

VELUX Group Modern Slavery Act Statement 2025

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.

This Statement outlines the steps taken by the VELUX Group during the financial year ending **31 December 2025** ("Reporting Period") to identify, assess, prevent, mitigate and address the risks of modern slavery – including forced labour, human trafficking and child labour – in our own operations and value chain. It builds on the progress reported in our 2024 Statement and reflects the outcomes of our 2025 company-wide human rights impact assessment.

Unless the context indicates otherwise, in this Statement, "VELUX", "we", and "our" refer 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 people's 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. They help create bright, healthy, and energy-efficient places for people who live, work, learn, and play under the roof. We work globally – with sales and manufacturing operations in 37 countries and around 11,500 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. In 2025, the VELUX Group had a total revenue of EUR 2.97 billion while VKR Holding had a total revenue of EUR 4.11 billion. The same year, the Villum Foundation and the VELUX FOUNDATION donated a total of EUR 306 million in charitable grants.

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 across all aspects of the organisation, from supplier selection and product design to 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. Our approach is guided by a coherent policy framework comprising the VELUX Group Sustainability Policy, the Code of Conduct and Basic Working Conditions for Suppliers, the Code of Conduct for Employees, the DEI Policy, the Health and Safety Policy and the Anti-harassment Policy. Together, these documents define our principles and requirements for responsible business conduct across our own operations and throughout our value chain.

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 recognised 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](#) sets out our expectations for responsible sourcing and ethical business practices, covering human rights, labour standards, health and safety, environmental protection, compliance and management systems, with an explicit prohibition of modern slavery and child labour throughout the supply chain. Aligned with the UN Global Compact and the Sustainable Development Goals, it is mandatory for all VELUX Residential direct material suppliers and indirect suppliers under contract.

The Code prohibits forced labour, human trafficking and child labour, and forbids requiring workers to surrender identity papers, ensuring workers are free to leave employment with reasonable notice. It also prohibits physical, sexual, psychological or verbal abuse as a method of workplace control, and requires that working hours, wages, rest and leave comply with local law and enable a decent standard of living. Suppliers are expected to cascade these principles to their own suppliers, with concerns reportable through the Speak Up channel.

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. Our activities involve the procurement and processing of natural resources - mainly pine, glass, aluminium and polyurethane - each of which carries distinct human rights and labour risks in upstream tiers. To mitigate risks in wood-based supply chains, we strive to use only wood certified to the FSC or PEFC responsible forest management standards. Risk exposure is further assessed against the salient risks identified in our 2025 human rights impact assessment.

Human Rights Impact Assessment

In 2025, VELUX conducted a company-wide human rights assessment to identify the human rights risks most significant, or salient, to our operations and value chain, and to review how these risks are currently managed. Based on the findings, we identified priority areas corresponding to our most salient risks: health and safety, effective remedy, non-discrimination, decent work, and support for a clean, healthy and sustainable environment.

Modern slavery risks – including forced labour, human trafficking and child labour – are addressed primarily within the "decent work" and "effective remedy" salient risk areas. We are now integrating the assessment outcomes into our management systems and establishing a roadmap to advance our approach to preventing and managing these salient risks.

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 recognised standards and frameworks, and flags high-risk suppliers for further review.

- **On-Site Assessment and Monitoring**

All new Residential direct material suppliers undergo on-site assessments as part of our Supplier Evaluation and Approval Process. Current suppliers are selected for on-site re-assessment or self-assessment annually based on quality performance and ESG risks. These assessments verify compliance with our Code of Conduct and assess working conditions, labour rights, and subcontractor practices.

Compliance with our Supplier Code of Conduct is a key performance indicator (KPI) for VELUX. We conduct scheduled re-evaluations and categorise 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, it is subject to the same risk assessment, due diligence, and reporting processes. As part of our whistleblowing mechanism review and supply chain due diligence in 2025, no incidents of modern slavery or forced labour were reported.

Training and awareness

Members of our Supplier Quality team, who conduct our supplier assessments, undergo mandatory training to ensure that forced labour and child labour are not being used in the organisation or in our supply chains.

Grievance mechanism

Our whistleblowing system, "Speak Up", can be used to report illegal or unethical business behaviour or breaches of our Codes of Conduct. The whistleblowing 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 that are deemed in scope will be fully investigated, and appropriate remedial actions taken. VELUX ensures anonymity and confidentiality to everyone involved in the investigation.

The Speak Up Programme is accessible across 40 countries and multiple languages, and

reports can be made anonymously, reinforcing a safe and supportive reporting environment. The channel is linked directly from our Supplier Code of Conduct and from the supplier-specific area of our website, ensuring easy access for external stakeholders.

Our actions in 2025

In 2025, we took several steps to enhance transparency and accountability across our operations and supply chain, supporting our commitment to preventing modern slavery:

- Company-wide human rights impact assessment completed, identifying five salient risk areas and initiating a roadmap for integrated management.
- Alignment with CSDDD and EUDR commenced, including preparation to receive supplier Due Diligence Statements.
- Continued Transparent and Equal Pay project with system integration and manager training, addressing the non-discrimination salient risk.
- Recognition on the CDP Supplier Engagement "A List" for proactive engagement on decarbonisation and supplier ESG performance.
- Carbon-reduction and ESG workshops hosted with suppliers in China, Europe and the US, supporting broader supplier due diligence infrastructure.
- Preparation for the VELUX Group Supplier Day, convening key partners to strengthen collaboration on sustainability.

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

This Statement for financial year 2025 has been approved by the VELUX A/S Management Group and signed on behalf of the applicable VELUX reporting entities.

Name: Lars Petersson
Position: VELUX Group CEO
Date: October 2026