

DATA ETHICS STANDARD



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INTRODUCTION

This Data Ethics Standard describes how Carlsberg is committed to treating data in accordance with our ethical principles, respect of our consumers and society and in compliance with regulatory requirements.

REQUIREMENTS

1. WE KEEP DATA SAFE

- The Carlsberg Group's IT capability is a strong business driver in the relationships with our consumers, customers, business partners, and on-site as well as remote workers. Accordingly, we take very seriously the expectations of these stakeholders that any data shared and used – whether personal data or business data – is protected through robust security features, effective processes for their implementation, and reliable IT applications and providers.
- The Carlsberg Group commits to safeguarding the digital well-being of our many stakeholders and all of their data in our care, including in our information systems, from the exponentially growing risks of illegal and damaging conduct by individuals or groups acting either carelessly or intentionally for financial gain or other pernicious reasons.

2. WE FOLLOW DATA PROTECTION LAWS

- The Carlsberg Group recognizes the importance of having legally effective and meaningful privacy and data protection standards in place, applicable to all of our business activities. This is necessary not only to comply with the many evolving regulatory requirements across our global markets, but also for the trust of those countries' citizens, leaders, and business communities.
- To assist with our local compliance efforts, the Carlsberg Group directs that all personal data, however and wherever used in our business operations, must be handled strictly in accordance with applicable laws and our privacy and data protection standards, set out in internal policies.

3. WE USE DATA RESPECTFULLY

- At the heart of the Carlsberg Group are the people who contribute to our success and enjoy our beverages all over the world. For our workers, our commitment to a fair, respectful, safe, and non-discriminatory workplace includes the lawful, fair, and limited handling of their data as part of our working relationship.
- When collecting and using consumer data to better produce and market our products, the Carlsberg Group does so ethically, for example, by not acting in any way to promote drinking to minors, by enabling consumers' autonomy over how their data is processed through transparent

privacy notifications, and by lessening the privacy impact of digital technologies that we use.

- The Carlsberg Group respects individual privacy as part of our greater commitment to ethical business conduct and stakeholder dignity

ROLES AND RESPONSIBILITIES

ROLES	RESPONSIBILITIES
Group legal & Compliance	Standard owner
Management, employees and contract workers of all entities in the Carlsberg Group	Responsible for adhering to this standard

STANDARD REVISION

This standard will be reviewed annually, or whenever a significant organisational change, breach or incident makes it relevant to review and revise.

Version: 01.00

Effective Date: 28/11/2025

Next Review Date: 28/11/2026

Standard Owner: Data and Analytics

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