



The VELUX Group Code of Conduct for employees



Bringing light to life™

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 introducing new building concepts.

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

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 describes the main principles of ethical behaviour and our expectations to you as a VELUX Group employee. The VELUX Group policies outlining our general CSR principles can be found in a separate document. 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 reducing our carbon footprint and to producing environmentally friendly products in a sustainable way. We continuously work to improve our procedures, increase recycling, and be more efficient in how we use the planet's resources. We monitor and assess our impact on the environment and aim to diminish it. 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.

As an employee in the VELUX Group:

- 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 reduce unnecessary consumption of water and energy in your activities.

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 and the core labour conventions of the ILO.

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.

Discrimination and harassment

In the VELUX Group, we are committed to providing a safe and motivating work environment, where people are treated fairly. Our employees shall have equal opportunities and treatment in employment, and we prohibit any type of discrimination or harassment based on age, race, sex, colour, religion, sexual orientation etc. The basis of recruitment, promotion or development in the VELUX Group is qualifications, skills, experience and performance. 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.

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 harass-

ment. 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 must immediately inform your closest superior, if you become aware of any inappropriate working conditions, hereunder child labour, forced labour or human trafficking.
- You must never discriminate customers, colleagues or business partners based on age, race, sex, colour, religion, sexual orientation etc.
- You must as a manager recruit and promote people based on qualifications, skills, experience and performance and not on age, race, sex, colour, religion, sexual orientation etc.
- We expect that you promote human rights in our entire value chain by safeguarding 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. 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 positively impacting 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 at factories 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.

Gifts and entertainment

In the VELUX Group, we do not 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, 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 you should always try to avoid such situations.

Conflict of interest

In the VELUX Group, we strive to act with integrity and conduct business according to the VELUX Group's 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, and we have a complete competition programme. 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.
- You should as a rule of thumb avoid facilitation payment or at least work to eliminate facilitation payment.
- 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 business 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 in no circumstances make payments to gain an undue business advantage over a competitor.
- Use the VELUX Group Core 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 you must keep all confidential and proprietary information 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 shall release financial statements and other disclosures in a full, fair, accurate, timely and understandable manner, so 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 the 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. Whistle-Blower System

In the VELUX Group, we promote ethical behaviour in all areas. 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 are not allowed. For further information about Speak Up! please see VELUX.com under the section "Whistle-Blower".

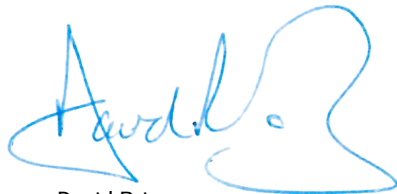
As an employee in the VELUX Group:

- If you suspect any illegal or unethical business behaviour, please report this to your immediate supervisor, the supervisor's manager, or local HR after having first confronted the colleague whom you suspect of illegal or unethical behaviour. If you feel uncomfortable for any reason addressing such concerns with your manager or local HR, you can make a report through Speak Up!
- The information you provide needs to be as specific as possible, including names, dates, places and events that will take place or have taken place. You can be anonymous, but please note that all reports are handled with the highest confidentiality so that you can feel safe identifying yourself in the reporting.
- You cannot use the Whistle-Blower System for reporting HR related personnel issues such as dissatisfaction with salary level, cooperation difficulties etc.

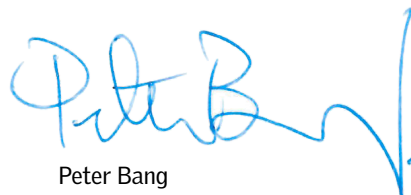
8. Changes to the Code of Conduct

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.

The VELUX Management Group



David Briggs
CEO, the VELUX Group



Peter Bang
CFO, Executive Vice President,
VELUX Finance



Michael K. Rasmussen
SVP Brand,
VELUX Communication & Brand Management



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Patrick McKenzie
SVP People and Strategy,
VELUX People & Strategy