



# DOVISTA - Code of Conduct for Employees

# Code of Conduct for Employees

## Introduction

Within the DOVISTA Group, the Model Company objective established by our founder Villum Kann Rasmussen in 1965 is the same governing principle driving every aspect of the company today. This objective speaks directly to people, planet and prosperity, identifying the desire to create products that benefit society, treat all employees and stakeholders better than most companies, enabling financial independence.

At all times, we are firmly committed to conducting business in a lawful and ethical manner. This Code of Conduct is provided for all DOVISTA Group employees, describing main principles of ethical behaviour and our expectations. The DOVISTA Group complies with the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. At all times, DOVISTA will comply with existing laws and regulations in the jurisdictions in which we operate, and we expect all of our business partners to do the same. Our Code of Conduct follows the ten principles of the UN Global Compact, contributing to sustainable development in line with our corporate strategy. DOVISTA Group policies outline our approach to many of the topics covered by the Code of Conduct including for example CSR, Environment, Anti-Corruption, Data Privacy & Ethics and Intellectual Property Rights. Each policy can be found in a separate document.

## Purpose

The purpose of this Code of Conduct for Employees is to ensure that DOVISTA employees have clear guidance with regard to lawful and ethical behaviour, including human and labour rights, environment and anti-corruption. We expect all our employees to assist us in meeting our core responsibilities and appreciate involvement in activities related to this objective. Employees are further expected and encouraged to react or inform their managers, or any other appropriate functions, if they identify any potential deviations from the ten guiding principles of the Global Compact. Procedures and programs like the whistle-blower system have been set up for this purpose.

## 1. Human and Labour Rights

The DOVISTA Group respects human rights at all times, including all principles of the International Bill of Human Rights and the core labour conventions of the International Labour Organisation.

### 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.

### Child labour, forced labour and human trafficking

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

## Anti-Bullying, Discrimination, and harassment

In the DOVISTA Group, we are committed to providing a safe and motivating work environment, where people are treated with fairness and respect. Our employees must have equal opportunities and treatment in employment, and we prohibit any type of bullying, discrimination, or harassment. Recruitment, promotion and development decisions are based solely on qualifications, skills, experience, and performance. We do not tolerate the use of physical punishment or other forms of physical, sexual, psychological or verbal abuse as a method of control in the workplace.

All employees have the right to work in an environment free from bullying, discrimination, and harassment, and must feel safe to report any such incidents without fear of retaliation.

We encourage open reporting and are committed to addressing all concerns seriously and promptly.

**Bullying** involves behaviours that are spiteful, offensive, mocking, derogatory, insulting, or hurtful. It may target an individual or a group of people. Bullying includes actions that intimidate, embarrass, exclude, demean or upset another person, whether intentionally or unintentionally. Bullying can be physical, verbal, or emotional.

**Discrimination** is, biased, offensive, or inappropriate behaviour directed at a person because of one or more aspects of their identities. Identity includes protected characteristics such as sex, race, nationality, sexual orientation, gender identity, religion, body size, ability status, pregnancy status, age, ethnic origin, belief, and marital status.

**Harassment** is unwanted physical, verbal, or nonverbal conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment for them. Harassment may be identity-based and includes behaviours targeting sex, race, nationality, sexual orientation, gender identity, religion, body size, ability status, pregnancy status, age, ethnic origin, belief, and marital status. Harassment also includes any unwanted physical, verbal, or non-verbal conduct of a sexual nature such as sexual harassment or assault.

### As an employee in the DOVISTA Group:

- You must contribute to an inclusive, supportive, and respectful working culture, free from harmful behaviours.
- Engage positively with colleagues, express disagreements respectfully, and avoid words or actions that could be experienced as bullying, harassment, or discrimination.
- As a leader, ensure that your team understands and embodies the culture we strive for.
- As a leader, act as a role model for inclusive, welcoming, and caring behaviours towards all DOVISTA employees.

## 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 DOVISTA Group:

- You must inform your closest superior immediately, if you become aware of any inappropriate working conditions, hereunder child labour, forced labour or human trafficking.
- You must never discriminate against customers, colleagues or business partners based on sex, race, nationality, sexual orientation, gender identity, religion, body size, ability status, pregnancy status, age, ethnic origin, belief, and marital status.
- You must as a manager recruit and promote people based on qualifications, skills, experience, and performance and not on sex, race, nationality, sexual orientation, gender identity, religion, body size, ability status, pregnancy status, age, ethnic origin, belief, and marital status.
- We expect that you promote human rights in our entire value chain by safeguarding that business partners live up to our Code of Conduct and related policies.

## Health and Safety

In the DOVISTA Group, Health and Safety is our highest priority, supported by our zero-accident ambition and corresponding targets. 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 including employee welfare and morale, cost reduction by elimination of accidents and increased operational discipline that positively impacts productivity, quality and delivery. The DOVISTA Group intervenes in activities if we feel safety is being compromised.

### As an employee in the DOVISTA Group:

- You are responsible for your own safety and for helping your colleagues to 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 any activity where safety is compromised.
- If violations in safety occur, we expect 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.

## 2. Environment

As a European market leader in the production and sale of vertical windows and exterior doors, the DOVISTA Group is very aware of our responsibility to the environment. Our consultancy provides the foundation for a healthy indoor climate and lower energy consumption for both new and renovated buildings. We see it as a clear commitment to be our customers' most trusted partner in creating sustainable solutions. This means operating in a way that is protective and respectful of our common environment and responsible with relation to our common resources. We are committed to reducing our carbon footprint. We monitor and assess our impact on the environment and aim to diminish it. The environmental performance of all DOVISTA Group sites must be monitored, and sites should have targets for efficient use of raw materials, energy management, emission reductions and waste management.

### As an employee in the DOVISTA 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 location and reduce unnecessary consumption of water and energy in your activities.

## 3. Anti-Corruption

In the DOVISTA Group, we work against corruption in all its forms, including bribery and facilitation payments.

### Gifts and entertainment

In the DOVISTA 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 cost, whereas paid holidays or similar activity is considered unacceptable.

### Money laundering

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

### Facilitation payments

The DOVISTA Group is opposed to facilitation payments. We are opposed to paying extra to public authorities to speed up routine duties, for example to avoid undue delays, and employees should always try to avoid such situations.

### Conflict of interest

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

### Fair competition

In the DOVISTA Group, we always aim for fair competition. We never support agreements, cooperation or communication with our competitors, suppliers, distributors or customers to gain an undue business advantage over a competitor, nor do we offer or accept payment to secure an undue advantage.

### As an employee in the DOVISTA 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 DOVISTA Group's property and intellectual property rights and make business decisions based on the best interests of the DOVISTA 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 under no circumstance make payments to gain an undue business advantage over a competitor.
- You must follow the DOVISTA Group Travel Policy when travelling.
- Use the DOVISTA Group Core Values and Model Company Objectives to guide your actions and consult your immediate superior when in doubt.

### Information and Data

In the DOVISTA 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 DOVISTA 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 DOVISTA 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 to 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.

### As an employee in the DOVISTA Group:

- You must ensure appropriate levels of confidentiality of information entrusted to you and protect the DOVISTA 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 DOVISTA 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.

## Whistleblower System

In the DOVISTA Group, we promote ethical behaviour in all areas. We have a Whistle-blower System (found on our intranet) where employees can report illegal or unethical business behaviour. All reports will be investigated, and the DOVISTA 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.

### As an employee in the DOVISTA 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 the Whistleblower system on our intranet.
- 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 your-self in the reporting.
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- You cannot use the Whistleblower System for reporting HR related personnel issues such as dissatisfaction with salary level, cooperation difficulties etc.

Concerns may be reported via this link:  
<https://dovista.whistleblownetwork.net/>