

KARLSBERG GROUP



Code of Conduct Suppliers and Business Partners

Dear Business Partners!

Karlsberg has developed into a beverage group with a strong brand portfolio over generations. Our goal or ambition is to make the lives of our consumers more enjoyable with our beverages and to pass on a healthy company in every respect to further generations.

Corporate responsibility in combination with sustainable behavior has therefore always been a high priority for us. An essential basic principle here is the compliance with prevailing national and international laws and regulations.

We adhere to the provisions of the "ETI Base Code" (Ethical Trading Initiative) as a minimum standard and implement these ie. follow even significantly higher standards. The Ethical Trading Initiative (ETI) is a membership initiative in which companies, trade unions and non-governmental organisations have joined forces. Member companies include retailers, supermarkets, department stores' chains and suppliers. The aim of the initiative is to improve working conditions worldwide.

Finally, with our Code of Conduct for the Karlsberg Group, we have imposed binding behavioural guidelines for responsible action.

We expect our business partners as well as their employees to act responsibly and to commit to the basic principles set out in this Code of Conduct.

Our CoC also strictly applies to third parties, like (sub-suppliers, subcontractors, etc.) insofar as they have been authorized by our business partners to fulfil contractual obligations within the scope of our business relationships. We expect our business partners to pass on the basic principles listed in this Code of Conduct to their contractors, get them to commit to them accordingly and ensure their compliance

1. Human Rights:

Karlsberg business partners respect and protect the globally applicable regulations for the protection of human and children's rights and respect for human dignity in accordance with the Universal Declaration of Human Rights of the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms.

In particular, the business partners refrain from any kind of forced labour, modern slavery or involuntary labour as well as child's labour.

They recognise and implement the core labour standards of the International Labour Organization (ILO), taking into account the laws and legal standards applicable in the various countries and locations. The minimum age of employment stipulated in ILO Convention No. 138 must not be undercut.

2. Anti-Discrimination and Equal Opportunities:

Karlsberg business partners do not tolerate any discrimination or harassment in the working and business environment, neither on the basis of ethnic or national origin, skin colour, religion, world view, age, disability, gender, sexual orientation, political stance nor by any other legally protected characteristics.

3. Product Safety:

Karlsberg business partners shall observe the respective applicable regulations and specifications on product safety, in particular the compliance with hygiene regulations throughout the entire production and delivery process.

4. Working Conditions

Karlsberg business partners shall ensure the compliance with all provisions of the attached "ETI Base Code", which reflects the most important international standards with regards to minimum standards of labour practices.

5. Avoidance of Conflicts of Interest:

Karlsberg business partners shall make their decisions solely on the basis of businesslike criteria and shall not be influenced by personal interests or relationships. Any existing or potential conflict of interest will be disclosed by Karlsberg's business partners immediately and without any delay.

6. Free Competition:

Karlsberg business partners do not engage in illegal, anti-competitive agreements and practices, in particular to price fixings, conditions and market sharing with competitors, suppliers or customers.

7. Protection Against Corruption and Bribery:

Karlsberg business partners prohibit any kind of corruption such as bribery or corruption, acceptance of advantages or granting of advantages. They shall ensure that their employees, subcontractors or representatives do not grant, offer, demand or accept any benefits, such as inadmissible donations, bribes and kickbacks or other unlawful payments or advantages to public officials, customers or other persons in the context of the business relationship.

8. Prevention of –Money Laundering and Terrorist Financing:

Karlsberg business partners observe the respective applicable legal provisions against money laundering as well as existing financial sanctions and economic embargoes.

9. Data Protection:

Karlsberg business partners shall comply with all applicable laws regarding the protection of personal data of employees, customers, suppliers and other data subjects.

10. Protection of Trade and Business Secrets:

Karlsberg business partners shall respect our trade and business secrets. Data/information provided may only be used without prior consent within the framework of the business relationship for the agreed purpose and for the fulfilment of services for the Karlsberg Association. Confidential information and content must be protected from internal and external misuse and may not be published, passed on to third parties or made available in any other form without any prior authorisation. (or pre-authorisation)

11. Environmental and Climate Protection:

Karlsberg business partners comply with the applicable national environmental laws, regulations and standards. They use our resources effectively or sustainably and increasingly use renewable energies. At the same time, they reduce energy and water consumption and greenhouse gas emissions.

To achieve this, the Karlsberg business partners have implemented an environmental management system appropriate to the size of their company (e.g. in accordance with ISO 14001 or a comparable national standard) or strive to implement such a system.

12. Compliance:

For us, compliance by business partners with the basic principles laid down in this Code of Conduct is of great importance. Therefore, it is an integral part of the assignment.

For the Carlsberg Group the adherence to our basic principles by our business partners set down in writing in our Code of Conduct is of great importance. It is therefore an integral part for an assignment.

Carlsberg business partners commit to pass on the principles and requirements described here to their subcontractors and suppliers and – if they are not already legally obliged to do so – to at least make every effort to impose corresponding binding obligations on their subcontractors and to regularly check compliance with the obligations.

We reserve the right, for example within the scope of audits or through other suitable measures, to check the compliance of the business partners with the standards of this Code of Conduct or to have them checked by third parties and, if necessary, to define necessary measures for improvements with the business partner. Not affected by the audits are documents and other sources of information that could contain business and trade secrets of the business partner or third parties or are subject to data protection.

13. Legal Consequences in the Event of Infringements:

Any violation of the basic principles and requirements set out in this Code of Conduct will be considered a material impairment of the business relationship between us and the business partner.

We expect our business partners to actively investigate any suspected violations and to cooperate unconditionally. We reserve the right to demand information about the relevant facts in the event of suspected non-compliance.

We have the right to terminate individual or all contractual relationships with business partners extraordinarily and without notice if they fail to comply with the basic principles of this Code of Conduct despite being given a reasonable period of time to do so, or if they fail to strive for and implement improvement measures.

Annex: ETI Base Code