

Anti-bribery and corruption policy

concerning

InstallatørGruppen

1 Introduction

- 1.1 InstallatørGruppen A/S ("InstallatørGruppen") is the parent company of the Group of companies (the "Group").
- 1.2 This anti-bribery and corruption policy (the "Policy") applies to all permanent and temporary employees, of the Group, as well as hired personnel, consultants and any other third party who have authority to act on behalf of Group regardless of location and reflects InstallatørGruppen 's zero-tolerance approach to bribery and corruption in any form as described in detail in the Policy.
- 1.3 This Policy is one of the ways we put the Group's values into practice. As such, the Policy establishes the standards to prevent, detect, and address bribery and corruption risks and supports compliance with all applicable anti-bribery and anti-corruption laws, including relevant international conventions and local regulations.

2 Business ethics and anti-corruption

- 2.1 InstallatørGruppen's commitment to conducting its business with integrity applies similarly to all its business relationships with all of the Group's Business Partners (as defined below). This involves that the Group always must follow the process for integrity due diligence and monitoring of potential and existing business partners as set out in section 7.1.
- 2.2 Entities, organisations, and individuals with whom the Group does business are referred to as "Business Partners". This includes partners in operated licenses, joint venture partners, entities and individuals who act on behalf of the Group, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship. Group is committed to conduct its business with integrity which applies similarly to all its business relationships with all its Business Partners.

3 Roles and responsibilities

- 3.1 All parties in the Group covered in the scope of this Policy are responsible for complying with this Policy and to seek advice when in doubt.
- 3.2 InstallatørGruppen's executive management is responsible for ensuring implementation of this Policy in each company within the Group through an effective compliance program, which includes an annual assessment of corruption risks associated with its business and operations, and ensuring adequate controls are adopted to mitigate such risks.

4 Applicable laws

- 4.1 If there are differences between any legal requirements or between legal requirements and the requirements in this Policy, the most stringent approach shall apply.

- 4.2 The corruption provisions do not only cover responsibility with respect to one's own organisation but also complicity with respect to Business Partners (partners in operated licenses, joint venture partners, entities and individuals who act on behalf of the Group, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship).

5 Zero tolerance against corruption

- 5.1 The Group strives to conduct business in an open and transparent manner regardless of location, at all times. The Group opposes all forms of corruption and will work actively to ensure that corruption does not occur in our business activities.
- 5.2 All personnel are prohibited from planning, performing or facilitating any corrupt activity in the public or private sector, even in cases where the Group or its personnel does not benefit directly. The same applies to acts of corruption made through a third party on behalf of the Group.
- 5.3 According to Danish law, corruption, inter alia, takes place if a person, for him or herself or others, gives, offers, requests, receives or accepts an improper advantage in connection with a position, office or assignment. An improper advantage can be anything of value, either financial or other. It is also not required that the improper advantage has actually influenced a decision or inaction.
- 5.4 Corruption could manifest in different ways and forms, which include bribes, kickbacks, facilitation payments and trading in influence. Bribery occurs when an individual attempts to influence others in the execution of their duties by offering an undue advantage. Trading in influence occurs when an improper advantage is provided to someone in order to influence the performance of the third party's duty.
- 5.5 Facilitation payments are payments aimed at expediting or securing the provision of products or services to which one has a rightful claim. Such payments often involve a public entity or official. As a rule, the Group prohibits the use of facilitation payments, even in cases where it is permissible under local laws. However, under very limited circumstances, in which a person's life, liberty, safety or health is in imminent threat and danger, facilitation payments may be allowed. Facilitation payments made under such circumstances shall be reported to local and group management without undue delay and accurately and transparently recorded in relevant accounting systems.
- 5.6 It is important to remember that corruption can occur everywhere and that each of us has a responsibility to proactively combat corrupt actions.

6 Gifts, hospitality and entertainment

- 6.1 As a rule, gifts in cash or cash equivalents such as gift vouchers, credit or debit cards, or loans are strictly prohibited. Any gift, hospitality or entertainment which has or may give the appearance of a purpose to influence the receiver in an improper manner is prohibited. Offer or acceptance of

gifts during certain time periods, such as during contract negotiations, competitive bidding or tender processes, is also prohibited.

- 6.2 Further to the above, the Group's employees, officers, directors, executive managers, hired personnel, consultants and any other third party who have authority to act on behalf of Group must not, directly or indirectly, accept gifts, except for promotional items of minimal value, normally bearing a company logo. Other gifts may be accepted in situations where it would clearly give offence to refuse, in which case the gift must be handed over immediately to InstallatørGruppen and will be regarded as InstallatørGruppen property. Only modest and non-extravagant gifts can be offered or provided to third parties, and only on an infrequent basis.
- 6.3 Hospitality and entertainment such as social events or meals may be attended or arranged by the Group's employees, officers, directors, executive managers, hired personnel, consultants and any other third party who have authority to act on behalf of Group if there is a legitimate business reason, the costs are modest and kept within reasonable limits and the immediate superior is informed. When in doubt, consult the line management or InstallatørGruppen's Head of Legal. In the case of an event attended by spouses or children of employees, participation must always be approved by line management or InstallatørGruppen 's Head of Legal.
- 6.4 It is allowed to attend events, however, if the cost exceeds what is considered reasonable and modest, InstallatørGruppen will cover the expense (please also refer to section 6.9 below). Examples of costs that Group may bear include airfare, hotel accommodation, and similar expenses in connection with business events.
- 6.5 Attendance of events by the Group's personnel, such as external training, seminars, or conferences, is permitted if there is a legitimate business reason and the associated costs and expenses in connection to the event are paid by InstallatørGruppen . InstallatørGruppen shall not pay for travel, accommodation or other related expenses incurred by third parties. Exceptions can solely be made in special circumstances.
- 6.6 All gifts and events must be reasonable and proportional and must not influence or appear to influence a business decision. Cash and cash equivalents are prohibited. Gifts and hospitality must be able to withstand public scrutiny and openness. If there is any doubt, the employee must consult their immediate manager before acceptance or provision.
- 6.7 Employees may accept external, symbolic or promotional gifts that are reasonable in value and within ordinary business practice. External gifts with a value up to DKK 1,000 are allowed without prior approval. External gifts over DKK 1,000 must be approved in advance by the employee's immediate manager. If an external gift is assessed to exceed a reasonable level, it should be returned to the sender and documented with the employee's immediate manager. The tax treatment and any required registration of such gifts is the employee's own responsibility. Gifts in connection with jubilees or formal receptions may exceed the general threshold where reasonable.
- 6.8 The Group may give external representative gifts (for example wine, gift baskets or flowers) in line with the Group's values. Such representative gifts up to DKK 1,000 are allowed without prior

approval. External gifts over DKK 1,000 require prior approval from the immediate manager. Gifts in connection with jubilees or formal receptions may exceed the general threshold where reasonable.

- 6.9 Events and hospitality must have a legitimate business purpose and be modest and proportionate to that purpose. Events where the cost per participant does not exceed DKK 3,500 are allowed without prior written approval. If family members or accompanying people attend and the total event value exceeds DKK 5,000, the event must be approved in advance by the immediate manager. Participation in events held abroad is generally discouraged unless the professional content clearly and demonstrably outweighs any hospitality or representational aspects. Such participation must be supported by written evidence (e.g. detailed agenda, speaker list, learning objectives, and related materials) showing the overriding business purpose and demonstrating compliance with applicable tax rules. Prior written approval from the immediate manager is required for all international events, and all supporting documentation must be retained to satisfy tax and audit requirements.
- 6.10 Interactions with public officials and employees of public bodies require special caution. Gifts, hospitality or other advantages to people employed by public authorities, state-owned entities or other public bodies are strictly prohibited under all circumstances, regardless of monetary value. If such a gift or invitation is offered or requested, it must be declined and reported immediately in writing to InstallatørGruppen's management.
- 6.11 If an employee is unsure whether a gift, hospitality or event is appropriate, the matter must be discussed with the immediate manager or escalated to InstallatørGruppen's executive management before acceptance or payment.

7 Relations with third parties

7.1 Third-party due diligence and risk management

- 7.1.1 The Group's third parties are defined as its customers, suppliers, agents, brokers, lobbyists, intermediaries, consultants, recipients for sponsorships or donations, joint venture partners, as well as potential targets for merger and acquisition activities. Group will only be associated with third parties who adhere to anti-corruption and ethical standards similar to its own. To ensure this, risk-based third-party risk management efforts shall be adopted. These efforts shall include an annual corruption risk assessment of all third parties and additional measures towards higher-risk third parties, such as pre-contractual integrity due diligence and post-contractual monitoring.
- 7.1.2 An integrity due diligence shall always be conducted before engaging agents, lobbyists, intermediaries and any third party who will represent the Group or act on its behalf. Potential parties for joint ventures and targets for merger and acquisition activities shall also be subject to integrity due diligence. The objective is to gather information to gain a deeper and more holistic understanding of corruption and other integrity and compliance risks associated with a third party, to the extent

accessible or disclosed. Group may engage external service providers to perform integrity due diligence.

- 7.1.3 Contracts with third parties must always contain audit and termination clauses with specific references to compliance with anti-corruption laws and this Policy.

7.2 *Representatives, including agents*

- 7.2.1 If agents or other intermediaries are used, all agreements regarding the relationship between the agent/intermediary and the Group shall be in writing and sufficiently describe the relationship between the parties. The agreed compensation for an agent or other intermediary must be proportional to the service rendered, and any payments made shall be in accordance with the agreed compensation and subject to satisfactory documentation of the rendered services. The work of the agent or intermediary shall be closely monitored. The agreement regarding the engagement shall oblige the agent/intermediary to act in accordance with the Group's Code of Conduct, this Policy and applicable laws. No illegal payments shall be channelled through agents or intermediaries.

7.3 *Additional requirements for interactions with government authorities and public officials*

- 7.3.1 Extra caution shall be exercised by all Group personnel when interacting with government authorities, public officials and politically exposed persons, which are not limited to politicians and persons employed in the public sector but also any persons who could be in a position to influence decisions made in the public sector or government-owned enterprises.
- 7.3.2 Gifts, hospitality and entertainment offered to any public official or politically-exposed-person must as a general rule not take place and only if approved by InstallatørGruppen's CFO or Head of Legal in advance. Similarly, any costs or expenses covered by the Group for the benefit of such persons must also as a general rule not take place and only subject to prior approval by InstallatørGruppen's CFO or Head of Legal. All approvals shall be documented in writing.
- 7.3.3 A third party shall not be engaged if such engagement will expose the Group to levels of corruption, integrity and compliance risks that are deemed as inappropriate. Regardless of corruption or integrity risks, the Group must not engage in business relationships with third parties, where doing so would breach national or international sanctions laws.

7.4 *Charitable donations and sponsorships*

- 7.4.1 Charitable donations are payments for the benefit of a community or other causes. Typical areas for such donations are education, health, sports, culture, support to non-governmental organisations or other social causes. Payments are made without any demands or expectations of anything in return.
- 7.4.2 Sponsorship is a transaction where the Group makes a payment to associate its name with an activity or an organisation and receives specific rights and benefits in return, such as the promotion

of the sponsor's name, products or services. Sponsorships shall always reflect the Group's values, quality and profile.

- 7.4.3 Charitable donations and sponsorships shall never be made if the purpose is to improperly influence anyone. Neither shall such payments be made if the recipient has close ties to public officials who have the authority to make decisions in matters of importance to the Group or existing or potential business relations. No such payments shall be made to individuals or be used for private purposes. All charitable donations and sponsorships shall be made in accordance with the Group's Code of Conduct, this Policy and applicable laws.

7.5 *Money laundering*

- 7.5.1 Money laundering is the process when a person or party hides illegally acquired funds – money or all other forms of assets – or tries to make such funds look legitimate. Money laundering also includes the use of legitimate funds to support criminal activity or terrorism.

- 7.5.2 The Group is firmly opposed to all forms of money laundering. In order to avoid being involved in money laundering, all employees shall ensure that the due diligence process described in section 7.1 is followed and that any concerns are reported.

7.6 *Training and communication*

- 7.6.1 The Group's anti-corruption principles and requirements shall be communicated to all personnel on a regular basis through periodic reminders and regular training. Anti-corruption training shall/can be conducted by management or external subject matter experts. Attendance of anti-corruption training shall be mandatory for all and recorded in writing.

- 7.6.2 InstallatørGruppen's executive management shall serve as a point of consultation and contact to address any questions relating to anti-corruption compliance or concerns regarding possible breaches.

7.7 *Reporting and raising concerns*

7.7.1 Reporting

- 7.7.1.1 Any Group personnel who observe a possible violation of this Policy and/or applicable laws shall report their concern without undue delay in accordance with InstallatørGruppen's Whistleblower Policy. Questions or concerns regarding ethical and compliant conduct shall be reported to one's immediate supervisor whenever this is appropriate.

- 7.7.1.2 However, in circumstances where the immediate supervisor is involved in the possible violation, or where such reporting is not deemed appropriate, one shall alert other members of management, including InstallatørGruppen's chief executive officer (the "Group CEO") and the chairperson of the Board of Directors, if deemed necessary.

7.7.1.3 Concerns can also be reported on an anonymous basis according to the Whistleblower Policy.

7.7.2 Handling of concerns

7.7.2.1 All reports will be treated as confidential information. Where anonymity is elected, the Group will safeguard the identity of the reporter.

7.7.2.2 The Group will not use any retaliatory measures against anyone for raising or helping to address a genuine business integrity concern.

7.8 *Consequences of violations*

7.8.1 Violation of this Policy may have severe consequences for the employment or contractual relationship with the Group and may lead to dismissal or termination.

7.8.2 All cases where this has had consequences for the employment or contractual relationship with InstallatørGruppen must be reported immediately to the Group CEO and the chairperson of InstallatørGruppen's board of directors.

This Policy has been adopted by the Board of Directors on 1 June 2026 and available on InstallatørGruppen's website. This Policy and the requirements contained therein are subject to annual review.