

## 2025 VELUX Canada Inc Report on Bill S-211 Addressing Modern Slavery in Supply Chain

Statement for the fiscal year ending 31 December 2025

### **Introduction**

In compliance with the Bill S-211 Addressing Modern Slavery in Supply chains, the VELUX Group (VELUX) provides the following statement in relation to the prevention of slavery and human trafficking in our own business as well as in our supply chain. This statement is made pursuant Bill S-211 addressing Modern Slavery in Supply chains and constitutes our Group's slavery and human trafficking statement for the fiscal year ending 31 December 2025.

Modern slavery 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.

### **VELUX organization and supply chain**

VELUX organization and supply chain VELUX operates a global sales, service and manufacturing network with 21 production sites in 12 countries and sales companies in 37 countries. Our product portfolio includes roof windows and skylights, modular skylights for commercial buildings, flat roof windows and sun tunnels, blinds and roller shutters, flashings and installation products and active (digital) products. Globally we employ around 11,000 highly skilled and dedicated employees. VELUX is headquartered north of Copenhagen in Denmark. 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.

Through our Sustainability Strategy we pioneer climate and nature action, innovate sustainable products, and secure a responsible business. We transform our high ambitions for sustainability into tangible actions across our company and value chain. This ensures that sustainability is truly integrated throughout our business from sourcing to production, people and products to sustainable building advocacy and product end-of-life. We aim to foster a culture where responsible and ethical business conduct is expected from everyone in the VELUX Group. The expectation to act lawfully, responsibly, and with integrity, including respecting the fundamental human rights of all individuals, is embedded in the VELUX Code of Conduct and supporting policies.

## **VELUX policies**

A number of VELUX Group policies set out our position and requirements connected to human rights and working conditions. These policies are guided by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The policies are publicly available on our homepage 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. The main content relating to sustainability from our group policies is incorporated in the Sustainability Policy and we take a clear stance against forced labour, human trafficking and child labour in and beyond our value chain. Also, through our policy, we acknowledge our responsibility to respect freedom of association and collective bargaining and to ensure proper working conditions, non-discrimination and diversity in our entire organization.

The policy commits us to respecting human rights, including the principles set forth in the International Bill of Human Rights and the core labour conventions of the ILO. This includes avoiding infringing the rights of individuals, groups and communities through our business activities and relationships.

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

The VELUX Group Code of Conduct for Employees provides a guide to daily behaviour for all VELUX employees. The VELUX Code of Conduct builds on the 10 principles of UN Global Compact and our VELUX Values and serves as a guide to make the right choices. It describes the main principles of ethical behaviour and our expectations towards all VELUX employees within the following areas: human and labour rights, anti-corruption and business ethics, climate and environment, health and safety, information and data protection.

This includes a clear standpoint against: child labour, forced labour and human trafficking; discrimination and harassment, including physical punishment or other forms of physical, sexual, psychological or verbal abuse as a method of control in the workplace. The Code also includes our standpoint on respect for freedom of association and collective bargaining and requirements relating to basic working conditions.

## **VELUX Diversity, Equity and Inclusion (DEI) Policy**

Our diversity, equity and inclusion (DEI) policy outlines our vision for DEI and serves as a guiding principle to foster a diverse, equitable and inclusive company culture that enables everyone to thrive.

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

The Code of Conduct and Basic Working Conditions for Suppliers (Code of Conduct for Suppliers) was introduced to ensure that all VELUX products and services are developed and manufactured in a responsible way throughout our value chain, including at sub-suppliers. Like the high standards we set for ourselves, we expect our suppliers to share the commitment to these standards. It includes: our standpoint against forced labour, human

trafficking and child labour; how we expect our suppliers to respect freedom of association and collective bargaining; and how we expect them to ensure proper working conditions, non-discrimination against employees and their employees' right to privacy.

## **Supply chain due diligence**

The VELUX Code of Conduct for Suppliers outlines our expectations for suppliers. Suppliers must undertake a self-assessment which includes elements of our Code of Conduct for Suppliers. After selection, suppliers are audited using our Supplier Evaluation and Approval Process. Compliance is monitored through scheduled re-evaluation activities and non-compliance is categorized in terms of severity ("major" and "minor"). Where non-compliance is identified, we request corrective action plans, and we follow up to ensure that improvements are made. The process to identify and close off "major" non-compliance involves sign off at Senior Manager level at the review board. Ideally, we offer support and advice to suppliers, to enable the supplier to comply with the Code of Conduct for Suppliers. However, if requested improvements do not progress in an acceptable manner, we reserve the right to bring the cooperation to an end. We are currently working to strengthen our risk assessment and screening processes, in line with upcoming EU Directives. As part of this work, our risk mitigation assessment for human rights violations was updated in 2026, namely our supplier audit program. This now covers aspects of the UN Guiding Principles. To work more proactively with sustainability (including human rights) risk management, we are using new risk management tools, including an AI platform. With the insights this provides, we will be able to monitor risk across our supply chain and support our suppliers to drive change.

In 2023, we established new governance and compliance procedures around the platform, which are a part of our daily monitor and governance process.

## **Risk identification**

VELUX main risk for modern slavery is associated with our sourcing of goods and services in our supply chain. We have identified that our main risks are associated with our material sourcing of semi-processed goods and raw material for our products, But we also see smaller transactional suppliers and larger purchases within indirect procurement, such as electronics, as risk areas. Our approach is risk based and guided by a structured methodology that considers the severity and likelihood of potential impacts.

In 2025, VELUX conducted a company-wide human rights assessment to identify human rights risks most significant, or salient, to our operations and value chain, and to review how these risks are currently managed.

## **Training**

Our Supplier Quality, ESG teams and assessors have completed mandatory training to ensure that force labour and child labour are not being used in our supply chains. This 100% attendance was completed in Q1/2026.

VELUX conducts regular training for key functions and supplier assessors to ensure awareness of human rights risks, including modern slavery.

## **Speak Up line**

Our Speak Up line can be used to report illegal or unethical business behaviour or breaches with our Codes of Conduct. The Speak Up channel operates in around 40 countries and multiple languages and is accessible via web or QR code. It is available to all internal and external stakeholders including employees, business partners, suppliers, customers and any other stakeholders.

All reports are fully investigated, and appropriate remedial actions are taken. VELUX ensures anonymity and confidentiality to everyone involved in the investigation.

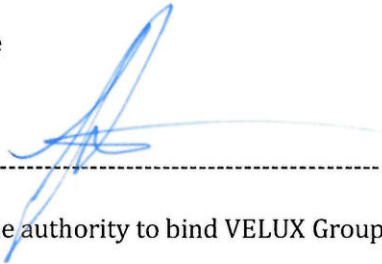
"In accordance with the requirements of the Act, and particular section 11 thereof, I attest that I have reviewed the information contained in the report for VELUX Group. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is trust, accurate and complete in all material respects for the purposes of the Act, for the Reporting year listed above."

Full Name Lars Petersson

Title CEO, The VELUX Group

Date May 31st 2026

Signature

A handwritten signature in blue ink, consisting of a stylized 'L' followed by a horizontal line and a small flourish, positioned above a dashed horizontal line.

"I have the authority to bind VELUX Group"