



# CARLSBERG SUPPLIER AND LICENSEE CODE OF CONDUCT

# 1. INTRODUCTION

## 1.1 OUR COMMITMENT

The Carlsberg Group is dedicated to contributing positively to society and the environment through ethical business practices and sustainability. This Code sets minimum standards for suppliers, service providers and licensees to reduce supply chain risks and enhance transparency. In partnership with our value chain, we aim to identify, prevent, and mitigate negative impacts on people and the planet, following international standards and national laws while advancing human rights and environmental protection.

Carlsberg upholds the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Responsible Business Conduct. As a UN Global Compact signatory, we are committed to its four pillars: human rights, labour, environment, and anti-corruption. The Code aligns with international standards, such as the UN Global Compact's Ten Principles, the Base Code of the Ethical Trading Initiative (ETI), the principles of the International Labour Organization (ILO) and ISO 14001. Furthermore, the Code supports the UN Sustainable Development Goals (SDGs).

Aligned with our sustainability programme, this Code reflects Carlsberg's commitment to tackling key ESG topics and addressing global challenges, such as inequality, climate change and water scarcity. We collaborate with our suppliers to drive responsible business practices and positively impact society.

## 1.2 SCOPE

This Code applies to all suppliers, service providers and labour providers as well as their suppliers up to the material source, forming a mandatory part of any agreement with Carlsberg Group members. This includes upstream

suppliers and service providers (such as employment and marketing agencies) and downstream partners (such as agents, distributors, licensees, and others involved in sponsorships or collaborations). The Code covers all workers across the supply chain, including permanent, temporary, contract and migrant workers. Carlsberg will periodically review and update this Code as necessary, notifying suppliers of any changes.

## 1.3 COMPLIANCE

Suppliers must comply with all relevant laws and regulations in the markets in which they operate and, where applicable, meet trading requirements in the markets where their products are sold. Where national standards differ, suppliers must follow the highest standard of protection for workers and the environment without contradicting the legal framework of the country. Suppliers must be able to demonstrate compliance with this Code and applicable laws in their own operations and in their supply chains.

Suppliers are encouraged to have policies aligned with Carlsberg's principles. This Code includes mandatory requirements and best practices promoting compliance and continuous improvement in sustainability and ethics. Carlsberg reserves the right to verify compliance through self-assessments, audits, or other monitoring methods. The supplier is responsible for covering the cost of compliance verification.

### Audits and visits

We may adopt different due diligence methods and approaches, including requiring Sedex membership and a SMETA audit or equivalent, before a supplier enters a business relationship with Carlsberg, during the contractual period, or when services are renewed or modified. Non-cooperation with these screenings, including auditing, is regarded as a breach of this Code.

Any concerns must be addressed before proceeding with any work. For SMETA audits or equivalent, we require resolution of all critical and major non-conformances, as defined by Sedex, within a timeframe agreed with Carlsberg. Carlsberg reserves the right to audit suppliers at any time, with or without prior notice, to ensure compliance with the Code and contractual terms. Full cooperation during these audits is mandatory, and Carlsberg will ensure that sensitive or proprietary information is managed appropriately. Suppliers must also be aware that Carlsberg may, at its discretion, accept alternative or equivalent audit frameworks.

### **Certifications**

In addition to this Code's universal requirements, stricter rules may apply for specific products due to human rights and environmental risks, with these policies taking precedence in the event of any conflict. Carlsberg regularly reviews these policies and provides suppliers with access to tools and updates. Certain products, such as sugar and cobalt, require certifications beyond tier 1 for higher ethical standards.

Carlsberg values long-term, transparent relationships with suppliers and supports alignment through open communication and improvement opportunities. If a supplier violates this Code, corrective action will be required, and Carlsberg reserves the right to audit compliance and terminate agreements if standards are not met. Carlsberg may share data, including ESG information, with authorities or third-party auditors as needed.

### **1.4 REPORTING OF CONCERNS OR VIOLATIONS**

The supplier has a duty to report any suspected or confirmed misconduct that involves or impacts Carlsberg, whether this is a violation of this Code or applicable laws, and whether it is committed by our supplier or our own associates. The reporting of these concerns ensures that Carlsberg can effectively address issues and maintain a high level of integrity across our business relationships.

In addition to the supplier's own reporting mechanisms, there are resources available to the supplier and its employees through Carlsberg, including the following:

- [Independent Speak-up line available 24/7](#)
- HR, legal or market representative
- E-mail: [SpeakUp@Carlsberg.com](mailto:SpeakUp@Carlsberg.com)

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## 2. MANAGEMENT SYSTEMS

Suppliers must establish and maintain effective management systems to prevent and address violations of this Code and mitigate adverse impacts on people and the planet. These management systems should include necessary strategies, policies, processes, and resources designed to identify risks, address root causes of issues and ensure compliance with all relevant laws, regulations, and the principles of this Code. Suppliers must also maintain transparent and accurate records to demonstrate compliance and track ongoing improvement efforts.

### 2.1 GOVERNANCE

Suppliers must appoint a senior member of management to be responsible for compliance with the Code.

Suppliers must adopt and publicly communicate policy statements that align with and support this Code. These policy statements must be appropriate to the complexity and size of the supplier's operations and must be approved at the highest management level.

### 2.2 POLICY COMMITMENT AND COMMUNICATION

Suppliers must share this Code with their employees, suppliers, and service providers, ensuring that its principles are upheld throughout the supply chain. All tiers must adhere to these standards, promoting transparency and accountability. Suppliers must require business partners, including intermediaries such as brokers and recruitment agencies, to work towards compliance and avoid practices that hinder adherence to the Code. If significant risks are identified, Carlsberg may request supply chain transparency for the relevant goods or services.

### 2.3 DUE DILIGENCE AND RISK AND IMPACT MANAGEMENT

Suppliers must establish a risk-based due diligence system aligned with key regulations and standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), to ensure that this Code's expectations are integrated. Clear governance and objectives for human rights and environmental due diligence (HREDD) must be defined.

Suppliers should involve workers, especially vulnerable groups like home-based workers, smallholders, and migrants, in their processes and address challenges through stakeholder collaboration and consultation. Adverse impacts caused or contributed to by the supplier must be promptly remedied.

### 2.4 GRIEVANCE MECHANISMS AND CONTINUOUS IMPROVEMENT

Suppliers must establish effective, legitimate, accessible, and transparent grievance mechanisms in accordance with the UNGPs, providing a safe and confidential way for individuals to raise concerns and seek remedies for grievances related to human rights and environmental issues.

Suppliers must also maintain a whistleblower policy that enables confidential and anonymous reporting of concerns and explicitly prohibits retaliation. To ensure that individuals can raise issues without fear of adverse consequences, no retaliatory actions may be taken against employees or stakeholders who report suspected misconduct or non-compliance with this Code.

Where applicable, suppliers must ensure that their subcontractors and sub-suppliers comply with the Code, provide evidence of its implementation, and monitor its effectiveness to ensure that the intended outcomes are achieved.

Suppliers must ensure continuous improvement in the implementation of the Code. Due diligence processes should be documented and publicly reported on as part of a transparent governance framework.

### Good practice

Suppliers are encouraged to enhance their management systems by adopting advanced technologies and best practices to anticipate risks, exceed compliance standards and improve transparency. They should develop supply chain mapping systems for full visibility using traceability tools and collaborating with stakeholders to ensure responsible sourcing and mitigate risks. Suppliers are also encouraged to establish independent whistleblower mechanisms, offering support and protection to ensure impartial investigations.

Suppliers are encouraged to engage proactively with local communities, NGOs and industry bodies to collaboratively shape policies and practices that contribute to responsible sourcing and human rights protection. This includes contributing to public consultations and working groups aimed at improving industry standards.

## 3. FUNDAMENTAL HUMAN RIGHTS

Suppliers to Carlsberg are required to respect human rights in accordance with internationally recognised frameworks, such as the UNGPs and ILO Conventions. Suppliers must, as a minimum, address human rights risks and impacts that are of higher relevance in their supply chains, including preventing violations related to forced labour, child labour and discrimination, ensuring the protection of, for example, freedom of association and land rights. We also expect suppliers to conduct their own due diligence to identify and address additional human rights risks that may be salient to their business and supply chain.

### 3.1 PROHIBITION OF FORCED LABOUR

Carlsberg prohibits all forms of forced labour, modern slavery, and human trafficking in line with national laws, the Palermo Protocol, and ILO Conventions. Suppliers must comply with these standards, banning practices such as sex trafficking, torture, state-imposed forced labour, and involuntary prison labour. Prison labour is only allowed with Carlsberg's approval as part of a reintegration programme and subject to enhanced due diligence.

Suppliers must uphold anti-slavery laws across their supply chains, ensuring that workers are not subjected to abuse, coercion, or intimidation, including physical or mental abuse. Workers must freely sign employment contracts without fees or deposits and retain their personal documents. Their freedom of movement must not be restricted, and they must be able to leave employment with reasonable notice and without penalty.

### 3.2 EMPLOYMENT OF YOUNG WORKERS AND PROHIBITION OF CHILD LABOUR

Suppliers must uphold children's rights and strictly prohibit child labour, adhering to ILO Conventions No. 138 on Minimum Age and No. 182 on the Worst Forms of Child Labour. A child is defined as anyone under 15 or the legal minimum working age in the given country, whichever is higher, with exceptions for specific countries where the minimum age is 14 as allowed by ILO Conventions.

Child labour, including work that exploits, harms, or hinders education, is strictly forbidden. If child labour is identified, suppliers must support initiatives to transition children out of such work. Children may assist in family businesses only if the work is light, age-appropriate and compliant with ILO standards.

All workers must be at least 15 years old or the legal working age, whichever is higher. Suppliers must verify applicants' ages and ensure that young

workers (under 18) are not exposed to harmful tasks, night work or activities that interfere with their education. Employment of young workers must comply with local laws, include educational benefits, and prioritise safety and wellbeing.

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

Suppliers must respect workers' rights to unionise, participate in union activities and bargain collectively without fear of retaliation, harassment, or termination in accordance with the ETI Base Code, the UNGPs and ILO Convention No. 87, ensuring that these protections are communicated and upheld by management. Suppliers should foster a supportive environment for worker organisations by providing meeting spaces, allowing engagement during working hours and sharing negotiation information, while treating worker representatives fairly by providing access to resources, time off for union duties and management support. Where unions are restricted, alternative forms of representation, such as worker councils, should be established in line with ILO Convention No. 135. Suppliers must also respect the legal right to strike, avoid punitive measures or obstructive policies, and address strikes constructively through dialogue with worker representatives to resolve underlying issues.

### **3.4 PROHIBITION OF DISCRIMINATION AND HARASSMENT**

Suppliers must ensure non-discrimination in all employment decisions, basing them solely on lawful criteria, regardless of race, gender, religion, sexual orientation, disability, or other traits. They must protect employees from harassment, bullying, abuse, or threats, fostering a safe and respectful workplace. Clear rules on discrimination, harassment, ethics, and disciplinary measures must be established and communicated to all employees. Additionally, suppliers must promote equality and inclusivity by valuing diversity in areas such as gender, age, culture, and lifestyle, and by implementing policies and programmes that support diversity, equality, and inclusion.

#### **Good practice**

Suppliers are encouraged to gather worker feedback on diversity and inclusion to assess discrimination and harassment risks for minority or vulnerable groups in the supply chain.

Suppliers are encouraged to set diversity, equity, and inclusion (DE&I) targets, including on gender equality and female empowerment, in alignment with Carlsberg's commitment to improve gender balance at leadership level.

### **3.5 RESPECT FOR LAND RIGHTS**

Business partners are required to respect the land, forest and water rights of individuals and communities impacted by their operations and sourcing practices. All matters related to property or land use, including any transfers or usage agreements, must follow the principles of free, prior, and informed consent, and uphold transparency in contracts and full disclosure. Business partners must refrain from any practices involving land-grabbing. All necessary environmental permits, approvals and registrations must be properly obtained, upheld, maintained, and kept.

## 4. LABOUR CONDITIONS

Suppliers must ensure fair, safe, and respectful working conditions, adhering to national laws, industry standards and ILO Conventions. This includes regulating working hours, paying minimum and/or collectively agreed wages and benefits, and offering legally binding employment contracts. Suppliers are expected to uphold these standards to protect workers' rights and promote a responsible work environment.

### 4.1 WORKING HOURS MANAGEMENT

Suppliers must comply with national laws, collective agreements, and industry standards on working hours, prioritising greater protection of workers. Working hours must not be excessive, with overtime being voluntary and within legal or collectively agreed limits. Regular working hours should not exceed 48 hours per week, with a maximum of 60 hours, including overtime, in line with ILO and ETI standards. In exceptional circumstances, exceeding 60 hours is allowed, but only if this complies with national law, collective agreements, and health and safety safeguards, and is justified by unforeseen situations such as production peaks or emergencies. Workers must have at least one day off per week, or two days in a 14-day period if permitted by national law.

### 4.2 PAYMENT OF WAGES AND BENEFITS

Suppliers must ensure that wages and benefits for a standard working week meet or exceed national legal standards, collectively agreed rates or industry benchmarks, whichever is higher. Wages must be paid regularly and documented with a payslip. Workers must receive clear written information about employment conditions and wages, including any deductions. Wage deductions as a disciplinary measure or not allowed by law are prohibited. Suppliers must comply with labour laws, including social security, insurance,

and benefits such as sick leave, holiday, and parental leave. They must also avoid bypassing these obligations through subcontracting or other schemes.

#### Good practice

Suppliers are encouraged to make reasonable efforts to reach living wage levels for all workers, including temporary and agency workers.

### 4.3 REGULAR EMPLOYMENT PROVISION

At the commencement of employment or service, suppliers must provide all employees with a legally binding contract written in a language they understand. This contract must include key information, such as job title, expected wages, working hours, notice period, benefits, leave entitlements, terms and conditions, and any disciplinary and grievance mechanisms.

All temporary employment must comply with applicable national employment laws.

#### Good practice

Suppliers are encouraged to promote continuous professional development for employees by offering regular training that improves employees' skills and knowledge. By making training opportunities widely accessible, suppliers can support workers in advancing their careers. It is recommended that suppliers strive to monitor and assess the impact of these initiatives to promote ongoing growth and improvement.



## 5. HEALTH AND SAFETY

Suppliers must uphold rigorous health and safety standards, complying with all relevant laws, regulations and industry benchmarks, including the ILO Declaration on Fundamental Principles and Rights at Work. This includes providing a safe working environment, proper accommodation and effective management of chemicals and hazardous substances. Suppliers must also implement emergency response procedures to protect workers, visitors, and surrounding communities from harm.

### 5.1 OCCUPATIONAL HEALTH AND SAFETY

Suppliers must comply with all applicable health and safety laws, regulations, and industry standards, including ILO Convention No. 155 on Occupational Safety and Health, ensuring a safe working environment for all employees, subcontractors, and visitors. Health and safety responsibilities should be assigned to senior management at both supplier and site levels, ensuring oversight of health and safety policies, compliance with regulations and prompt action to address any issues. Suppliers must maintain a written health and safety policy accessible to workers, with gender-sensitive procedures to minimise risks. A workplace risk assessment should be conducted to identify potential hazards, including those related to mental health and ergonomics, and appropriate measures must be implemented to mitigate these risks. Suppliers must provide personal protective equipment (PPE) free of charge and ensure that workers are trained in its use and safe work practices. Carlsberg considers health and safety when selecting suppliers and contractors, and contracts will include clear health and safety requirements. Contractors working at Carlsberg sites must have relevant training, be equipped to safely execute tasks and follow Carlsberg's health and safety policies and procedures. Suppliers and subcontractors must obtain a permit to work for high-risk activities at Carlsberg sites, and violations of these policies may result in penalties or contract termination.

### Good practice

Suppliers are encouraged to adopt a proactive approach to health and safety, aiming for a zero-accident workplace by implementing advanced safety measures, fostering a strong safety culture, and continuously improving risk management practices to protect the wellbeing of all employees.

Suppliers are recommended to implement the ISO 45001 health and safety management system or equivalent.

### 5.2 ACCOMMODATION

Suppliers must ensure that worker accommodation meets or exceeds local community standards, with unrestricted access for workers to enter and leave. If workers pay for accommodation, costs must be reasonable and not take up a large portion of their wages. Where possible, safe transportation to and from the workplace should be provided. Accommodation must offer gender-segregated sleeping, living and washing areas, where necessary, and allow families to stay together. It must comply with local health and safety regulations, with records of inspections and maintenance kept. A fire safety plan, including trained fire wardens, regular equipment testing and fire drills, must be in place and communicated to workers. Suppliers must provide adequate climate control, lighting, ventilation, and well-maintained sanitary and laundry facilities. Secure storage for personal belongings, hygienic cooking facilities or canteens, and provisions for specific dietary or religious needs must also be provided.

### **5.3 CHEMICALS AND HAZARDOUS SUBSTANCE MANAGEMENT**

Suppliers must implement strict procedures for managing chemicals, including safe procurement, storage, handling, use, recovery, and disposal, especially for hazardous materials. Workers in relevant roles must be trained in safety procedures. Safety data sheets (SDSs) for hazardous substances must be available in the local language, maintained and kept up to date. Suppliers must ensure that proper control measures are in place to protect workers and the environment, including clear labelling, secure storage, spill prevention and appropriate personal protective equipment. Suppliers should also work to reduce the use of hazardous substances and replace them with safer alternatives.

### **5.4 EMERGENCY RESPONSE PROCEDURES**

Suppliers must establish emergency procedures for health, safety and industrial incidents, ensuring that all workers are informed. They must maintain clear evacuation routes, provide audible/visible alarms and train staff in first aid and firefighting. Regular emergency drills, including fire and hazardous material response, must be conducted, with records kept.

## **6. ENVIRONMENTAL PROTECTION**

Carlsberg recognises the need to address climate change and reduce greenhouse gas emissions in line with the Paris Agreement. Suppliers play a key role in minimising climate impacts, enhancing resilience and identifying opportunities related to climate change, water security and other environmental issues. Suppliers must comply with environmental laws, regulations, and international standards, such as ISO 14001, and implement an effective environmental management system (EMS). They must manage carbon emis-

sions, water use and waste, and focus on biodiversity, deforestation prevention, sustainable agriculture, and responsible energy consumption. Environmental actions should respect human rights, including the fair treatment of workers and local communities, and consider the impact of climate change on working conditions and cultural livelihoods.

### **6.1 MANAGEMENT OF ENVIRONMENTAL ISSUES**

Suppliers must comply with all relevant environmental laws and requirements, staying current and proactive in preventing and mitigating adverse environmental impacts from their activities, products, and services. They must implement a robust environmental management system (EMS), aligned with standards such as ISO 14001, to monitor and address impacts on resources, energy, water, waste, carbon emissions and biodiversity. Significant environmental incidents or non-compliances with potential impact on Carlsberg must be reported immediately. Suppliers must regularly report on environmental performance, demonstrate measurable progress, and maintain transparency. They must also uphold environmental standards across their own supply chain, set clear environmental policies and provide regular training to ensure effective implementation.

### **6.2 CARBON EMISSION MANAGEMENT**

Suppliers must actively monitor and reduce their direct (Scope 1), indirect energy-related (Scope 2) and other indirect (Scope 3) CO<sub>2</sub> emissions across their operations and supply chain, following the Greenhouse Gas Protocol. They must support Carlsberg's Scope 3 targets by implementing measurable carbon reduction strategies aligned with Science Based Targets initiative (SBTi) standards. Suppliers should address emissions across the entire product lifecycle, from design and manufacturing to end-of-life disposal. Suppliers must provide regular updates on progress towards carbon reduction targets, including detailed reporting to Carlsberg on Scope 1, 2 and 3 emissions, and share successes and challenges to maintain transparency with stakeholders.

### Good practice

Suppliers are encouraged to engage in public disclosure of their carbon footprint and reduction efforts to demonstrate commitment and progress towards environmental sustainability.

Suppliers are encouraged to set and approve science-based targets for their Scope 1, 2 and 3 emissions, and to set a net zero target.

## 6.3 WATER MANAGEMENT

Suppliers must manage water responsibly, especially in areas with limited resources, by improving efficiency through water reuse and recycling. They must ensure that their operations do not harm local water rights, provide access to water and sanitation, and work with communities to improve access to safe water. Wastewater must be treated to meet local standards before discharge, either on site or at authorised facilities, and measures must be in place to prevent contamination of local water sources. Suppliers should regularly report on water usage, recycling, and reduction efforts, and continuously improve practices based on performance metrics and feedback.

### Good practice

Suppliers are encouraged to assess risks linked to water availability across their operating and sourcing locations, identify high risk areas and take action to address and ensure water security across their own operations and supply chain.

## 6.4 WASTE MANAGEMENT

Suppliers are required to adhere to established standards and responsible practices in waste and chemical management, strictly following national

regulations to ensure environmental protection and safety. They must manage chemicals responsibly from procurement to disposal, regularly reviewing and updating these practices to maintain compliance and meet current best practices. Hazardous waste, including certain chemicals, must not be disposed of in landfills or incinerated on site without proper authorisation, and the use of persistent organic pollutants (POPs) is strictly prohibited due to their long-term environmental and health risks.

Suppliers are also expected to minimise packaging waste by prioritising recyclable, reusable, renewable or compostable materials, aiming to reduce or eliminate single-use items. Additionally, suppliers should maintain and disclose a comprehensive inventory of all packaging materials, detailing recycled content, recyclability and compostability to support Carlsberg's transparency and circularity goals for sustainable packaging.

### Good practice

Suppliers are encouraged to reduce waste across the product's lifecycle, distribution, and service provision, and to apply a lifecycle assessment approach to reducing the carbon footprint of their materials continuously.

## 6.5 NO POLLUTION

Suppliers must comply with applicable laws and regulations in connection with air emissions (including odorous substances), noise pollution, soil pollution (including risks of historic or current pollution), water intake, discharges to ground and surface water, and waste processing and disposal.

## 6.6 BIODIVERSITY AND DEFORESTATION

Suppliers must ensure that their products do not contribute to deforestation, avoiding conversion of natural forests and preventing severe degradation, in line with the Accountability Framework Initiative and relevant regulations,

such as the EU timber and deforestation regulations. They must protect biodiversity by avoiding practices that harm habitats or endanger species, adhering to local and international laws. Suppliers should provide traceability information and demonstrate due diligence to ensure compliance and transparency, supporting Carlsberg's biodiversity and anti-deforestation goals. For agricultural raw materials, suppliers must implement sustainable and regenerative practices and maintain traceability aligned with Carlsberg's standards.

### **Good practice**

Suppliers are encouraged to adopt circular economy principles that support biodiversity and combat deforestation, including designing products and processes that maximise resource efficiency, reduce waste and promote the use of sustainable materials. Suppliers should seek to close the loop on resource use by implementing recycling and reuse strategies, and prioritise sourcing raw materials from responsible, certified suppliers that do not contribute to deforestation.

Suppliers are encouraged to obtain relevant product certifications or engage in organisations including, but not limited to, the Sustainable Agriculture Initiative (SAI) Platform, the Forestry Stewardship Council (FSC) and BonSucro.

## **6.7 ENERGY**

Suppliers must promote energy efficiency across all sites, equipment, and supply chain stages, prioritising cost-effective measures. They should increase energy efficiency in transportation, packaging, and retail, ensuring compliance with energy-related regulations and maintaining up-to-date permits. Suppliers must keep accurate monthly records of energy usage to monitor progress and identify improvements. Additionally, they should develop a plan to transition to renewable energy sources.

# **7. BUSINESS ETHICS**

Suppliers must uphold high standards of business ethics, ensuring compliance with all relevant laws and regulations. This includes avoiding corruption and bribery, maintaining transparency in gifts, donations, and entertainment, and preventing conflicts of interest. Suppliers must comply with applicable competition and data protection laws and provide truthful environmental claims.

## **7.1 CORRUPTION AND BRIBERY**

Suppliers must comply with all applicable laws relating to anti-corruption in connection with their business activities, and in particular must not: (i) try to gain an undue advantage by promising, offering or giving anything of value, directly or indirectly, to any public official, business partner or any other third party; or (ii) engage in any other form of corruption, extortion, embezzlement or fraud that seeks to unjustly obtain improper advantages or otherwise influence the outcome of business dealings. Suppliers must ensure that all relevant employees and third parties have knowledge of and comply with applicable laws.

## **7.2 GIFTS AND ENTERTAINMENT**

Suppliers must not offer, fund, or donate lavish gifts, extravagant entertainment, or hospitality for any employees of, or other counterparts in, the Carlsberg Group in an attempt to influence business decisions. Suppliers must ensure that any gifts and entertainment offered to Carlsberg employees are transparent and have a justifiable business rationale. In any event, suppliers must not offer any gifts, entertainment, hospitality, or travel to Carlsberg employees working in the Carlsberg procurement organisation.

### **7.3 CONFLICT OF INTEREST**

Carlsberg employees would be exposed to a conflict of interest if their personal interest might affect their ability to act objectively and in the best interest of the Carlsberg Group. Suppliers must not engage in any activity that creates such a conflict of interest or where such a conflict of interest could be reasonably perceived to exist. Suppliers must immediately take measures to stop any such conflict of interest.

### **7.4 COMPETITION AND FAIR TRADE**

Suppliers must not enter into any anticompetitive agreement with competitors (written, oral or tacit, e.g. by remaining silent, shaking hands, giving a wink) or engage in any other form of activity that has as its object or effect the prevention or restriction of competition and/or breaches applicable laws relating to competition or fair trade.

### **7.5 SUSTAINABILITY CLAIMS AND GREENWASHING**

Suppliers must ensure that all environmental, green or sustainability claims about their products, services or activities are truthful, clear, transparent, and easily understood by consumers and businesses alike, and such claims must be substantiated with robust, verifiable evidence.

Suppliers must comply with all relevant legislation and regulatory guidance to ensure accuracy and integrity in their environmental and sustainability communications. Suppliers must avoid misleading comparisons, unsupported claims about environmental goals or implying endorsements by third parties without proper authorisation. Any necessary qualifying information should be prominently and clearly presented.

### **7.6 INFORMATION SECURITY, DATA PROTECTION AND RESPONSIBLE ARTIFICIAL INTELLIGENCE (AI)**

Suppliers must comply with all applicable laws and regulations relating to information and cyber security, data protection and AI. Suppliers are expected to adhere to relevant industry standards and implement state-of-the-art practices in collecting, sharing, and using consumer and employee personal data and confidential business information entrusted to them by Carlsberg, and in the development and operation of AI systems.

Suppliers must design and maintain AI systems to be robust, resilient, and secure. Suppliers are expected to operate AI systems responsibly and transparently, with documented evidence of fair and ethical AI design and use that causes no harm to individuals or society. Suppliers are not allowed to use consumer and employee personal data and confidential business information entrusted to them by Carlsberg for AI model training and advanced analytics purposes without Carlsberg's specific and express permission.

At Carlsberg's request, suppliers must promptly complete relevant assessments and provide information about their information and cyber security, data protection and responsible AI programmes, policies, and controls. Carlsberg has the right to audit suppliers' policies and practices to confirm compliance with the requirements outlined in this section.

### **7.7 TRADE SANCTIONS AND IMPORT/EXPORT RESTRICTIONS**

Suppliers must comply with all applicable laws and regulation relating to trade sanction and import/export restrictions in connection with their business activities. Suppliers must ensure that all relevant employees and third parties have knowledge of and comply with all applicable trade sanctions laws and regulations and import/export restrictions.



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