

Roxul Inc. d/b/a ROCKWOOL's Report on Fighting Against Modern Slavery, Forced Labour and Child Labour for the Financial Year 2025

This statement is made pursuant to the Fighting Against Forced and Child Labour in the Supply Chains Act in Canada. This statement describes the actions taken and considerations that Roxul Inc. d/b/a ROCKWOOL ("ROCKWOOL") and its Danish parent company, ROCKWOOL A/S (sometimes collectively referred to herein as the ("ROCKWOOL Group") have taken to minimise the risk of modern slavery, forced labour, and child labour occurring within ROCKWOOL's operations in Canada and throughout the ROCKWOOL Groups' global supply chains worldwide.

1. The steps taken during previous financial year to prevent and reduce the risk that forced labour or child labour is used at any steps of the production of goods wherever we operate.

In line with the Danish Financial Statements Act and other applicable directives and regulations including EU's Corporate Sustainability Reporting Directive (CSRD)¹ and the associated European Sustainability Reporting Standards (ESRS)², ROCKWOOL has issued an Annual Report and Sustainability Statement for the financial year 2025. This report complies with and fulfils the requirements to report on the management of risks related to the environment, climate, human rights, labour and social conditions, anti-corruption, gender distribution and data ethics. The Report can be found [here](#).

To support the implementation of CSRD a steering committee was established consisting of members of Group Management and senior managers at the ROCKWOOL Group. The steering committee met monthly during 2025 to guide strategic business decisions related to the CSRD implementation.

Since late 2023, the ROCKWOOL Group has had a Human Rights Committee consisting of three members of Group Management. The Committee meets four times a year and its role is to approve, implement, promote and sponsor policies, manuals, evaluate risks assessments and action plans that continuously uphold the due diligence process in relation to human rights.

In addition to having in-house human rights subject matter expertise in the Group Sustainability and in Group Business Assurance, an internal Human Rights Working Group was established in 2024. This working group meets at least two times a year, while maintaining regular contact on an ongoing basis. The 10 members are ROCKWOOL employees from different countries and functions. Their task is to draft and update Group policies and manuals and execute an inclusive dialogue with internal stakeholders on human rights related issues. All corporate documents and plans in relation to human rights are presented to Group Management for further review, approval and implementation. These commitments enable the ROCKWOOL Group to better articulate its human rights commitments across our operations and value chain, and provide the necessary framework so that it, and its subsidiaries, can help ensure alignment with internationally recognised standards and principles of protecting human rights and addressing inequalities, inequities, and discrimination.

The ROCKWOOL Group expects suppliers to uphold similar standards and to enforce these guidelines towards their suppliers. The ROCKWOOL Group continuously work to ensure that all suppliers conduct their business in line with the ROCKWOOL Group's policies.

¹ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.

² Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.

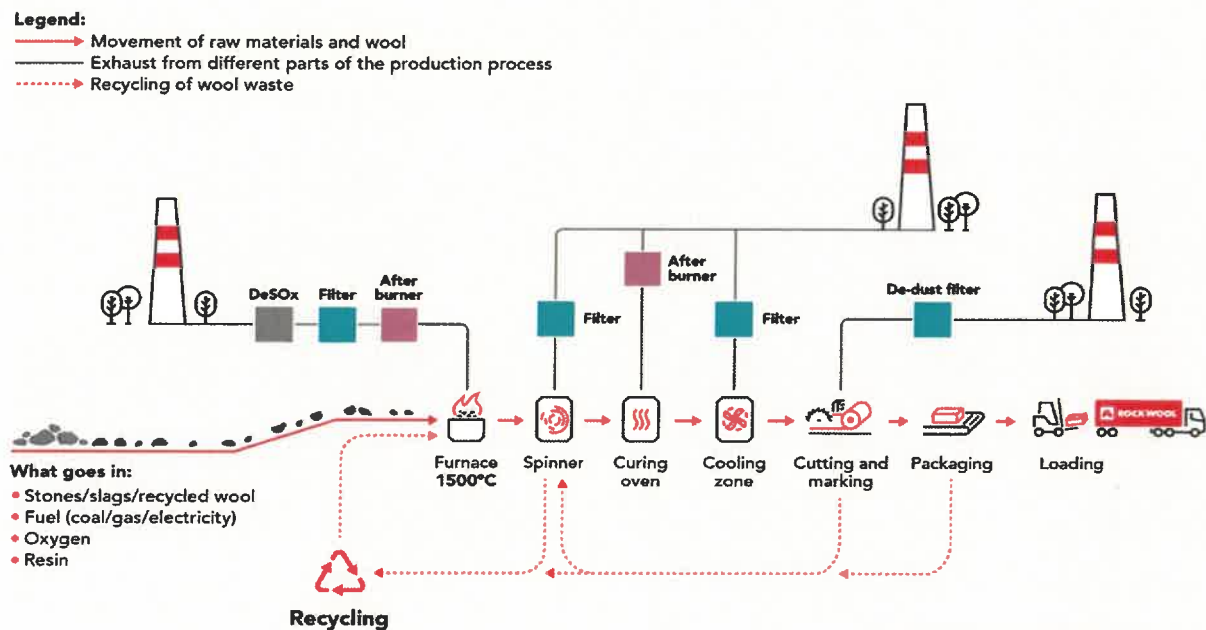
2. The entity's structure, activities, and supply chains.

This statement applies to the ROCKWOOL Group and reporting subsidiaries, including ROCKWOOL A/S and relevant reporting entities indicated in the Annual Report.

The ROCKWOOL Group based in Denmark, is an industrial company with leading positions in insulation, acoustic ceilings and horticultural growing media based on stone wool technology. The ROCKWOOL Group operates mainly in Europe including the UK, North America and Asia. The ROCKWOOL Group has approximately 13,000 employees (approx.: EU: 10,600; NA: 1,500; APAC: 1,200), operates out of 40 manufacturing facilities in 23 countries and has a sales presence in over 120 countries. More information is available at www.rockwoolgroup.com.

In Canada, ROCKWOOL manufactures high-performing and sustainable insulation products for the construction industry as well as alternative growing media products for agriculture. ROCKWOOL has factories and offices located in Milton, Ontario and Grand Forks, British Columbia. In Canada, ROCKWOOL has 748 employees and operates under the trademarks ROCKWOOL, Grodan, and Rockfon.

Infographic below presents how our stone wool products are produced:



Our products are distributed via regional distribution networks and sales organisations across the Group's markets, 85% of sales do not cross customs borders and 400 km is the average transport distance for insulation in Europe.

The ROCKWOOL Group's supply chain engages more than 10,000 suppliers worldwide across high- and low-risk jurisdictions covering a multitude of categories of goods and services. Suppliers vary from small local suppliers to large international suppliers supplying the ROCKWOOL Group on a worldwide basis. In 2025 the top-5 countries in which our supply chains operated were: Germany, Denmark, Poland, The Netherlands and France. Suppliers with whom we will sign a contract register via the online supplier portal and are assessed during onboarding against the [ROCKWOOL Code of Conduct for Suppliers](#); high-risk

categories undergo additional due diligence.

While the ROCKWOOL Group has mapped and assessed direct (Tier 1) suppliers and undertaken prioritised mapping for selected categories, the Group does not yet have complete mapping of all indirect tiers (beyond Tier 1) across all categories (e.g. Tier 2, raw material extraction tiers). In 2026, we will develop an approach to map Tier 2 in the highest-risk categories and collect tier data in supplier onboarding for high-risk categories. We also plan to expand supplier coverage for the revised Supplier Code of Conduct. We aim for all contracted suppliers to sign the Supplier Code of Conduct.

Supplier categories span industries including raw materials, transport and logistics, packaging, CAPEX, maintenance services and professional services.

As a global player, the ROCKWOOL Group is aware that sourcing and procurement activities can have an impact on both human rights and the environment. The ROCKWOOL Group co-operates closely with suppliers and sees them as important stakeholders in ROCKWOOL's common pursuit of a more sustainable supply chain.

3. The entity's policies and due diligence processes in relation to modern slavery, forced and child labour.

Respect for human rights is a fundamental value for the ROCKWOOL Group, one that is reflected in both the materials we produce and the way we operate. The Group's human rights approach is an integrated part of the [ROCKWOOL Group Code of Conduct](#) which is the main policy document for all employees at ROCKWOOL, available on [rockwoolgroup.com](#) and is owned by the Board of Directors. It describes integrity in the context of what this means at the ROCKWOOL Group. The Code of Conduct lists several key areas for ROCKWOOL, including all its subsidiaries, such as preventing corruption and bribery, use of gifts and hospitality, conflict of interest, competition and antitrust law, data privacy, money laundering, and the handling of confidential information. The Code of Conduct also details the ROCKWOOL Group's principles in relation to human rights and labour rights, the environment, health and safety. All employees at the ROCKWOOL Group, and its subsidiaries, are expected to act with the highest integrity.

The ROCKWOOL Group's Code of Conduct is the foundation of the Group's approach to human rights. The principles it embodies are applied in everyday business activities, including management of human capital and gender equity. This approach to human rights is guided by the [ROCKWOOL Group Human Rights Policy](#) and the Manual and the ROCKWOOL Limited's Anti-Slavery and Human Trafficking Policy.

In addition to the Code of Conduct and above mentioned policies, the ROCKWOOL Group has adopted additional policies to manage human rights risks. They are: [Diversity Equity and Inclusion \(DEI\) Policy](#), a [Whistleblower Policy](#) and a [Community Engagement Policy](#). Each policy also has a supporting manual. These documents cover, among other things: freedom of association, prohibition of forced and child labour, prohibition of confiscation of ID documents, recruitment principles (including prohibition of worker-paid recruitment fees), grievance and remedy mechanisms and occupational health and safety.

As stated in ROCKWOOL 2025 Annual Report "ROCKWOOL is committed to respect all internationally recognised human rights as proclaimed in the International Bill of Human Rights, including the United Nations Universal Declaration of Human Rights as well as the 11 fundamental Conventions of the International Labour Organisation (ILO) and the ILO Declaration on Fundamental Principles and Rights at Work." ROCKWOOL respects and promotes human rights in accordance with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and the 10 principles defined in the UN Global Compact relating to human rights, labour, environment and anti-corruption in its activities and relationships with its employees, suppliers, partners and the communities in which it operates and expect our partners and suppliers to do the same when working with ROCKWOOL.

while seeking to comply with the principles of internationally recognised human rights to the greatest extent possible.

As a supplement to the Code of Conduct, ROCKWOOL's [Whistleblower Policy](#), encourages all employees, including those of its subsidiaries and third parties, to report violations of the Code of Conduct and sensitive concerns. Report can be made via a dedicated website, in multiple languages and anonymously. All communication with the whistleblower is encrypted and reporting is done in compliance with national data protection regulation and GDPR.

The ROCKWOOL Group's grievance mechanisms are available for anyone to report possible human rights issues related to ROCKWOOL. The Group's Whistle-blower system can be used for that purpose.

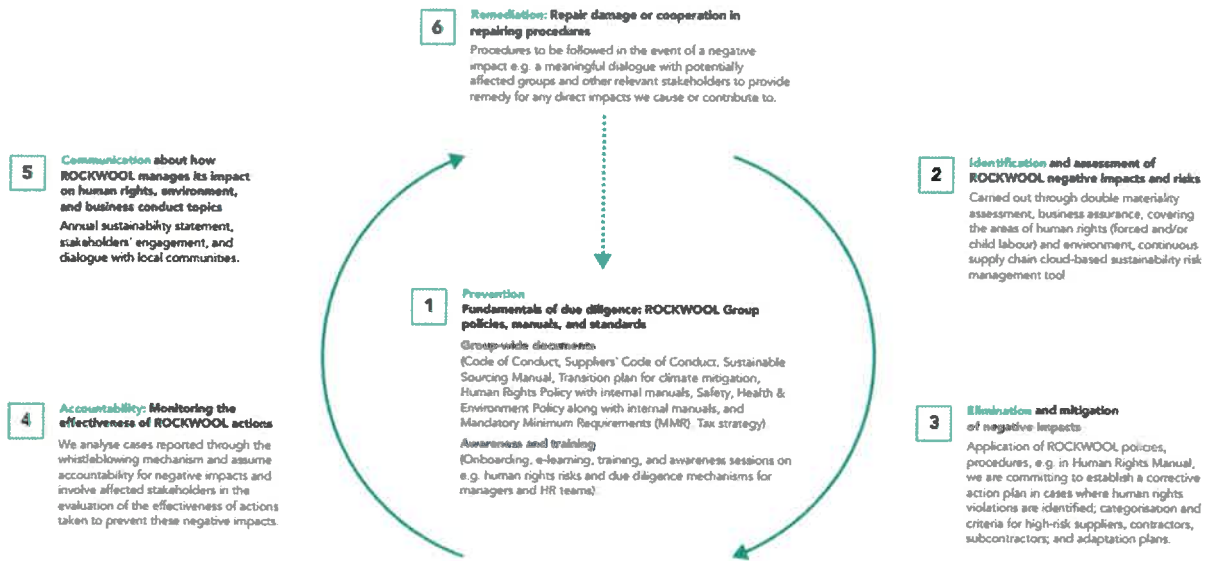
The ROCKWOOL Group recognizes risk connected with the categories and countries ROCKWOOL is engaged with in terms of compliance with international, national and local laws and guidelines relating to human rights, environmental issues and manufacturing practices as well as ethics and bribery, particularly in relation to sourcing and procurement.

The ROCKWOOL Group has a specific [Code of Conduct for Suppliers](#), which aligns with the overall Code of Conduct and reflects the Group's commitment in relation to the UNGC towards suppliers. The Code of Conduct for Suppliers is designed to mitigate risk by clearly stating the ROCKWOOL Group's expectations of its suppliers and the requirement for its suppliers to enforce the same guidelines within their supply chain. In 2024, the new version of Code of Conduct for Suppliers was approved and is now active for the on-boarding of potential new suppliers. This new version of Code of Conduct for Suppliers is also in the process of being redistributed to existing suppliers that have already accepted the provisions of previous version of Code of Conduct for Suppliers. The ROCKWOOL Group's goal is to have every on-boarded supplier sign the most recent version of its Code of Conduct for Suppliers.

Before being approved as a new supplier and as a pre-requisite to secure a formal contract with ROCKWOOL, suppliers must register via an online supplier portal and answer questions relating to ROCKWOOL's Code of Conduct for Suppliers. As part of this process, suppliers are required to confirm that they will comply with the United Nations Universal Declaration of Human Rights and the ten universal principles defined in the UN Global Compact and with all international, national and local laws relating to employment, health and safety, human rights and labour rights and anti-corruption. This also helps suppliers to understand ROCKWOOL's commitment to sustainability in general.

The ROCKWOOL Group takes a risk-based approach to identifying supply chains where the likelihood of violations against human rights, the environment and other sustainability issues are high. We therefore undertake an annual risk assessment of our supply chains. This includes an evaluation of categories and countries where we operate or source products and services.

ROCKWOOL due diligence mechanisms cover actual and potential negative impacts on environment, people, and business



ROCKWOOL Group Annual Report 2025

4. The parts of the entity's business and supply chains that carry a risk of modern slavery, forced labour or child labour being used and the steps it has taken to assess and manage that risk.

The ROCKWOOL Group's Board of Directors oversees sustainability reporting. The CFO's area includes managing the risk and control framework associated with sustainability reporting. It also includes providing updates to the Audit Committee and Board of Directors. The risk and control framework relating to the sustainability statement is structured around a detailed set of data points and their underlying processes.

Definitions and calculation methodologies are aligned with ESRS, and a "comply or explain" approach has been applied to each data point. Each year, a detailed sustainability reporting risk assessment is conducted. As part of this assessment, sustainability reporting risks are prioritised by assessing the risk of the individual data points using six different risk factors. These are the relative significance of the data, the volume and complexity of the source data, the risk of inaccurate recording of the source data, the risk of manipulation of the reported data and the complexity of the calculation or consolidation of reported data.

Identified sustainability reporting risks, the related mitigating controls and assessed residual risks, are documented and evaluated annually. Key findings and improvement actions are reported to the Audit Committee. It is also secured that mitigating controls are reflected in relevant processes and systems.

The first double materiality assessment (DMA) was conducted by Group Sustainability in 2023. Every year, the ROCKWOOL Group updates the DMA to identify, assess, and monitor the material impacts on people and the environment (impact materiality) as well as key business risks and opportunities arising from sustainability topics (financial materiality). The latest DMA update was completed in Q2 2025, approved by Group Management, and validated by the Board of Directors. The assessment is revisited if any significant internal or external changes occur, such as significant strategy reviews, regulatory developments, or evolving stakeholder expectations. Through the DMA, material sustainability impacts, risks and opportunities are identified. Over 50 sustainability topics were assessed using the methodology

described below.

As part of the DMA, impact, dependencies, risks and opportunities of ROCKWOOL were assessed including own operations and upstream and downstream value chain. In the upstream value chain assessment, the focus was on direct (Tier 1) suppliers and business partners while also considering Tier 2 and Tier 3 (for example, raw material extraction, specific geographies with assessed high human rights risks and/or with high environmental risks). In the downstream value chain assessment, corporate customers, end-users of our products, for example building owners, were considered.

Materiality was assessed from both an impact and financial perspective:

- From an impact materiality perspective, actual and/or potential negative impacts were assessed over short-, medium- or long-term time horizons and based on severity (scale, scope, and irremediability) and likelihood. For impacts with potential human rights implications, severity was considered over likelihood. Actual and/or potential positive impacts were assessed based on scale, scope and likelihood. Actual impacts were given a 100 percent likelihood. The impact materiality threshold was set at above two, which means that topics with an impact materiality score lower than or equal to two have minimal informative value.
- From a financial materiality perspective, ROCKWOOL assessed, over short-, medium- or long-term time horizons, risks and opportunities using two parameters: likelihood of occurrence and potential magnitude of financial effects. The financial materiality threshold was set at equal to or above three (significant).

Regarding stakeholder engagement, interests and views were considered through analysis of environmental and human rights risk assessments, past events, and internal and external surveys carried out within the past three years. In 2025, three additional interviews were conducted: one with customer representatives and two with financial institutions' representatives. There was no direct consultation with affected stakeholders; however, internal stakeholders who have ongoing dialogue with external stakeholders took part.

When scoring risks, both gross risk and mitigating actions were assessed. Any risk was first assessed as a gross risk (hazard, exposure, vulnerability) and then reassessed with mitigation measures to determine the potential impact on ROCKWOOL's assets and supply chain. The identified risks in 2025 were: working conditions in terms of health and safety, working time for workers in factories, and adequate wages for contracted workforce, equal treatment and opportunities for all in terms of gender pay inequalities in manufacturing and potential human rights risk of child and/or forced labour among contracted workforce.

The ROCKWOOL Group is committed to avoiding causing or contributing to adverse impacts on people in its operations, supply chain, business relationships, and in the communities where it operates. The ROCKWOOL Group has a strong focus on its salient human rights risks, which includes discrimination, child and forced labour, safety and health together with employment and working conditions as well as access to grievance mechanisms.

In 2025, actions to address ROCKWOOL's salient human rights risks focused on the following themes:

a) Anchoring ROCKWOOL Human Rights Policy across the Group:

- The goal of the training campaign, carried out by our internal human rights experts, was to train operational teams on ROCKWOOL's policies and manuals related to human rights and on the practical application of the due diligence mechanism in respect of human rights. The campaign started in 2023 and continued in 2024 by training the Group Sourcing and Procurement team,

and was expanded in 2025 with trainings sessions dedicated to stone wool factories and the HR community.

- A Human Rights Risk Assessment Questionnaire was sent to around 100 employees from different entities to support awareness on human rights across the organisation.

b) Incorporation of human rights topics in ROCKWOOL internal business assurance process:

- In 2025, ROCKWOOL has added human rights topics, specifically addressing forced labour and child labour, into the internal business assurance process by verifying adherence to the provisions in the two Human Rights Manuals. The objective is not only to prevent any human rights breaches – especially those linked to forced and/or child labour within the most vulnerable workforce group, contract workers – but also to assess the effectiveness of our existing controls and actions, involve relevant stakeholders in this evaluation, and support the continuous and effective implementation of our commitments on working conditions and working time.

c) Accessibility of ROCKWOOL offices for people with disabilities:

- A revision of the new build offices, rental or renovation policy included setting standards that ensure accessibility of our administrative premises for people with disabilities.

d) Establishing ROCKWOOL Non-Discrimination Manual:

- ROCKWOOL has published internally a Non-Discrimination Manual that gives practical guidelines to support our commitment to treat all employees with dignity and respect in a workplace free from discrimination.

e) Embedding human rights due diligence in the supply chain:

- In 2024, the Group Sustainable Sourcing Manager and the Group Sustainability Partner were assigned to human rights due diligence in the supply chain, focusing primarily on suppliers from high-risk countries and sectors. In 2025 the Supplier ESG Compliance Specialist was assigned to conducting supplier audits.
- Based on ROCKWOOL's internal Sustainability Sourcing Manual, the Group perform sustainability risk assessments, including human rights, and monitor suppliers from high-risk categories through a real time cloud-based sustainability risk management tool. In 2025, the Group monitored over 1,400 suppliers from high-risk categories and started to monitor potential suppliers (prior to contracting during Tenders).

5. Key performance indicators

The ROCKWOOL Group tracks indicators such as percentage of high-risk suppliers monitored, percentage of suppliers that have signed the latest Supplier Code of Conduct, and percentage of targeted employees trained. Group Sustainability, in coordination with Group Business Assurance, is responsible for tracking and reporting KPIs to the Audit Committee.

The ROCKWOOL Group combines these KPIs with qualitative feedback from the double materiality assessment, human rights risk assessment questionnaires, internal business assurance reviews, and analysis of grievance cases to evaluate whether controls work in practice and to refine actions where needed.

6. Any measures taken to remediate any forced or child labour and the loss of income to the most vulnerable families that results from measure taken to eliminate the use of forced labour or child labour in our activities and supply chains.

ROCKWOOL confirms that, having taken all reasonable steps to prevent or detect such breaches, it received no information or reports indicating the presence of forced or child labour in its supply chains during the 2025 financial reporting year. Therefore, no measures to remediate the loss of income to



vulnerable families were required.

7. Training provided to employees on forced labour and child labour.

To ensure a strong understanding of the risks of modern slavery and human trafficking in the ROCKWOOL Group's supply chains and its business, the ROCKWOOL Group provides training to its employees, including its subsidiaries.

Face-to-face training was expanded by the ROCKWOOL Group to include training of contract workers on human rights issues and policy. The ROCKWOOL Group will continue this practice in the coming years.

To promote awareness and implementation of human rights and due diligence mechanisms set forward in our Human Rights Policy, Group Management has decided to set the following targets:

- By September 2025, 100 percent of selected stone wool factory managers, Technical Directors, occupational health and safety managers, and Senior HR managers pass the training on human rights risks and due diligence mechanisms. The target has been achieved, and 100 percent of the targeted audience completed the training.
- By March 2025, identified HR leads per region and country pass the training covering the Manuals on counteracting forced and/ or child labour. The target was achieved at 97 percent of the targeted HR community audience completed the training.

Training sessions were developed and delivered by our two internal human rights experts. To support the training sessions, our internal human rights experts have prepared dedicated presentations.

8. How the entity assesses its effectiveness in ensuring that modern slavery, forced labour and child labour are not being used in its businesses and supply chains.

The ROCKWOOL Group has described in Sections 1, 3, and 4 above the policies and tools to comprehensively outline the steps taken, to ensure that there is no modern slavery or human trafficking in its supply chains.

Following a review of the effectiveness of the steps the ROCKWOOL Group has taken to ensure that there is no modern slavery or human trafficking in its supply chains, ROCKWOOL further improved its supplier management processes and guiding documents to define, control, communicate, and document ROCKWOOL's approach to sustainable sourcing and to ensure enforcement of its revised Code of Conduct for Suppliers.

Based on my knowledge, and having exercised reasonable diligence, I attest that the above report is true, accurate and complete in all material respects for purposes of 2025 financial reporting year.

Rory Mass

President and Director, Roxul Inc. d/b/a ROCKWOOL