

VELUX Group Policy

Policy:	VELUX Anti-Corruption policy
Reference to VKR Group Policy:	VKR Anti-Corruption Policy
Latest update:	June 2021
Latest review:	October 2023
Policy responsible:	Senior Director, Global Ethics & Compliance, Sofie Kamph Eismark
Target group:	All employees, managers and external board members in the VELUX Group
Classification:	Public document

1. Introduction

This policy describes how the VELUX Group complies with existing legislation on anti-corruption and strives to live up to our Model Company Objective in order to prevent corruption. It also outlays how to handle a situation involving corruption. The policy applies all parts of the VELUX organisation, and in relationships where VELUX companies may otherwise have a controlling influence.

2. Purpose

The purpose of this policy is to outline the rules to avoid corruption when doing business on behalf of the VELUX Group.

This policy is linked to the internal anti-corruption compliance program described on VELUX One (VELUX Intranet).

3. Policy

All VELUX companies must comply with all relevant legislation and not to accept circumstances, which will injure our image if made public.

Due to significant differences in business culture and customs in the regions and countries where the companies operate, this policy exemplifies the possible interpretation difficulties within critical areas. Where doubts arise, employees must use the VELUX Values and Model Company Objective to guide actions and inform their immediate manager. Furthermore, the VELUX Code of Conduct for employees can be consulted as a guiding tool.

Conflicts of interest

Actual conflicts of interest or even just the perception of a conflict of interest can undermine good business decisions and practices. Whenever business involves family, friends or other persons related to the decision-maker, employees should always inform their immediate manager about this relationship to avoid any doubt or undue suspicion, just as employees should invite competitive offers to ensure fair pricing. All top managers sign an addendum to their employment contracts which governs relations with related parties, customers, and suppliers.

Bribery

We believe in fair competition and are therefore against bribery in any form. We promote transparency and have focus on operating according to the arm's length principle. We neither offer nor accept payment to secure an undue advantage. We take the same approach to all our suppliers.

Extortion (e.g., protection money)

We work against extortion and always resist giving in to illegal coercion, intimidation or threats of physical harm made by persons to obtain money, property, or services. We will actively work to protect our employees against extortion. In cases where it is necessary to pay for the protection of our employees or property, we only cooperate with legal security companies. If faced with attempts of extortion, we seek collaboration with authorities to prevent them.

Facilitation payments

We are opposed to paying additional charges to public authorities to speed up routine duties e.g., to avoid undue delays. The companies covered by the policy must develop guidelines to avoid facilitation payments and to ensure transparency. In no circumstances will we make payments to gain an undue business advantage over a competitor.

Money laundering

We reject money laundering, whichever illegal activities are involved, observe all rules in relation hereto and cooperate with authorities. To support these ambitions and efforts, we have implemented internal control activities including monitoring that there is a clear link between payment and service and that the payment is made to identifiable and traceable legal persons.

Tax evasion

We do not accept tax evasion, nor do we help others to commit tax evasion. We have implemented internal control systems that minimises the risk of such actions. Furthermore, we do not engage in activities in which the sole objective is to create tax benefits for the participants. Our approach is guided by our Tax Policy, which applies to employees as well as consultants and advisors involved in tax issues.

Gifts and entertainment

We neither give nor accept large gifts or excessive forms of entertainment. However, what is accepted in practice may differ from culture to culture, and therefore a maximum amount

has not been fixed. Instead, transparency to the immediate manager is a must. 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. If in doubt consult your immediate superior.

Political organisation

The VELUX Group does not support or make contributions to any political party, group or individual. However, we participate in relevant forums and argue for our views and interests, and for that purpose we meet with relevant political decision-makers. We are member of various professional interest groups and organisations, trade associations and the like, some of which may spend part of their membership fees to support political parties. This is beyond our control. We consider the relevance of any such membership at a general level.

Charity

Our main ultimate shareholder is a philanthropic foundation, which makes donations to many purposes based on the deed of the foundation and applicable law. Through the Employee Foundation of the VKR Group, we support public charitable or other non-profit projects in the local communities where we have activities. Additional contributions and sponsorships to the activities of the Employee Foundation should only be made if done openly and in compliance with local law. It must always be ascertained that such charity is not a cover for bribery or could be perceived as such.

4. Responsible

The management of each VELUX company is responsible for ensuring knowledge and compliance with the policy.

In VELUX A/S, all function area responsible are responsible for ensuring knowledge and compliance with the policy.

However, all employees contribute to ensure compliance to this policy by reporting any concern or misconduct directly to their manager or by using the VELUX whistle-blower system Speak Up for full confidentiality.

Global People & Organisation is responsible for ensuring, that all relevant managers and employees have taken the required online course available on Workday Training.

Responsible for controlling and monitoring the compliance with the policy is Senior Director, Global Ethics & Compliance, Sofie Kamph Eismark.