# VKR Group Communication Policy

Approved by the Board of Directors of VKR Holding A/S on 18.12.2024

The VKR Group Communication Policy outlines the general principles governing our approach to internal and external communication on VKR Group activities. It applies to VKR Holding A/S and all companies ultimately controlled by VKR Holding A/S (the "VKR Group").

Connecting buildings with nature



Connecting buildings with nature



## VKR Group Communication Policy

#### 1. Introduction

Our Model Company Objective, which serves as the compass for our actions, is the foundation of our culture. It sets the overall ambition for all VKR Group Companies to operate responsibly and maintain financial independence.

This Policy governs our approach to communications activities, outlining the obligations and expectations associated with all VKR Group internal and external communication.

It is our overall policy to engage in open, respectful and transparent communication with all our stakeholders, reflecting our commitment to ethical business practices and corporate responsibility. We respect the confidentiality and privacy of our stakeholders in all our communication.

This Policy applies to VKR Holding A/S and all companies ultimately controlled by VKR Holding A/S (the "VKR Group").

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#### 2. General Communication Principles

The communication of VKR Holding A/S and each Business Area<sup>1</sup> shall adhere to the following general communication principles:

- External and internal communication must be consistent with the Model Company Objective.
- Each Business Area shall communicate only about its own business activities and refrain from commenting on the VKR Group other Business Areas. VKR Holding A/S is the only spokesperson for issues spanning across Business Areas.
- Communication regarding the ownership of the VKR Group, the relationship with the Kann-Rasmussen Family, and any foundations associated with the VKR Group, including VILLUM FONDEN and VELUX FONDEN, in publicly available annual accounts and sustainability reports (see the ESG Policy), must be coordinated with VKR Holding. This also applies to communication regarding donations from these foundations.

#### 3. Financial and Sustainability Communication Principles

To maintain accuracy and consistency in financial and sustainability communication, VKR Holding A/S and each Business Area must adhere to the following financial and sustainability communication principles:

- The annual report of VKR Holding A/S (statutory financial statements) must comply with the Danish Financial Statements Act and "generally accepted accounting principles", in line with best in class standards for similar unlisted companies.
- Only VKR Holding is authorized to publicly comment on the VKR Group's consolidated accounts
  and financial performance. Each Business Area may publish its own consolidated figures,
  provided these figures are already included in VKR Holding A/S' annual report. Any release of
  more detailed financial information requires prior approval from VKR Financial Reporting.
- The annual report of VKR Holding A/S includes sustainability statements at the VKR Group level, in accordance with the Danish Financial Statements Act. Each Business Area may issue their own voluntary sustainability reports, which must be coordinated with VKR Financial Reporting. These reports can be published no sooner than one week after the release of VKR Holding A/S´ annual report.
- Accuracy and timeliness are essential when submitting material to public authorities, including statutory financial statements and income tax returns.

#### 4. Roles and Responsibilities

Ultimate accountability for this Policy rests with the boards of directors of VKR Holding and the respective Business Areas, while responsibility for policy implementation and compliance lies with the respective Executive Managements. These responsibilities may be delegated to one or more functional leaders as needed.

<sup>&</sup>lt;sup>1</sup> A group of operating companies under the control of VKR Holding, such as the VELUX Group or DOVISTA Group





#### 5. Supplementary Policies, Guidelines, and Instructions

Each Business Area shall issue its own communication policy, compliant with this policy. VKR Holding A/S and each Business Area are authorized to issue supplementary sub-policies, guidelines and instructions, subject to compliance with this Policy.