

## **ROCKWOOL Statement on Fighting Against Modern Slavery, Forced Labour and Child Labour for the Financial Year 2025**

This statement is made under the Fighting Against Forced and Child Labour in the Supply Chains Act in Canada and Section 54 of the Modern Slavery Act 2015 in United Kingdom. While these disclosures are required under UK and Canadian legislation ROCKWOOL A/S (“ROCKWOOL”) applies the principles and standards outlined in this statement across the entire ROCKWOOL Group (“the Group”). This statement describes the actions taken and considerations made to minimise the risk of modern slavery, forced labour, and child labour occurring within our operations and throughout our global supply chains.

### **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)<sup>1</sup> and the associated European Sustainability Reporting Standards (ESRS)<sup>2</sup>, 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 ROCKWOOL. The steering committee met monthly during 2025 to guide strategic business decisions related to the CSRD implementation.

Since late 2023, ROCKWOOL 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 ROCKWOOL 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.

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

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<sup>1</sup> 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.

<sup>2</sup> 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 ROCKWOOL and reporting subsidiaries, including ROCKWOOL A/S and relevant reporting entities indicated in the Annual Report.

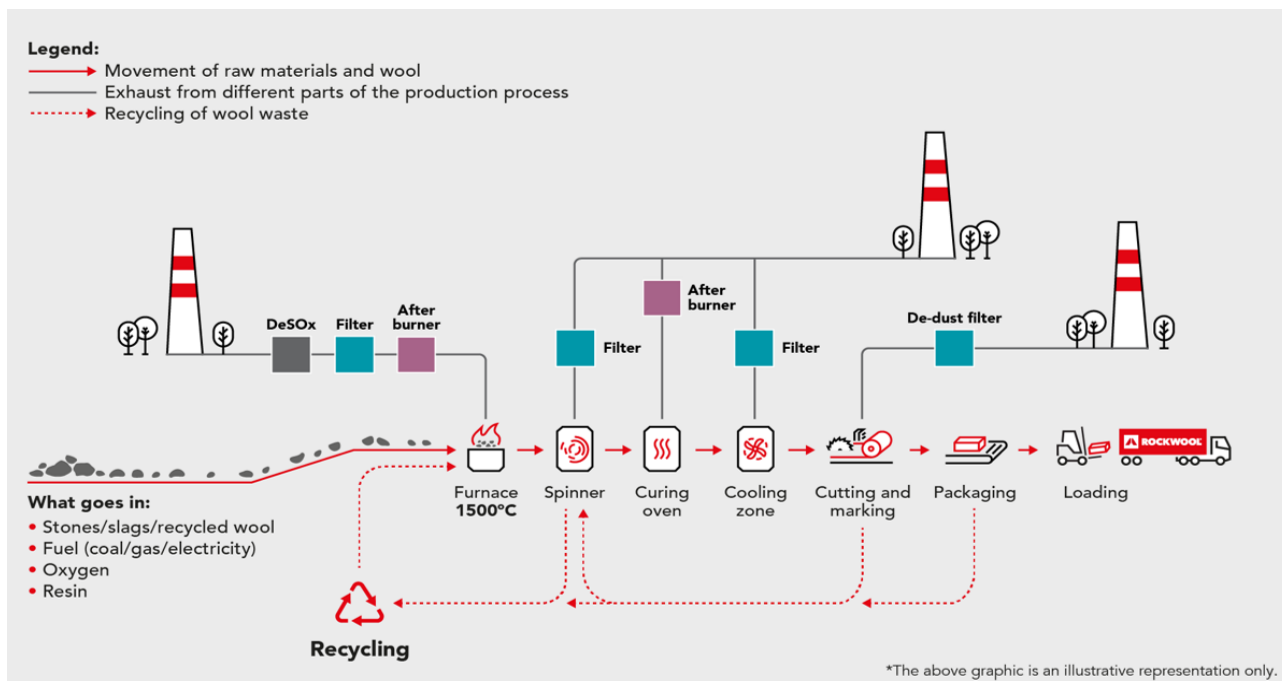
ROCKWOOL based in Denmark, is an industrial company with leading positions in insulation, acoustic ceilings and horticultural growing media based on stone wool technology. ROCKWOOL operates mainly in Europe including the UK, North America and Asia. ROCKWOOL has approximately 13,000 employees (approx.: 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](http://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.

In the UK and Ireland ROCKWOOL Limited is a manufacturer of high-performing and sustainable insulation products as well as fire-stopping solutions for the construction industry. With stone wool production and offices in Bridgend, South Wales, our global centre of fire-stopping excellence in the West Midlands, and our UK and Ireland sales team, ROCKWOOL Limited has over 500 employees.

In 2025, ROCKWOOL generated external revenue of 3,877 M EUR, of which the Insulation segment accounted for 3,206 M EUR and the Systems segment for 671 M EUR.

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.



ROCKWOOL'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 ROCKWOOL 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 ROCKWOOL 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, ROCKWOOL is aware that sourcing and procurement activities can have an impact on both human rights and the environment. ROCKWOOL 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 at ROCKWOOL, 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 ROCKWOOL. 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 ROCKWOOL principles in relation to human rights and labour rights, the environment, health and safety. All employees at ROCKWOOL, and its subsidiaries, are expected to act with the highest integrity.

The ROCKWOOL'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 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. Group has been a member of the UN Global Compact since 2016 and reports on progress annually. Our human rights experts took part in two editions of UNGC business and human rights accelerator programme. One of them is a member of the UNGC Human Rights Working Group. ROCKWOOL is also a member of the Business for Social Responsibility (BSR), a sustainable business network and its Human Rights Working Group.

## Policies and processes

### Policies

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#### Policies related to human rights and gender equity

Our Code of Conduct (CoC) (see p. 104) is the foundation of ROCKWOOL's approach to human rights. The principles it embodies are applied in everyday business activities, including management of human capital and gender equity. In addition to the Code of Conduct, we have adopted policies to manage human rights risks in ROCKWOOL's operations.

Group policy	Description   Scope   Accountability
Diversity, Equity, and Inclusion (DEI) Policy	<p><b>Description:</b> The objective of the DEI policy is to foster an inclusive culture where all employees feel respected and empowered, ensure equal opportunities for career development, and address any form of discrimination. This includes visible and invisible, innate and acquired characteristics, such as age, gender, race, colour, disability, religion, sexual orientation, political opinion, social origin, or other. Additionally, we consider the preferences and needs of employees with different perspectives, including those from vulnerable groups, ensuring that everyone feels valued and supported. Monitoring is conducted through regular employee surveys, diversity metrics, and DEI performance evaluations to ensure continuous progress. The policy is publicly available on our corporate website: <a href="http://www.rockwool.com/group/about-us/corporate-governance/human-rights/">www.rockwool.com/group/about-us/corporate-governance/human-rights/</a>.</p> <p><b>Scope:</b> The DEI policy covers all ROCKWOOL employees globally.</p> <p><b>Accountability:</b> Group Management promotes the DEI policy. Managing Directors, along with Human Resources teams, are responsible for implementing the policy.</p>
Recruitment Policy	<p><b>Description:</b> The objectives of the Recruitment Policy are to ensure a diverse resource pool that strengthens the organisation and future talent pipeline, to attract and recruit people with the right skills, potential, and aspiration, to secure objectivity, fairness, consistency, and transparency in the sourcing, recruitment and selection of candidates, and to continuously develop best practices in global recruitment processes so they are efficient, effective, and free from bias and discrimination. All countries where ROCKWOOL has operations must have a local guideline in place on the hiring of 'Students', based on agreed global principles. Reference is also made to the Employment of Relatives Policy and the Diversity statement on the corporate web page. The Recruitment Policy is available to all employees on the intranet.</p> <p><b>Scope:</b> The policy applies to all internal and external recruitment activities as well as all levels and functions within the Group.</p> <p><b>Accountability:</b> The recruitment policy and complementing manuals and/or guidelines are the responsibility of the CHRO.</p>
Human Rights Policy	<p><b>Description:</b> ROCKWOOL is committed to respecting all internationally recognised human rights as proclaimed in the International Bill of Human Rights, including the United Nations Universal Declaration of Human Rights and the 11 fundamental Conventions of the International Labour Organisation (ILO) and the ILO Declaration on Fundamental Principles and Rights at Work. We also endorse and follow the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.</p> <p>ROCKWOOL's policy refers to the following impacts and salient human rights risks assessed in the double materiality assessment: non-discrimination, including gender considerations, working conditions, a safe and healthy workplace, and counteracting child and forced labour. It explicitly commits ROCKWOOL to engage in meaningful dialogue with potentially affected groups and other relevant stakeholders to prevent or mitigate impacts and to provide a remedy for any direct impacts we cause or contribute to. Ensuring compliance with the policy is supported through regular risk assessments, internal audits, and stakeholder engagement, allowing ROCKWOOL to address any human rights violations or concerns proactively. We regularly report on human rights issues, and the Integrity Committee plays a key role in monitoring adherence to the policy.</p> <p>The policy is publicly available on our corporate website.</p> <p><b>Scope:</b> The policy covers all ROCKWOOL operations globally as well as suppliers covered by Supplier Code of Conduct. Key stakeholder groups affected by the policy include employees, contract workers, local communities, and supply chain workers.</p> <p><b>Accountability:</b> Group Management is responsible for the Human Rights Policy, while Managing Directors are responsible for the implementation, supported by Human Resources.</p>
Human Rights Manuals	<p><b>Description:</b> The Human Rights Policy is supported by two manuals:</p> <p>(1) "Group Human Rights Manual referring to Forced and Child Labour" for general purposes and (2) "Group Human Rights Manual - Forced and Child Labour - Contingent Workers". The latter includes checklists, provisions, guidelines, and mandatory procedures when working with contract workers. Both manuals address the most significant issues and set mandatory provisions regarding the employment process and adaptation of processes to prevent future adverse impacts. This includes criteria and documentation of the age of contract workers and employment conditions such as limits on working hours per week, living wage, rest periods, annual holidays, statutory taxes and social security, minimum criteria for accommodation or housing, termination of the contract, grievance mechanisms, and remedy. ROCKWOOL's "Group Human Rights Manual - Forced and Child Labour - Contingent Workers" states zero tolerance for human trafficking and violations of human rights.</p> <p>The manuals are available for internal stakeholders on our intranet.</p> <p><b>Scope:</b> The scope of the two manuals is the same as the scope of the Group Human Rights Policy.</p> <p><b>Accountability:</b> The Group Sustainability Sourcing Manager and Managing Directors are responsible for the implementation of the manuals.</p>



In line with the UN Guiding Principles, the Group conducts human rights due diligence through a dedicated process. The Group is committed to identifying and preventing or mitigating impacts in its operations and supply chain and to continuously improving its human rights approach. In addition to this year-round due diligence, the Group's Human Rights Committee conducts a human rights risk assessment process at least every three years. The Group discloses its approach to due diligence and its efforts to mitigate salient impacts in the Group's Annual Report.

In recent years, ROCKWOOL carried out several actions to strengthen due diligence governance and internal processes within human rights. These activities included revising the ROCKWOOL Code of Conduct and approving a dedicated Human Rights Policy replacing the previous Human Rights Commitment. In 2024 a Group Human Rights Manual on the prevention of Forced and Child Labour was adopted and covers ROCKWOOL's own employees as well as contingent workers. These key actions provide the necessary framework to ensure compliance with internationally recognised human rights standards. In 2025, to mitigate risks linked to human rights and /or gender bias, as a supplement to Human Rights Policy and DEI Policy, ROCKWOOL has internally published a Non-Discrimination Manual.

The Group's aim is also to help ensure respect for human rights within the communities in which the Group operates. In short, business activities and how these are conducted mutually reinforces ROCKWOOL's fundamental commitment to respect human rights and enrich modern living.

ROCKWOOL is committed to having an ongoing dialogue with potentially affected groups and other relevant stakeholders to prevent or mitigate impacts as well as to providing remedy for any direct impacts the Group causes or contributes to. In keeping with the UN Guiding Principles, where national law and international human rights standards differ or they are in conflict, the Group will adhere to national law 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.

ROCKWOOL'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.

ROCKWOOL 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.

ROCKWOOL 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 ROCKWOOL'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. ROCKWOOL'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.

ROCKWOOL 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 conduct topics



**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.**

ROCKWOOL 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, ROCKWOOL 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.

ROCKWOOL 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. ROCKWOOL 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 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.

ROCKWOOL 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 ROCKWOOL's supply chains and its business, ROCKWOOL provides training to its employees, including its subsidiaries.

Face-to-face training was expanded by ROCKWOOL to include training of contract workers on human rights issues and policy. ROCKWOOL 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.**

ROCKWOOL 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 ROCKWOOL 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.

**ROCKWOOL GROUP CEO**

**Jes Munk Hansen**