



# CODE OF CONDUCT

# Table of Content

<b>BUSINESS CONDUCT</b> .....	<b>4</b>
<b>CONFIDENTIALITY</b> .....	<b>4</b>
<b>PRIVACY</b> .....	<b>4</b>
<b>CONFLICTS OF INTEREST</b> .....	<b>4</b>
<b>ANTI-CORRUPTION, ANTI-BRIBERY &amp; ANTI-MONEY LAUNDERING</b> .....	<b>5</b>
<b>TRADE, SANCTIONS &amp; FINANCIAL RECORDING</b> ..	<b>5</b>
<b>COMPETITION</b> .....	<b>5</b>
<b>QUALITY AND FOOD SAFETY STANDARDS</b> .....	<b>6</b>
<b>ENVIRONMENTAL RESPONSIBILITIES</b> .....	<b>6</b>
<b>HUMAN RIGHTS</b> .....	<b>7</b>
<b>EQUAL OPPORTUNITY AND RIGHTS</b> .....	<b>7</b>
<b>LABOUR</b> .....	<b>8</b>
<b>HEALTH &amp; SAFETY</b> .....	<b>8</b>
<b>RESPONSIBILITY &amp; DOCUMENTATION</b> .....	<b>9</b>
<b>REPORT VIOLATIONS</b> .....	<b>9</b>

# Code of Conduct

The Royal Unibrew Group is committed to contributing positively to developments in the areas in which we operate, to limit our environmental impact, encourage sustainability, establish safe and good working conditions for our employees and supply consumers with products of a very high quality.

Royal Unibrew believes that it is of utmost importance to continue our long track record of doing business according to high ethical standards strongly linked to our corporate values making us strive to be responsible, committed, holistic, creative, ambitious as well as honest and open in the way we do our business.

Suppliers, vendors, distributors, contractors, consultants, agents, and other providers (the “Suppliers”) of goods and services who do business with Royal Unibrew are expected to conduct business in accordance with this Code of Conduct. It is the responsibility of the Suppliers that their employees, sub-suppliers and other third parties acting on their behalf do not violate the standards of this Code of Conduct.

In addition, Royal Unibrew expects its Suppliers to conduct their business responsibly, with integrity, honesty and transparency and to maintain awareness as well as comply with all applicable laws, regulations and relevant industry standards. In the event of any inconsistency, the more stringent requirements must be observed.

Please see [www.royalunibrew.com](http://www.royalunibrew.com) for a list of companies in the Royal Unibrew Group.

## Business Conduct

1. Suppliers shall be qualified and competent to perform and discharge their duties under any agreement with Royal Unibrew, and to the extent required by applicable laws, Suppliers shall obtain and maintain all licenses and/or registrations as may be necessary or required to perform their duties in accordance with such agreements.

## Confidentiality

2. Suppliers must take all reasonable and necessary precautions to safeguard Royal Unibrew's and its partners' information to which it has access, including not disclosing information to anyone, inside or outside of Royal Unibrew, unless disclosure is properly authorized, and based on a clearly defined legitimate business need, shared only on a strictly need-to-know basis, and subject to a written confidentiality agreement.

## Privacy

3. Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

## Conflicts of interest

4. Suppliers are prohibited from providing or offering gifts and entertainment to any employees of, or parties related to Royal Unibrew that inappropriately influence, or could inappropriately influence Royal Unibrew's business decisions or allow the Supplier to gain an unfair advantage.

Suppliers shall avoid situations that directly or indirectly can create a conflict between the interest of Royal Unibrew and any individuals personal interest, and Suppliers shall immediately disclose to Royal Unibrew any situation in which they perceive a potential conflict of interest so that appropriate action can be taken.

## **Anti-corruption, Anti-bribery & Anti-money laundering**

- 5.** Royal Unibrew requires its Suppliers to comply with all applicable anti-corruption, anti-bribery and anti-money laundering laws and related rules and regulations, decrees and/or official government orders binding upon the Supplier and/or Royal Unibrew, including but not limited to the US Foreign Corrupt Practices Act 1977, the UK Bribery Act of 2010, the Danish Penal Code and any local laws implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (all of the foregoing as amended and restated from time to time).

Suppliers shall not give or receive bribes or by engaging in any other form of corruption, extortion, embezzlement, or fraud.

Suppliers shall not engage in, facilitate or be associated with any form of money laundering. Suppliers shall not use confidential information it possesses regarding Royal Unibrew to either engage in or support insider dealing.

## **Trade, Sanctions & Financial recording**

- 6.** Suppliers must not be the target of any trade, economic or financial sanctions or embargoes, and must comply with all applicable laws, regulations or orders concerning any applicable trade, economic or financial sanctions or embargoes.

Suppliers shall perform all business and commercial dealings transparently and record them accurately in their books and records according to local law.

## **Competition**

- 7.** Suppliers shall be committed to vigorous, lawful, straightforward and ethical competition. Suppliers shall ensure that their business practices fully comply with the competition laws wherever they do business.

## Quality and food safety standards

- 8.** Royal Unibrew is committed to producing high quality and safe products across all of Royal Unibrew's brands.

Suppliers involved in any aspect of developing, handling, manufacturing, packing, transporting or storing Royal Unibrew's products are expected to:

- Know and comply with both productsafety and product quality standards, policies, specifications, and procedures that apply to the products produced at the Supplier's location.
- Follow and adhere to good manufacturing practices and testing protocols.
- Immediately report issues to Royal Unibrew that could negatively affect the quality or public perception of a Royal Unibrew product.

## Environmental Responsibilities

- 9.** Royal Unibrew strives to continue to improve its environmental performance for the benefit of neighbours, employees, customers, suppliers, business partners and ultimately the end consumers. Royal Unibrew expects the same from its Suppliers.

Suppliers shall comply with all applicable environmental laws and regulations.

Suppliers shall strive to reduce the environmental impact of their operations with respect to areas such as resource consumption, discharges and waste volumes and they shall act environmentally responsible wherever they operate.

## Human Rights

- 10.** Royal Unibrew aims for increased awareness on labour and human rights issues throughout its organisation worldwide. Any allegations that labour or human rights are not properly protected within our sphere of influence or that we may be complicit in violations will be taken seriously.

Suppliers must not have been convicted of any offence involving slavery and human trafficking, or be subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.

## Equal opportunity and rights

- 11.** We value diversity. Suppliers shall ensure equal opportunity and rights for everyone they employ and shall not discriminate in the recruitment, evaluation, treatment and promotion of employees on grounds of race, religion, belief, ancestry, national origin, colour, gender, sexual orientation, age, marital status, pregnancy status, physical appearance or disability etc.

## Labour

- 12.** Suppliers shall maintain a framework of fair and just remuneration wherever they operate.

Suppliers shall not participate in or benefit from any form of child or forced labour in any of their operations and shall strive to influence partners and sub-suppliers to act similarly.

Suppliers shall respect employees' right to freedom of association and right to collective bargaining for employees working in their operations and in accordance with the law or practice of the countries in which they operate.

Any products supplied in accordance with an agreement entered into with Royal Unibrew must be manufactured in compliance with the principles set out in the International Labour Organisation (ILO) Eight Fundamental Conventions nos. 29, 87, 98, 100, 105, 111, 138 and 182 and in the United Nations Convention of the Rights of the Child Article 32, and no products shall be made in whole or in part by sweatshop labour, convict labour or indentured labour under penal sanction.

## Health & Safety

- 13.** Suppliers shall ensure a safe, healthy and secure working environment in accordance with applicable laws and other relevant industry standards, including, but not limited to, protection against fire, accidents and toxic substances.

Suppliers must protect employees from any acts of verbal, sexual, physical or psychological harassment, abuse or threats.

Suppliers shall provide its employees with the protective equipment and training necessary to perform their tasks safely, and shall keep accurate records of accidents, injuries and known exposure to health and safety risks at work according to local legislation.



## Responsibility & Documentation

- 14.** Suppliers are responsible for controlling their own supply chain, and Royal Unibrew expects Suppliers to encourage compliance with this Code of Conduct by any supplier of goods and services that are used by the Supplier when performing the Supplier's obligations under any agreement entered into with Royal Unibrew.

Royal Unibrew expects Suppliers to be able to provide evidence of their compliance with this Code of Conduct and all applicable laws upon request.

## Report violations

- 15.** Royal Unibrew encourages its Suppliers, including their employees, to speak up if they have any concerns regarding a possible violation of the Code of Conduct. Royal Unibrew welcomes speaking up as an opportunity to identify and repair potential misconduct.

Violations and suspicions can be reported anonymously to Royal Unibrew via the Royal Unibrew Whistleblower reporting system at:

**[www.royalunibrew.com](http://www.royalunibrew.com)**

For further information and questions, please contact:

**Royal Unibrew A/S**  
**Faxe Alle 1**  
**DK-4640 Faxe**  
**Denmark**  
**Phone: +4556771500**  
**E-mail: [contact@royalunibrew.com](mailto:contact@royalunibrew.com)**  
**Att.: Group General Counsel**

[www.royalunibrew.com](http://www.royalunibrew.com)

