



MARKETING COMMUNICATION POLICY

INTRODUCTION

THE CARLSBERG GROUP'S MARKETING COMMUNICATION POLICY

MARKETING COMMUNICATION PRINCIPLES

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The Carlsberg Group has focused on brewing for a better today and tomorrow for over 170 years. Not only for ourselves, but for society as a whole. We are proud of our brands, with all our beverages crafted to be enjoyed in moderation and sit at the heart of social occasions for millions of people all over the world.

We are committed to playing our role in supporting people to consume our products responsibly, as they are intended, and recognise our important responsibility to do so. Our Marketing Communication Policy (MCP) supports this commitment, determining the high standards we set ourselves as a brewer and as an industry for what and how we communicate to ensure that we reach the right people, with the right messages. It applies to all employees and contractors communicating through, or on behalf of, our brands. However, in cases where local regulations are stricter, they must always supersede this policy.

Our MCP exists to enable, rather than to restrict. Through the eight principles which guide our marketing, with clear dos & don'ts under each, we are able to develop innovative, creative and entertaining marketing in the confidence that it aligns with our purpose and high standards as a responsible brewer.

João Abecasis
Chief Commercial Officer
Carlsberg Group

1. APPEAL

DESIGN COMMUNICATIONS TO APPEAL TO ADULT AUDIENCES

Our beers, ciders and other alcoholic products are intended only for persons over the legal drinking age. Our marketing communications must always therefore be designed to appeal only to adults.

DOS & DON'TS

- ✓ Only target adults (18+) with our messages and never persons under the legal drinking age stipulated in national or regional law (e.g. 20 in Iceland).
- ✓ Only feature people who are – and reasonably appear to be and are being portrayed as – over 25 years of age.
- ✗ Do not include any of the following in our marketing materials:

People, styles or behaviours: Celebrities, sportspersons, actors, influencers, cartoon or animated characters, clothing styles, behaviours, music etc. **with primary appeal to persons under the legal drinking age, or to juvenile or adolescent behaviour.**

Elements: Toys, playgrounds, schools, zoos, skate parks, children’s gaming arcades, child-related fantasy worlds, slapstick humour, sexual humour or digital marketing elements (e.g. lenses or filters) that are likely to be of particular appeal to those under the legal drinking age.

Themes or treatments: Children’s music, fairy tales, schoolteachers, or drawing styles, symbols and designs that are clearly childish (e.g. children’s scribbles or drawings).

Promotional items: Competition prizes etc. **with primary appeal to persons under the legal drinking age.**

PR & SPONSORSHIPS

- ✓ While any person appearing in advertisements must be over 25 years of age, persons between the minimum legal drinking age and 25 years of age may be engaged in unpaid PR activity (e.g. gifting) or partner-led sponsorship communication in which our brand is not a primary focus (e.g. Carlsberg Man of the Match).
- ✗ Do not repost or interact with social media posts featuring, or posted by, persons aged 18-25 years, from the profile of our alcoholic brands. Do not encourage 18-25-year-old recipients of alcoholic gifts to post on social media.

PROMOTIONS

- ✓ Only target in-store or in-outlet promotions at persons over the legal drinking age. Brand promoters must be of legal drink age or above and cannot feature in communications of the promotion unless they are over 25 years.

PRODUCT DEVELOPMENT & PACKAGING

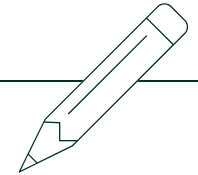
- ✗ Do not develop new alcoholic products or packaging designs with particular appeal to persons under the legal drinking age.

RESEARCH

- ✓ Only include adults over the legal drinking age within the study market when conducting research activities related to our alcoholic brands. See our internal Research & Analytics Code of Conduct for further guidance.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- Can I confirm that my communication is designed to appeal to an adult audience?
- Can I confirm that my communication only uses persons who are, and reasonably appear to be, over the age of 25?
- Have I checked that my communication does not include any excluded elements, people, themes or promotional items?

ASSOCIATED CODES

- WFA’s Responsible Marketing Pact
- Carlsberg Group Research & Analytics Code of Conduct

2. PLACEMENT

ACTIVELY RESTRICT PEOPLE UNDER THE LEGAL DRINKING AGE FROM BEING EXPOSED TO OUR COMMUNICATIONS

Our marketing must always be placed in environments that primarily reach people above the legal drinking age. Where available, we must implement restrictive measures that prevent people under the legal drinking age from seeing our marketing communications.

DOS & DON'TS

MEDIA AND PLACEMENT

- ✔ Always activate age affirmation mechanisms (age gates) whenever they are available.
- ✔ Only promote brands in media (including digital), events or programmes where at least 70% of the audience is above the legal drinking age (no more than 30% is below) based on demographic data – on all channels where age affirmation mechanisms are not available.
- ✔ In addition to the above, always use data to ensure that adverts are targeted appropriately on digital channels where age affirmation mechanisms are not available. Where possible, use interest-based factors to remove demographics that may be under the legal drinking age, as well as self-declared age data. Always compile a brand safety list to prevent brand content being placed near underage content.
- ✔ Always apply the five Digital Guiding Principles to our brands' owned digital channels, including social media channels and websites:

Age gate: Always use an age affirmation mechanism (age gate) whenever they are available to limit underage access. Where not available, include an age disclaimer stating that content is only intended for users above the legal drinking age.

Forward advice notice (FAN): Always include a forward advice notice in an account's bio where content-sharing functionality is available – clearly stating that the content should only be shared with persons above the legal drinking age in the country of viewing.

Responsible drinking message: Always include a clearly visible responsible drinking message in an account's bio.

Transparency / official signpost: Always verify owned digital platforms to help users identify them as official through either an official verification sign such as "✓" or a written statement such as "This is the official <brand name> channel".

User-generated content guidelines: Never engage with any user-generated content (UGC) that would promote irresponsible alcohol consumption or otherwise breach guidelines in this policy, and inform users that irresponsible content will be removed through a UGC policy.

- ✔ Always take reasonable steps to prevent the placement of advertising in close proximity (100 metres or less) to places primarily frequented by minors, including schools, zoos and playgrounds. Also, take into account religious buildings or places with sensitivities to alcoholic brands.
- ✔ Always gain approval from Group Commercial's media team before commencing any advertising relating to gaming.

INFLUENCERS

- ✔ Always apply the following principles to paid, incentivised or unpaid influencer content where we have a contractual or other material relationship in place:

Selection: Wherever platforms allow, employ age affirmation mechanisms on digital platforms to paid influencer content to prevent minors from viewing content associated with our alcoholic brands. When using platforms where these mechanisms are not yet available, always ensure that paid influencers are at least 25 years old and have primary appeal to adult audiences.

Never associate with influencers who feature posts that would not be compliant with this policy or are known to have reputational associations with harmful drinking or behaviours that could bring our brands into disrepute.

Engagement: Always have a signed written agreement in place for paid influencers with either us or our agencies, including: information linking to local legal requirements, guidelines on clear disclosure of their association with our brand, guidelines on responsible marketing (as set out in this policy), and advice on and examples of best practices.

Monitoring: Always monitor paid influencer content for compliance with this policy, aiming to remove any non-compliant posts within 72 hours.

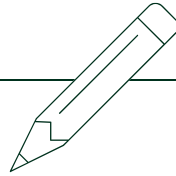
POINT OF SALE & EVENTS

- ✔ Only allow sampling of alcoholic beverages by persons over the legal drinking age.
- ✔ Only engage persons above the legal drinking age in experiential marketing of our brands.

2. PLACEMENT

ACTIVELY RESTRICT PEOPLE UNDER THE LEGAL DRINKING AGE FROM BEING EXPOSED TO OUR COMMUNICATIONS

SENSE CHECK



Check that you are on the right track by answering yes to the following questions:

- Where age affirmation mechanisms are available, have I activated them to age-gate content from those under the legal drinking age?
- Where age affirmation mechanisms are not available, do I have audience data on all channels confirming that at least 70% of the audience is above the legal drinking age? In addition, have I used data (including interest-based factors) to ensure, as far as possible, that the audience is likely to be above the legal drinking age?
- Do my brands' owned social media channels comply with our Digital Guiding Principles by implementing an age gate, forward advice notice, responsible drinking message, validation (transparency/official signpost) and UGC policy?
- Does my influencer campaign comply with our principles for selection, engagement and monitoring?
- Do I have measures in place to prevent people under the legal drinking age from accessing our products at events that we organise and control?

ASSOCIATED CODES

- IARD's Digital Guiding Principles
- The Carlsberg Group's event security guidelines

3. MODERATION

ADVOCATE RESPONSIBLE DRINKING AND ENJOYMENT IN MODERATION

Our marketing communications must always advocate responsible drinking, moderation and enjoyment of our products as part of a balanced, healthy lifestyle.

DOS & DON'TS

ADVERTISEMENTS

- ✓ Always show our products being enjoyed in moderation as part of a balanced, healthy lifestyle.
- ✗ Never encourage excessive or irresponsible drinking, show drunkenness or suggest that it is normal or acceptable to be drunk.
- ✗ Never present abstinence in a negative way, and instead, always show respect for those who choose not to drink alcohol.
- ✓ Always incorporate responsible drinking messaging as mandatory in all marketing and brand communication briefs for all touch points of our alcoholic products (including web, social media and video commercials) and print materials. This should be in a size that is clearly legible.

POINT OF SALE & EVENTS

- ✓ Always ensure that sampling activities are conducted in a way that has the necessary safeguards and protocols to prevent persons who are underage, intoxicated or driving from taking part. Never pressure people to consume our products.
- ✗ Never sponsor activities, such as “drinking games”, that encourage rapid or excessive consumption of alcohol.
- ✓ Always make an alcohol-free beer, water or carbonated soft drink available at events for those who do not wish to drink alcohol.

MEDIA & PLACEMENT

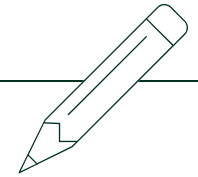
- ✓ Always actively monitor owned branded websites and social media pages and, wherever possible, remove user-generated content advocating or showing irresponsible drinking.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:

Am I sure that...

- my communication does not encourage or normalise the excessive consumption of alcohol?
- my communication does not present abstinence or moderation in a negative way?
- my communication includes a responsible drinking message that is clearly legible?
- my trade activation and/or sampling activity does not encourage excessive drinking?



4. SAFETY

NEVER ASSOCIATE CONSUMPTION OF OUR PRODUCTS WITH DRINK DRIVING, POTENTIALLY DANGEROUS ACTIVITIES OR ANTISOCIAL BEHAVIOUR

Drinking alcohol can affect inhibitions and decision making, which means it is not safe in certain situations, such as when driving or operating dangerous machinery. We must never therefore associate consumption of our products with potentially dangerous activities or other situations where it would be unsafe or unwise.

DOS & DON'TS

ADVERTISEMENT

- ✘ Never show consumption of alcohol in situations where it would be unsafe or unwise, such as driving any kind of motor vehicle, operating machinery, in dangerous environments such as clifftops or water rapids, or where individuals are demonstrating bravado or daring behaviour, including participating in activities such as extreme sports (e.g. skydiving).
- ✘ Never associate consumption of our products with violent, aggressive, dangerous or anti-social behaviour.
- ✘ Never associate consumption of our products with gambling, weapons, tobacco or illegal activities, including those related to drugs or drug culture. Never glamourise or trivialise associated issues.
- ✘ Never associate consumption of our products with violent sports (e.g. boxing, martial arts) or blood sports (e.g. bullfighting).
- ✘ Never show our alcoholic brands being consumed by people actively participating in sports (though it is acceptable to show our alcoholic products being consumed after participation, provided this otherwise complies with this policy).

PR & SPONSORSHIPS

- ✘ Never sponsor activities, events or individuals involved with gambling, violent sports, extreme sports, tobacco, illegal drugs, sports that cause harm to animals or sports that are likely to be of particular appeal to children (e.g. skateboarding).

- ✘ Do not associate consumption of our products with any motor sports, motor events or other similar activities (due to concerns about the dangers of drinking and driving), unless specifically promoting responsible drinking in connection with our alcohol-free brands (e.g. don't drink and drive) *.

POINT OF SALE & EVENTS

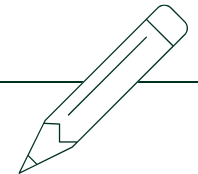
- ✔ Always comply with our Brand Promoter Manual. When engaging with brand promoters at events or as part of any other sponsorship or marketing activation, we must fulfil our commitment to provide a healthy and safe working environment, regardless of where in the world this takes place.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:

Am I sure that my communication **does not** associate consumption of our alcoholic products with...

- violence, aggression and anti-social behaviour?
- gambling, weapons, tobacco or drugs?
- potentially dangerous activities, such as driving or extreme sports?
- bravado or daring behaviour?



* For guidance on alcohol-free beers, see principle 8 on pages 11-12.

ASSOCIATED CODES

- The Carlsberg Group's Brand Promoter Manual

5. EFFECTS

NEVER CLAIM THAT ALCOHOL CAN CONTRIBUTE TO INDIVIDUAL SUCCESS, ENHANCE ABILITIES OR BENEFIT HEALTH

While our products can be presented as an enjoyable part of social life, our marketing communications must not suggest that drinking alcohol can contribute to personal social success or acceptance. We must avoid suggesting that the success of a social occasion is linked to drinking alcoholic beverages, or that alcoholic beverages offer health or performance benefits.

DOS & DON'TS

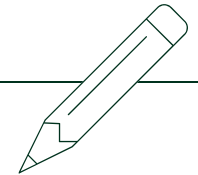
ADVERTISEMENTS

- ✘ Never suggest that consumption of alcoholic products can contribute to personal social success, acceptance, popularity or confidence, or the success of a social occasion.
- ✘ Never suggest that our products can contribute to sexual success or enhance a person's sexual attractiveness.
- ✘ Never suggest that the consumption of alcohol can be a catalyst for an extreme change in mood or state, that it can be used to solve personal problems, or that it can reduce social anxiety or overcome boredom and loneliness.
- ✘ Never suggest that our products can act as an aid to removing personal inhibitions.
- ✘ Never give the impression that alcoholic products can enhance mental ability or improve physical performance. If sports are featured, it must be clear that consumption takes place after the sporting activity has ended.
- ✘ Never attempt to hide the nature or strength of an alcoholic beverage, place improper emphasis on its alcoholic strength, or indicate that it is preferred due to its superior strength. It is, however, permissible to emphasise the low strength of our alcohol-free beers*.
- ✘ Never claim that drinking alcohol can provide health or dietary benefits**.
- ✘ Never claim, or make reference to claims, that alcohol can prevent, treat or cure any human disease.

- ✘ Do not target pregnant women or portray pregnant women consuming our products.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



Can I confirm that the characters in my advert do not appear...

- to have significantly altered their mood or state by drinking alcohol?
- to have used alcohol as a catalyst to solve personal problems or reduce social anxiety?
- to be more socially or sexually successful or attractive after drinking alcohol?
- to have enhanced mental ability or physical performance after drinking alcohol?

Can I confirm that my communication does not...

- suggest that alcohol can provide health or dietary benefits?
- attempt to hide the nature or strength of the beverage, or place improper emphasis on its ABV?

* For guidance on alcohol-free beers, see principle 8 on pages 11-12.

** This does not restrict the communication of nutritional information and facts. For guidance, see page 9. Always consult your local Legal and Corporate Affairs team if unsure.

6. TRANSPARENCY

PROVIDE TRANSPARENT INFORMATION ABOUT OUR PRODUCTS

Consumers have the right to know what is in our products, so we always provide transparent information about our beverages' nutritional values, ingredients and alcohol content on our packaging and online.

DOS & DON'TS

PACKAGING

- ✓ Always list ingredients and provide calorific information per 100 ml on consumer-facing primary packaging and websites for our beer, cider and ready-to-drink (RTD) brands. Ensure provision, either on pack or online, of all seven nutritional measures (energy, fat, saturated fat, carbohydrate, sugars, protein, salt).
- ✓ Always carry a responsible drinking message (e.g. drink responsibly) and a clear age restriction symbol or equivalent words for the legal drinking age on consumer-facing primary packaging. Brands can also include a second responsible drinking symbol discouraging either consumption during pregnancy or drinking and driving.
- ✓ Always carry the URL of a website (brand or corporate) containing information about a product's ingredients and nutritional information, and the risks associated with excessive alcohol consumption on consumer-facing primary packaging.

MEDIA & PLACEMENT

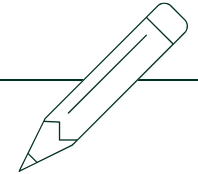
- ✓ Always carry information on responsible drinking and the risks associated with excessive alcohol consumption within one click of the landing page on our brands' websites.

PRODUCT DEVELOPMENT

- ✗ Never produce or promote any alcoholic beverages that contain excessive amounts of added stimulants. Contact Group Development and Corporate Affairs with any questions.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- Does my beer, cider or RTD brand's primary packaging list ingredients and provide nutritional information per 100 ml?
- Does my beer, cider or RTD brand's primary packaging carry a responsible drinking message and a clear age restriction symbol or equivalent words for the legal drinking age?

7. PROGRESS

COMMUNICATE LEGALLY, TRUTHFULLY AND RESPECTFULLY, CHAMPIONING SOCIAL INCLUSION AND ENVIRONMENTAL SUSTAINABILITY

Our beers are at the heart of social occasions around the world. Driven by our purpose of brewing for a better today and tomorrow, we have a responsibility not only to be legal, truthful and decent in our communications, but also to push the boundaries of sustainability and champion a more inclusive world.

DOS & DON'TS

- ✓ Always ensure that our communications are ethical, transparent and truthful, and never misleading.
- ✓ Always evaluate communications for appropriateness, good taste and decency both for the target audience and wider society. Consider whether themes that seem harmless in one market could be offensive or culturally insensitive in other markets in which the Carlsberg Group operates.
- ✓ Always be sensitive to, and respectful of, diversity in respect of race, gender, sexual orientation, religion, colour, ethnicity, national origin, disability, wealth or profession. Avoid inappropriate or potentially harmful stereotypes. Always make an effort to actively promote diversity and inclusion in marketing campaigns, casting and materials.
- ✓ Always be sensitive to, and respectful of, groups or individuals who do not wish to associate with alcohol.
- ✓ Always check that communications and associated promotions comply with local laws. In cases where local regulations are stricter, they must always supersede this policy.
- ✓ Be careful to encourage and show consumer behaviour that is environmentally sustainable, such as disposing of packaging in recycling streams.

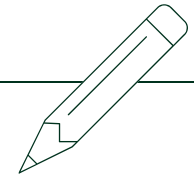
- ✓ Always ensure that any claim of sustainable environmental benefits is articulated clearly, in approachable language, and can be substantiated with solid evidence or scientific data, e.g. using a life cycle assessment (LCA) or recognised certification scheme (such as Cradle to Cradle (C2C)). For support, contact Corporate Affairs.

ASSOCIATED CODES

- The Carlsberg Group's Diversity & Inclusion Policy
- The Carlsberg Group's Environmental Policy

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- Does my communication comply with local laws on alcohol promotion and general advertising legislation?
- Have I evaluated my communication for appropriateness, good taste and decency for both the target audience and wider society?
- Does my communication push, advance or take a leadership role in our desire to drive greater inclusivity in society?
- Can we substantiate our environmental statements with solid evidence?

8. ALCOHOL-FREE

OFFER CHOICE THROUGH ALCOHOL-FREE BEERS AND MARKET THEM RESPONSIBLY

Through our alcohol-free beers, we are committed to offering consumers a positive choice when they want to enjoy the taste of a refreshing beverage but without alcohol. Our communications should always target adults and our alcohol-free beers should be clearly distinguished from alcoholic variants.

APPLICABLE BRANDS

ALCOHOL-FREE BEERS (AFBs)

For the purpose of this policy, the term alcohol-free beer (AFB) covers any beer, cider or radler that is a line extension of a brand containing alcohol and contains no more than 0.5% alcohol by volume (ABV) (e.g. Carlsberg 0.0), unless local regulations state lower. Brands meeting these criteria must follow the entire policy, with exceptions or additional requirements provided in this section.

Communications relating to alcohol-free beverages with no connection to alcoholic brands should follow local soft drinks regulations and industry standards.

DOS & DON'TS

- ✓ Always comply with the standards set out in this policy, including always aiming to appeal to (principle #1) and reach (principle #2) persons over the legal drinking age with our communications, with only those exceptions provided for below.

ADVERTISEMENTS

- ✓ Always be clear and transparent about the fact that we are marketing alcohol-free products. Any communication should ensure that there can be no confusion between our AFBs and our alcoholic brands.
- ✓ Only state facts regarding health or performance benefits if we have substantiated scientific evidence. These facts should only be used after consulting with Corporate Affairs, Group Development and local Legal teams.

- ✓ AFBs can be associated with:

- **Driving:** We can present AFBs as a responsible choice for those who are driving. However, alcohol-free products must only be shown being consumed before or after driving, not during. Consideration must always be given to local driving laws. Always get approval from your local Legal and Corporate Affairs teams.
- **Sports:** We can present AFBs as an appropriate choice for refreshment in connection with non-violent and non-extreme sports, such as running or cycling. They must not be seen to enhance performance. Always get approval from your local Legal and Corporate Affairs teams.

- ✗ Our AFB products should not target or be associated with:

- **Pregnant women:** Do not direct communications at pregnant women, or portray pregnant women consuming our AFBs.
- **Overtly dangerous situations:** Never associate our AFBs with situations that are overtly dangerous or violent by nature, e.g. extreme sports or operating heavy machinery.

PACKAGING & ADVERTISING

- ✓ While acceptable to include, our AFBs are exempt from our commitment to always include a responsible drinking message in communications and on pack.
- ✓ Always include a clear age restriction symbol or equivalent words for the legal drinking age for alcohol on consumer-facing primary packaging.

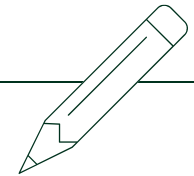
8. ALCOHOL-FREE

OFFER CHOICE THROUGH ALCOHOL-FREE BEERS AND MARKET THEM RESPONSIBLY

POINT OF SALE & EVENTS

- ✓ Only conduct sampling of alcohol-free beers with persons over the legal drinking age for alcohol.
- ✗ Never sell alcohol-free beers in children's or youth institutions or on other premises specifically devoted to those under the legal drinking age (e.g. schools).
- ✗ Never merchandise AFBs in areas of retail stores with particular appeal to persons under the legal drinking age for alcohol, e.g. next to sweets or toys.

SENSE CHECK



Check that you are on the right track by answering yes to the following questions:

- Is my communication targeted at adults?
- Does my communication explicitly state that the product is alcohol-free?
- Does my communication comply with this policy, with only exceptions provided for within this section?

COMPLIANCE & SCOPE

COMPLIANCE & SCOPE

COMPLIANCE

This policy represents the minimum standards for all Carlsberg Group brands and entities. Compliance is mandatory and the personal responsibility of all employees and contractors communicating through, or on behalf of, our brands. This applies both to the letter and the spirit.

In many cases, our policy contains standards that are stricter than required by local regulations. However, in cases where local regulations are stricter, they must always supersede this policy.

TRAINING

All marketing employees and marketing agencies must complete training in this policy, via online e-learning or face to face, at the beginning of their employment with the Carlsberg Group. This training should be repeated on an annual basis.

This policy must form an appendix to all relevant agency contracts, with its terms being mandatory.

SUPPORT

Local Legal and Corporate Affairs teams are able to provide support with interpreting the policy and local legislation. They should be consulted as early as possible during the development of marketing communications. When areas of doubt exist, or in the event of suspected non-compliance, the matter should be escalated to Group Commercial and Group Corporate Affairs departments.

SCOPE

This policy covers:

- All products and brands containing alcohol
- Applicable alcohol-free beers (AFBs) as detailed on pages 11-12.

It applies to any communication on behalf of brands in the two categories above, with channels including, but not limited to:

- **Media:** digital, broadcast, print, cinema, outdoor advertising, billboards and product placement.
- **Point of sale materials:** drinkware, serving materials/merchandise, eCommerce and clothing, communication and displays.
- **Sponsorships & PR:** sports teams, stadiums, music festivals, influencers (including individual athletes, artists) and media outreach.
- **Promotions:** consumer competitions, in-store offers, eCommerce offers, trade promotions, experiential activations, product placement and events.
- **Brand innovation and product development:** packaging, labelling and naming.
- **Third-party channels:** customer/supplier communications for our brands.

ROLES AND RESPONSIBILITIES

| Body/function/individuals | Roles and responsibilities |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ExCom | Responsible for policy approval. |
| Group Commercial (CCO) | Policy owner with overall responsibility to ExCom for marketing communication issues in the Carlsberg Group and for ensuring that material marketing communication risks in the Group are duly attended to and communicated to ExCom/the Audit Committee/the Supervisory Board as relevant. |
| Global/local Marketing Director | Responsible for ensuring that this policy is implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. |
| Local brand owners | Responsible for verifying and validating marketing materials against the policy. |
| Local Legal Counsel & Corporate Affairs | Responsible for verifying marketing materials against legal requirements/stakeholder views/industry standards. |
| VP Corporate Affairs | Joint final decision-maker in the event of escalation. |
| VP Group Legal | Joint final decision-maker in the event of escalation. |
| Management, employees and contract workers of all entities in the Carlsberg Group | Responsible for adhering to this policy. |



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Replacing September 2019 version

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Denmark