

## VELUX Group Modern Slavery Act Statement 2024

### Introduction

This Modern Slavery Act Statement ("Statement") is made pursuant to the UK Modern Slavery Act 2015. This Statement is made on behalf of applicable reporting entities covered by the Act.

It outlines the steps taken by VELUX during the financial year ending 31 December 2024 ("Reporting Period") and outlines our practices and approach to identify, assess and address the risks of modern slavery, including forced labour and human trafficking, and child labour ("Modern Slavery") in our firm's own operations and our supply chain. Unless the context indicates otherwise, in this Statement, "VELUX", "we", and "our" refers to the VELUX Group's entities within the scope of reporting.

Modern Slavery is a crime and a violation of fundamental human rights. It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. It includes practices such as forced labour, debt bondage, human trafficking, and other forms of exploitation.

### About VELUX

VELUX roof windows have been bringing daylight and fresh air into peoples' homes around the world for more than 80 years, creating better living environments. We offer a range of products including roof windows and modular skylights, decorative blinds, sun screening products, and roller shutters, as well as installation and smart home solutions. We work globally – with production sites in 12 countries and sales companies in 37 countries, and around 12,000 employees worldwide. The VELUX Group is owned by VKR Holding A/S, a limited company owned by the Villum Foundation and members of the Kann Rasmussen family.

### Company facts



The way we do business is defined in our [Model Company Objective](#), which our founder Villum Kann Rasmussen formulated in 1965. With the Model Company Objective, we aim to set a positive example through our behaviour and work to create products that are both functional and useful for society. We operate as a “one firm” globally, which means that all entities fully embody our values and our high standards of ethical conduct and responsibility

We have fully integrated sustainability into our corporate strategy. This ensures that sustainability is at the heart of our business and integrated throughout all aspects of the organisation –, from supplier selection, product design as well as their end-of-life handling.

### **VELUX policies**

We are committed to upholding human rights and preventing modern slavery and child labour. We adhere to the principles set forth in the United Nations Global Compact (UNGC), the International Bill of Human Rights, the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. We have implemented a number of policies that reflect our commitment to ethical business practices. The policies are publicly available on our website to demonstrate the high expectations we set for ourselves, our suppliers and our employees.

#### **Sustainability Policy**

[The VELUX Group Sustainability Policy](#) provides high-level guidance on how we conduct business responsibly and ethically. It reflects our commitment to respecting and promoting internationally recognized human rights, including those set out in the International Bill of Human Rights and the ILO Core Labour Standards, such as the elimination of forced and compulsory labour. Our approach is guided by key international frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, which help shape how we work to ensure responsible practices within our own operations and how we set standards and expectations for our suppliers.

#### **Code of Conduct and Basic Working Conditions for Suppliers**

[The Code of Conduct and Basic Working Conditions for Suppliers](#) (Code of Conduct for Suppliers) sets out our expectations for responsible sourcing and ethical business practices. It defines clear requirements related to human rights, labour standards, health and safety, environmental protection, compliance, and management systems. A key element is the explicit prohibition of modern slavery and child labour throughout the supply chain. This Code is embedded in our supplier due diligence process and serves as a foundation for promoting responsible conduct across our value chain.

#### **VELUX Code of Conduct for Employees**

[The Code of Conduct for Employees](#) (“Code of Conduct”) provides a guide to daily behaviour for all VELUX employees. The VELUX Code of Conduct builds on our VELUX Values and describes the main principles of ethical behaviour and our expectations

towards all VELUX employees and sets a clear standpoint against any form of modern slavery, including but not limited to forced labour, human trafficking and child labour.

## **Risk Assessment and Due Diligence processes**

### **Risk identification**

VELUX's primary exposure to potential modern slavery risk most likely lies in the sourcing of goods and services within our supply chain, particularly in relation to semi-processed goods, raw materials, and certain service industries.

### **Due diligence of own operations and our supply chain**

Modern slavery risks associated with our business conduct are assessed through systematic due diligence processes. Our due diligence practices are aligned with our broader commitment to responsible and sustainable business practices. We are continually enhancing these practices in our efforts to uphold international due diligence standards, such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct.

Our supplier due diligence process is part of a risk-based approach to identify, prevent, mitigate, and account for adverse human rights impacts, including modern slavery and forced labour, across our global supply chain. This process applies to both new and existing suppliers and is aligned with our commitment to ethical sourcing and responsible business conduct.

We apply a three-tiered due diligence framework that includes:

- **Self-Assessment and Declarations**

All prospective suppliers are required to complete a self-assessment questionnaire that includes key elements of the VELUX Code of Conduct for Suppliers. This assessment evaluates the supplier's policies and practices related to human rights, labour standards, and compliance with anti-slavery laws.

- **Third-Party Risk Screening**

We use an independent, AI-powered third-party risk assessment platform to evaluate suppliers based on environmental, social, and governance (ESG) criteria. This includes a modern slavery-specific risk filter and document-based verification of supplier claims. The platform assesses suppliers against globally recognized standards and frameworks, and flags high-risk suppliers for further review.

- **On-Site Assessment and Monitoring**

Selected suppliers undergo on-site assessments as part of our Supplier Evaluation and Approval Process. These assessments verify compliance with our Code of Conduct and assess working conditions, labour rights, and subcontractor practices. We reserve the right to assess suppliers' subcontractors where appropriate. We continuously monitor our suppliers' performance. If a supplier does not meet expectations, we may initiate an

on-site reevaluation, accompanied by a self-assessment using our dedicated Quality, Environmental, Social, and Governance (QESG) questionnaire.

Compliance with our Supplier Code of Conduct is a key performance indicator (KPI) for VELUX. We conduct scheduled re-evaluations and categorize non-compliance as either “major” or “minor.” Corrective action plans are required for all non-compliance findings, and follow-up visits are conducted to ensure resolution. Minor issues require managerial sign-off, while major issues must be escalated to director-level approval. Our preferred approach is to support suppliers in improving their practices. However, if a supplier fails to make acceptable progress, we reserve the right to terminate the business relationship.

The supply chain of VELUX UK is integrated into the VELUX Group’s global supply chain. As such, they are subject to the same risk assessment, due diligence, and reporting processes. As part of our whistleblower mechanism review and supply chain due diligence in 2025, no incidents of modern slavery or forced labour were reported.

### **Training and awareness**

Our Supplier Quality team, who conducts our supplier assessments, undergo mandatory training to ensure that forced labour and child labour are not being used in the organization nor in our supply chains.

### **Grievance mechanism**

Our Whistle-Blower System, “Speak Up”, can be used to report illegal or unethical business behaviour or breaches with our Codes of Conduct. The whistle-blower system can be used by all, including employees, business partners, suppliers, customers and any other stakeholders, to report serious concerns in a secure and confidential way. All reports will be fully investigated, and appropriate remedial actions taken. VELUX ensures anonymity and confidentiality to everyone involved in the investigation.

### **Our actions in 2024**

In 2024, we took several steps to enhance transparency and accountability across our operations and supply chain, supporting our commitment to preventing modern slavery:

- **Supplier Policy Framework**

We consolidated all supplier-relevant policies into a single, accessible framework on our dedicated supplier webpage ([velux.com/suppliers](https://velux.com/suppliers)), making expectations clearer and more transparent for our partners.

- **Whistleblower Governance**

We introduced a new operating model and standard procedure for handling whistleblower cases. The process is now overseen by a Whistleblower Committee with representatives from both the VELUX Group and VKR Holding A/S. The Head of Compliance reports to the VELUX Audit Committee, ensuring independent oversight and accountability.

- **Speak Up Programme**

We rebranded our Whistleblower Programme as the Speak Up Programme and launched an internal awareness campaign. The campaign emphasized the importance of reporting unethical or illegal behaviour, explained how to report concerns, and highlighted the programme's accessibility in 40 countries and multiple languages. Reports can be made anonymously, reinforcing a safe and supportive reporting environment.

These initiatives strengthen our ability to detect and respond to potential human rights violations, including modern slavery, across our operations and supply chain.

**Statement Regarding Approval and Signature of Modern Slavery Statement**

This statement has been signed off by Lars Petersson, VELUX Group CEO, and has been approved by the VELUX A/S Management Group.

September 2025