

ENVIRONMENTAL POLICY

INTRODUCTION AND PURPOSE

Environmental sustainability is very important for the Carlsberg Group as a global beer and beverage company. Most of our raw materials and ingredients are sourced directly from nature, and the continued success of our business is directly linked to the health of the environment. We are therefore continuously looking for ways to reduce our impact on the environment and the communities in which we operate.

The Carlsberg Group appreciates the important role that we play in understanding, protecting and enhancing the services that ecosystems provide and the underlying biodiversity. We are therefore constantly striving to optimize our use of natural resources, to view our products and activities from a lifecycle perspective, and to develop and use products, materials and technologies in a way that contributes to long-term sustainable development.

Our sustainability program clearly underlines our commitment to sustainable development by setting ambitious targets that tackle the impacts of our activities throughout the value chain, from the sourcing of materials, through packaging, production, distribution, sales and marketing, to the consumption of our products.

The purpose of the Environmental Policy is to prevent and control potential risks to the environment, supported by our ambitious targets towards 2030 and 2040, as described in Carlsberg's ESG programme, Together Towards ZERO and Beyond.

The Carlsberg Group is dedicated to continuously assessing and enhancing our approach to ESG, and to continuously updating this approach.

SCOPE

This Policy applies globally to the management, employees and contract workers of all entities in the Carlsberg Group. The Policy also applies to visitors and to situations where the Group's employees or agents are working at external locations. We require our suppliers and partners to adhere to all relevant environmental regulations, and to demonstrate that their environmental performance, management processes and impacts are aligned with our targets.

REQUIREMENTS

1. COMMITMENTS

- 1.1.** To adhere to applicable laws and regulations at all times.
- 1.2.** To continuously improve our environmental standards.
- 1.3.** To communicate and deliver according to our strategy, targets and related objectives.
- 1.4.** To continuously work on risk reduction with a view to achieving zero environmental accidents and reducing our impact on the environment.
- 1.5.** To maintain our certified environmental management system.
- 1.6.** To secure the resources, and build and maintain the organizational capabilities, necessary to deliver on our commitments.
- 1.7.** To work on improving environmental performance by establishing targets and KPIs, monitoring performance and implementing robust management controls for environmental aspects and data.
- 1.8.** To communicate transparently and effectively with stakeholders.

2. ISO CERTIFICATION AND INTEGRATED MANAGEMENT SYSTEM (IMS)

- 2.1.** The Carlsberg Group's production and supply chain management must be certified according to ISO 14001 and adhere to established environmental management practices.

3. ENERGY

- 3.1.** The Carlsberg Group strives to use all energy sources as efficiently as possible, and to reduce greenhouse gas emissions as well as emissions related to noise, dour and other nuisances.
- 3.2.** The Carlsberg Group regularly assesses the possibilities for introducing renewable energy in our operations in order to reduce our carbon footprint and strives to gradually convert our energy use to renewable solutions.
- 3.3.** The Carlsberg Group collaborates with suppliers and customers to drive innovation and implement energy efficiency programmes, increase renewable energy use and reduce environmental impact across the supply chain.

4. CLIMATE CHANGE AND RESILIENCE

- 4.1.** The Carlsberg Group strives to implement initiatives that mitigate climate change and increase climate resilience across the value chain.
- 4.2.** The Carlsberg Group continuously works to reduce emissions across the value chain aligned with targets set according to the framework of the Science Based Targets initiative.
- 4.3.** The Carlsberg Group engages with suppliers and service providers to drive improvements and to set commitments aligned with the requirements of the Science Based Targets initiative.

5. WATER AND WASTEWATER

- 5.1.** The Carlsberg Group strives to achieve sustainable use of water in the communities in which we operate by focusing on water efficiency, withdrawal, consumption, and discharge. Carlsberg regularly monitors water withdrawals, usage and discharges, and continually works to improve and implement applicable best practices.
- 5.2.** The Carlsberg Group regularly assesses our exposure to “areas of water risk (including areas of high water stress)” and “water scarcity” and initiates appropriate actions to ensure the long-term availability of water wherever we operate.
- 5.3.** In areas of high water stress, the Carlsberg Group will replenish the water consumed by our breweries by implementing water replenishment projects in which we engage with local communities to understand how we can best help to manage their watersheds.
- 5.4.** The Carlsberg Group ensures that wastewater from our activities is treated in compliance with legal requirements. This is done either at an on-site wastewater treatment plant or an off-site municipal/industrial wastewater treatment plant.
- 5.5.** The Carlsberg Group encourages suppliers to safeguard water resources.

6. WASTE AND BY-PRODUCTS

6.1. The Carlsberg Group works to eliminate or reduce/minimize waste generation in order to preserve resources and avoid pollution of soil, water and air.

6.2. The Carlsberg Group strives to utilize brewery by-products as feed material, soil improver or a source of renewable energy, or in any other innovative solutions.

6.3. The Carlsberg Group aims to avoid any form of uncontrolled land filling or uncontrolled on-site/off-site waste handling.

6.4. The Carlsberg Group is committed to reducing waste that cannot be recycled, and to increasing circularity.

7. PACKAGING

7.1. The Carlsberg Group continuously works with partners to reduce consumption of packaging materials and increase the share of reusable packaging. The Carlsberg Group continuously works on selecting only recyclable packaging to minimize environmental impacts.

7.2. The Carlsberg Group engages with suppliers to ensure the responsible sourcing of packaging materials with lower environmental impact.

7.3. Before new packaging types are introduced to the marketplace, they must undergo a lifecycle assessment (LCA) or similar environmental assessment.

7.4. The Carlsberg Group is committed to playing an active role in improving and implementing new environmentally friendly deposit return systems for our consumer-facing primary packaging.

8. RAW MATERIALS

8.1. The Carlsberg Group continuously works with suppliers to implement regenerative practices and to ensure that raw materials delivered to Carlsberg are sourced sustainably and comply with relevant certifications and actions to reduce the environmental impact. The Carlsberg Group supports increased traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along our

value chain. Within raw materials the Carlsberg Group focuses primarily on malt, barley, wheat, syrups, sugar, rice, corn and hops.

8.2. The Carlsberg Group takes a fact-based approach to biodiversity and ecosystems impact, and includes several topics in the assessment of impact, such as climate change, land use change, freshwater use and pollution. This is particularly relevant within raw materials and packaging due to the potential impacts on waterways, soil and biodiversity.

8.3. The Carlsberg Group commits to no deforestation across its primary deforestation-linked raw materials by 31 December 2025.

9. INVESTMENTS AND PURCHASES

9.1. The Carlsberg Group prioritizes environmental aspects of investments and purchases when planning, costing and implementing activities with significant environmental impact, including all the areas covered in this Policy.

9.2. The Carlsberg Group prioritizes the purchase of energy-efficient equipment and improved design for energy/environmental performance.

10. STAKEHOLDERS

10.1. The Carlsberg Group is committed to open and unbiased dialogue with our stakeholders on environmental issues, and we periodically align our approach with external and internal stakeholders through materiality assessments.

10.2. The Carlsberg Group collaborates with the communities in which we operate to promote sustainability efforts. To do so, we establish partnerships with suppliers, industry peers, non-governmental organizations and government entities according to our environmental priorities.

ROLES AND RESPONSIBILITIES

Body/functions/individuals	Roles and responsibilities
ExCom	Responsible for endorsing and approving the Policy, and for ensuring that the organisation has the necessary resources and capabilities to be able to adhere and comply with the Policy.
EVP Carlsberg Integrated Supply Chain (ISC)	Owns the Policy and ensures its implementation within the ISC.
Group ISC Sustainability	Owns the Policy. Responsible for ensuring that the Policy is regularly reviewed, updated and communicated in the organization for implementation and adherence. Establishes processes and governance within the ISC to address environmental risks and provides updates to ExCom as needed. Responsible for defining the ISC sustainability strategy and for establishing environmental targets and performance indicators. Oversees the Group's ISO 14001 environmental management system.
Group ISC Manufacturing	Responsible for drawing up utilities programmes, establishing performance indicators and targets, and securing resources to comply with environmental standards and regulations and deliver on Carlsberg commitments.
Group Sustainability & ESG	Responsible for embedding the Environmental Policy into Carlsberg's ESG Strategy. Responsible for ensuring relevant and correct communication of Policy efforts to external stakeholders.
Regions EVPs	Responsible for ensuring that this Policy and related standards are implemented with full compliance in their respective organisations, and that all relevant employees are made aware of the Policy and its requirements and comply with the Policy. Responsible for conducting appropriate risk assessments for the businesses. Responsible for securing relevant resources for compliance with the Policy.
Managing Directors/regional and local management	Responsible for implementing the Policy and related requirements in all functions and across all activities within their respective functions and markets.
Brewery Directors	Responsible for implementing the Policy and related requirements in production and logistics, for leading by example, and for ensuring adequate understanding of and compliance with the Policy within their respective functions and markets.
Managers/Directors of all functions at Carlsberg	Responsible for leading by example and for ensuring adequate understanding of and compliance with the Policy within their respective functions.
Management, employees and contract workers of all entities in the Carlsberg Group, including visitors	Responsible for compliance with the Policy and for reporting any observed accidents and incidents.

GLOSSARY

IMS

Integrated Management System. Includes the ISO 9001, ISO 14001 and ISO 45001 standards.

ESG

Environmental, social and governance.

KPI

Key performance indicator.

DEVIATIONS

No exemptions from this Policy can be granted unless there are exceptional circumstances, or the Policy is obviously not applicable. All requests for exemptions must be made in writing to the Policy owner. The Policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

In the event of any discrepancies between this Policy and national laws or other applicable standards, the more stringent requirements will apply. Discrepancies between the provisions of this Policy and national laws or other applicable standards must be evaluated by the Carlsberg Corporate Office in conjunction with the Group companies. Companies that have recently joined the Carlsberg Group may be granted exemption from the Policy's provisions during the integration period.

POLICY REVISION

This Policy will be reviewed and revised when necessary. 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 will be binding. Responsibility for revision lies with the Policy owner.

ASSOCIATED POLICIES AND MANUALS

- Supplier and Licensee Code of Conduct
- COM Utility
- Health & Safety Policy
- Property loss prevention standards (21 in total)
- Insurance Manual
- Crisis Management Policy
- Appendix 1 to the Trade Sanction Screening Policy – Country List
- Trade Sanctions Information and Screening Results Sheet

CONTACT

For more information, please contact Group ISC Sustainability.



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