



LABOUR & HUMAN RIGHTS POLICY

INTRODUCTION AND PURPOSE

The Carlsberg Group's employees are of great value and the key to our success. The Group must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

The purpose of this policy is to define the labour and human rights standards to which all employees in the Carlsberg Group are entitled, irrespective of the country in which they work.

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 about 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 contemplated new minority joint venture cooperations, Carlsberg shall strive to commit the other shareholder(s) to adopt the policy or a similar standard for the joint venture.

REQUIREMENTS

1. NON-DISCRIMINATION

1.1. The Carlsberg Group does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.

1.2. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

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.

2.2.

3. CHILD LABOUR

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 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. The Group must not hire employees under the age of 18 for positions requiring hazardous work that could jeopardise health, safety or morals.

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

4.1. The Carlsberg Group must respect employees' rights to form, join or not 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. HARASSMENT

5.1. Carlsberg Group companies must protect workers from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace by either their fellow employees or managers.

6. WORKING HOURS, BENEFITS AND WAGES

6.1. The Carlsberg Group must adhere to the stricter of Applicable laws or industry standards, relating to minimum wages, working hours, overtime and benefits.

6.2. Employees must not be required to work more than 60 hours a week, including overtime, on a regular basis (or more than the limits on regular hours and overtime allowed by local laws and regulations).

6.3. Wages for overtime must be paid in legal tender on a regular basis. Wage deductions as a disciplinary measure must not be permitted unless provided for by national law. Employees must be entitled to at least one day off in seven, and must be given reasonable breaks while working and sufficient rest periods between shifts.

6.4. The Carlsberg Group must be committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement.

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

7. LEAVE

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

8. EMPLOYEE CONTRACTS/LETTERS

8.1. All employees must be provided with a written, understandable and legally binding employment contract/letter.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
ExCom	Responsible for policy approval.
EVP Group HR	Owns, endorses and ensure 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 labour and human rights issues and dilemmas, and ensures that labour and human rights issues are identified and addressed. Audits, reviews, measures and reports on labour and 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

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must 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

- Labour and Human Rights Manual [LINK](#)
- Brand Promoters Manual [LINK](#)

CONTACT

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

ENGLISH



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