

DATA ETHICS POLICY

INTRODUCTION

In our increasingly connected and data-driven world, the free exchange of personal and business information has become essential to consumers, businesses, and society at large. Yet, the opportunities of data digitalization also bring risks of misuse that threaten both individual privacy and a fair marketplace.

This fast-paced, digital business environment is constantly evolving, setting a very different scene compared to when Carlsberg was founded in 1847. One thing has never changed for us, however: The Carlsberg Group is committed to earn and keep the trust of our consumers, business partners, employees, and other stakeholders as we strive to brew for a better today and tomorrow.

SCOPE

This policy applies globally to the management, employees and contract workers of all entities in the Carlsberg Group.

REQUIREMENTS

1. WE KEEP DATA SAFE

1.1. The Carlsberg Group's IT capability is a strong business driver in the relationships with our consumers, customers, business partners, and on-site as well as remote workers. Accordingly, we take very seriously the expectations of these stakeholders that any data shared and used – whether personal data or business data – is protected through robust security features, effective processes for their implementation, and reliable IT applications and providers.

1.2. The Carlsberg Group commits to safeguarding the digital well-being of our many stakeholders and all of their data in our care, including in our information systems, from the exponentially growing risks of illegal and damaging conduct by individuals or groups acting either carelessly or intentionally for financial gain or other pernicious reasons.

2. WE FOLLOW DATA PROTECTION LAWS

2.1. The Carlsberg Group recognises the importance of having legally effective and meaningful privacy and data protection standards in place, applicable to all of our business activities. This is necessary not only to comply with the many evolving regulatory requirements across our global markets, but also to promote the trust of those countries' citizens, leaders, and business communities.

2.2. We gain these stakeholders' trust by respecting the political choices and community concerns that have been expressed through their local privacy laws. To assist with our local compliance efforts, the Carlsberg Group directs that all personal data, however and wherever used in our business operations, must be handled strictly in accordance with our global privacy and data protection standards, set out in our internal policies.

3. WE USE DATA RESPECTFULLY

3.1. At the heart of the Carlsberg Group are the people who contribute to our success and enjoy our beverages all over the world. For our workers, our commitment to a fair, respectful, safe, and non-discriminatory workplace includes the lawful, fair, and limited handling of their data as part of our working relationship.

3.2. When collecting and using consumer data to better produce and market our products, the Carlsberg Group does so ethically, for example, by not acting in any way to promote drinking to minors, by enabling consumers' autonomy over how their data is processed through transparent privacy notifications, and by lessening the privacy impact of digital technologies that we use.

3.3. The Carlsberg Group respects individual privacy as part of our greater commitment to ethical business conduct and stakeholder dignity.

ROLES AND RESPONSIBILITIES

Roles	Responsibilities
ExCom	Responsible for Policy approval and endorsement.
Group legal & Compliance	Policy owner.
Management, employees and contract workers of all entities in the Carlsberg Group	Responsible for adhering to this policy.

DEVIATIONS

Exceptions to this policy shall not be granted, unless exceptional conditions exist or the policy is obviously 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 reviewed when needed but as a minimum every second year. 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 is binding.

CONTACT

For more information, please reach out to the office of the CIO.

ENGLISH



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Carlsberg Breweries A/S
J. C. Jacobsens Vej 1
1799 Copenhagen V
Denmark