

Modern Slavery Statement for the Financial Year 2020

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes ROCKWOOL Limited and the ROCKWOOL Group's statement for the financial year ending 31 December 2020. The statement describes the initiatives and considerations that ROCKWOOL Limited as part of the ROCKWOOL Group has taken to minimise the risk of slavery and human trafficking taking place in its supply chains or in the company.

ROCKWOOL Group structure and supply chain

The ROCKWOOL Group is a focused industrial company with leading positions in insulation, acoustic ceilings and horticultural growing media based on stone wool technology. ROCKWOOL Group companies operate under the trademarks ROCKWOOL, Grodan, Lapinus, Rockfon and Rockpanel. Group operations are focused on Europe, Russia, North America and Asia. The ROCKWOOL Group employs more than 11,500 employees. ROCKWOOL Group operates out of 47 manufacturing facilities and has a presence in 39 countries. More information is available on www.rockwoolgroup.com.

The ROCKWOOL Group currently engages more than 10,000 suppliers worldwide covering a multitude of categories of goods and services. Suppliers vary from small local suppliers to large international suppliers supplying the Group on a worldwide basis. The ROCKWOOL Group total spend for 2020 was around 1,800MEUR.

Policies relating to slavery and human trafficking

The ROCKWOOL Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. During 2020, the ROCKWOOL Group disclosed its commitment to respect human rights. The ROCKWOOL Group has been a UN Global Compact (UNGC) signatory since 2016, where ROCKWOOL committed to implementing the 10 principles including principle four on elimination of all forms of forced and compulsory labour. The ROCKWOOL Group's anti-slavery policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains. The ROCKWOOL Group opposes any kind of discrimination due to age, gender, race, colour, religion, political opinion, social origin or any other aspects of human rights. The ROCKWOOL Group takes very seriously the right to exercise freedom of association and collective bargaining. The ROCKWOOL Group does not use child labour or knowingly engage with business partners that do so. As is the case with the ROCKWOOL Group's policies, the ROCKWOOL Group ensures that this commitment is fully understood and implemented across the ROCKWOOL Group.

The ROCKWOOL Group Code of Conduct and Whistle-blower Policy

The ROCKWOOL Group operates a [Code of Conduct](#), which explicitly states its opposition to forced or compulsory labour and that it will not engage with business partners that use forced or compulsory labour. The Code of Conduct has been communicated internally and is publicly available on rockwoolgroup.com.

As a supplement to the Code of Conduct, the ROCKWOOL Group operates a [Whistle-blower Policy](#), which encourages employees and third parties to report violations of the Code of Conduct and sensitive concerns. In 2020, the ROCKWOOL Group updated its whistle-blower reporting tool. Reporting is now possible via a dedicated website and on the new ROCKWOOL Group whistle-blower app. Reports can be made in multiple languages and anonymously. All communication with the whistle-blower is encrypted and reporting is made in compliance with national data protection regulation and GDPR. The updated whistle-blower reporting tool has been communicated across the ROCKWOOL Group. In 2020 the ROCKWOOL Group did not receive any whistle-blower reports concerning the use of forced or compulsory labour in the supply chain.

Supplier due diligence process

The ROCKWOOL Group's commitment to respect human rights is an integral part of its work with its suppliers. The ROCKWOOL Group Supplier Code of Conduct is an important part of that work, outlining the ROCKWOOL Group's expectation that suppliers respect the United Nations Universal Declaration of Human Rights and UN Global Compact.

The ROCKWOOL Group acknowledges there is a risk connected with the categories and countries the ROCKWOOL Group is engaged with in terms of compliance with international, national and local laws and guidelines relating to employment, environmental and manufacturing practices as well as ethics and bribery, particularly in relation to sustainable sourcing.

The ROCKWOOL Group has a specific Code of Conduct for Suppliers, which is in alignment with the overall Code of Conduct and reflects the Group's commitment in relation to the UNGC towards suppliers. The Code of Conduct 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 2020, the ROCKWOOL Group continued to scrutinise its internal processes with respect to the due diligence of human rights in its supply chain. During 2020, the ROCKWOOL Group evaluated the sustainability risk relating to three areas, one of them being human rights and labour rights across the countries in which the ROCKWOOL Group operates and the type of materials and services the ROCKWOOL Group procures. This resulted in a new risk matrix that the ROCKWOOL Group will use to assess new suppliers as well as to reassess existing suppliers in 2021.

Before being approved as a new supplier, suppliers must register in the ROCKWOOL Group's online supplier portal and answer questions relating to the ROCKWOOL Group's supplier Code of Conduct. This helps the ROCKWOOL Group understand the extent to which the supplier is in compliance with international, national and local laws and standards.

The ROCKWOOL Group accepts suppliers operating on their own code of conduct on a level equal or higher to that of the ROCKWOOL Group.

The ROCKWOOL Group's group sourcing and procurement team (GSP) is required to conduct supplier evaluations. During the supplier approval process, the supplier is evaluated on various labour and human rights parameters and segmented in accordance with criticality and risk profile. The risk profile determines the evaluation process that will be applied to the individual supplier.

GSP's management of contracts with large and strategic suppliers includes regular visits to suppliers and visits of production facilities as well as third party audits as and when required. The close collaboration with new and existing suppliers is a part of the ROCKWOOL Group's current assessment of compliance with the Code of Conduct for Suppliers.

Due to the COVID-19 pandemic no audits were undertaken in 2020.

We can confirm that we did not identify any instances of slavery in our supply chains in 2020.

Training and capacity building

To ensure a high level of 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 staff. As part of the roll out of the new supplier evaluation process, employees in GSP dealing with suppliers have received the required training. In early 2021 an e-learning course in the Code of Conduct was concluded, which targeted around 4,000 employees worldwide. As part of the enrolment package, new employees are obligated to complete the Code of Conduct e-learning to focus attention from the outset on the importance of the Code of Conduct.

Approved by the Board April 2021



Signed:
Title: Managing Director, ROCKWOOL Limited