



HUMAN RIGHTS POLICY

INTRODUCTION

The Carlsberg Group is committed to meeting our responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights and we recognise our responsibility to respect all internationally recognised human rights across our own activities and business relationships.

The purpose of this policy is two-fold: to communicate – internally and externally - Carlsberg Group's commitment to respect human rights, in line with the expectation of UN Guiding Principles on Business and Human Rights, and to provide guidance to our employees on appropriate behaviour when it comes to labour and human rights issues.

The Carlsberg Group strives to continuously improve our ability to identify potential or actual human rights impacts that our business may be connected to and, once identified, to take appropriate action to prevent or mitigate those impacts.

The Carlsberg Group is committed to open and unbiased dialogue with our stakeholders on human rights issues, and we periodically align our approach with external and internal stakeholders.

SCOPE

This policy applies globally to the management, employees and contract workers of all entities in the Carlsberg Group. Where the Carlsberg Group participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) shall be made specifically aware of the significance to Carlsberg of the policy and shall be encouraged to apply the same policy or a similar standard to the joint venture. For potential new non-controlling joint venture cooperations, Carlsberg shall strive to commit the other shareholder(s) to adopting the policy or a similar standard for the joint venture.

Our expectations regarding the respecting of human rights by our suppliers, vendors, agents and contractors are specifically addressed in our Supplier and Licensee Code of Conduct.

REQUIREMENTS

While Carlsberg commits to respecting all internationally recognised human rights, the topics below are those we consider most significant to our operations.

1. NON-DISCRIMINATION

1.1. Carlsberg aims to create equal access to opportunity regardless of social identity, and employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria such as performance and potential, qualifications and experience.

1.2. The Carlsberg Group aspires to promote a positive and inclusive work environment that respects every individual. We do not tolerate any form of discrimination based on distinguishing characteristics such as race, colour, gender, religion, political or other opinion, national or social origin, sexual orientation, age or disability.

2. FORCED LABOUR

2.1. The Carlsberg Group does not tolerate any form of forced labour, including bonded labour, indentured labour and slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end.

3. CHILD PROTECTION

3.1. The Carlsberg Group does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 15 or the legal minimum age for employment under applicable local law, whichever is higher. Where the applicable local minimum working age is 14, in accordance with exceptions for developing countries, this lower age will apply. All legal restrictions regarding the employment of persons below the age of 18 must be observed. Younger workers may be employed through Company-approved, short-term internships, apprenticeships or work

experience programmes, but they are never permitted to do work that may threaten their health & safety or hinder their education.

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

4.1. The Carlsberg Group respects employees' rights to form or join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests, without fear of punitive actions such as intimidation, harassment or termination of employment.

5. HARRASMENT

5.1. The Carlsberg Group is committed to treating every employee with dignity and respect, and to promoting equal opportunities. We do not tolerate any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace, nor in any work-related circumstance outside the workplace, by either fellow employees or managers.

6. WORKING HOURS, BENEFITS AND WAGES

6.1. The Carlsberg Group will adhere to the stricter of applicable local laws or industry standards relating to working hours, benefits and wages.

6.2. Where there is no local statutory minimum wage, Carlsberg strives to pay employees sufficiently to meet a decent standard of living. Wages for overtime must be paid in legal tender, and on a regular basis.

6.3. We promote a healthy work/life balance. Employees must be entitled to at least one day off in seven and must be given reasonable breaks in work and sufficient rest periods between shifts.

6.4. The Carlsberg Group ensures that all employees have the right to sick leave and annual holiday, as well as parental leave, as provided by national legislation, for those employees who have to care for a new-born or newly adopted child. Employees who take such leave must not, as a result of taking such leave, face dismissal or threat of dismissal.

6.5. The Carlsberg Group is committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement where possible.

6.6. In the event of major layoffs or redundancies, the Carlsberg Group must, as a minimum, satisfy applicable local laws and industry standards.

6.7. Employees shall be provided with written and understandable information about their employment conditions, and about the particulars of their salaries.

7. HEALTH & SAFETY

7.1. The health & safety of our employees always comes first. In the Carlsberg Group, we want everyone to return home safely every day and we believe accidents are preventable. We aim to empower our people to identify unsafe behaviours and take proactive action to help their colleagues adopt safe ways of working. We rely on a variety of methods to support and sustain a culture of safety within the Carlsberg Group, with the aspiration of achieving an incident-free workplace.

REMEDY AND GRIEVANCE

The Carlsberg Group is committed to identifying potential and actual adverse human rights impacts that our operations may cause or contribute to, and strives to prevent, mitigate or remedy such impacts.

Any employee with concerns about the human rights impact of our operations may raise these through our employee mechanisms for raising workplace-related grievances.

We encourage employees who have a concern to talk in the first instance to their line manager, or alternatively to raise their concern with their HR or compliance representatives.

If neither of these options is possible, The Carlsberg Group's Speak Up system enables employees and contract workers to speak up about possible violations of human rights without fear of retaliation. Speak Up can be accessed by telephone or online. It is operated across the business by an independent third party appointed by Group. All issues raised through the Speak Up system are monitored by the Group Legal and Compliance function. All reporting is carried out confidentially, and employees can choose to share their concerns anonymously.

The Speak Up system is also available to other stakeholders to use, wherever negative human rights impacts may occur as a result of Carlsberg's activities.

The Speak Up system can be found [here](#).

ROLES AND RESPONSIBILITIES

Roles	Responsibilities
ExCom	Responsible for Policy approval.
SVP GROUP HR	Owns, endorses and ensures the implementation of the policy.
Relevant Group VPs/Country Managing Directors/regional and local management	Responsible for ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Ensure local compliance with the policy, including adequate control measures to eliminate or reduce risks to express behaviours in breach with the policy.
Group HR	Drives the implementation of the policy, provides specific advice on human rights issues and dilemmas, and ensures that human rights issues are identified and addressed. Audits, reviews, measures and reports on human rights performance.
Group Sustainability	Advises policy owners on policy content and ensures relevant and correct communication of policy efforts to external stakeholders.
Management, employees and contract workers of all entities in the Carlsberg Group	Responsible for adhering to this policy. Comply with the letter and spirit of the policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

DEVIATIONS

Exceptions to this Policy shall not be granted, unless exceptional conditions exist, or the Policy is obviously not applicable. Any request for an exception shall be put in writing to the Policy Owner. The Policy Owner shall assess and decide on each request individually. Exceptions shall be duly logged and documented.

POLICY REVISION

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of ExCom. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

ASSOCIATED POLICIES AND MANUALS

- Code of Ethics & Conduct
- Supplier and Licensee Code of Conduct
- Diversity & Inclusion Policy
- Marketing Communication Policy
- Health & Safety Policy
- Human Resources Policy
- Anti-Bribery & Corruption Policy
- Brand Promoters Manual
- Speak Up Manual
- Human Rights Manual

CONTACT

For more information, please contact the Local HR manager, Group Sustainability or Group HR.

ENGLISH



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