

# HEALTH & SAFETY

## GLOBAL POLICY



## CONTEXT

**This policy defines the fundamental requirements for the management of Health & Safety performance in all Carlsberg Group's business activities, thereby eliminating or mitigating risks in order to prevent occupational injuries and illnesses, avoid industrial accidents, and to protect the people in the communities in which we operate.**

## OUR COMMITMENT

The Carlsberg Group proactively strives to protect human health and wellbeing, to provide a healthy and safe working environment and to ensure the highest level of protection and preservation of its assets and the environment. The Group is committed to promoting a zero-accident culture and takes all reasonable measures to assess and control the potential risks of its operations, including process and occupational health and safety risks.

## WHO DOES THIS APPLY TO?

This policy applies globally to all personnel of all entities controlled by the Carlsberg Group while performing duties at Carlsberg Group sites and at offsite locations. It also applies to contractors, whilst at Carlsberg Group sites. Where the Carlsberg Group participates in existing joint ventures as a noncontrolling shareholder, the other shareholder(s) must be made specifically aware of the importance of this policy to the Group and encouraged to apply the same policy or a similar standard to the joint venture. Where new minority joint-venture cooperations are contemplated, the Carlsberg Group will strive to commit the other shareholder(s) to adopting this policy or a similar standard for the joint venture.

## THE CORE PRINCIPLES OF THIS POLICY

Carlsberg Group's zero-accident vision is based on a culture of safety leadership, accountability, and proactive risk management. Core Principles of the Policy are:

- 1. Semper Ardens:** Continuous Improvement mindset driving excellence through and above compliance and discipline
- 2. Safety First:** Leadership and empowerment of people with compassion and positive energy
- 3. Inclusive Safety Culture:** Everyone's voice matters, and all take shared responsibility for protecting themselves and others.



# REQUIREMENTS

## 1. HEALTH AND SAFETY MANAGEMENT SYSTEM

- 1.1.** Carlsberg Group sites must have a certified health & safety management system in place in accordance with ISO 45001, with the same scope as this policy.
- 1.2.** Multi-site integrated systems (e.g. Health & Safety, Environment and Quality) are encouraged to improve consistency and efficiency globally.

## 2. HEALTH AND SAFETY ORGANIZATION

- 2.1.** In order to support a robust zero-accident culture, the Carlsberg Group establishes local health and safety organisations to provide specialist advice to all relevant personnel.

## 3. INCIDENT REPORTING AND ANALYSIS

- 3.1.** All relevant health and safety incidents, including occupational injuries and illnesses, as well as process safety incidents, must be recorded, analysed and communicated as required by local legislation and by the Carlsberg Group's standards and procedures. Deliberate and wilful concealing of incidents is not acceptable and may result in disciplinary action.
- 3.2.** Management must keep accurate records of reported incidents, ensuring proper classification, reporting, communication, analysis and follow-up.
- 3.3.** Management must ensure that reasonable and appropriate actions are taken to contain the consequences of an incident and prevent its reoccurrence.

## 4. COMPLIANCE

- 4.1.** All Carlsberg Group subsidiaries must comply with national and local laws and regulations, as well as with the provisions of this policy, the loss prevention Group standards and the Health & Safety Group standards.

- 4.2.** In the event of any discrepancies between this policy and national laws or other applicable standards, the more stringent requirements will apply. In the event of any doubt, the case must be evaluated jointly by Group H&S and Group Legal.

## 5. LIFE SAVING RULES

The Life Saving Rules are ways of working for activities in which a serious threat to life is concerned, based on serious and/or fatal events in the Carlsberg Group's history or on general industry experience.

- 5.1.** All personnel must follow the Life Saving Rules at all times. Deliberate and wilful violation of the rules may result in disciplinary actions up to and including termination of employment.

**The Carlsberg Life Saving Rules**

|             |                                                      |
|-------------|------------------------------------------------------|
| <b>LSR1</b> | Always follow traffic rules, on-site and on the road |
| <b>LSR2</b> | Always follow Lockout Tagout procedures              |
| <b>LSR3</b> | Never impair machinery safety guards and interlocks  |
| <b>LSR4</b> | Always follow working at height procedures           |
| <b>LSR5</b> | Always follow confined space entry procedures        |

## 6. EMERGENCY PLANNING AND RESPONSE

- 6.1.** Emergency response procedures must be established, maintained and tested annually at all Carlsberg Group sites. These procedures must describe the appropriate measures to be taken during the emergency to minimize the consequences for site personnel and to surrounding communities.
- 6.2.** Instruction and training on how to proceed in an emergency must be provided for all relevant personnel, including contractors and members of the public visiting Carlsberg Group sites.
- 6.3.** Carlsberg Group sites must communicate with local communities and their emergency services, providing them with the relevant information to allow adequate planning for a response at community level.
- 6.4.** Emergency scenarios may escalate to crisis scenarios. The Carlsberg Group's Crisis Management Policy (CGCMP) and procedures describe the structure and requirements of the crisis management processes.

## 7. LEADERSHIP AND PARTICIPATION

As an integral part of managing the business, managers at all levels are responsible and accountable for managing workplace health and safety with strong leadership and credibility. They must lead by example and ensure that employees are actively involved in Health & Safety programmes and initiatives. At the same time, employees are expected to engage with those activities, contributing to a sustainable zero-accident culture.

- 7.1.** All people leaders must regularly observe work in progress and give feedback to their teams, acknowledging safe behaviours and addressing unsafe conditions and behaviours.

- 7.2.** Employees are empowered to:

- stop production, warehousing and distribution activities and/or put any task on hold if they judge that it is not safe enough to proceed, until a competent person takes appropriate risk control measures;
- communicate unsafe conditions in the working environment to management;
- challenge any unsafe acts that they observe.

- 7.3.** Behavioural observation and feedback programmes must be implemented by all relevant sites, in conjunction with unsafe conditions communication and treatment processes.

- 7.4.** All sites must have systems in place in order to proactively communicate with employees, contractors and other stakeholders about health and safety. Where appropriate, education and training must be provided to ensure that they are prepared to perform their tasks safely.

## 8. CONTRACTOR MANAGEMENT

- 8.1.** Health and safety management must always be taken in consideration in supplier and contractor selection processes. The contracts must be explicit about the H&S requirements to be fulfilled.
- 8.2.** Contractors and other third parties entering Carlsberg Group sites must have sufficient relevant information and training and be properly equipped to execute their tasks safely.
- 8.3.** Contractors must follow all applicable Carlsberg Group rules and procedures while at Carlsberg managed sites.



## HOW TO REPORT A BREACH

You are responsible for asking questions, seeking guidance and reporting any suspected violations regarding compliance with our policies. If you see or suspect that any employee or representative of Carlsberg has or is engaging in conduct that violates this policy, you should report this to your manager or compliance representative. Alternatively, our Speak Up whistleblowing phone line and web reporting tool

can be also be accessed anonymously by employees, by those in our value chain and the communities we operate. Where matters are brought to us, we are committed to protect the rights of those reporting them and we do not tolerate any reprisal against anyone who raises a matter in good faith or where they have assisted an investigation. The **Speak Up Policy** contains more information about how cases are investigated.

## DEFINITIONS & KEY TERMS

### Carlsberg Group site

Any owned or leased location directly managed by Carlsberg Group subsidiaries, or where construction and/or installation work is being carried out on behalf of the Group.

### Crisis

A situation that is not planned or prepared for or where the preparation is insufficient to deal with the scale of the event and the result has the potential to seriously damage the organisation's reputation and strategic objectives.

### Process safety

Process Safety concerns the prevention and control of incidents that have the potential to release hazardous materials or energy. Such incidents can cause toxic effects, fire, or explosion, and could ultimately result in serious injuries, property damage, lost production, and environmental impact.

### ISO 45001

International standards for occupational health and safety management systems that provide organisations with a framework for identifying and controlling their health and safety risks, reducing the potential for accidents, complying with legislation and improving operational performance.

### Injury

Any wound or damage to the body, resulting from a brief single event or exposure.

### Illness

Any work related abnormal physical or mental health condition that impairs physiological, mood, thinking or behaviour function.



## ROLES & RESPONSIBILITIES

| ROLES / NAME                                                       | RESPONSIBILITIES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ExCom Policy Sponsor<br/>[EVP Integrated Supply Chain]</b>      | <ul style="list-style-type: none"> <li>The Global Policy Sponsor is a senior leader who provides strategic oversight,</li> <li>ensures resources are allocated, and champions the policy at the executive level.</li> <li>Accountable for the final approval of the policy framework.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Policy Owner [Group Health and Safety]</b>                      | <ul style="list-style-type: none"> <li>Policy owner with overall responsibility to ExCom for health and safety issues in the Carlsberg Group and for ensuring that health and safety risks in the Group are duly attended to and communicated to ExCom as relevant. Has overall responsibility for the Group Health &amp; Safety strategy, direction, performance management, management system, policies and standards.</li> </ul>                                                                                                                                                                                                                                                                                                                               |
| <b>Policy Subject Matter Expert [Group Health and Safety]</b>      | <ul style="list-style-type: none"> <li>The Policy SME provides in-depth expertise on the policy's subject matter, supporting its development, implementation, and ongoing maintenance.</li> <li>Responsible for monitoring adherence and providing guidance on exceptions.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Functional heads at CCO / Country / Region / Function</b>       | <ul style="list-style-type: none"> <li>Responsible for implementing the global policy locally, adapting it to regional requirements while maintaining alignment. Consulted during policy development to ensure feasibility and alignment with regional regulations.</li> <li>Responsible for leading by example and 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 that health and safety risks are properly assessed, controlled and communicated, and that all relevant personnel receive the required training to perform their tasks safely and with sufficient knowledge of the related risks and applicable controls.</li> </ul> |
| <b>All entities, managers and employees in the Carlsberg Group</b> | <ul style="list-style-type: none"> <li>Responsible for understanding and complying with the policy in their day-to-day work.</li> <li>Informed about policy updates and trained on how to comply effectively.</li> <li>Responsible for adhering to this policy and reporting any occupational health and safety incidents, process safety incidents and substandard conditions.</li> <li>If in doubt, always contact their local Health &amp; Safety Officer who shall, if needed, verify with Group Health &amp; Safety.</li> </ul>                                                                                                                                                                                                                              |



## HOW WE MONITOR

**We monitor the adherence to our codes and policies through an internal controls assessment programme carried out in partnership with our internal controls team.**

Additionally, risks are mapped annually and self-assessed. Furthermore, a prioritised internal audit programme or specific deep dives and spot checks for compliance combined with external audits by ISO certification bodies ensure independent assurance.

Failure to adhere to the key principles or failure to deliver appropriate mitigation may result in disciplinary action.

## EXCEPTIONS & DEVIATIONS

Exceptions to this Policy shall not be granted, unless exceptional conditions exist, or the Policy is not applicable. Any request for an exception shall be put in writing to the Policy Owner. The Policy Owner shall assess and decide on each request individually. Exceptions shall be duly logged and documented.



## POLICY REVISION

This Policy will be revised when needed but as a minimum every year. It may be amended at any time with the approval of the relevant ExCom Policy Sponsor. In the event of any discrepancies between the English version of this Policy and a translated version, the English version is binding.

## ASSOCIATED STANDARDS & MANUALS

- Risk Management Manual
- Diversity, Equity and Inclusion Standard

## SUPPORTING TOOLS & RESOURCES

- Health & Safety standards Assessments
- Health and safety management system
- Group and local health and safety organisation
- Health & Safety campaigns and trainings

## CONTACT

For more information, please reach out to Group Health & Safety.

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Policy Owner: Kostas Sagias, Director H&S Group

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