



BRAND PROMOTER MANUAL

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INTRODUCTION

At the heart of the Carlsberg Group are our brand promoters (BPs) – the people who make it all possible by promoting our brand portfolio to customers and consumers across on-trade, off-trade and market activations. We are proud of our BPs and recognise the vital role they play.

This manual builds on Carlsberg's commitment to respect human rights by treating people with fairness, honesty and compassion, and by providing a safe and inclusive workplace where everyone belongs and can perform their job with confidence and pride.

SCOPE

This manual applies globally and sets out the principles and standards for BPs across all entities of the Carlsberg Group wherever they are deployed and whether they are hired directly or through agencies.

Where the Group participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) must specifically be made aware of this manual's importance and must be encouraged to apply the same standards. When considering new associates and non-controlling joint ventures, the Group must strive to commit the other shareholder(s) to adopting the manual for the associate or joint venture.

Agencies engaged by the Carlsberg Group to provide BPs must specifically be made aware of and adhere to the same standards in addition to the standards required by the [Carlsberg Supplier & Licensee Code of Conduct](#).

All venues where BPs are deployed should be informed of the standards required by the Carlsberg Group in respect of providing a safe and harassment-free working environment.

Violation of this manual by any involved party may result in legal, contractual or employment sanctions.

STANDARDS

1. SAFETY

The Carlsberg Group strives to provide a healthy and safe working environment for BPs. The Group is committed to promoting a zero accidents culture and takes all reasonable measures to assess and mitigate any potential risks to which BPs may be exposed in fulfilling their role.

1.1. The Carlsberg Group will not deploy BPs at a particular venue or occasion if safe working conditions cannot be provided.

1.2. BPs are empowered to:

- Leave premises if they judge that the working conditions are not safe, until such time as appropriate risk control measures are put in place.
- Communicate unsafe conditions in the working environment to venues or our management.
- Challenge any unsafe acts observed and immediately inform a BP supervisor when faced with an unsafe situation.

1.3. All relevant health and safety incidents, including accidents and occupational injuries and illnesses, must be reported in a timely manner to a BP supervisor and/or People & Culture, recorded in Carlsberg's Safety Recording System, analysed and communicated as required by local legislation and the Carlsberg Group's safety standards and procedures. Please refer to section 3 with regard to harassment-related incidents.

1.4. BP supervisors are responsible for regularly visiting the venues where BPs are deployed.

- Where BPs are required to work at a venue other than their regular venue, a BP supervisor or another relevant party (e.g. Trade Marketing) must visit the venue to ensure safe working conditions for BPs prior to their deployment.

1.5. Safety training must be provided to all newly hired BPs before they commence work. Safety refresher training must be provided to all BPs at least once a year.

SAFE TRANSPORT

1.6. In markets where transportation to and from venues takes place late at night or where venues are located in remote areas, a risk assessment must be

conducted to ensure that BPs are not exposed to risk when transporting themselves to/from venues.

- 1.7.** BPs must be ensured a safe transport option. The chosen option must take into consideration factors such as the specific location of the venue, the available means of transport, security conditions in the vicinity of the venue and weather conditions. Options may include provision of financial support for BPs' own transport or the provision of safe group transportation in instances where the assessment concludes that precautions are required.
- 1.8.** BPs must be well trained in transport safety and be reminded to make use of safety aids (e.g. a motorbike helmet or car seat belt) at all times during their commute.
- 1.9.** Where it is deemed necessary for safety reasons and BPs feel comfortable with the practice, offer the option of a check-in and check-out protocol for BPs to notify their supervisor upon arrival at the venue and upon returning home.

2. BEHAVIOUR AND RESPONSIBLE DRINKING

- 2.1.** The Carlsberg Group has strict standards relating to the consumption of alcohol in relation to work. The Responsible Drinking Policy sets out those standards and defines the responsibilities of the Group and our employees in respect of alcohol consumption.
- 2.2.** The Group's BPs must always promote the enjoyment of our products in moderation and only serve individuals who are of legal drinking age.
 - In cases of doubt about whether a consumer is of legal drinking age, BPs are expected to inform the venue manager or BP supervisor so that appropriate actions can be taken.
- 2.3.** BPs must not sit with customers or drink alcohol during working hours under any circumstances, including drinking alcohol with customers or consumers in order to increase sales.
- 2.4.** If a customer offers any form of alcohol or other beverage to a BP, they should politely decline and explain that it is not allowed under the BP management policy.
- 2.5.** BPs must not engage in any form of games or activities prompted by customers and consumers during working hours.

- 2.6.** BPs must never drink-drive. If a BP is in a position where they are unsure whether they have exceeded the legal limit, under no circumstances should they drive a vehicle.
- Drink-driving is considered an act of serious misconduct and may result in termination of service/employment and legal implications.
- 2.7.** In addition to not consuming alcohol, BPs are strictly prohibited from smoking and using any form of illegal drug during working hours.
- 2.8.** BPs should refrain from promoting our products to customers who are acting drunk, out of control or aggressively for the sake of achieving sales.

3. PREVENTION OF HARASSMENT

3.1. The Carlsberg Group does not tolerate any acts of physical, verbal, sexual or psychological harassment, such as bullying, abusive behaviour or threats in the workplace.

3.2. Anyone, regardless of their gender, sexual orientation, age, ethnicity or any other personal characteristic, can be the victim or perpetrator of harassment.

Harassment, understood as “words or behaviour that threaten, intimidate or demean a person”, includes, but is not limited to: deliberate unsolicited and unwanted sexual flirtations or advances; offensive remarks and illustrations; requests for sexual acts and/or favours; leering; whistling; and inappropriate physical, verbal and non-verbal expressions and gestures of any kind.

3.3. Harassment should be immediately reported to a BP supervisor or People & Culture BP (Commercial/Sales).

- Any form of harassment must be thoroughly investigated and appropriate actions taken.
- The company reserves the right to call the local authorities where the specific situation requires.
- Where a BP or Carlsberg employee is the perpetrator, they may be subject to disciplinary action, including termination of service/employment.

3.4. Agencies and BP supervisors are required to train BPs on how to handle harassment (as part of the safety training) before they commence work for Carlsberg.

4. UNIFORM AND ACCESSORIES

- 4.1. Each market where BPs are employed is responsible for adapting the uniform guidelines to local conditions:

IF APPLICABLE (e.g. where markets require and/or allow the use of uniforms):

- 4.2. BPs must be provided with uniforms that make them clearly visible and identifiable. The uniform should be worn in its entirety and solely for work purposes. (Note: in this section, “uniform” refers to the BP’s full attire)
- 4.3. Uniforms must always be functional, fit for purpose and decent. The design and choice of material should take into consideration input from BP supervisors and BPs themselves.
- 4.4. The uniform design must follow the brand corporate visual identity (CVI) guidelines and reflect the brand image and persona.
- 4.5. The uniform should be made of appropriate materials that are suitable for the local weather conditions, provide an adequate level of comfort and are conducive to safe working.
- 4.6. The uniform and accessories should be designed and made to ensure occupational health and safety (e.g., if shoes are provided, they should be of a non-slip design).

5. EMPLOYMENT CONTRACT AND REMUNERATION

The Carlsberg Group has strict standards relating to labour rights. The [Carlsberg Human Rights Policy](#) sets out those standards and defines the Group’s responsibilities.

- 5.1. BPs, irrespective of whether they are hired directly (full or part-time) or through an agency, must have a written contract clearly setting out all terms and conditions.
- 5.2. BPs must be thoroughly briefed on the contractual terms and conditions during the employment process and be given a copy of the contract signed by both parties.
- 5.3. BPs promoting both non-alcoholic and alcoholic drinks must be:
(1) at or above 18 years of age AND

(2) of the legal drinking age of the country of employment, if this is higher.

Legal identification testifying to age must be provided prior to employment.

- 5.4.** The fixed portion of BPs' remuneration must be based on an hourly rate that is at least equal to the statutory minimum wage of the country of employment. In markets where no statutory minimum wage exists, we strive to pay BPs an industry-competitive rate that also allows a satisfactory standard of living, taking into consideration the prevailing cost of living in the country of employment.
- 5.5.** Incentive plans may be put in place in addition to the fixed portion of remuneration and may make up a reasonable proportion of the overall compensation. Incentive plans must always be fair, transparent, and communicated to and understood by the BPs. They must always be set up in such a way that BPs are not subjected to vulnerable or unsafe situations.
- 5.6.** While BPs are incentivised to make sales, they must also be trained on the importance of observing work etiquette, such as responsible drinking and safety, to ensure that our standards of behaviour are adhered to.

6. TRAINING AND COMMUNICATION

- 6.1.** Newly hired BPs must complete mandatory orientation training (which includes work safety and behaviour) and pass a test before they commence work.
- 6.2.** BP supervisors, relevant Trade Marketing or Sales Management personnel, the People & Culture Business Partner (Sales or Commercial) and Procurement personnel (agency contracts) must be familiar with the standards set out in this manual and be able to provide information or training to their respective stakeholders.
- 6.3.** BP supervisors or Trade Marketing or Sales Management personnel must communicate relevant standards and their significance to the venue owner/management prior to the deployment of BPs.
- 6.4.** A standard set of BP training modules is made available for markets to adapt and use.
- 6.5.** Refresher training for BPs must be conducted on an annual basis.
 - If a BP is rehired after a six-month period, they must undergo training again.

- 6.6.** If any standard is changed or updated, training must be provided to BPs or relevant stakeholders in a timely manner.
- 6.7.** Agencies are expected to follow and implement Carlsberg's training standards for BPs (i.e. contents, frequency, assessment).

7. ACCREDITATION OF AGENCIES

- 7.1.** Newly engaged agencies should be thoroughly onboarded, trained and accredited before the market deploys BPs provided by them.
- 7.2.** The agency accreditation process requires the agency to pass an assessment upon completing the training provided by the responsible market personnel. In addition, the agency will need to meet the standards outlined in the due diligence process for BP agency selection (e.g. records of labour disputes, credit check, business licence, bank account). If the agency fails to pass the accreditation process, they will not be qualified to provide BPs to any Carlsberg market.
- 7.3.** Existing agencies will be assessed and evaluated on an annual basis to ensure the fulfilment of BP deployment standards.
- 7.4.** As part of the agency contract, agencies are required to strictly follow and adhere to Carlsberg's expectations and standards when it comes to the employment, deployment and training of BPs.

8. DIVERSITY AND NON-DISCRIMINATION

- 8.1.** Recruitment of BPs must be carried out without prejudice or bias in respect of ethnicity, age, gender, sexual orientation, religion or any other social or physical characteristics.
- 8.2.** BPs must report any form of discrimination, concern or violation to their supervisor and/or People & Culture.

9. CARE AND SUPPORT MECHANISM

- 9.1.** BPs must be clearly informed who their supervisor is, and that a procedure is in place for them to express any grievances or concerns. BPs can always rely on support from their supervisor should a situation so require.
- 9.2.** There must always be a supervisor whom BPs can access or contact when working, and local support lines must be in place in all markets.
- 9.3.** BPs are explicitly told to ask questions, flag up or report potential violations, and voice concerns about compliance with our standards. All grievances and concerns must be filed, investigated and have any remedial actions tracked.
- 9.4.** In addition, BPs may file a report (anonymously if preferred) via the Carlsberg Group's SpeakUp hotline or any future online support mechanism (e.g. mobile app).
- 9.5.** To ensure that we continuously track and listen to BPs' voices, the company will conduct annual surveys so that appropriate actions can be put in place.
- 9.6.** Audit checks, carried out by Carlsberg or an external party, are to be conducted on a regular basis to ensure that the standards set out in this manual are adhered to.

Glossary

- 1) **Agency:** An external entity contracted by the Carlsberg Group to provide services or products, in this case brand promoters (BPs).
- 2) **Audit check:** A systematic evaluation that identifies areas of risk and ensures compliance with internal and external policies and legal requirements.
- 3) **Brand promoter (BP) (also referred to as a brand ambassador (BA) or sales promoter (SP)):** A hired individual (i.e. directly employed by a Carlsberg entity or an agency accredited by Carlsberg) responsible for representing and promoting the brand portfolio of the Carlsberg Group to customers and consumers.
- 4) **Carlsberg accreditation:** A certification process that agencies must complete to ensure they are aligned with the Carlsberg Group's standards and regulations related to BP management.
- 5) **Corporate visual identity (CVI):** The visual elements that represent and communicate the brand image of a corporation (e.g. logo, colour palette, typography).
- 6) **Diversity:** The inclusion of individuals from various backgrounds, including differences in race, age, gender, sexual orientation, religion and other personal characteristics.
- 7) **Grievance mechanisms:** Procedures established within the organisation for employees to report concerns or complaints regarding workplace issues, including harassment or policy violations.
- 8) **Harassment:** Words (written or verbal) or behaviour (physical and non-verbal) that threaten, intimidate or demean a person and create a hostile work environment; considered a type of abuse.
- 9) **Human Rights Policy:** Policy that defines the labour and human rights standards to which all employees in the Carlsberg Group are entitled, irrespective of the country in which they work.

- 10) **Occupational safety:** Practices and measures designed to protect employees from workplace hazards, ensuring their health and safety while performing their work duties.
- 11) **Off-trade:** The sale of products in retail environments where they are purchased for consumption off the premises, such as supermarkets and off-licences.
- 12) **On-trade:** The sale of products in establishments where they are consumed on the premises, such as bars and restaurants.
- 13) **Responsible Drinking Policy:** The commitment of the Carlsberg Group to create a culture of responsible drinking by promoting moderate consumption of our products and addressing alcohol-related harm in society.
- 14) **SpeakUp hotline:** An anonymous reporting tool provided by the Carlsberg Group through an external service provider that allows employees to safely report concerns or violations.
- 15) **Statutory minimum wage:** The legally mandated lowest amount that an employer can pay an employee for their work, which varies by country.
- 16) **Zero accidents culture:** The commitment of the Carlsberg Group to make health and safety a top priority for the working environment, and the belief that all accidents are preventable.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
EVP, Region	Owns, endorses and ensures implementation of the manual across the geographical regions of the Carlsberg Group where BPs are deployed. Region refers to all the Carlsberg Regions under which their markets deploy BPs, whether directly through Carlsberg or through their respective third- party agencies.
Group & Regional People & Culture	Ensures timely updating and internal communication of the manual to the market People & Culture team. Advises and guides market People & Culture directors on the manual's content and addresses their enquiries.
Managing Director in a market that deploys brand promoters	Responsible for ensuring that this manual and related standards are implemented and adhered to in the Carlsberg market entity.
Commercial, Sales (including brand supervisors/managers) and Trade Marketing personnel who deploy brand promoters	Responsible for ensuring that: 1) agencies engaged by the local Carlsberg Group company to provide brand promoters are specifically made aware of the importance of the manual and the requirement to apply the same standards; 2) venues where brand promoters are deployed are informed of the standards required by the Group in respect of providing a safe and harassment-free working environment.
Market People & Culture Director & People & Culture BP (Commercial/Sales)	Supports local implementation of the manual's requirements and is responsible for ensuring that local initiatives are developed in line with this manual.
Market Procurement personnel	Responsible for: 1) sourcing agencies in line with Carlsberg's Supplier & Licensee Code of Conduct; 2) thoroughly explaining the BP standards when engaging agencies; 3) ensuring full incorporation of BP standards in the contract.
Market Safety personnel	Responsible for: 1) advising and providing guidelines on safety and risk assessment for BP supervisors to conduct the risk assessment; 2) conducting investigations when any accident/incident occurs and providing recommendations on prevention; 3) advising on the general safety standards related to the deployment of BPs; 4) reviewing the safety training materials for BPs.

DEVIATIONS AND MANUAL REVISION

No exemptions from this manual can be granted unless there are exceptional circumstances and otherwise specified. All requests for exemptions must be made in writing to the manual owner. The manual owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

This manual will be revised regularly as deemed necessary, but as a minimum every two years. In the event of any discrepancies between the English version of this manual and a translated version, the English version will be binding.

ASSOCIATED POLICIES AND MANUALS

- [Code of Ethics & Conduct](#)
- [Carlsberg Supplier & Licensee Code of Conduct](#)
- [Human Rights Policy](#)
- [Marketing Communication Policy](#)
- [Diversity & Inclusion Policy](#)

**** Note:** Previously “HR” now referred to as “People & Culture”.

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