



# HUMAN RIGHTS POLICY

# 1. INTRODUCTION AND PURPOSE

We brew for a better today and tomorrow. Doing business responsibly and sustainably supports that purpose and drives efforts to deliver value for our shareholders and society.

Given our global footprint and scale, we recognise that our operations and value chain impact people, and that we have a responsibility to respect the human rights of our employees, workers in our supply chain, our consumers and the communities in which we operate either directly or through our business partners.

The Carlsberg Group Human Rights Policy articulates our commitment to respect human rights, our approach to continuous human rights due diligence and rightsholder engagement, including the provision of grievance channels, our human rights governance, and our commitment to provide and cooperate in access to remedy in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

## 2. SCOPE

The Carlsberg Group Human Rights Policy applies to our entire value chain, including our employees, agency workers, contractors, consultants and other individuals working on the Group's premises or working for or on behalf of the Group, as well as to our global business partners. Our business partners include our customers, suppliers, service providers, consultants and all other parties with whom we have a commercial relationship.

The principles of this Policy are embedded in the [Carlsberg Supplier and Licensee Code of Conduct](#), which describes in detail how these principles apply to licensees, suppliers and service providers, and in the [Carlsberg Brand](#)

[Promoter Manual](#), which includes specific guidance on how the principles of this Policy apply to the people promoting our products.

## 3. OUR COMMITMENT TO HUMAN RIGHTS

We are committed to respecting internationally recognised human rights across our global operations and value chain. This commitment includes the [International Bill of Human Rights](#), consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR). [The International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#) and ILO fundamental Conventions, the Children's Rights and Business Principles (CRBP) and the UN Women's Empowerment Principles are also part of this commitment. As a signatory to the [UN Global Compact](#), we are committed to its Ten Principles, which incorporate human rights, and we follow the framework provided by the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) to inform our approach to human rights due diligence.

We recognise that respecting human rights is a dynamic and complex process within the context of emerging regulations on mandatory due diligence and evolving stakeholder expectations. We are therefore committed to conducting ongoing human rights due diligence in line with the UNGPs, and we strive to continuously improve our ability to identify potential and actual human rights impacts connected to our business and take appropriate action to prevent and mitigate those impacts.

We operate in diverse contexts around the globe, including in some environments where human rights risks may be higher than in others. Where there are areas of conflict between national and international human rights standards, we seek ways to respect international human rights to the greatest extent possible.

We are committed to communicating this Policy internally to our employees and management and externally to our business partners and other stakeholders. We will continue to review and update this Policy by incorporating insights from rightsholders and stakeholders, as well as learnings from our ongoing human rights due diligence work.



## 4. IMPLEMENTING OUR POLICY

To implement the Carlsberg Group Human Rights Policy, we have a robust human rights due diligence process that consists of four core steps, aligned with the requirements of the UNGPs.

The first step of our human rights due diligence process focuses on identifying potential human rights risks associated with our business and value chain, and prioritising them based on saliency.

In the second step of our human rights due diligence process, we manage the risks identified by integrating the results of our due diligence work into our policies and processes, and, where relevant, creating programmes focused on tackling concrete risks. This is supported by regular training and capacity-building sessions.

As a third step, we track our progress by monitoring advancement towards defined targets and tracking human rights claims raised by employees and other stakeholders through our [Speak Up system](#).

As a final step, we are committed to reporting publicly on our due diligence process and our overall approach to human rights through the Carlsberg Group Human Rights Report. The latest version of the report can be found on our [public website](#).

## 5. CORE PRINCIPLES

Our strong commitment to respect human rights is further reflected in our approach to specific areas of human rights, which is based on recognised international human rights standards and reflects the human rights risks we have identified as most salient in the context of our operations, value chain and industry.

### 5.1 OCCUPATIONAL HEALTH AND SAFETY

We proactively strive to promote wellbeing and provide a healthy and safe working environment to our employees, contractors and workers in the value chain. As outlined in our [Health & Safety Policy](#), we are committed to promoting a ZERO Accidents Culture and take reasonable measures to assess and control the potential risks of our operations, including process and occupational health and safety risks. For example, all Carlsberg sites must have a certified health and safety management system in place in accordance with ISO 45001. Employees are empowered to:

- Stop production, warehousing and distribution activities, and/or put any task on hold, if they judge that it is not safe enough to proceed until a competent person takes appropriate risk control measures.
- Communicate unsafe conditions in the working environment to management.
- Challenge any unsafe acts that they observe.

### 5.2 WORKING HOURS AND RIGHT TO REST AND LEISURE

Excessive working hours and consistent overtime without appropriate rest and recuperation periods can result in lost time due to health and safety accidents, and adversely impact the enjoyment of other human rights. In line with international labour standards such as the ILO Conventions, the maximum regular (excluding overtime) working hours per week must not exceed 48 hours. The maximum weekly limit for combined regular and

overtime hours should be 60, in accordance with international standards. Local law or collective bargaining agreements may require fewer working hours; in these cases, local law and collective bargaining agreements must be followed.

Where overtime work is required due to operational needs, it must be consensual, with the exceptions defined by applicable legislation and collective bargaining agreements. Overtime hours must be compensated at a rate equal to or superior to applicable legal requirements and competitive industry standards. Employees must be given at least one day off in seven, reasonable breaks during working hours and sufficient rest periods between shifts. All employees have the right to sick leave, annual holiday and parental leave, as provided by national legislation and the [Carlsberg's global Parental Leave Policy](#). Where local industry standards or international conventions are more stringent than applicable legal requirements, the standard most favourable to employees should be followed.

### 5.3 WAGES AND BENEFITS

All employees and workers, regardless of whether they are employed on a permanent, temporary or casual basis, must be provided with written and understandable information about their employment conditions and salary details. Wages and benefits must meet or exceed applicable minimum legal

and regulatory requirements, and we will strive to pay employees sufficiently for them to have a decent standard of living. Where there is no local statutory minimum wage, we will also strive to pay employees enough for them to have access to a decent standard of living, in line with industry standards or collective agreements. Legally mandated benefits, such as medical insurance, social insurance and pensions, will be provided and wage deductions will not be used as a disciplinary measure.

#### **5.4 DISCRIMINATION AND HARASSMENT**

We do not tolerate discrimination based on distinguishing characteristics such as race, colour, gender, religion, political or other opinion, national or social origin, sexual orientation, age or disability. We do not tolerate any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace. Our expectations of our employees regarding discrimination and harassment are articulated in our [Code of Ethics & Conduct](#) and supported by regular training and capacity-building.

#### **5.5 FORCED LABOUR**

We do not tolerate any form of forced labour, including bonded labour, indentured labour, slave labour or human trafficking; employment must be freely chosen. Practices conducive to forced labour, such as requiring the payment of recruitment fees by employees, requiring illegal or unreasonable notice periods, retaining employees' original identity documents or restricting freedom of movement, are also prohibited.

#### **5.6 CHILD LABOUR AND JUVENILE WORK**

We do not tolerate the use of child labour under any circumstances. The minimum age for full-time employment must be 15, in line with relevant ILO Conventions, or the legal minimum age for employment under applicable local law, whichever is higher. Where the applicable local minimum working age is 14, this lower age will apply as long as it follows the exceptions for developing countries permitted by the ILO. All legal restrictions regarding

the employment of persons below 18 must be observed. In line with the ILO, the minimum age for admission to any employment or work that, by its nature or the circumstances in which it is carried out, is likely to jeopardise the health, safety or morals of young persons must be no less than 18 years. Younger workers may be employed through company-approved, short-term internships, apprenticeships or work-experience programmes, provided they do not interfere with their physical or mental health or education. We understand that child labour is often a consequence of systemic issues, such as poverty or lack of access to education, and we are committed to working with key stakeholders to collaborate in addressing the root causes of child labour.

#### **5.7 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

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.

#### **5.8 WATER USE AND ACCESS**

Access to safe drinking water and sanitation is [recognised as a human right by the UN General Assembly](#), and we understand that the use of freshwater may have adverse impacts on communities and can exacerbate water scarcity in some of the regions in which we operate. To reduce these impacts, we continually assess and work to mitigate water risks related to our breweries and supply chain, and we have set targets to replenish water equal to the amount of water we consume at our breweries in areas considered as high-risk. We employ technologies to improve water efficiency and minimise wastewater, and work with experts, NGOs and communities to achieve our targets.

### 5.9 RESPECT FOR LAND RIGHTS

We are committed to respecting land rights in line with applicable national laws and international human rights standards regarding the rights of individuals and communities impacted and paying special attention to vulnerable groups.

## 6. GOVERNANCE OF HUMAN RIGHTS

Our comprehensive governance structure ensures strong oversight of the Carlsberg Group Human Rights Policy and our global human rights programme. Human Rights is a focus area of Carlsberg's ESG programme, which is an integral part of Accelerate SAIL, our business strategy.

Responsibility for and oversight of human rights, including the approval of this Policy, lie with our Executive Committee, which is chaired by the Group CEO. Implementation of this Policy is overseen by our ESG Steering Committee. This Policy is owned by the Group Corporate Affairs function, and our Group Sustainability and ESG team is responsible for driving our global human rights due diligence work, providing advice on human rights issues, and measuring and reporting on human rights performance. The relevant Group VPs, country managing directors, and regional and local management are responsible for ensuring that this Policy and related standards are implemented and that all employees are aware of the Policy and its requirements. Management, employees and contract workers of all entities in the Carlsberg Group, as well as our business partners, are responsible for adhering to this Policy.

Finally, this Policy is informed by third-party human rights experts, as well as internal and external stakeholders, and we are committed to incorporating feedback from experts and stakeholders on an ongoing basis to continuously improve our programme.

## 7. REPORTING BREACHES OF THIS POLICY

We encourage employees who experience or witness misconduct, including human rights concerns, to talk in the first instance to their line manager or raise their concern with their HR or compliance representatives.

If neither of these options is possible or you are not an employee of Carlsberg, you may consider raising your concerns via our Speak Up system, which enables employees and external parties worldwide to speak up about any breach of our [Code of Ethics & Conduct](#), including possible human rights violations, anonymously, confidentially and without fear of retaliation. The Speak Up system is available in more than 300 languages, and an explanatory Speak Up Manual can be found on the Carlsberg Group external website and intranet in languages of the countries where Carlsberg is present.

The Speak Up system can be accessed by telephone or online and it is hosted by an independent third party appointed by the Group. You can find the Speak Up system [here](#).

All issues raised through the Speak Up system are monitored, reviewed and investigated independently by our Speak Up Review Team, part of Group Internal Audit. Throughout the process, you can communicate with the Speak Up Review Team and ask any relevant questions.

The Carlsberg Group does not retaliate and does not tolerate retaliation in any form. Therefore, we have developed mechanisms to protect our whistleblowers from retaliation. If you experience retaliation in any form, we en-

courage you to report this via the Speak Up system, as retaliation represents a separate form of misconduct and breach of our [Code of Ethics & Conduct](#) that should be investigated and addressed appropriately.

## 8. ACCESS TO REMEDY

We are committed to providing or cooperating in the remediation of any adverse human rights impact on individuals, workers and communities that we have caused or contributed to. We also expect our business partners to follow this approach, and we will collaborate with judicial or non-judicial mechanisms to provide access to remedy as applicable. If our human rights due diligence processes establish that we are directly linked to adverse impacts on human rights, we will use our leverage to help bring positive change in line with the UNGPs. Where we do not have leverage over the relevant supplier or other stakeholder, we will seek ways to increase our influence, for example through multistakeholder initiatives or industry partnerships.

## 9. ABOUT THIS POLICY

We recognise that respecting human rights is a dynamic process within a constantly changing and challenging environment. To ensure its continued adequacy and relevance, this Policy will be reviewed regularly. It may be amended at any time with the approval of the Executive Committee. In the event of any discrepancies between the English version of this Policy and any translated version, the English version shall prevail.





## 10. ROLES AND RESPONSIBILITIES

<b>Roles</b>	<b>Responsibilities</b>
<b>ExCom</b>	Responsible for Policy approval
<b>ESG Steering Committee</b>	Responsible for overseeing this Policy
<b>VP Corporate Affairs</b>	Owns and endorses the Policy
<b>Relevant Group VPs</b> <b>Country managing directors</b> <b>Regional and local management</b>	Responsible for: <ul style="list-style-type: none"> <li>• Ensuring that this Policy and related standards are implemented and followed</li> <li>• Effectively communicating this Policy to all employees</li> <li>• Ensuring local compliance with the Policy</li> <li>• Establishing adequate control measures to prevent breaches of this Policy</li> </ul>
<b>Group Sustainability and ESG</b>	Responsible for: <ul style="list-style-type: none"> <li>• Updating this Policy and the Carlsberg Group Human Rights Manual</li> <li>• Identifying salient risks</li> <li>• Providing advice on human rights issues</li> <li>• Developing monitoring mechanisms to track performance</li> <li>• Communicating the company's efforts in this area</li> </ul>
<b>All employees</b>	Responsible for: <ul style="list-style-type: none"> <li>• Adhering to this Policy</li> <li>• Familiarising themselves with the Carlsberg Group Human Rights Manual</li> </ul>



## **11. ASSOCIATED POLICIES AND MANUALS**

- Code of Ethics & Conduct
- Supplier and Licensee Code of Conduct
- Marketing Communication Policy
- Health & Safety Policy
- Speak Up Manual
- Brand Promoter Manual
- Diversity, Equity & Inclusion Policy
- Environmental Policy
- Anti-Bribery & Corruption Policy
- Internal Human Rights Manual



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