

MODERN SLAVERY ACT COMPLIANCE STATEMENT

Carlsberg UK Limited

2020

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INTRODUCTION FROM THE BOARD OF CARLSBERG UK LIMITED (CARLSBERG)

We are proud of the steps we have taken to combat slavery and human trafficking within our own business and our supply chain to date, and are committed to continually improving our practices. Slavery can take many forms including forced labour, human trafficking and child labour. We are opposed to all forms of servitude and oppression and will continue to work to prevent modern slavery in our business and in our supply chains.

WHAT IS THE MODERN SLAVERY ACT AND HOW DOES IT AFFECT CARLSBERG?

The Modern Slavery Act (Act) is a pioneering piece of legislation that was passed into law by the UK Parliament in 2015. The objective of the Act is to encourage greater transparency for consumers and amongst businesses about steps taken to combat slavery and human trafficking within businesses and their supply chains.

Following the introduction of the Act, companies that exceed certain thresholds must complete an annual statement which explains the steps that the organisation has taken during the

preceding financial year to address slavery and human trafficking. As one of the largest brewers in the UK, Carlsberg's statement is set out below and includes an overview of our company structure and current practices.

ORGANISATION'S STRUCTURE

We market, promote and supply certain alcoholic and non-alcoholic drinks in the UK with our well-known brands including Carlsberg, Carlsberg Export and Tetley's. We are a part of the Carlsberg group (the Carlsberg Group), and our ultimate parent company is Carlsberg A/S which has its head office in Denmark and is listed on the Copenhagen stock exchange.

OUR BUSINESS

Carlsberg Group's business is organised into three regional business units: Western Europe, Eastern Europe, and Asia, with additional areas reached via licensing arrangements and exports. Please see our [Carlsberg Group website](#) for more details.

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OUR SUPPLY CHAINS

Our supply chains include the manufacture, distribution, marketing and sales of our products. Our sister company, Carlsberg Supply Company AG (CSC) is responsible for global planning, procurement, production and logistics in the Carlsberg Group.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Carlsberg Group Supplier and Licensee Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In 2019 Carlsberg Group undertook a global review of the Supplier and Licensee Code of Conduct and updated the materials to reflect the changes in both our own supply chains and the global market place. Changes include increased environmental commitments, clarity on the scope of application of the Code and added requirement to comply with the Act. It is our ambition to incorporate the revised Supplier and Licensee Code of Conduct into new supplier agreements in 2020.

Our Labour and Human Rights Policy, supplemented by the Labour

and Human Rights Manual, also defines the labour and human rights standards to which all employees and contractors of the Carlsberg Group are entitled, irrespective of the country in which they work. We intend to review our Labour and Human Rights Policy in 2020 to ensure this reflects our respect for human rights and the associated prevention and mitigation of human rights-related risks.

Human resources professionals and managers are invited to complete an e-learning on the Labour and Human Rights Policy. The Carlsberg Group also encourages the application of this policy (or policies of a similar standard) to joint ventures in which it holds an interest.

Since 2008, Carlsberg Group has been a signatory to the UN Global Compact (**Compact**). The Compact intends to align companies with universal principles on human rights, labour and anti-corruption amongst others. We aim to act in compliance and support with the Compact, as reflected in our Supplier and Licensee Code of Conduct.

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OUR DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MEASURING EFFECTIVENESS IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

As part of Carlsberg's commitment to combatting unethical behaviour and in order to comply with applicable laws, we screen all of our business partners and a fundamental part of this process is to ensure we have all the necessary details about our partners.

Carlsberg employees are obliged to maintain records of all screening procedures undertaken, and information obtained as part of 'knowing' our business partners. Without satisfactory documentation, Carlsberg will not be able to progress a business arrangement with a partner. In addition to this screening and the review of our Labour and Human Rights Policy above, we intend to further review Carlsberg's approach to, and understanding of, human rights as they relate to our operations and value chain in 2020.

Carlsberg have appointed an independent third party to operate an internal "SpeakUp" process across the business. The SpeakUp system encourages and facilitates employees and contract workers speaking up about situations or conduct that are not in line with our Anti-Bribery and Corruption Policy and Manual without fear of

retaliation. The SpeakUp process is activated via a telephone line or online reporting and issues are monitored by the Carlsberg Group Legal and Compliance function.

During the period to which this statement relates, Carlsberg has not experienced supply chain disruption as a result of Covid19. Notwithstanding any disruption caused by the virus, the health, safety and security of our employees, contractors, agents and suppliers throughout the supply chain remains a priority. We anticipate that our statement issued in 2021 will reflect upon any measures taken to mitigate risks introduced to the supply chain by Covid19.

TRAINING FOR STAFF

In addition to the Labour and Human Rights Policy e-learning outlined above, all employees at Carlsberg undertake Business Ethics e-learning training module when they join the company. The Business Ethics e-learning module reflects the requirements contained within Carlsberg's Anti-Bribery and Corruption Policy and Manual. Completion of the e-learning training is monitored and additional training and awareness activities undertaken on a regular basis.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2019.

For further information on the Carlsberg business, its economic contribution to society and its sustainability efforts, visit www.carlsberggroup.com.



Managing Director
Tomasz Blawat
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