dam construction. Afterward, Group A issued a critique of the ESIA, claiming that construction had started prior to the independent review of the impact assessment. Following this, in 2008, another ESIA was conducted by Assessment Company A2 and Assessment Company A3, which also faced scrutiny and criticism from various quarters. Notably, an OECD petition filed by the NGO Survival against Firm A highlighted initial transparency issues and a dearth of information regarding the dam's assessment, prompting the firm to commit to rectifying these deficiencies. However, despite these efforts, the accuracy and comprehensiveness of the 2008 ESIA have been heavily disputed. Non-profit organizations and scholars have pointed out shortcomings such as falsification, omission, distortion, and cherry-picking of information in the ESIA report.

6 Conclusions

Social washing behavior can have significant adverse consequences on both people and firm performance. Only recently, scholars have begun to unveil the enormous impact of illicit behaviors such as corruption, modern slavery, and sexism. Many authors have already investigated the greenwashing practices of different firms, including AEC firms. However, social washing is still little known and explored. To explore the practices of social washing, we investigated two AEC firms comparing third parties' documents (i.e., NGO's publications, newspapers' articles, and researchers' reports) that include scandals and critics on firm social sustainability behaviors with the firm documents (i.e., firms websites' quotations and ESG /Sustainability Reports) that include the firms' commitments and values towards social sustainability.

The findings reveal that AEC firms practice social washing in the social sustainability areas of human rights labor and decent work. The most critical project management topics for the occurrence of social washing are found to be Impact Assessment, Community Engagement and Human Resource Management. We identified the main practices of social washing in the area of human rights and labor rights: deceptive impact assessment, cherry-picking, inadequate or absent local community engagement and concealment of modern slavery practices.

AEC firms should avoid social washing practices by carrying out a comprehensive Impact Assessment, including transparent information on the positive and negative impacts of the project. AEC firms need to effectively and proactively involve local communities in the initiation phase of the project and monitor the project impacts at the local level. The principles of transparency, fairness, accountability, and inclusion, which are the core of social sustainability, should be both the *means* and the *ends* of community engagement. Yet, only in a few selected cases we found firms communicate "undesirable" facts about their actions; this is too little and far from being acceptable.

Increased awareness and knowledge of firm social washing practices can incentivize firms to adopt more accurate monitoring tools on the one hand and the creation of legislation that not only prohibits but also punishes social washing practices on the other. According to the framework introduced in this paper, there are four different cases of social washing occurrence. Social washing emerges when firms communicate false information or misleading information (exaggerating positive impact actions and minimizing negative impact actions) or when they perform selective disclosing, hiding information or cherry-picking on their social sustainability actions. Our framework specifies cases and levels of social washing occurrence.

In this paper, the assessment of firms is built upon reports from third parties that have been triangulated. Yet, despite all the possible methodological rigor, it is always necessary to question and critically evaluate the trustworthiness of judgment expressed about the firms or the topic in the absence of formal legal determinations, considering the potential for bias and politically motivated reports from impacted or interested stakeholders. Yet, this is a scientific paper, not a trial of the firm's observations. Therefore, paradoxically, whether the observations from NGOs and other stakeholders are genuine or not is not the key point. Therefore, given the challenges and risks of collecting primary data (Locatelli et al., 2022), using secondary documents is an accepted practice in this domain, see e.g., (Siano et al., 2017; Bontempi et al., 2023; Baker et al., 2024). This is consistent with the aim of this paper, which is to identify and conceptualize a novel relevant phenomenon in this domain, i.e., social washing.

For practitioners, our framework could trigger future evaluations of project organizations to clarify the level of coherence between action and communication with respect to social sustainability.

Data Availability Statement

Some or all data, models, or code generated or used during the study are available from the corresponding author by request.

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Table 1: Documents of Data Collection

AEC firm	Actions	Communication
A	**9** NGOs and Researchers' Publications	**7** ESG/Sustainability Reports (year 2013-2019) **16** Website Pages and **1** video
B and Subsidiary B	**4** Newspaper Articles and **1** video **14** NGO Publications and Articles	**9 ESG/**Sustainability Reports (year 2014-2022) **19** Website Pages and Publication

Table 2 Key information about AEC firms considered

Firm	Foundation (year)	Headquarter (country)	Status	# of employees
Firm A	Before 1950	Italy	Multinational	>80.000
Firm B	Before 1950	France	Multinational	>200.000
Subsidiary B	After 2000	Qatar	Local	1.000 Circa

Table 3: Themes and Codes of the Thematic Analysis

THEME	SOURCE	CODES	DESCRIPTION
Social Impacts	ACTION	Loss of livelihood and food insecurity	facts and data concerning the decline of indigenous communities' means of living and related risks for food insecurity.
		Migration and conflict	facts concerning the movement of populations and the associated tensions caused by competition for resources.
		Human Rights abuses	facts and scandals concerning the expropriation of land and forced displacement of indigenous communities without their consent or adequate compensation
	COMMUNIC	Economic growth and local development	firm communication concerning the increase in national production and the improvement in the standard of living of the population.
		Job creation	firm communication regarding the expansion of the labor market and increased employment opportunities within a community.
Impact Assessment	ACTION	Falsification and omission of information	facts and scandals concerning the deliberate act of providing false or misleading data or intentionally leaving out important details or facts. These actions undermine the accuracy and transparency of the Impact Assessment.
		Cherry-Picking	facts concerning the selective or biased use of data, ignoring or omitting information that contradicts it. It involves picking and presenting only the positive impacts or data that supports a conclusion while disregarding any negative impact or contradictory information.
	COMMUNIC.	Internal Measurement	firm communication on the strategies and tools adopted to assess the impacts of a specific project or to evaluate the compliance of the firm's operations with international sustainable standards.
		External Audit	firm communication on the independent external evaluation of the firm's operations and impacts.
		Transparency	firm communication on the importance of providing consistent and complete information on the firm's activities and the impacts of its actions.
Community Engagement	ACTION	Lack of consultation and compensation	facts about situations where communities are not adequately involved in decision-making processes and are not adequately compensated for losses and impacts resulting from certain actions or projects.
	COMMUNIC.	Stakeholders Engagement	firm communication on the involvement of groups and individuals affected by the project in the decision-making process to respect the needs and interests of the different parties.
		Community support and social initiatives	firm communication on the implementation of initiatives to address social challenges and improve community welfare, including the provision of essential services such as education and care.
Human Resource Management	ACTION	Modern Slavery	facts and scandals relating to the movement, recruitment, exploitation, and abuse of power over the vulnerable and fragile conditions of migrant workers, including practices such as passport confiscation, low wages, etc.
		Unsafe working conditions	facts and scandals relating to the exposure of workers to risks to their physical health and safety at work. It includes inadequate safety measures, lack of appropriate training, equipment malfunction, etc.
	COMMUNIC.	Decent work	firm communication about fair, equitable, and dignified employment opportunities. It includes fair wages, job security, no discrimination, etc.
		Employees training and education	firm communication about the provision of knowledge, skills, and development opportunities to employees.
		Employees healthcare and safety	firm communication concerning the measures and programs implemented to protect the physical and mental well-being of their employees in the workplace. It includes healthcare services, safe working conditions, etc.
		Labor Union	firm communication concerning workers' representation and collective bargaining.

Figure 1 Framework of operationalization of social washing

		ACTIONS IN A SOCIAL SUSTAINABILITY AREA	
		All / Most of the Actions with Negative Social Impact	One or few Actions with a Positive Social Impact
COMMUNICATION ON A SOCIAL SUSTAINABILITY AREA	False Information	THE TELEVANGELIST[1] The firm performs negative actions but presents them as positive or invents positive actions that do not exist. *Case example in the Labor and Decent Work area*: A firm does not pay workers adequately, and working conditions are unsafe, but the firm communicates that it respects workers' rights and takes safety measures that do not actually exist.	THE SHADY CAR SELLER[3] The firm performs negative actions and one or a few positive actions. It communicates exaggerated information about the positive actions and unverifiable or partial information about the negative actions. *Case example in the Labor and Decent Work area*: A firm pays workers adequately, but working conditions are unsafe, and the work-life balance is very low. The firm presents itself as a competitive firm providing high salaries and opportunities for career growth while it provides not transparent and complete information on safety measures and employees' well-being.
	Selective Disclosing	THE MAGICIAN[2] The firm performs negative actions, and it does not communicate anything, purposefully hiding all information on *X*. The firm only communicates in other areas, *Y* and *Z*. *Case example in the Labor and Decent Work area*: A firm does not pay workers adequately, and working conditions are unsafe, but there is no communication on labor and decent work. The firm only communicates about human rights and gender equality.	THE LAZY HUSBAND[4] The firm performs negative actions and one or a few positive actions. It does *Cherry-Picking* by communicating only information about positive actions and lack of communication on negative actions. *Case example in the Labor and Decent Work area*: A firm pays workers adequately, but working conditions are unsafe, and the work-life balance is very low. The firm focuses communication on salaries and career growth, while there is no communication on the quality of safety measures and the well-being status of its employees.