

The VELUX Group

VELUX restricted substances management standard (VRSMS) - Global



October 2025



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Introduction

Our suppliers must support the VRSMS and comply with all applicable environmental laws and regulations. Additionally, they must adhere to VELUX's internal restrictions, which may exceed legal requirements, to safeguard the environment and human health, and promote sustainable development. Suppliers must also assist VELUX in meeting our environmental obligations, including providing compliance certificates and notifications regarding the initial supply of substances, articles and mixtures.

In the past, supplier selection focused on quality, delivery times, price, service, and support. Now, and in the future, suppliers must also demonstrate a willingness and ability to comply with environmental laws and regulations. Since 1st October 2018, all suppliers are required to sign up to the VRSMS to confirm their compliance.

The VRSMS is incorporated into the VELUX Code of Conduct and Basic Working Conditions, which suppliers are also required to sign up to.

The VRSMS serves as a tool to support compliance. Environmental and health and safety laws and regulations are continuously evolving and differ across countries. Due to uncertainties, it is essential for companies to monitor and implement changes. Suppli-

ers are responsible for complying with all relevant environmental laws and regulations and for supporting VELUX in meeting our obligations and internal thresholds.

VELUX will update or clarify the VRSMS as needed, at least once per year. Updates will be communicated at [Chemical compliance for suppliers](#). Suppliers are responsible for ensuring that they comply to the latest version.

Suppliers currently providing VELUX with restricted substances, SVHCs, or substances deemed unacceptable must promptly notify VELUX in writing.

Suppliers are expected to maintain appropriate environmental management systems that monitor and document relevant issues concerning environmental protection, human health, and sustainable development. These systems should support continuous improvement in pollution prevention. Suppliers capable of obtaining certifications such as ISO14001, EMAS, or IECQ QC 080000 HSPM are expected to do so and maintain them.

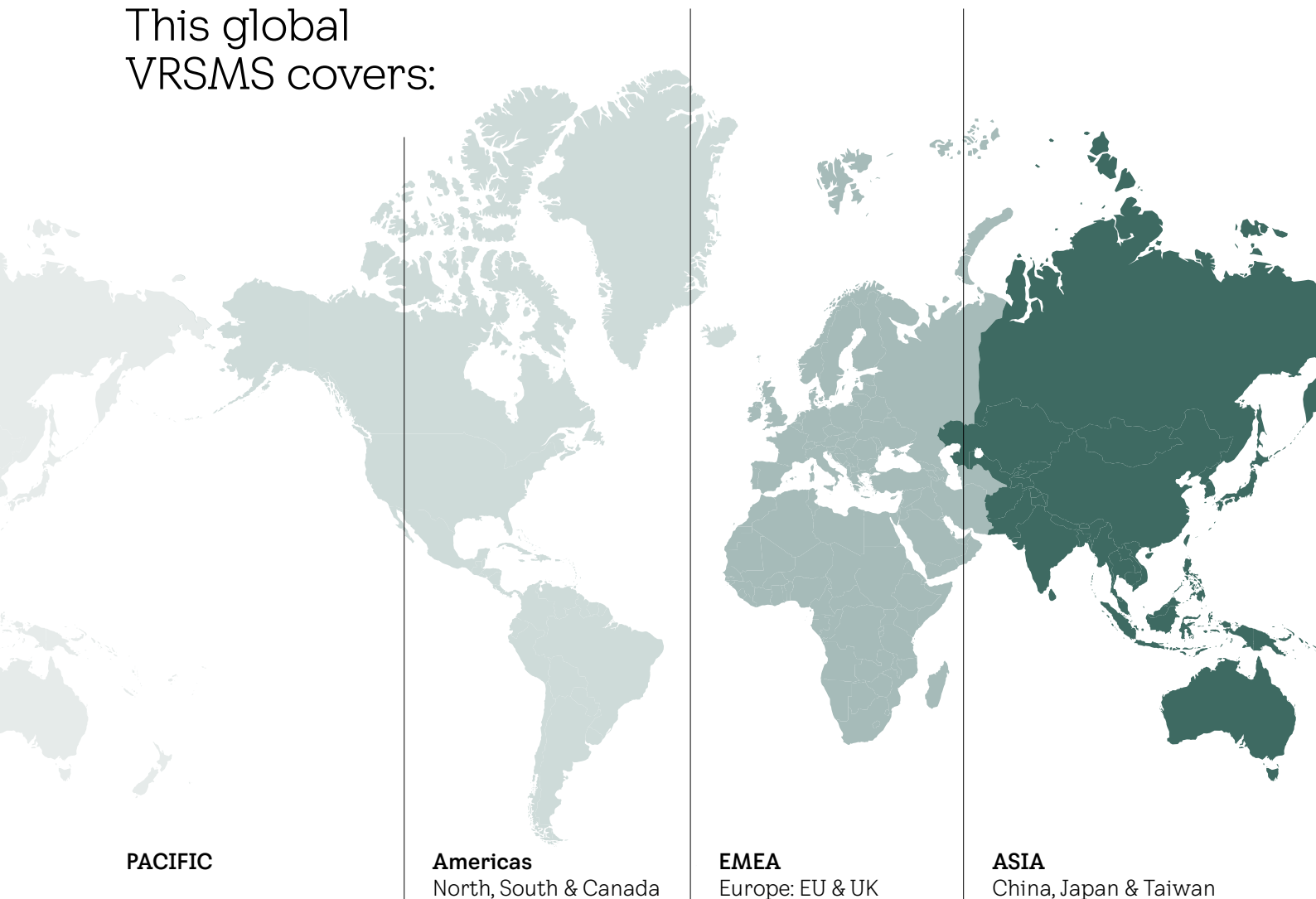
Suppliers are expected to be willing and able to document compliance. Suppliers not willing to sign up to and comply with the VRSMS or who – when requested by VELUX – do not provide documentation demonstrating

compliance with the VRSMS or who do not commit to an effective policy and plan to implement compliance will not be accepted as VELUX suppliers. By accepting the VRSMS the supplier commits to ensure compliance of the delivered product to the regulations of the end user market.

Suppliers will be requested to sign up to the VRSMS by completing an SAP ARIBA questionnaire that will be sent by e-mail or by signing a designated sign-up form.

Suppliers warrant that all documentation related to products delivered to VELUX is accurate, not misleading, and provided in good faith. VELUX may, at their discretion, require specific suppliers to conduct and submit test results regarding product content.

This global VRSMS covers:



EMEA: In Europe, among others, the EU legislation EC 1907/2006 “REACH”, the RoHS II Directive (65/2011/EU) and the Biocidal Product Regulation (528/2012/EU).

To fulfil the **REACH Regulation**, the supplier is required to send information on components or articles containing Substances of Very High Concern (SVHC) with values over 0,1% w/w, stating the name of the SVHC and its safe use, to the VELUX location(s) to which the component or article is delivered. The information on SVHC’s in components or articles will be used to ensure the safety of

VELUX employees, to inform our customers and to be submitted in the [SCIP Database](#). All Suppliers, who have submitted information on SVHC substances in articles supplied to VELUX in the SCIP Database, are obliged to share the SCIP number from the submission report with us.

To fulfil the requirements in the **RoHS II Directive**, the suppliers must review their compliance with the RoHS II Directive at least every second year. VELUX shall be informed in writing if there have been any changes in the RoHS II compliance for any substances supplied to VELUX. There are

some exceptions in the RoHS II Directive; some applications are exempted for specific RoHS II substances. If a supplier uses any of the RoHS exceptions in substances supplied to VELUX, VELUX shall be informed in writing.

To fulfil the requirements in the **Biocidal Product Regulation** the Supplier is required to send information to VELUX on the active substances used in either the biocidal product or the treated article, and possible labelling requirements, connected to the active substance.

Questions?

If a supplier has any questions regarding this VRSMS, as updated from time to time, please contact VELUX on email VRSMS@velux.com



Scope

The VRSMS describes in general terms certain, but not all requirements related to substances supplied to VELUX. It **links** to references for some laws and regulations applicable in the EMEA, Americas (North & South), ASIA & Pacific for **orientation**.

The purpose of the global VRSMS is to induce the suppliers to comply and to inform of certain conditions for, or prohibition of, the manufacture, use or placing on the market of substances, articles or mixtures restricted by law or regulation or our internal policies and plans.

The VRSMS contains links to the legislative requirements, but suppliers have the responsibility to identify their risks for their own/supply chain processes and products.



Applications

The VRSMS applies globally and to all chemicals and all consumable processing materials, raw materials, finished materials, components, articles and any other item that are supplied to VELUX. This also includes, production equipment, tools and production or non-production goods of any type. The requirements apply to any supplier supplying to any VELUX location(s) globally.



Requirements

The primary purpose of the VRSMS is to manage and control restricted substances within formed components or in materials such as minerals or powders or in any other item, which VELUX uses as a downstream user. However, it should be noted that any substance which is intrinsically hazardous, or which forms or releases restricted content during processing, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilization, recycling or disposal is also subject to VRSMS.

Acceptance of the VRSMS is a precondition for becoming and remaining a supplier to VELUX.

At the request of VELUX, the supplier shall disclose, if need be, in confidence, detailed information on the composition, toxicity and environmental and health and safety impacts of the supplier's deliveries to VELUX.

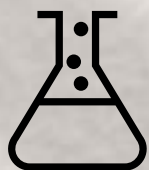
In addition to information required to comply with the VRSMS each supplier must, at request, provide information to VELUX regarding guidance on TOXICITY, HEALTH, SAFETY and DANGEROUS GOODS TRANSPORTATION as well as emissions anticipated to be released to humans and/or environment.

Before the supplier makes any change to the composition of the substance, article or mixture or hazard labelling they must inform the affected VELUX location(s).

Specific for Suppliers of chemicals and mixtures (including paints):

Please note that according to the REACH Regulation (Article 31(8)) you are obliged to provide Safety Data Sheets (SDS) to VELUX; please do so by sending updated SDS to your VELUX contact person and cc to 3Eco email address: updates@3eco.com in order for us to be able to add to 3E protect.





Substance restrictions

Substance restrictions **need to be identified by supplier and supply chain** by CAS no., substance name, legislation, chemical classification and applications affected/exempted. More information about hazard pictograms can be found [here](#).

It is the suppliers' responsibility to identify all affected substances which have an impact on VELUX deliveries and products.

Information and links for supplier and supply chain orientation for restricted substances

Please find some information on laws and regulations in annex 1 (EU, UK), annex 2 (AMERICAS (North, South & Canada), annex 3 (ASIA, China, Japan) and annex 4 (PACIFIC) which may be relevant for suppliers.



Annex 1

SUBSTANCE RESTRICTIONS

EMEA Europe: EU & UK

Please note that the information described in the links below refers to the current version of the regulations, please consider revising them periodically. VELUX will revise this document at a minimum once per year.

1. REACH Registration, Evaluation and Authorisation of Chemicals (REACH) European Union (1907/2006/EC) (annex XIV).
[Read more](#)
2. REACH, Registration, Evaluation and Authorisation of Chemicals (REACH) European Union (1907/2006/EC) (annex XVII)
[Read more](#)
3. REACH, Registration, Evaluation and Authorisation of Chemicals (REACH) European Union (1907/2006/EC) (annex XVII: PFAS Restriction Proposal)
[Read more](#)
4. REACH, Registration, Evaluation and Authorisation of Chemicals (REACH) European Union (1907/2006/EC) (candidate list)
[Read more](#)
5. Restrictions of Hazardous Substances (RoHS) European Union (65/2011/EU)
[Read more](#)
6. Battery Directive (2023/1542/EU)
[Read more](#)
7. Packaging and Packaging Waste Directive (EU) 2018/852 + (94/62/EC)
[Read more](#)
8. CLP Regulation (EC) No 1272/2008 (Regulation on classification, labelling and packaging of substances and mixtures (EC) No 1272/2008)
[Read more](#)
9. Biocidal Product Regulation (528/2012/EU)
[Read more](#)
10. Substances that deplete the ozone layer Regulation (EU) 2024/590
[Read more](#)
11. F-Gas Regulation (EU) 2024/573
[Read more](#)
12. Persistent Organic Pollutants Regulation (2019/1021/EU) + (2020/1021/EU)
[Read more](#)
13. Conflict Minerals (EU) 2017/821) + (EU) 2019/821
[Read more](#)
14. OEKO-TEX® (Edition 02.2024) (only relevant for textiles (decoration materials)
[Read more](#)
15. EU Taxonomy, annex C
[Read more](#)
16. UK REACH
[Read more](#)
17. Construction Products Regulation (EU) 2024/3110
[Read more](#)
18. Regulation on Deforestation-free Products (EU) 2023/1115
[Read more](#)



Annex 2

SUBSTANCE RESTRICTIONS

AMERICAS – North, South & Canada

1. The Toxic Substances Control Act (TSCA) – 15 U.S. Code Chapter
2. Clean Air Act – 42 U.S. Code s. 7401
3. National Environmental Protection Act (NEPA) – 42 U.S. Code s. 4321 et seq.
4. Clean Water Act – 33 U.S. Code Chapter 23
5. Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
6. Occupational Safety & Health Administration Regulations (OSHA) Regulations & Standards
7. Comprehensive Environmental Response, Compensation, & Liability Act (CERCLA/Superfund) – 42 U.S. Code Chapter 103
8. Resource Conservation and Recovery Act (RCRA) – 42 U.S. Code 82
9. Safe Drinking Water Act (SDWA) – 42 U.S. Code s. 300f et seq.
10. Hazardous Materials Transportation Act – 49 U.S. Code s. 5101 et seq.
11. PFAS/PFOS fluorine synthetic chemical compound restrictions
12. Toxic Substance Control Act
13. Canada (CEPA) Canadian Environmental Protection Act
14. (GHS Rev 7) Globally Harmonized System of Classification and Labeling of Chemicals
15. (FHSA) Federal Hazardous Substances Act – managed by CPSC Consumer Product Safety Commission



Annex 3

SUBSTANCE RESTRICTIONS ASIA – China, Japan & Taiwan

CHINA (the PCR)

1. Environmental Protection Law of the People's Republic of China
2. Law of the People's Republic of China on Environmental Pollution Caused by Solid Wastes Prevention and Control
3. Water Pollution Prevention and Control Law of the People's Republic of China
4. Atmospheric Pollution Prevention and Control Law of the People's Republic of China
5. Soil Pollution Prevention and Control Law of the People's Republic of China
6. Regulation on the Safety Administration of the Transport of Radioactive Materials
7. Regulation on the Safety Administration of Radioactive Waste
8. Regulation on the Safety Administration of Hazardous Chemicals
9. Regulation on the Administration of Ozone Depleting Substances
10. Regulation on the Safety and Protection of Radio isotopes and Radiation Devices
11. Environmental Administrative rules on the First Time Imported Chemicals and the Import and Export of the Toxic Chemicals
12. Administrative Measures for the Import and Export of Ozone Depleting Substances
13. Administrative Measures of Licenses for Storage and Disposal of Radioactive Solid Waste
14. Measures for Cleaner Production Review
15. Directory of Hazardous Wastes of the State

16. Regulation on the limit on Use of Hazardous Substances in Electric and Electronic Products

17. China RoHS

18. [List of Chemicals under Priority Control](#) (first batch)

19. [List of Chemicals under Priority Control](#) (second batch)

Japan

20. (CPSA) Consumer Product Safety Act
21. (CSCL) Chemical Substances Control Law

TAIWAN

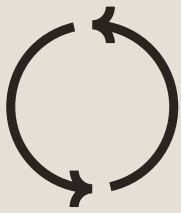
22. [Taiwan Toxic Chemical Substance Control Act](#) (TCSCA)



Annex 4

SUBSTANCE RESTRICTIONS PACIFIC

There is no “one stop shop” of restricted substances in PACIFIC. In Australia, the laws and regulations fall into three regulatory categories: (i) environmental, (ii) workplace safety and (iii) transport regulation. There are federal and state regimes for each type of regulation.



Global VRSMS Summary of the Changes

AS-IS

- Scope: Europe, including a few others (US, China, Japan – not reviewed by national experts)
- VRSMS is being used globally, but not in all cases and without the **“decision taken on making it global”**
- VRSMS contains an annex with a list of regulated substances (only European legislation)
- VRSMS can only be signed in SAP ARIBA

NEW

- Scope: **All Suppliers globally** must sign the VRSMS independent of the country they are selling to.
- Chemical legislations from Europe, US, Japan, Canada and China are added and reviewed by national experts.
- The annex with the list of regulated substances (only European legislation) has been removed.
- Signature page added for those Suppliers not in SAP ARIBA

NOTE: The intention is to add more legislations from more countries continuously.

Revision 2.0

Document Owner:
Product Regulatory Affairs

