

# The VELUX Group

## Code of Conduct for employees

### 1. Introduction

In the VELUX Group, it is our core business to create better living environments for all. We are committed to creating building solutions that balance care for people and planet, and we do this by putting people first and taking leadership in the quest to pioneer sustainable buildings and introduce new building concepts.

As early as 1965, the Group's founder formulated the objective to be a Model Company. This means a company working with products useful to society, which treats its customers, suppliers, employees of all categories and shareholders better than most companies. It is the Group's purpose to establish a number of Model Companies that cooperate in an exemplary manner.

In the VELUX Group, we are firmly committed to conducting our business lawfully and ethically. This Code of Conduct is provided to you as a VELUX Group employee, a manager or external board member (hereafter referred to as employee) to guide your daily behaviour. The Code of Conduct, together with the VELUX Values, describes the main principles of ethical behaviour and our expectations to you as a VELUX Group employee. The VELUX Group policies outlining our general sustainability principles and business ethics can be found in separate documents. The Code of Conduct is built on the ten principles of the UN Global Compact.

### 2. Climate and Environment

In the VELUX Group, we are committed to minimising our impact on the environment from our operations, supply chain and across the lifecycle of our products. We aim to continuously improve our environmental performance by finding better ways. In our sustainability targets we have also committed to a 100% reduction in our CO<sub>2</sub> emissions from VELUX operations, to halve our value chain emissions by 2030 and to strive for zero waste in our operations. The environmental performance of all VELUX Group sites must be monitored, and sites should have targets for efficient use of raw materials, water management, emission reductions and waste management.

- You are responsible for protecting the environment through your daily actions, and you must follow the environmental procedures that apply to your job.
- You must contribute to minimising our environmental footprint by increasing reuse or recycling of waste at your site and reducing unnecessary consumption of water and energy in your activities.

- You are encouraged to bring forward new ways to improve our climate and environment performance, and should report any non-compliance to national environmental laws and regulations within VELUX.

## 3. Human and Labour Rights

In the VELUX Group, we are committed to always respecting human rights, including the principles set forth in the International Bill of Human Rights, the core labour conventions of the International Labour Organisation (ILO) and the UN Guiding Principles of Business and Human Rights. All of our employees are expected to consider how their decisions may adversely impact human and labour rights, and to report any breaches of our standards to management, People & Organisation (P&O), or through our Whistle-Blower system. See the information under “7. Grievance Mechanisms” for further information.

### **Diversity, Equity and Inclusion**

In the VELUX Group, we are committed to fostering a diverse, equitable, and inclusive workplace that enables everyone to thrive. We acknowledge that every employee has a unique set of perspectives, identities, and experiences, and we aim for an environment in which everyone feels respected and valued for who they are. Our employees shall have equal opportunities and treatment in employment, and the basis of recruitment, promotion or development in the VELUX Group is qualifications, skills, experience and performance.

### **Discrimination and harassment**

In the VELUX Group, we are committed to providing a safe and motivating work environment where people are treated fairly. We have a zero-tolerance policy for workplace violence, bullying, and harassment. We prohibit any type of discrimination or harassment based on age, race, colour, gender, religion, national origin, sexual orientation, disability, or any other characteristic protected by national or local laws. We do not allow use of physical punishment or other forms of physical, sexual, psychological or verbal abuse as a method of control in the workplace.

### **Child labour, forced labour and human trafficking**

The VELUX Group does not accept child labour, forced labour or any form of human trafficking. No employee shall be required to lodge deposits or identity papers with their employer, and workers shall be able to move around freely.

### **Freedom of association and collective bargaining**

We respect our employees’ right to join, form or not join a labour union without fear of reprisal, intimidation or harassment. We ensure freedom of association and respect our employees’ right to collective bargaining.

### **Working conditions**

Working conditions, hours, rest periods, leave and wages are in accordance with local regulations and industry practice. The normal work week shall not exceed 48 hours on average within a timeframe of four months. Overtime work can occur but shall not be requested on a regular basis.

As an employee in the VELUX Group:

- You are expected to promote a respectful and inclusive working environment through your daily interactions.
- You must never discriminate against customers, colleagues or business partners based on age, race, colour, gender, religion, national origin, sexual orientation, disability, or any other characteristic protected by national or local laws.
- You are obligated to report any concerns or suspicions of inappropriate working conditions including discrimination, harassment, bullying, child labour, forced labour or human trafficking.
- We expect that you promote human rights in our entire value chain by ensuring that business partners live up to our human rights and working conditions policy.

## 4. Health and Safety

In the VELUX Group, we are determined to create and sustain a safe working environment. We do not compromise on keeping our employees safe and we support well-being in the workplace.

### Health

VELUX considers alcohol and drug abuse a hazard to the health and safety of our employees. Therefore, we are dedicated to maintaining a work environment that is free from the influence and impact of drugs, alcohol, and other substances.

If an employee is suspected, confronted, and acknowledges to having a substance abuse issues, VELUX will, whenever possible, take measures to offer support and facilitate treatment to address the problem.

The use of prescribed drugs/medicine for private use is always allowed.

Consumption of alcoholic beverages, within reasonable limits, is acceptable during business lunches, dinners, receptions, business visits, etc. This extends to social and business events organized outside of office hours on behalf of VELUX. However, the consumption of alcohol should always be based on the employees' sound judgement.

### Safety

We believe time invested in safety has significant business benefits in terms of employee welfare and morale, cost reduction by elimination of accidents and increased operational discipline which positively impacts productivity, quality and delivery. The VELUX Group intervenes in activities if we feel safety is being compromised.

As an employee in the VELUX Group:

- You are responsible for our own safety and for helping your colleagues stay safe.
- You are obliged to follow our internal safety procedures, and we do not accept any violations of the safety

procedures and measures.

- You are encouraged to intervene in activities if safety is compromised.
- If violations in safety occur, we demand that managers deal promptly with the issues and prevent recurrence.
- Management is accountable for preventing accidents and injuries.
- Management is responsible to ensure that employees are trained in safety.

## 5. Anti-Corruption and Business Ethics

In the VELUX Group, we work against corruption in all its forms, including bribery and facilitation payments as described in details in our Anti-corruption Policy. Furthermore, we comply with all applicable sanctions and export control regulations as described in the VKR Sanction Compliance Policy.

### **Gifts and entertainment**

In the VELUX Group, we do not give or accept gifts or other types of compensation from third parties that could influence our business decisions. This means that it is permissible to accept gifts at reasonable amounts, as long as they do not influence business decisions. Usually it will be acceptable to invite or join a business partner for a meal and entertainment at a reasonable level, whereas paid-for holidays or the like are unacceptable.

### **Money laundering**

The VELUX Group rejects money laundering, whatever illegal activities are involved, and we observe all rules on that subject and cooperate with authorities.

### **Facilitation payment**

The VELUX Group is opposed to facilitation payment. We are opposed to paying extra to public authorities to speed up routine duties, e.g. to avoid undue delays, and such situations should always be avoided.

### **Conflict of interest**

In the VELUX Group, we strive to act with integrity and conduct business according to the VELUX Values. This means that every employee must make business decisions based on the best interest of the VELUX Group - and not the employee's own personal interest.

### **Fair competition**

In the VELUX Group, we always aim for fair competition. We have a complete Competition Compliance Programme for relevant employees to ensure that the VELUX Group Competition Law Compliance Policy is complied with. Because of our leading market position, this programme is critical for our business. We never support agreements, cooperation or

communication with our competitors, suppliers, distributors or customers to gain an undue business advantage over a competitor, and we neither offer nor accept payment to secure an undue advantage.

As an employee in the VELUX Group:

- You must never give or accept gifts or other types of compensation from third parties that could influence or question our impartiality in business decisions. If you are offered gifts or entertainment that cause doubt, please consult with your manager.
- You must not offer contributions or sponsorships to activities that could be a cover for bribery or could be perceived as such.
- The VELUX Group is opposed to facilitation payment. We are opposed to paying extra to public authorities to speed up routine duties, e.g. to avoid undue delays, and you should always try to avoid such situations.
- You must respect the VELUX Group's property and intellectual property rights and make business decisions based on the best interests of the VELUX Group – not personal interest.
- You should always inform your manager to avoid any doubt or undue suspicion whenever a business decision potentially involves family, friends or other people related to the decision-maker.
- You must never exchange information with competitors relating to pricing, tender bids, market share, production, costs etc.
- You must invite competitive offers when doing business with partners to ensure fair pricing.
- You must not, under any circumstances, make payments to gain an undue business advantage over a competitor.
- Use the VELUX Values and Model Company Objective to guide your actions and inform your immediate superior when in doubt.

## 6. Information and Data

In the VELUX Group, confidential and proprietary business information is important to our business, and all confidential and proprietary information must be kept in strict confidence except when authorised or legally required to disclose information and data. Intellectual property rights (IPR) of the VELUX Group are administrated, managed and owned by VKR Holding A/S and are subject to the IPR Policy.

“Confidential and proprietary information” is non-public information relating to the VELUX Group that might be useful to competitors or harmful to our company, our suppliers or our customers if disclosed. This may include business, financial, personnel or technological information, and information about third parties like trade secrets that belong or are related to a supplier, competitor, contractor or consultant.

Our financial books and records must be properly maintained, must accurately reflect all transactions and must conform with relevant legal requirements (the VELUX Group Accounting Manual).

As an employee in the VELUX Group:

- You must ensure appropriate levels of confidentiality of information entrusted to you and protect the VELUX Group's confidential and proprietary information even after employment has ended.
- You must release financial statements and other disclosures in a full, fair, accurate, timely and understandable manner so that management can make responsible business decisions based on them. If you are involved in a disclosure process, you must comply with the disclosure procedures of the VELUX Group to the relevant extent of your responsibilities.
- You must keep data on customers, employees, suppliers, and other personal or confidential information protected in accordance with legislation, including, but not limited to, the General Data Protection Regulation and the EU Directive 2016/943 of 8 June, 2016 on Business Secrets.
- You must not create or participate in the creation or maintenance of any records that purposefully mislead anyone or hide any inappropriate acts or behaviour.

## 7. Grievance Mechanisms

In the VELUX Group, we promote ethical behaviour in all areas. If an employee knows of or suspects non-compliance with this Code of Conduct, they should follow an appropriate course of action to address it. Employees should take one or more of the actions described below according to the nature and severity of the concern.

### **Raise the concern/speak out**

In some cases, it may be appropriate for an employee to raise a concern in the moment or directly. This depends on the specific circumstances, as not every situation makes this safe, appropriate, or possible. Depending on the nature and severity of the concern, the employee should also take any additional actions as described below.

### **Consult a trusted manager**

Employees are encouraged to confide in their immediate manager if they feel comfortable doing so. Alternately, they may consult their manager's manager or another manager who is able to support and direct on appropriate action. All managers are obliged to recognize the potential sensitivity of a situation and act with confidentiality.

### **Confide in P&O (People & Organisation)**

Employees are always welcome to reach out to their local P&O contact. If they do not feel comfortable doing so, they may consult the manager of their local P&O contact, or another P&O manager who is able to support and direct on appropriate action. P&O is obliged to treat all inquiries seriously and confidentially, and to advise and act on concerns.

### **Report using the Whistle-Blower System**

We have a Whistle-Blower System “Speak Up”, where employees can report illegal or unethical business behaviour. All reports will be investigated, and the VELUX Group ensures anonymity and confidentiality to everyone involved in the investigation – not only to the reporting employee, but also to the person at whom the allegations are aimed. All reporting must be done in good faith, and deliberate reporting of untrue allegations is not allowed. For further information about Speak Up please see VELUX.com under the section “Whistle-Blower”.

As an employee in the VELUX Group:

- If you know of or suspect any non-compliance with this Code of Conduct, you must follow one or more of the actions described above as soon as is safe to do so.
- We expect that you act in good faith and maintain confidentiality.
- Use the VELUX Values and Model Company Objective to guide your actions and inform your immediate manager when in doubt. If you feel uncomfortable informing your immediate manager, you may consult your manager’s manager, another manager, your local P&O contact, the manager of your local P&O contact, or another P&O manager.

## **8. Changes to the Code of Conduct**

The VELUX Group reserves the right to amend, alter or terminate the Code of Conduct at any time and for any reason. Amendments to the Code of Conduct will be disclosed on the intranet.

**Executive Group Management**

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