

VKR Group Anti-Corruption and Fraud Prevention Policy

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

The VKR Group Policy Anti-Corruption and Fraud Prevention Policy outlines the general principles governing our approach to anti-corruption and fraud prevention in the VKR Group. It applies to VKR Holding A/S and all companies ultimately controlled by VKR Holding A/S (the "VKR Group").

Connecting
buildings
with nature



VKR Group Anti-Corruption and Fraud Prevention 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 anti-corruption and fraud prevention, providing a framework for identifying, preventing, and addressing any instances of corruption or fraud that may arise in the course of our operations.

It is our overall policy to uphold the highest standards of ethics and comply with anti-corruption laws and regulations. We insist that integrity and fairness be reflected in all our activities. Therefore, we strongly oppose corruption in any form, including the offering, giving, soliciting, or receiving of bribes. We will not tolerate any form of corruption, whether committed by our employees or by third parties acting on our behalf.

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

2. Anti-Corruption and Fraud Prevention Principles

We define “corruption” as the abuse of a position or an office for private gain. Corruption takes many forms, including, among other things, bribery, extortion, facilitation payments, kickbacks, trading in influence, nepotism (preferential treatment of one's relatives or friends), etc.

We define “fraud” as dishonest actions undertaken for gain or for the purpose of causing a loss or exposing others to the risk of loss. Examples include the wilful misrepresentation of facts with the intention of deceiving and failure to disclose information when legally obligated to do so for personal gain.

In accordance with our Model Company Objective, the VKR Group is committed to doing business ethically. As part of this commitment, the VKR Group has a zero-tolerance stance to corruption and fraud, and in no circumstances will we make payments to gain an undue business advantage over a competitor.

We expect and require of all employees, suppliers, customers and third-party representatives (“Business Relations”) that they act in compliance with all applicable anti-bribery and anti-corruption laws, including (but not limited to) the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 (UKBA).

Due to significant differences in business cultures and customs across the regions and countries in which we operate, employees shall refer to the Model Company Objective for guidance whenever doubts arise. Furthermore, employees are encouraged to inform their immediate manager or use the VKR Group’s Whistleblower systems to report any potential violations of this Policy or applicable laws.

2.1 Bribery and Undue Advantages

We believe in fair competition and oppose bribery in any shape or form. We promote transparency and operate based on the arm’s-length principle. We will neither offer nor accept payment to secure an undue advantage, nor will we allow others to offer or accept bribes on our behalf. We take the same approach to all our Business Relations.

2.2 Charity & Sponsorships

The majority shareholder of VKR Holding A/S is a philanthropic foundation which, grant support to many charitable purposes based on its deed of foundation. Through the VKR Group Employee Foundation, we actively support public charitable initiatives and non-profit projects in the local communities where we operate.

We shall always ensure that any donations or sponsorships we offer do not, in fact, serve as a bribe or to confer on us any undue advantage. No such contributions should ever be used to improperly influence business or political decisions.

2.3 Conflicts of Interest

We expect all employees to act with objectivity and honesty and to avoid conflicts of interest. A conflict of interest exists when an individual responsible for acting in the best interests of VKR Group

has another private interest or loyalty that could interfere, or appear to interfere, with the interests of the VKR Group.

Whenever business involves family, friends or otherwise related persons, employees should always inform their immediate manager promptly about this relationship to avoid any doubt or undue suspicion. Disclosures of potential conflicts should be prompt and transparent, enabling the VKR Group to decide potential corrective actions.

2.4 Extortion (e.g. protection money)

We oppose extortion and refuse to succumb to illegal coercion, intimidation, threats, or physical harm. We do not and will not make payments to criminals for protection, and we always cooperate with authorities to prevent threats or attempts at extortion. When necessary - to ensure the safety of our employees or property - we only engage with legitimate security companies.

2.5 Facilitation Payments

We do not and will not make payments, or engage third parties to make payments, for purposes of facilitation. Facilitation payments are minor payments made to facilitate or expedite a service that one is legally entitled to receive. Examples of facilitation payments include supplementary fees for expediting border crossings, the processing of official documents or registrations, or the obtaining of authorizations.

2.6 Fraud

We are committed to preventing and detecting fraud and will not tolerate any kind of fraud.

2.7 Gifts and Entertainment

We recognize that gifts and participating in events are a natural and legitimate part of doing business. In some circumstances, however, the offering or acceptance of personal advantages such as gifts, events, paid travel and accommodation, etc., may be perceived or used as a cover for bribes or improper advantages. This includes personal advantages offered or received in day-to-day interactions with suppliers, business partners, public officials, etc. ("Business Relations").

All employees are expected to use common sense and uphold integrity when offering or accepting personal advantages from Business Relations. Generally, accepting or offering personal advantages, such as gifts, events or the like, is not permitted if it raises concerns of improper conduct or the potential for undue advantage. Specifically employees should avoid personal advantages that:

- influence or appear to influence the outcome of a negotiation or transaction
- are offered on a "quid pro quo" basis, expecting something in return
- are uncommon, frequent or extravagant
- are provided in the form of cash or cash equivalents, including gift cards or vouchers

Personal advantages received as part of a board position or similar may be accepted, provided they are reported to the Business Area¹ management and are of a modest nature.

2.8 Money Laundering and Tax Evasion

We oppose money laundering and tax evasion. Consequently, we make payments solely to accounts registered in our business partner's home country and name. For further guidance, please refer to our Tax Policy.

3. Roles & 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.

4. Supplementary Policies, Guidelines and Instructions

Each Business Area shall issue its own Anti-Corruption and Fraud Prevention 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. VKR Corporate Affairs ("VKR-CA") shall be involved in and approve such documents.

¹ A group of operating companies under the control of VKR Holding, such as the VELUX Group or DOVISTA Group