

# MODERN SLAVERY ACT COMPLIANCE STATEMENT

## CMBC SUPPLY LIMITED

### INTRODUCTION FROM THE BOARD OF CMBC SUPPLY LIMITED (CMBC SUPPLY)

CMBC is committed to ensuring all our business and partners are free from slavery and human trafficking. We are opposed to all forms of modern slavery including forced and compulsory labour, human trafficking, and child labour, 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 CMBC SUPPLY?

The Modern Slavery Act (**Act**) is a pioneering piece of legislation passed into law by the UK Parliament in 2015. The objective of the Act is to encourage greater transparency for consumers and among businesses about steps taken to prevent 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.

CMBC Supply's statement for the financial year ending 31 December 2024 is set out below and includes an overview of our company structure and practices during that period.

### ORGANISATION'S STRUCTURE

We brew, package, and deliver certain alcoholic and non-alcoholic drinks in the UK with our well-known brands including Carlsberg Danish Pilsner, Carlsberg Export, 1664, Tetley's, Hobgoblin and Marston's Pedigree, as well as licensed brands such as Erdinger. We are a part of the Carlsberg group (the **Carlsberg Group**), which has its headquarters in Copenhagen, Denmark and is listed on the NASDAQ.

On 30 October 2020, Carlsberg UK Holdings Limited and Marston's PLC completed a 'joint venture' transaction to create a new beer company group, the '**Carlsberg Marston's Brewing Company Group**' or '**CMBC Group**'.

On 31 July 2024, Carlsberg UK Holdings Limited completed the acquisition of Marston's plc 40% shareholding in Carlsberg Marston's Limited, thereby becoming the sole owner of the CMBC Group.

At the end of 2024, the Carlsberg Group announced it would be acquiring Britvic PLC, with completion of the transaction planned for January 2025.

### OUR BUSINESS

The Carlsberg Group is present in different regions, and primarily in Europe and Asia. Please see the [Carlsberg Group website](#) for more details.

## OUR SUPPLY CHAINS

Our supply chains include the manufacture, distribution and packaging of our products. Our affiliate company, Carlsberg Supply Company AG (**CSC**), is responsible for global planning, procurement, production and logistics in the Carlsberg Group. We also procure goods and services directly from suppliers and have an 'in-house' logistics operation and depot network.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

The Carlsberg Group is committed to meeting its responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights (UNGP). We acknowledge our responsibility to respect all internationally recognised human rights across our own activities and business relationships.

As a signatory of the UN Global Compact (**UNGC**) since 2008, the Carlsberg Group is committed to adhering to its 10 principles, which include a strong focus on human rights. As part of the Carlsberg Group, CMBC Supply is aligned with these commitments.

Our commitment to respect human rights is reflected in our policies, including our [Human Rights Policy](#) (the **Policy**), which was updated again in 2024. The Policy sets out our commitment to human rights and our expectations for all members of the Carlsberg Group (including CMBC Supply in the UK), its employees and business partners globally, with further guidance being provided in an internal Human Rights Manual that explains how the Policy applies in real-life situations.

Our Executive Committee, chaired by the Group CEO, is responsible for our performance on ESG, including human rights. It provides strategic guidance and approval of our Human Rights Policy. Implementation of the Policy is overseen by our ESG Steering Committee, made up of leaders from across the Carlsberg Group. The Policy covers topics such as working hours and the right to rest and leisure, wages and benefits, freedom of association, discrimination, harassment, forced labour and child labour and juvenile work.

The Carlsberg Supplier & Licensee Code of Conduct lays down requirements for suppliers in the areas of human rights, occupational health and safety, environmental management and business ethics, including the prevention of forced and child labour, and non-discrimination. To work with us, suppliers must meet these requirements and ask the same of their own suppliers. We seek to work with our suppliers to help them mitigate risk, and we also collaborate through industry partnerships to provide supplier training and build capabilities in order to deliver a positive impact. In cases where our suppliers are unwilling to improve their practices or demonstrate alignment with our policies, we reserve the right to terminate the business relationship.

Compliance clauses and a reference to the Supplier and Licensee Code of Conduct are included in all of the Carlsberg Group's procurement contract templates including its general terms and conditions of procurement. These templates are used by local markets as the basis for the majority of their contracts including by CMBC Supply in the UK. Where a third party's contract template is used, equivalent wording is added to ensure the same level of contractual protection. In 2024 we updated our Supplier and Licensee Code of Conduct to better reflect our current approach to this area. .

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

At least once a year, the Carlsberg Group reviews the human rights that our business and value chain could potentially impact globally. This process builds on the formal identification of salient human rights risks we conducted with Shift in 2020, which considered industry trends, public research, best practices from peers and input from internal stakeholders. Salient human rights are those at risk of the most severe impacts. We refresh our assessment of salient human rights risks annually and it was last refreshed in 2024.

Our salient human rights risks can affect different stakeholders in different stages of our value chain – from the sourcing of ingredients, materials and services to the production and consumption of our beer. The Carlsberg Group partners with tens of thousands of suppliers around the world and some of our salient human rights risks are in our supply chain. We strive to partner with suppliers that share our commitment to respecting human rights and we believe that together we can have a positive impact on people.

Sourcing responsibly is a key component of our human rights approach, and we have joined two global organisations, AIM-Progress and Sedex, to support our due diligence of suppliers. As a member of AIM-Progress, we share best practices for responsible sourcing with other manufacturers of fast-moving consumer goods and suppliers of these companies.

Sedex is a membership platform that enables companies to manage and improve working conditions in their global supply chains, and we are using tools developed by Sedex to screen, assess and audit relevant suppliers for human rights risks.

In 2023, we established a new Responsible Sourcing Programme – with accompanying guidance sessions for global and local procurement teams – to enhance our oversight of supplier practices in areas covered by our Supplier & Licensee Code of Conduct and in relation to other identified salient human rights risks. The programme includes a three-step process to identify, assess and audit higher-risk suppliers and uses tools developed by the Sedex platform that we can access as members. An initial screening determines a supplier's level of risk based on its location and the service or product it provides. To conduct this screening, we use the Sedex Radar tool, which draws on a range of sources to define risk levels for human rights, labour conditions, the environment, ethics, and health and safety. Suppliers in categories and countries identified as high-risk through the initial screening process are then asked to complete the detailed Sedex self-assessment questionnaire, which generates a risk profile specific to that supplier.

Suppliers classified as high risk in this phase of the process are asked to go through a rigorous third-party audit that includes site visits and uses the Sedex Members Ethical Trade Audit (SMETA) methodology. The four pillar SMETA audit covers topics included in our SLCOC (Supplier and Licensee Code of Conduct), including human rights, labour conditions, health and safety, environmental management, ethical business, including checks to prevent child and forced labour.

To supplement this work, we also conduct internal human rights audits and use third-party experts to perform human rights impact assessments covering the value chain in top risk markets. We did not identify any forced labour issues in 2024.

Additionally, in 2024 we completed the SMETA audit for our Burton brewery and in 2025, we will complete the audit for our Northampton brewery, which is currently in the initial stage of the process. Britvic are also part of Sedex so in 2025 we will be looking into the Britvic processes and aligning their processes with those of the Carlsberg Group.

If a Carlsberg Group employee believes that our policies, including those related to human rights, have been breached, we encourage them to discuss it with their manager, our compliance team or a human resources representative. If such discussions do not resolve the issue or the employee does not feel comfortable sharing their concerns with their manager, compliance team or human resources representative, they can also raise their concerns anonymously using our Carlsberg Speak Up platform. This 24-hour helpline is run by an independent service provider and is available by phone or online everywhere we operate. The helpline is also available to third parties who would like to speak up. The Speak Up system includes more than 300 languages, and an explanatory Speak Up Manual is available online. All claims that potentially constitute a breach of our policies are investigated, and we have measures in place to prevent retaliation of any kind against anyone reporting a concern. The Carlsberg Group plan to review, update and relaunch the Speak Up process in 2025.

## **TRAINING FOR STAFF**

We allocate e-learning on our Human Rights Policy to people managers and human resources professionals when they join the company. We also allocate this e-learning to employees when they are promoted and become a people manager. In 2025, the training will be revised and will be deployed to all employees.

In addition to the Human Rights Policy e-learning outlined above, to reflect our commitment to act ethically and with integrity, all employees at CMBC undertake a Code of Ethics and Conduct e-learning training module when they join the company. Whilst this e-learning module does not directly address specific modern slavery topics, it covers a wide range of ethical and legal and compliance issues, including antibribery and corruption, competition law, data protection and privacy, conflicts of interest, political activities, discrimination and harassment and reflects the requirements contained within the Carlsberg Group's Code of Ethics and Conduct. Completion of this e-learning training is monitored, and additional training and awareness activities undertaken on a regular basis. It is our belief that a knowledge of other ethical, legal and compliance issues challenges our employees' decision making, encourages a culture of compliance and embeds the commitment to acting ethically and with integrity within the business. It, therefore, indirectly contributes to modern slavery compliance and respect for human rights. The Carlsberg Group plan to review, update and relaunch the Code of Ethics and Conduct in 2025.

## **TRAINING FOR SUPPLIERS**

In 2024 the Carlsberg Group trained approximately 120 suppliers both online and offline. The UK follows the Carlsberg Group global policies, and the UK procurement team are part of these efforts.

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 2024.

For further information on our / the Carlsberg Group's business, our / the Carlsberg Group's economic contribution to society and sustainability efforts, visit <https://www.carlsbergmarstons.co.uk> and [www.carlsberggroup.com](https://www.carlsberggroup.com).

A handwritten signature in black ink, consisting of a large, stylized 'P' and 'D' with a long horizontal stroke extending to the right.

Paul Thomas Davies

Chief Executive Officer

Date: 21st May 2025