ENVIRONMENTAL POLICY
INTRODUCTION AND PURPOSE

As a global beer and beverage company, environmental sustainability is extremely important for the Carlsberg Group’s business. 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 understands 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 optimise our use of natural resources, to view our products and activities from a life cycle perspective, and to develop and use environmentally friendly products, materials and technologies in a way that contributes to long-term sustainable development.

Our sustainability programme Together Towards ZERO clearly underlines our commitment to sustainable development, by setting industry-leading 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 and it is supported by our ambitious targets towards 2022 and 2030 as described in Together Towards ZERO.

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.
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.

1.5. To maintain our certified environmental management system.

2. ISO CERTIFICATION AND INTEGRATED MANAGEMENT SYSTEM (IMS)

2.1. The Carlsberg Group’s supply chain management and production must be certified according to ISO 14001, which includes logistics.

2.2. The Carlsberg Group has multi-site ISO 14001 certification for majority-owned companies throughout the supply chain in Western Europe.

3. ENERGY AND EMISSIONS

3.1. The Carlsberg Group strives to use all energy sources as efficiently as possible, and to reduce greenhouse gas emissions and emissions related to noise/odor/nuisance.

3.2. The Carlsberg Group regularly assesses the possibilities for introducing renewable energy in our operations in order to reduce our carbon footprint.

4. WATER AND WASTEWATER

4.1. The Carlsberg Group strives to achieve sustainable use of water in the communities in which we operate.

4.2. The Carlsberg Group regularly assesses our exposure to water scarcity in all forms and initiates appropriate actions to ensure the long-term availability of water.

4.3. In water-scarce areas, the Carlsberg Group engages with local communities to understand how we can best help to manage their watersheds.

4.4. 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. WASTE AND BY-PRODUCTS

5.1. The Carlsberg Group works to eliminate or reduce/minimise waste generation in order to conserve resources and avoid pollution of soil, water and air.

5.2. The Carlsberg Group strives to utilise brewery by-products as feed material, renewable energy or soil improver.

5.3. Any form of uncontrolled land filling or uncontrolled on-site/off-site waste handling must be avoided.
6. PACKAGING

6.1. The Carlsberg Group continuously works with partners to reduce consumption of packaging materials and to promote their reuse and recycling in order to minimise environmental impact.

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

6.3. The Carlsberg Group is committed to playing an active role in improving and building environmentally friendly beverage packaging systems.

7. INVESTMENTS AND PURCHASES

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

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

8. STAKEHOLDERS

8.1. 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.
# ROLES AND RESPONSIBILITIES

<table>
<thead>
<tr>
<th>Body/function/individuals</th>
<th>Roles and responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ExCom</strong></td>
<td>Responsible for policy approval.</td>
</tr>
<tr>
<td><strong>EVP Carlsberg Supply Chain (CSC)</strong></td>
<td>Owns, endorses and ensures the implementation of the policy.</td>
</tr>
<tr>
<td><strong>Group Environment, Health &amp; Safety</strong></td>
<td>Policy owner with overall responsibility to ExCom for environmental issues in the Carlsberg Group and for ensuring that material environmental risks in the Group are duly attended to and communicated to ExCom as relevant. Overall responsibility for the Group's EHS programme and management system, EHS performance, utility programme, utility performance, targets, guidance and direction.</td>
</tr>
<tr>
<td><strong>Group Sustainability</strong></td>
<td>Advises policy owners on policy content, and ensures relevant and correct communication of policy efforts to external stakeholders.</td>
</tr>
<tr>
<td><strong>Relevant Group VPs/Country Managing Directors/regional and local management</strong></td>
<td>Responsible for ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Responsible for conducting appropriate risk assessments for the businesses.</td>
</tr>
<tr>
<td><strong>Production Directors/Customer Supply Chain Directors</strong></td>
<td>Have full responsibility and accountability for the implementation of the policy across all supply chain activities within their respective areas.</td>
</tr>
<tr>
<td><strong>Managers/Directors</strong></td>
<td>Responsible for leading by example and ensuring adequate understanding of the policy within their respective groups.</td>
</tr>
<tr>
<td><strong>Management, employees and contract workers of all entities in the Carlsberg Group including visitors</strong></td>
<td>Responsible for adhering to this policy and reporting any observed accidents and incidents.</td>
</tr>
</tbody>
</table>
GLOSSARY

**EHS**
Environment, Health and Safety.

**IMS**
Integrated Management System.

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, when necessary, revised every two years. 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 & Licensee Code of Conduct
- COM Utility
- Health & Safety Policy
- Property loss prevention standards (21 in total)
- Insurance Manual
- Crisis Management Policy
- Appendix 1 to Trade Sanction Screening Policy – Country List
- Trade Sanctions Information and Screening Results Sheet

CONTACT

For more information, please contact Group Environment, Health & Safety.