



CARLSBERG SUPPLIER AND LICENSEE CODE OF CONDUCT

1. INTRODUCTION

1.1 OUR COMMITMENT

The Carlsberg Group is dedicated to contributing positively to society and the environment through ethical business practices and sustainability. This Code sets minimum standards for suppliers, service providers and licensees to reduce supply chain risks and enhance transparency. In partnership with our value chain, we aim to identify, prevent, and mitigate negative impacts on people and the planet, following international standards and national laws while advancing human rights and environmental protection.

Carlsberg upholds the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Responsible Business Conduct. As a UN Global Compact signatory, we are committed to its four pillars: human rights, labour, environment, and anti-corruption. The Code aligns with international standards, such as the UN Global Compact's Ten Principles, the Base Code of the Ethical Trading Initiative (ETI), the principles of the International Labour Organization (ILO) and ISO 14001. Furthermore, the Code supports the UN Sustainable Development Goals (SDGs).

Aligned with our sustainability programme, this Code reflects Carlsberg's commitment to tackling key ESG topics and addressing global challenges, such as inequality, climate change and water scarcity. We collaborate with our suppliers to drive responsible business practices and positively impact society.

1.2 SCOPE

This Code applies to all suppliers, service providers and labour providers as well as their suppliers up to the material source, forming a mandatory part of any agreement with Carlsberg Group members. This includes upstream

suppliers and service providers (such as employment and marketing agencies) and downstream partners (such as agents, distributors, licensees, and others involved in sponsorships or collaborations). The Code covers all workers across the supply chain, including permanent, temporary, contract and migrant workers. Carlsberg will periodically review and update this Code as necessary, notifying suppliers of any changes.

1.3 COMPLIANCE

Suppliers must comply with all relevant laws and regulations in the markets in which they operate and, where applicable, meet trading requirements in the markets where their products are sold. Where national standards differ, suppliers must follow the highest standard of protection for workers and the environment without contradicting the legal framework of the country. Suppliers must be able to demonstrate compliance with this Code and applicable laws in their own operations and in their supply chains.

Suppliers are encouraged to have policies aligned with Carlsberg's principles. This Code includes mandatory requirements and best practices promoting compliance and continuous improvement in sustainability and ethics. Carlsberg reserves the right to verify compliance through self-assessments, audits, or other monitoring methods. The supplier is responsible for covering the cost of compliance verification.

Audits and visits

We may adopt different due diligence methods and approaches, including requiring Sedex membership and a SMETA audit or equivalent, before a supplier enters a business relationship with Carlsberg, during the contractual period, or when services are renewed or modified. Non-cooperation with these screenings, including auditing, is regarded as a breach of this Code.

Any concerns must be addressed before proceeding with any work. For SMETA audits or equivalent, we require resolution of all critical and major non-conformances, as defined by Sedex, within a timeframe agreed with Carlsberg. Carlsberg reserves the right to audit suppliers at any time, with or without prior notice, to ensure compliance with the Code and contractual terms. Full cooperation during these audits is mandatory, and Carlsberg will ensure that sensitive or proprietary information is managed appropriately. Suppliers must also be aware that Carlsberg may, at its discretion, accept alternative or equivalent audit frameworks.

Certifications

In addition to this Code's universal requirements, stricter rules may apply for specific products due to human rights and environmental risks, with these policies taking precedence in the event of any conflict. Carlsberg regularly reviews these policies and provides suppliers with access to tools and updates. Certain products, such as sugar and cobalt, require certifications beyond tier 1 for higher ethical standards.

Carlsberg values long-term, transparent relationships with suppliers and supports alignment through open communication and improvement opportunities. If a supplier violates this Code, corrective action will be required, and Carlsberg reserves the right to audit compliance and terminate agreements if standards are not met. Carlsberg may share data, including ESG information, with authorities or third-party auditors as needed.

1.4 REPORTING OF CONCERNS OR VIOLATIONS

The supplier has a duty to report any suspected or confirmed misconduct that involves or impacts Carlsberg, whether this is a violation of this Code or applicable laws, and whether it is committed by our supplier or our own associates. The reporting of these concerns ensures that Carlsberg can effectively address issues and maintain a high level of integrity across our business relationships.

In addition to the supplier's own reporting mechanisms, there are resources available to the supplier and its employees through Carlsberg, including the following:

- [Independent Speak-up line available 24/7](#)
- HR, legal or market representative
- E-mail: SpeakUp@Carlsberg.com

CONTENTS

1. INTRODUCTION.....	2	6. ENVIRONMENTAL PROTECTION	10
1.1 Our commitment.....	2	6.1 Management of environmental issues	10
1.2 Scope	2	6.2 Carbon emission management.....	10
1.3 Compliance.....	2	6.3 Water management.....	11
1.4 Reporting of concerns or violations.....	3	6.4 Waste management.....	11
2. MANAGEMENT SYSTEMS	5	6.5 No pollution	11
2.1 Governance	5	6.6 Biodiversity and deforestation.....	11
2.2 Policy commitment and communication.....	5	6.7 Energy	12
2.3 Due diligence and risk and impact management	5	7. BUSINESS ETHICS.....	12
2.4 Grievance mechanisms and continuous improvement	5	7.1 Corruption and bribery.....	12
3. FUNDAMENTAL HUMAN RIGHTS	6	7.2 Gifts and entertainment.....	12
3.1 Prohibition of forced labour	6	7.3 Conflict of interest.....	13
3.2 Employment of young workers and prohibition of child labour.....	6	7.4 Competition and fair trade	13
3.3 Freedom of association and collective bargaining.....	7	7.5 Sustainability claims and greenwashing	13
3.4 Prohibition of discrimination and harassment.....	7	7.6 Information security, data protection and responsible artificial intelligence (AI)	13
3.5 Respect for land rights.....	7	7.7 Trade Sanctions and import/export restrictions	13
4. LABOUR CONDITIONS	8		
4.1 Working hours management	8		
4.2 Payment of wages and benefits	8		
4.3 Regular employment provision	8		
5. HEALTH AND SAFETY	9		
5.1 Occupational health and safety.....	9		
5.2 Accommodation	9		
5.3 Chemicals and hazardous substance management	10		
5.4 Emergency response procedures.....	10		

2. MANAGEMENT SYSTEMS

Suppliers must establish and maintain effective management systems to prevent and address violations of this Code and mitigate adverse impacts on people and the planet. These management systems should include necessary strategies, policies, processes, and resources designed to identify risks, address root causes of issues and ensure compliance with all relevant laws, regulations, and the principles of this Code. Suppliers must also maintain transparent and accurate records to demonstrate compliance and track ongoing improvement efforts.

2.1 GOVERNANCE

Suppliers must appoint a senior member of management to be responsible for compliance with the Code.

Suppliers must adopt and publicly communicate policy statements that align with and support this Code. These policy statements must be appropriate to the complexity and size of the supplier's operations and must be approved at the highest management level.

2.2 POLICY COMMITMENT AND COMMUNICATION

Suppliers must share this Code with their employees, suppliers, and service providers, ensuring that its principles are upheld throughout the supply chain. All tiers must adhere to these standards, promoting transparency and accountability. Suppliers must require business partners, including intermediaries such as brokers and recruitment agencies, to work towards compliance and avoid practices that hinder adherence to the Code. If significant risks are identified, Carlsberg may request supply chain transparency for the relevant goods or services.

2.3 DUE DILIGENCE AND RISK AND IMPACT MANAGEMENT

Suppliers must establish a risk-based due diligence system aligned with key regulations and standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), to ensure that this Code's expectations are integrated. Clear governance and objectives for human rights and environmental due diligence (HREDD) must be defined.

Suppliers should involve workers, especially vulnerable groups like home-based workers, smallholders, and migrants, in their processes and address challenges through stakeholder collaboration and consultation. Adverse impacts caused or contributed to by the supplier must be promptly remedied.

2.4 GRIEVANCE MECHANISMS AND CONTINUOUS IMPROVEMENT

Suppliers must establish effective, legitimate, accessible, and transparent grievance mechanisms in accordance with the UNGPs, providing a safe and confidential way for individuals to raise concerns and seek remedies for grievances related to human rights and environmental issues.

Suppliers must also maintain a whistleblower policy that enables confidential and anonymous reporting of concerns and explicitly prohibits retaliation. To ensure that individuals can raise issues without fear of adverse consequences, no retaliatory actions may be taken against employees or stakeholders who report suspected misconduct or non-compliance with this Code.

Where applicable, suppliers must ensure that their subcontractors and sub-suppliers comply with the Code, provide evidence of its implementation, and monitor its effectiveness to ensure that the intended outcomes are achieved.

Suppliers must ensure continuous improvement in the implementation of the Code. Due diligence processes should be documented and publicly reported on as part of a transparent governance framework.

Good practice

Suppliers are encouraged to enhance their management systems by adopting advanced technologies and best practices to anticipate risks, exceed compliance standards and improve transparency. They should develop supply chain mapping systems for full visibility using traceability tools and collaborating with stakeholders to ensure responsible sourcing and mitigate risks. Suppliers are also encouraged to establish independent whistleblower mechanisms, offering support and protection to ensure impartial investigations.

Suppliers are encouraged to engage proactively with local communities, NGOs and industry bodies to collaboratively shape policies and practices that contribute to responsible sourcing and human rights protection. This includes contributing to public consultations and working groups aimed at improving industry standards.

3. FUNDAMENTAL HUMAN RIGHTS

Suppliers to Carlsberg are required to respect human rights in accordance with internationally recognised frameworks, such as the UNGPs and ILO Conventions. Suppliers must, as a minimum, address human rights risks and impacts that are of higher relevance in their supply chains, including preventing violations related to forced labour, child labour and discrimination, ensuring the protection of, for example, freedom of association and land rights. We also expect suppliers to conduct their own due diligence to identify and address additional human rights risks that may be salient to their business and supply chain.

3.1 PROHIBITION OF FORCED LABOUR

Carlsberg prohibits all forms of forced labour, modern slavery, and human trafficking in line with national laws, the Palermo Protocol, and ILO Conventions. Suppliers must comply with these standards, banning practices such as sex trafficking, torture, state-imposed forced labour, and involuntary prison labour. Prison labour is only allowed with Carlsberg's approval as part of a reintegration programme and subject to enhanced due diligence.

Suppliers must uphold anti-slavery laws across their supply chains, ensuring that workers are not subjected to abuse, coercion, or intimidation, including physical or mental abuse. Workers must freely sign employment contracts without fees or deposits and retain their personal documents. Their freedom of movement must not be restricted, and they must be able to leave employment with reasonable notice and without penalty.

3.2 EMPLOYMENT OF YOUNG WORKERS AND PROHIBITION OF CHILD LABOUR

Suppliers must uphold children's rights and strictly prohibit child labour, adhering to ILO Conventions No. 138 on Minimum Age and No. 182 on the Worst Forms of Child Labour. A child is defined as anyone under 15 or the legal minimum working age in the given country, whichever is higher, with exceptions for specific countries where the minimum age is 14 as allowed by ILO Conventions.

Child labour, including work that exploits, harms, or hinders education, is strictly forbidden. If child labour is identified, suppliers must support initiatives to transition children out of such work. Children may assist in family businesses only if the work is light, age-appropriate and compliant with ILO standards.

All workers must be at least 15 years old or the legal working age, whichever is higher. Suppliers must verify applicants' ages and ensure that young

workers (under 18) are not exposed to harmful tasks, night work or activities that interfere with their education. Employment of young workers must comply with local laws, include educational benefits, and prioritise safety and wellbeing.

3.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must respect workers' rights to unionise, participate in union activities and bargain collectively without fear of retaliation, harassment, or termination in accordance with the ETI Base Code, the UNGPs and ILO Convention No. 87, ensuring that these protections are communicated and upheld by management. Suppliers should foster a supportive environment for worker organisations by providing meeting spaces, allowing engagement during working hours and sharing negotiation information, while treating worker representatives fairly by providing access to resources, time off for union duties and management support. Where unions are restricted, alternative forms of representation, such as worker councils, should be established in line with ILO Convention No. 135. Suppliers must also respect the legal right to strike, avoid punitive measures or obstructive policies, and address strikes constructively through dialogue with worker representatives to resolve underlying issues.

3.4 PROHIBITION OF DISCRIMINATION AND HARASSMENT

Suppliers must ensure non-discrimination in all employment decisions, basing them solely on lawful criteria, regardless of race, gender, religion, sexual orientation, disability, or other traits. They must protect employees from harassment, bullying, abuse, or threats, fostering a safe and respectful workplace. Clear rules on discrimination, harassment, ethics, and disciplinary measures must be established and communicated to all employees. Additionally, suppliers must promote equality and inclusivity by valuing diversity in areas such as gender, age, culture, and lifestyle, and by implementing policies and programmes that support diversity, equality, and inclusion.

Good practice

Suppliers are encouraged to gather worker feedback on diversity and inclusion to assess discrimination and harassment risks for minority or vulnerable groups in the supply chain.

Suppliers are encouraged to set diversity, equity, and inclusion (DE&I) targets, including on gender equality and female empowerment, in alignment with Carlsberg's commitment to improve gender balance at leadership level.

3.5 RESPECT FOR LAND RIGHTS

Business partners are required to respect the land, forest and water rights of individuals and communities impacted by their operations and sourcing practices. All matters related to property or land use, including any transfers or usage agreements, must follow the principles of free, prior, and informed consent, and uphold transparency in contracts and full disclosure. Business partners must refrain from any practices involving land-grabbing. All necessary environmental permits, approvals and registrations must be properly obtained, upheld, maintained, and kept.

4. LABOUR CONDITIONS

Suppliers must ensure fair, safe, and respectful working conditions, adhering to national laws, industry standards and ILO Conventions. This includes regulating working hours, paying minimum and/or collectively agreed wages and benefits, and offering legally binding employment contracts. Suppliers are expected to uphold these standards to protect workers' rights and promote a responsible work environment.

4.1 WORKING HOURS MANAGEMENT

Suppliers must comply with national laws, collective agreements, and industry standards on working hours, prioritising greater protection of workers. Working hours must not be excessive, with overtime being voluntary and within legal or collectively agreed limits. Regular working hours should not exceed 48 hours per week, with a maximum of 60 hours, including overtime, in line with ILO and ETI standards. In exceptional circumstances, exceeding 60 hours is allowed, but only if this complies with national law, collective agreements, and health and safety safeguards, and is justified by unforeseen situations such as production peaks or emergencies. Workers must have at least one day off per week, or two days in a 14-day period if permitted by national law.

4.2 PAYMENT OF WAGES AND BENEFITS

Suppliers must ensure that wages and benefits for a standard working week meet or exceed national legal standards, collectively agreed rates or industry benchmarks, whichever is higher. Wages must be paid regularly and documented with a payslip. Workers must receive clear written information about employment conditions and wages, including any deductions. Wage deductions as a disciplinary measure or not allowed by law are prohibited. Suppliers must comply with labour laws, including social security, insurance,

and benefits such as sick leave, holiday, and parental leave. They must also avoid bypassing these obligations through subcontracting or other schemes.

Good practice

Suppliers are encouraged to make reasonable efforts to reach living wage levels for all workers, including temporary and agency workers.

4.3 REGULAR EMPLOYMENT PROVISION

At the commencement of employment or service, suppliers must provide all employees with a legally binding contract written in a language they understand. This contract must include key information, such as job title, expected wages, working hours, notice period, benefits, leave entitlements, terms and conditions, and any disciplinary and grievance mechanisms.

All temporary employment must comply with applicable national employment laws.

Good practice

Suppliers are encouraged to promote continuous professional development for employees by offering regular training that improves employees' skills and knowledge. By making training opportunities widely accessible, suppliers can support workers in advancing their careers. It is recommended that suppliers strive to monitor and assess the impact of these initiatives to promote ongoing growth and improvement.

5. HEALTH AND SAFETY

Suppliers must uphold rigorous health and safety standards, complying with all relevant laws, regulations and industry benchmarks, including the ILO Declaration on Fundamental Principles and Rights at Work. This includes providing a safe working environment, proper accommodation and effective management of chemicals and hazardous substances. Suppliers must also implement emergency response procedures to protect workers, visitors, and surrounding communities from harm.

5.1 OCCUPATIONAL HEALTH AND SAFETY

Suppliers must comply with all applicable health and safety laws, regulations, and industry standards, including ILO Convention No. 155 on Occupational Safety and Health, ensuring a safe working environment for all employees, subcontractors, and visitors. Health and safety responsibilities should be assigned to senior management at both supplier and site levels, ensuring oversight of health and safety policies, compliance with regulations and prompt action to address any issues. Suppliers must maintain a written health and safety policy accessible to workers, with gender-sensitive procedures to minimise risks. A workplace risk assessment should be conducted to identify potential hazards, including those related to mental health and ergonomics, and appropriate measures must be implemented to mitigate these risks. Suppliers must provide personal protective equipment (PPE) free of charge and ensure that workers are trained in its use and safe work practices. Carlsberg considers health and safety when selecting suppliers and contractors, and contracts will include clear health and safety requirements. Contractors working at Carlsberg sites must have relevant training, be equipped to safely execute tasks and follow Carlsberg's health and safety policies and procedures. Suppliers and subcontractors must obtain a permit to work for high-risk activities at Carlsberg sites, and violations of these policies may result in penalties or contract termination.

Good practice

Suppliers are encouraged to adopt a proactive approach to health and safety, aiming for a zero-accident workplace by implementing advanced safety measures, fostering a strong safety culture, and continuously improving risk management practices to protect the wellbeing of all employees.

Suppliers are recommended to implement the ISO 45001 health and safety management system or equivalent.

5.2 ACCOMMODATION

Suppliers must ensure that worker accommodation meets or exceeds local community standards, with unrestricted access for workers to enter and leave. If workers pay for accommodation, costs must be reasonable and not take up a large portion of their wages. Where possible, safe transportation to and from the workplace should be provided. Accommodation must offer gender-segregated sleeping, living and washing areas, where necessary, and allow families to stay together. It must comply with local health and safety regulations, with records of inspections and maintenance kept. A fire safety plan, including trained fire wardens, regular equipment testing and fire drills, must be in place and communicated to workers. Suppliers must provide adequate climate control, lighting, ventilation, and well-maintained sanitary and laundry facilities. Secure storage for personal belongings, hygienic cooking facilities or canteens, and provisions for specific dietary or religious needs must also be provided.

5.3 CHEMICALS AND HAZARDOUS SUBSTANCE MANAGEMENT

Suppliers must implement strict procedures for managing chemicals, including safe procurement, storage, handling, use, recovery, and disposal, especially for hazardous materials. Workers in relevant roles must be trained in safety procedures. Safety data sheets (SDSs) for hazardous substances must be available in the local language, maintained and kept up to date. Suppliers must ensure that proper control measures are in place to protect workers and the environment, including clear labelling, secure storage, spill prevention and appropriate personal protective equipment. Suppliers should also work to reduce the use of hazardous substances and replace them with safer alternatives.

5.4 EMERGENCY RESPONSE PROCEDURES

Suppliers must establish emergency procedures for health, safety and industrial incidents, ensuring that all workers are informed. They must maintain clear evacuation routes, provide audible/visible alarms and train staff in first aid and firefighting. Regular emergency drills, including fire and hazardous material response, must be conducted, with records kept.

6. ENVIRONMENTAL PROTECTION

Carlsberg recognises the need to address climate change and reduce greenhouse gas emissions in line with the Paris Agreement. Suppliers play a key role in minimising climate impacts, enhancing resilience and identifying opportunities related to climate change, water security and other environmental issues. Suppliers must comply with environmental laws, regulations, and international standards, such as ISO 14001, and implement an effective environmental management system (EMS). They must manage carbon emis-

sions, water use and waste, and focus on biodiversity, deforestation prevention, sustainable agriculture, and responsible energy consumption. Environmental actions should respect human rights, including the fair treatment of workers and local communities, and consider the impact of climate change on working conditions and cultural livelihoods.

6.1 MANAGEMENT OF ENVIRONMENTAL ISSUES

Suppliers must comply with all relevant environmental laws and requirements, staying current and proactive in preventing and mitigating adverse environmental impacts from their activities, products, and services. They must implement a robust environmental management system (EMS), aligned with standards such as ISO 14001, to monitor and address impacts on resources, energy, water, waste, carbon emissions and biodiversity. Significant environmental incidents or non-compliances with potential impact on Carlsberg must be reported immediately. Suppliers must regularly report on environmental performance, demonstrate measurable progress, and maintain transparency. They must also uphold environmental standards across their own supply chain, set clear environmental policies and provide regular training to ensure effective implementation.

6.2 CARBON EMISSION MANAGEMENT

Suppliers must actively monitor and reduce their direct (Scope 1), indirect energy-related (Scope 2) and other indirect (Scope 3) CO₂ emissions across their operations and supply chain, following the Greenhouse Gas Protocol. They must support Carlsberg's Scope 3 targets by implementing measurable carbon reduction strategies aligned with Science Based Targets initiative (SBTi) standards. Suppliers should address emissions across the entire product lifecycle, from design and manufacturing to end-of-life disposal. Suppliers must provide regular updates on progress towards carbon reduction targets, including detailed reporting to Carlsberg on Scope 1, 2 and 3 emissions, and share successes and challenges to maintain transparency with stakeholders.

Good practice

Suppliers are encouraged to engage in public disclosure of their carbon footprint and reduction efforts to demonstrate commitment and progress towards environmental sustainability.

Suppliers are encouraged to set and approve science-based targets for their Scope 1, 2 and 3 emissions, and to set a net zero target.

6.3 WATER MANAGEMENT

Suppliers must manage water responsibly, especially in areas with limited resources, by improving efficiency through water reuse and recycling. They must ensure that their operations do not harm local water rights, provide access to water and sanitation, and work with communities to improve access to safe water. Wastewater must be treated to meet local standards before discharge, either on site or at authorised facilities, and measures must be in place to prevent contamination of local water sources. Suppliers should regularly report on water usage, recycling, and reduction efforts, and continuously improve practices based on performance metrics and feedback.

Good practice

Suppliers are encouraged to assess risks linked to water availability across their operating and sourcing locations, identify high risk areas and take action to address and ensure water security across their own operations and supply chain.

6.4 WASTE MANAGEMENT

Suppliers are required to adhere to established standards and responsible practices in waste and chemical management, strictly following national

regulations to ensure environmental protection and safety. They must manage chemicals responsibly from procurement to disposal, regularly reviewing and updating these practices to maintain compliance and meet current best practices. Hazardous waste, including certain chemicals, must not be disposed of in landfills or incinerated on site without proper authorisation, and the use of persistent organic pollutants (POPs) is strictly prohibited due to their long-term environmental and health risks.

Suppliers are also expected to minimise packaging waste by prioritising recyclable, reusable, renewable or compostable materials, aiming to reduce or eliminate single-use items. Additionally, suppliers should maintain and disclose a comprehensive inventory of all packaging materials, detailing recycled content, recyclability and compostability to support Carlsberg's transparency and circularity goals for sustainable packaging.

Good practice

Suppliers are encouraged to reduce waste across the product's lifecycle, distribution, and service provision, and to apply a lifecycle assessment approach to reducing the carbon footprint of their materials continuously.

6.5 NO POLLUTION

Suppliers must comply with applicable laws and regulations in connection with air emissions (including odorous substances), noise pollution, soil pollution (including risks of historic or current pollution), water intake, discharges to ground and surface water, and waste processing and disposal.

6.6 BIODIVERSITY AND DEFORESTATION

Suppliers must ensure that their products do not contribute to deforestation, avoiding conversion of natural forests and preventing severe degradation, in line with the Accountability Framework Initiative and relevant regulations,

such as the EU timber and deforestation regulations. They must protect biodiversity by avoiding practices that harm habitats or endanger species, adhering to local and international laws. Suppliers should provide traceability information and demonstrate due diligence to ensure compliance and transparency, supporting Carlsberg's biodiversity and anti-deforestation goals. For agricultural raw materials, suppliers must implement sustainable and regenerative practices and maintain traceability aligned with Carlsberg's standards.

Good practice

Suppliers are encouraged to adopt circular economy principles that support biodiversity and combat deforestation, including designing products and processes that maximise resource efficiency, reduce waste and promote the use of sustainable materials. Suppliers should seek to close the loop on resource use by implementing recycling and reuse strategies, and prioritise sourcing raw materials from responsible, certified suppliers that do not contribute to deforestation.

Suppliers are encouraged to obtain relevant product certifications or engage in organisations including, but not limited to, the Sustainable Agriculture Initiative (SAI) Platform, the Forestry Stewardship Council (FSC) and BonSucro.

6.7 ENERGY

Suppliers must promote energy efficiency across all sites, equipment, and supply chain stages, prioritising cost-effective measures. They should increase energy efficiency in transportation, packaging, and retail, ensuring compliance with energy-related regulations and maintaining up-to-date permits. Suppliers must keep accurate monthly records of energy usage to monitor progress and identify improvements. Additionally, they should develop a plan to transition to renewable energy sources.

7. BUSINESS ETHICS

Suppliers must uphold high standards of business ethics, ensuring compliance with all relevant laws and regulations. This includes avoiding corruption and bribery, maintaining transparency in gifts, donations, and entertainment, and preventing conflicts of interest. Suppliers must comply with applicable competition and data protection laws and provide truthful environmental claims.

7.1 CORRUPTION AND BRIBERY

Suppliers must comply with all applicable laws relating to anti-corruption in connection with their business activities, and in particular must not: (i) try to gain an undue advantage by promising, offering or giving anything of value, directly or indirectly, to any public official, business partner or any other third party; or (ii) engage in any other form of corruption, extortion, embezzlement or fraud that seeks to unjustly obtain improper advantages or otherwise influence the outcome of business dealings. Suppliers must ensure that all relevant employees and third parties have knowledge of and comply with applicable laws.

7.2 GIFTS AND ENTERTAINMENT

Suppliers must not offer, fund, or donate lavish gifts, extravagant entertainment, or hospitality for any employees of, or other counterparts in, the Carlsberg Group in an attempt to influence business decisions. Suppliers must ensure that any gifts and entertainment offered to Carlsberg employees are transparent and have a justifiable business rationale. In any event, suppliers must not offer any gifts, entertainment, hospitality, or travel to Carlsberg employees working in the Carlsberg procurement organisation.

7.3 CONFLICT OF INTEREST

Carlsberg employees would be exposed to a conflict of interest if their personal interest might affect their ability to act objectively and in the best interest of the Carlsberg Group. Suppliers must not engage in any activity that creates such a conflict of interest or where such a conflict of interest could be reasonably perceived to exist. Suppliers must immediately take measures to stop any such conflict of interest.

7.4 COMPETITION AND FAIR TRADE

Suppliers must not enter into any anticompetitive agreement with competitors (written, oral or tacit, e.g. by remaining silent, shaking hands, giving a wink) or engage in any other form of activity that has as its object or effect the prevention or restriction of competition and/or breaches applicable laws relating to competition or fair trade.

7.5 SUSTAINABILITY CLAIMS AND GREENWASHING

Suppliers must ensure that all environmental, green or sustainability claims about their products, services or activities are truthful, clear, transparent, and easily understood by consumers and businesses alike, and such claims must be substantiated with robust, verifiable evidence.

Suppliers must comply with all relevant legislation and regulatory guidance to ensure accuracy and integrity in their environmental and sustainability communications. Suppliers must avoid misleading comparisons, unsupported claims about environmental goals or implying endorsements by third parties without proper authorisation. Any necessary qualifying information should be prominently and clearly presented.

7.6 INFORMATION SECURITY, DATA PROTECTION AND RESPONSIBLE ARTIFICIAL INTELLIGENCE (AI)

Suppliers must comply with all applicable laws and regulations relating to information and cyber security, data protection and AI. Suppliers are expected to adhere to relevant industry standards and implement state-of-the-art practices in collecting, sharing, and using consumer and employee personal data and confidential business information entrusted to them by Carlsberg, and in the development and operation of AI systems.

Suppliers must design and maintain AI systems to be robust, resilient, and secure. Suppliers are expected to operate AI systems responsibly and transparently, with documented evidence of fair and ethical AI design and use that causes no harm to individuals or society. Suppliers are not allowed to use consumer and employee personal data and confidential business information entrusted to them by Carlsberg for AI model training and advanced analytics purposes without Carlsberg's specific and express permission.

At Carlsberg's request, suppliers must promptly complete relevant assessments and provide information about their information and cyber security, data protection and responsible AI programmes, policies, and controls. Carlsberg has the right to audit suppliers' policies and practices to confirm compliance with the requirements outlined in this section.

7.7 TRADE SANCTIONS AND IMPORT/EXPORT RESTRICTIONS

Suppliers must comply with all applicable laws and regulation relating to trade sanction and import/export restrictions in connection with their business activities. Suppliers must ensure that all relevant employees and third parties have knowledge of and comply with all applicable trade sanctions laws and regulations and import/export restrictions.



December 2024

Carlsberg Breweries A/S
J.C. Jacobsens Gade 1
1799 Copenhagen V
Denmark



嘉士伯 供应商和 被许可人 行为准则

1. 介绍

1.1 我们的承诺

嘉士伯集团致力于通过合乎道德的商业规范和可持续发展能力，为社会和环境做出积极贡献。本准则为我们的供应商、服务提供商和被许可人设定了最低行为标准，以减低供应链风险，提高透明度。通过与我们的价值链合作，我们致力于识别、预防、减轻对人类和地球的负面影响，遵循国际标准和国家法律，同时促进人权和环境保护。

嘉士伯支持《联合国人权宣言》（United Nations Universal Declaration of Human Rights）、《联合国工商业与人权指导原则》（UN Guiding Principles on Business and Human Rights，即UNGPs）、《经合组织负责的商业行为准则》（OECD Guidelines for Responsible Business Conduct）。作为联合国全球契约的签约方之一，我们致力于该契约的四大原则：人权、劳工、环境、反腐败。本准则符合各项国际标准，例如联合国全球契约十项原则、道德贸易行动组织（ETI）基本守则、国际劳工组织（ILO）基本原则、ISO 14001环境管理认证体系标准。此外，本准则支持联合国可持续发展目标（SDGs）。

本准则与我们的可持续发展计划相一致，反映了嘉士伯集团对解决关键ESG（环境、社会和公司治理）主题和应对全球挑战（如不平等、气候变化和水资源短缺）的承诺。我们愿与供应商一道，推动负责任的商业规范，积极影响社会。

1.2 适用范围

本准则适用于所有供应商、服务和劳务提供商及其直至材料源头的各级供应商，构成其与嘉士伯集团成员签订的任何协议中的强制性组成部分。

其中包括上游供应商和服务提供商（如就业中介机构和营销机构）和下游合作伙伴（如代理商、分销商、被许可人及其他参与赞助或合作的各方）。本准则也适用于供应链中的所有员工，包括正式工、临时工、合同工和外来民工。嘉士伯将根据需要定期审查和更新本准则，并将任何相关修订通知供应商。

1.3 合规

供应商必须遵守其经营所在市场的所有相关法律法规，并在适用的情况下满足其产品销售市场的贸易要求。如果各国标准不同，供应商必须在不违反其所在国家法律框架的情况下，遵循对工人和环境具有最高保护水平的标准。供应商必须能够证明其在自身运营和供应链中遵守本准则和适用法律。

我们鼓励供应商制定与嘉士伯原则相符的政策。本准则包含强制性要求和最佳规范，以促进在可持续发展和道德层面的合规和持续改进。嘉士伯保留通过自我评估、审计或其他监察方式验证供应商合规情况的权利。供应商负责承担合规验证产生的费用。

审计和巡视

我们可能采用不同的尽职调查方法和途径，包括在供应商与嘉士伯建立业务关系之前、合同期间或服务续约或变更时，要求其成为Sedex（Supplier Ethical Data Exchange）平台会员并进行SMETA（Sedex Members Ethical Trade Audit）社会责任审计筛查或同等审计。不配合该等筛查（包括审计）的，视同违反本准则。

在开展任何工作之前，必须解决存在的所有问题。对于SMETA审计或同等审计，我们要求供应商在与嘉士伯商定的时限内，解决Sedex标明的所有关键及重大不符合项。嘉士伯保留随时审查供应商的权利，无论是否事先通知，以确保供应商遵守本准则及合同条款。审查期间，供应商必须全面配合，而嘉士伯将确保供应商的敏感或专有信息得到妥善管理。同时供应商必须了解，嘉士伯可以自行决定接受其他替代或等效的审计框架。

认证

除本准则的通用要求之外，由于人权和环境风险，特定产品可能适用更严格的政策。如不同政策规定不一致时，该等更严格的政策将优先适用。嘉士伯会定期检查该等政策，并为供应商提供相关工具和最新信息。为达到更高的道德标准，特定产品（如糖和钴）需要一级（tier 1）以上的认证。

嘉士伯重视与供应商建立长期、透明的合作关系，并通过坦诚沟通和提供改进机会来推动双方达成一致。供应商违反本准则的，嘉士伯将要求其采取纠正措施。嘉士伯保留审核合规情况以及在供应商不符合标准的情况下终止与其签订的协议的权利。如有需要，嘉士伯可能会与当局政府或第三方审计机构分享数据，包括ESG信息。

1.4 举报问题或违规行为

供应商有责任举报任何涉及嘉士伯或影响嘉士伯的涉嫌或已证实的不当行为，无论该行为是否违反本准则或适用的法律，亦无论该行为是否为我们的供应商或我们自己的员工所为。该等问题的举报可确保嘉士伯能够有效地解决问题，并在我们的业务关系中保持高度诚信。

除供应商的自有举报机制之外，嘉士伯还为供应商及其员工提供以下举报渠道：

- [全天候独立畅言专线](#)
- 人力资源、法务或市场代表
- 电子邮件：SpeakUp@Carlsberg.com

目录

1. 介绍	2	6. 环境保护.....	10
1.1 我们的承诺	2	6.1 环境问题管理.....	10
1.2 适用范围	2	6.2 碳排放管理.....	10
1.3 合规	2	6.3 水资源管理.....	11
1.4 举报问题或违规行为	3	6.4 废弃物管理.....	11
2. 管理体系	5	6.5 无污染.....	11
2.1 治理	5	6.6 生物多样性和森林砍伐.....	11
2.2 政策承诺与沟通.....	5	6.7 能源	12
2.3 尽职调查及风险和影响管理.....	5	7. 商业道德.....	12
2.4 申诉机制和持续改进.....	5	7.1 腐败和贿赂	12
3. 基本人权	6	7.2 礼品和招待	12
3.1 禁止强迫劳动.....	6	7.3 利益冲突	13
3.2 雇用青年工人及禁用童工.....	6	7.4 竞争和公平贸易	13
3.3 结社自由和集体谈判.....	7	7.5 可持续发展主张和漂绿风险	13
3.4 禁止歧视和骚扰.....	7	7.6 信息安全、数据保护和负责任的人工智能（AI）	13
3.5 尊重土地权利.....	7	7.7 贸易制裁和进出口限制.....	13
4. 劳动条件	8		
4.1 工作时间管理	8		
4.2 支付工资和福利.....	8		
4.3 常规雇佣条款.....	8		
5. 健康和安全.....	9		
5.1 职业健康和安全	9		
5.2 住宿.....	9		
5.3 化学品和有害物质管理.....	10		
5.4 应急响应程序.....	10		

2. 管理体系

供应商必须建立并维护有效的管理体系，以预防和处理违反本准则的行为，及减轻对人类和地球的不利影响。该等管理体系应包含必要的战略、政策、流程和资源，用以识别风险，解决问题的根本原因，并确保遵守所有相关法律、法规和本准则的原则。同时，供应商必须保留透明、准确的记录，以证明合规性并跟踪正在进行的改进工作。

2.1 治理

供应商必须指定一名高级管理人员负责确保其遵守本准则。

供应商必须采用并公开传达符合且支持本准则的政策声明。该等政策声明必须与供应商经营的复杂程度和规模相适应，并且必须得到最高管理层的批准。

2.2 政策承诺与沟通

供应商必须将本准则传达给其员工、供应商和服务提供商，以确保本准则的原则在整个供应链中得到执行。各层级必须遵守该等标准，提高透明度和问责制。供应商必须要求其业务伙伴（包括代理商和招聘机构等中介机构）努力遵守本准则，并避免妨碍遵守本准则的行为。如发现重大风险，嘉士伯可能会要求相关商品或服务的供应链透明化。

2.3 尽职调查及风险和影响管理

供应商必须建立一个基于风险的尽职调查系统，该系统应与关键法规和标准（包括《联合国工商业与人权指导原则》，即UNGPs）相契合，以确保本准则的要求得以实现。必须确立人权和环境尽职调查（HREDD）的清晰治理框架和目标。

供应商应让工人（尤其是居家办公人员、小农户和外来民工等弱势群体）参与其流程，并通过与利益相关方的合作和协商来应对挑战。对于供应商造成或促成的不利影响，必须及时纠正。

2.4 申诉机制和持续改进

供应商必须根据《联合国工商业与人权指导原则》，建立有效、合法、便捷、透明的申诉机制，为个人提供安全、保密的途径，以便其提出有关人权和环境问题的申诉并寻求补救措施。

同时，供应商必须实施保护举报人的政策，允许保密、匿名报告问题，并明确禁止报复。为确保个人可以提出问题而不必担心不利后果，不得对举报涉嫌不当行为或不遵守本准则的员工或利益相关者采取报复行动。

在适用的情况下，供应商必须确保其分包商和次级供应商遵守本准则，提供实施本准则的证据，并监督其有效性，以确保达到预期效果。

供应商必须确保持续改进对本准则的执行。作为透明管理框架的一部分，尽职调查过程应予以记录并公开报告。

良好行为规范

我们鼓励供应商通过采用先进技术和最佳规范来完善其管理体系，以预测风险，超越合规标准，提高透明度。为实现全程可见性，供应商应开发供应链映射系统（供应链地图系统），使用溯源工具并与利益相关者合作，以确保负责任的采购并降低风险。同时，我们鼓励供应商建立独立的举报机制，为举报人提供支持和保护，以确保调查公正。

我们鼓励供应商积极与当地社区、非政府组织和行业机构合作，共同制定政策和规范，促进负责任的采购和人权保护，其中包括参与旨在提高行业标准的公共咨询和工作组活动。

3. 基本人权

嘉士伯的供应商必须按照国际公认的框架（如《联合国工商业与人权指导原则》和《国际劳工组织公约》）尊重人权。供应商至少必须解决与其供应链相关度较高的人权风险和影响，包括防止涉及强迫劳动、童工和歧视的违规行为，确保保护结社自由和土地权利等。同时，我们希望供应商自行开展尽职调查，以识别和解决可能对其业务和供应链产生显著影响的其他人权风险。

3.1 禁止强迫劳动

根据国家法律、《巴勒莫议定书》（the Palermo Protocol）以及《国际劳工组织公约》（ILO Conventions），嘉士伯禁止一切形式的强迫劳动、现代奴隶制和人口贩卖。供应商必须遵守前述标准，禁止性交易、酷刑、国家强制劳动和非自愿狱中劳役等行为。仅在取得嘉士伯批准的情况下，方能允许狱中劳役。该等狱中劳役应作为重新融入社会计划的一部分，并且必须加强尽职调查。

供应商必须在其供应链中遵守反奴役法规，确保员工不受虐待、胁迫或恐吓，包括身体或精神虐待。员工必须有签订劳动合同的自由，无需支付任何费用或保证金，并自行保留其个人证件。员工的行动自由不应受到限制，他们必须能够在合理通知的情况下离职而不受惩罚。

3.2 雇用青年工人及禁用童工

供应商必须维护儿童权利，严格禁止使用童工，遵守国际劳工组织关于最低年龄的第138号公约和关于最恶劣形式童工的第182号公约。童工指未满15周岁或所在国家法律规定的最低雇用年龄（以两者中较高者为准）的任何人，但在《国际劳工组织公约》允许最低雇用年龄为14周岁的特定国家除外。

严格禁止使用童工，包括剥削、伤害或妨碍学业的工作。如果发现使用童工，供应商必须支持帮助儿童脱离该等工作的举措。儿童可协助家族企业，但前提是工作量较轻、适合其年龄段且符合国际劳工组织的标准。

所有员工必须至少年满15周岁，或法律规定的最低雇用年龄，以两者中较高者为准。供应商必须核实求职者的年龄，并确保（18周岁以下的）

青年工人不参与有害健康、夜班或影响其学业的工作。雇用青年工人必须符合当地法律（包括教育福利相关法律），并将安全和福利放在首位。

3.3 结社自由和集体谈判

供应商必须尊重员工成立工会组织、参与工会活动和开展集体谈判的权利，根据《道德贸易行动组织基本守则》（ETI Base Code）、《联合国工商业与人权指导原则》（UNGPs）和《国际劳工组织公约》第87号（ILO Convention No. 87）确保员工无需担心因此遭受报复、骚扰或被解雇，并确保管理层传达和维护该等保护措施。供应商应营造支持员工组织的环境，为他们提供会议空间，允许员工在工作时间参与组织活动，并分享谈判信息，同时应公平对待员工代表，为他们提供获取资源的途径、履行工会职责所需的休假时间并给予管理层支持。如工会组织的设立受限，应根据《国际劳工组织第135号公约》设立其他代表形式，例如工人委员会。同时，供应商必须尊重员工罢工的合法权利，避免制定惩罚性措施或阻碍性政策，并通过与员工代表对话以建设性的方式处理罢工问题，以解决根本问题。

3.4 禁止歧视和骚扰

供应商必须确保在所有雇佣决策中不存在歧视，仅以合法的标准为依据，而不考虑种族、性别、宗教信仰、性取向、残疾或其他特征。供应商必须保护员工免受骚扰、欺凌、虐待或威胁，营造一个安全、尊重员工的工作场所。供应商必须制定有关歧视、骚扰、道德和惩戒措施的明确规则，并传达给所有员工。此外，供应商必须促进平等和包容，重视性别、年龄、文化和生活方式等方面的多样性，实施支持多元、平等、包容的政策和计划。

良好行为规范

我们鼓励供应商收集员工对多样性和包容性的反馈，以评估供应链中少数群体或弱势群体面临的歧视和被骚扰风险。

我们鼓励供应商制定多元、平等、包容（DE&I）目标，包括性别平等和女性赋权，以与嘉士伯改善领导层性别平衡的承诺相契合。

3.5 尊重土地权利

我们的商业伙伴必须尊重受其运营和采购行为影响的个人和社区的土地区域、森林及水资源权利。所有与财产或土地使用相关的事项，包括任何转让或使用协议，必须遵循自由、事先通知及知情同意的原则，并坚持合同的透明度和充分披露。我们的商业伙伴必须避免任何涉及土地掠夺的行为，必须妥善获取、遵守、维持并保存所有必要的环境许可、批准文件和登记记录。

4. 劳动条件

供应商必须遵守国家法律、行业标准及《国际劳工组织公约》，确保公平、安全、尊重员工的工作条件。其中包括规范工作时间，支付最低工资和/或集体商定的工资和福利，以及提供具有法律约束力的雇佣合同。供应商应遵守该等标准，保护员工权利，营造一个负责任的工作环境。

4.1 工作时间管理

供应商必须遵守有关工作时间的国家法律、集体协议和行业标准，优先加强对员工的保护。员工的工作时间不得过长，加班必须以员工自愿为前提，并且加班时长在法律或集体商定的限制范围内。根据国际劳工组织和道德贸易行动组织的标准，员工的正常工作时间不应超过每周48小时，最多不超过60小时（含加班时间）。特殊情况下，每周工作时间允许超过60小时，但前提是这种情况符合国家法律、集体协议、健康和安全保障措施，并且要有诸如生产高峰期或紧急情况等不可预见的情况作为合理理由。员工每周必须至少休息一天，或者，如果国家法律允许，在14天内必须休息两天。

4.2 支付工资和福利

供应商必须确保标准工作周的工资和福利达到或超过国家法律标准、集体商定的工资标准或行业基准，以较高者为准。供应商必须定期支付工资，并提供工资单。供应商必须确保员工收到关于雇佣条件和工资的明确书面信息，包括任何扣款。禁止作为惩戒措施或在法律不允许的情况下扣减工资。供应商必须遵守劳动法，包括有关社会保障、保险和福利（如病假、休假和育儿

假）的法律规定。同时，供应商必须避免通过分包或其他方案规避该等义务。

良好行为规范

我们鼓励供应商尽合理努力，使所有员工（包括临时工和派遣工）的工资达到生活所需的最低水平。

4.3 常规雇佣条款

在雇佣或服务开始时，供应商必须向所有员工提供以员工所理解的语言拟定的具有法律约束力的合同。该等合同必须载明关键信息，如职位、预期工资、工作时间、通知期、福利、休假等条款和条件，以及任何惩戒和申诉机制。

所有临时雇佣必须遵守适用的国家雇佣法。

良好行为规范

我们鼓励供应商定期开展员工培训，以提高员工的技能和知识水平，促进员工的职业持续发展。通过提供广泛的培训机会，供应商可以支持员工的职业发展。我们建议供应商尽力监测和评估该等举措的影响，以促进企业的持续增长和改进。

5. 健康和安全

供应商必须坚持严格的健康和安全标准，遵守所有相关法律、法规和行业基准（包括国际劳工组织《关于工作中的基本原则和权利宣言》），包括提供安全的工作环境、适当的住宿条件和对化学品及有害物质的有效管理。同时，供应商必须实施应急响应程序，以保护员工、访客和周围社区免受伤害。

5.1 职业健康和安全

供应商必须遵守所有适用的职业健康和安全法律、法规和行业标准（包括国际劳工组织《关于职业安全与健康公约》第155号），确保为所有员工、分包商和访客提供安全的工作环境。健康和安全责任应分配给供应商和现场的高级管理人员，确保对健康和安全政策进行监督，保证遵守法规，并迅速采取措施解决可能出现的任何问题。供应商必须制定书面的健康和安全政策，以方便员工查阅，该政策需包含考虑到性别差异的程序，以尽量降低风险。供应商应进行工作场所风险评估，以识别潜在风险（包括与心理健康和人体工学相关的风险），并采取适当措施减轻该等风险。供应商必须免费提供个人防护装备（PPE），并确保员工接受过个人防护装备使用和安全工作规范方面的培训。在选择供应商和承包商时，嘉士伯会考虑健康和安全因素，并在相关合同中载明健康和安全要求。在嘉士伯经营场所内工作的承包商必须接受相关培训，具备安全执行任务的能力，并遵守嘉士伯的健康和安全政策与程序。供应商和分包商必须获得许可，方可在嘉士伯经营场所内从事高风险活动。如有违反该等政策，可能会导致处罚或合同终止。

良好行为规范

为营造零事故工作场所，我们鼓励供应商积极主动地采取健康、安全的方法，实施先进的安全措施，培养强大的安全文化，不断改进风险管理规范，以保护所有员工的福祉。

我们建议供应商执行ISO 45001职业健康安全管理体系或同等体系。

5.2 住宿

供应商必须确保员工的住宿条件达到或超过当地社区标准，并且员工进出宿舍不受限制。如果员工需自付住宿费用，该等收费必须合理，且在其工资中的占比不大。可能的情况下，供应商应为员工提供往返工作场所所需的安全的交通工具。宿舍必须安排男女分开的睡眠区、起居区和盥洗区，并在必要情况下允许家人同住。宿舍必须符合当地的健康和安全法规，并保存检查和维护记录。必须制定宿舍的消防安全计划（包括训练有素的消防管理员、定期设备测试和消防演习），并传达给员工。供应商必须提供足够的温度控制、照明、通风、维护良好的卫生和洗衣设施。同时，供应商必须提供安全的个人物品储存空间，卫生的烹饪设施或食堂，以及满足特定饮食或宗教需求的供应品。

5.3 化学品和有害物质管理

供应商必须执行严格的化学品（尤其是有害物质）管理程序，包括安全采购、储存、处理、使用、回收和处置程序。相关岗位的员工必须接受安全程序培训。有害物质的安全数据表（SDSs）必须以当地语言提供，并对其进行妥善维护和及时更新。供应商必须确保采取适当的控制措施来保护员工和环境，包括清晰的标签、安全储存、防泄漏措施和适当的个人防护装备。同时，供应商应尽力减少有害物质的使用，并取代使用更安全的替代品。

5.4 应急响应程序

供应商必须制定应急响应程序，以应对职业健康、安全和工业事故，并确保将其传达给所有员工。供应商必须保持疏散路线畅通，提供声响/可视警报，并对员工开展急救和消防培训。供应商必须定期进行应急演练，包括火灾和有害物质应急响应，并保存记录。

6. 环境保护

嘉士伯认识到有必要根据《巴黎协定》应对气候变化，减少温室气体排放。供应商在最大限度降低气候影响、提高适应能力以及识别与气候变化、水资源安全和其他环境问题相关的机会方面发挥着关键作用。供应商必须遵守与环境相关的法律法规和国际标准（如ISO 14001 环境管理认证体系标准），并实施有效的环境管理体系（EMS）。供应商必须对碳排放、水资源和废弃物进行管理，并关注生物多样性、防止森林砍伐、可持

续农业发展和负责任的能源消耗等方面。环境保护措施应尊重人权，包括公平对待员工和当地社区，并考虑气候变化对工作条件和文化生活的影响。

6.1 环境问题管理

供应商必须遵守所有相关的环保法律和要求，及时了解法规动态，积极主动地预防和减轻其活动、产品和服务对环境的不利影响。供应商必须实施与ISO 14001等标准相契合的完善的环境管理体系，以监测并解决对资源、能源、水资源、废弃物、碳排放和生物多样性的影响。若发生对嘉士伯有潜在影响的重大环境事件或违规行为，必须立即报告。供应商必须定期报告环境绩效，展示可衡量的进展，并保持透明度。同时，供应商必须在其自有供应链中遵守环保标准，制定明确的环保政策，并定期开展培训，以确保有效实施该等标准和政策。

6.2 碳排放管理

供应商必须根据《温室气体核算体系》（the Greenhouse Gas Protocol），积极监测并减少其运营和供应链中的直接的（Scope范围1）、间接能源相关的（Scope范围2）及其他间接的（Scope范围3）二氧化碳排放。供应商必须通过实施符合科学碳目标倡议（SBTi）标准的可衡量的碳减排策略，来支持嘉士伯的Scope范围3目标。供应商应解决从设计、制造到报废处理整个产品生命周期中的碳排放问题。供应商必须定期提供减碳目标的最新进展，包括向嘉士伯详细报告Scope范围1、2、3的排放量，并与利益相关者分享成功经验和挑战，以保持透明度。

良好行为规范

我们鼓励供应商公开披露其碳足迹和减碳行动，以展示其对环境可持续性的承诺和进展。

我们鼓励供应商为其范围1、2、3设定和批准科学减排目标，并设定净零排放目标。

6.3 水资源管理

供应商必须对水资源进行负责任的管理，尤其是在水资源有限的地区，通过水资源的再利用或循环利用提高用水效率。供应商必须确保其经营活动不损害当地的用水权，提供用水和卫生设施，并与当地社区合作改善获得安全用水的状况。废水在排放之前必须在现场或认可的设施内进行处理，以符合当地排放标准。供应商必须采取措施防止当地水源受到污染。供应商应定期报告水资源的使用、循环利用和节水情况，并根据绩效指标和反馈持续改进用水规范。

良好行为规范

我们鼓励供应商在其运营和采购地点评估与水的可用性相关的风险，识别高风险区域，并采取措​​施解决其运营和供应链中的用水安全问题，确保用水安全。

6.4 废弃物管理

供应商必须遵守废弃物和化学品管理方面的既定标准和负责任的操作规范，

严格遵守国家法规，确保环境保护和安全。供应商必须对化学品从采购到处置进行负责任的管理，定期审查和更新相关规范，以确保合规性和符合现行规范。对于危险废弃物（包括特定化学品），未经适当授权，不得在垃圾填埋场处理，亦不得在经营场所内焚烧。由于持久性有机污染物（POPs）存在长期环境和健康风险，严禁使用持久性有机污染物。

同时，供应商应优先使用可回收、可重复使用、可再生或可堆肥的材料，最大限度地减少包装浪费，进而减少或消除一次性物品的使用。此外，供应商应制定并披露所有包装材料的详细清单，详细说明其中的回收成分，可回收性和可堆肥性，以支持嘉士伯实现可持续包装的透明度和循环利用目标。

良好行为规范

我们鼓励供应商在产品生命周期、分销和提供服务的过程中减少浪费，并运用生命周期评估方法持续减少其材料的碳足迹。

6.5 无污染

供应商必须遵守与气体排放（包括有异味的物质）、噪音污染、土壤污染（包括历史或当前污染风险）、取水、地面排放和地表水排放以及废弃物处理和处置有关的适用法律法规。

6.6 生物多样性和森林砍伐

供应商必须确保其产品不会导致森林滥伐，避免对天然林的开发转化，防止森林严重退化，符合问责框架倡议和相关法规，如欧盟木材和森林砍伐条例。

供应商必须保护生物多样性，避免采取损害栖息地或危及物种的做法，遵守当地及国际法律。供应商应提供可溯源信息，并展示其尽职调查，以确保合规性和透明度，支持嘉士伯的生物多样性和反森林滥伐目标。对于农业原材料，供应商必须执行可持续和可再生的行为规范，并保持可追溯性，以符合嘉士伯的标准。

良好行为规范

我们鼓励供应商采用支持生物多样性和打击森林砍伐的循环经济原则，包括设计能最大限度提高资源效率、减少浪费和促进可持续材料使用的产品和工艺。供应商应实施回收和再利用策略，力求实现资源利用的闭环，并优先从负责任、经过认证、不会导致森林砍伐的供应商处采购原材料。

我们鼓励供应商获取相关的产品认证或参与各种组织，包括但不限于可持续农业倡议（SAI）平台、森林管理委员会（FSC）和甘蔗可持续发展平台和标准组织（BonSucro）。

6.7 能源

供应商必须在所有经营场所、设备和供应链节点提高能源效率，优先考虑具有成本效益的能源使用措施。供应商应提高运输、包装和零售方面的能源效率，确保遵守与能源相关的法规，并确保持有最新的许可证。供应商必须保持准确的月度能源使用记录，以监控进展，制定改进措施。此外，供应商应制定向可再生能源过渡的能源使用计划。

7. 商业道德

供应商必须坚持高标准的商业道德，确保遵守所有相关的法律法规，包括避免腐败和贿赂行为，保持礼品赠送、捐赠和招待活动中的透明度，以及防止利益冲突。供应商必须遵守适用的竞争法律和 data 保护法律，并如实进行环境相关声明。

7.1 腐败和贿赂

供应商必须遵守与其经营活动中的反腐败有关的所有适用法律，尤其是不得从事下列行为：(i)直接或间接向任何公务人员、商业合作伙伴或任何其他第三方允诺或提供任何有价物品，以获取任何不正当利益；或(ii)从事任何其他形式的腐败、勒索、营私舞弊或欺诈行为，以获取不当利益或以其他方式影响其商业交易的结果。供应商必须确保所有相关员工和第三方均了解和遵守适用法律。

7.2 礼品和招待

供应商不得向嘉士伯集团的任何员工或与其接洽的其他人员提供奢华的礼品或奢侈的招待或款待，或为此提供资助或捐助，以影响任何商业决策。供应商必须确保提供给嘉士伯员工的任何礼品和招待均透明和有正当的商业理由。供应商在任何情况下均不得向在嘉士伯采购部门工作的嘉士伯员工提供任何礼品、招待或款待。

。

7.3 利益冲突

当嘉士伯员工的个人利益可能影响其以客观和符合嘉士伯集团最佳利益的方式行事的能力时，就会存在利益冲突。供应商不得从事将会引起该等利益冲突或者合理认为可能存在该等利益冲突的任何行为。供应商必须立即采取措施，以避免任何该等利益冲突。

7.4 竞争和公平贸易

供应商不得与竞争对手签订任何反竞争协议（书面、口头或默示，例如以保持沉默、握手、眼神暗示的方式），或参与任何其他形式的活动，以防止或限制竞争或违反有关竞争或公平贸易的适用法律。

7.5 可持续发展主张和漂绿风险（GREENWASHING）

供应商必须确保所有涉及其产品、服务或活动的环保、绿色或可持续发展主张均真实、清晰、透明、易于消费者和企业理解。该等主张必须有可靠、可验证的证据作为支撑。

供应商必须遵守所有相关的立法和监管指引，以确保其环保和可持续发展宣传的准确性和完整性。供应商必须避免误导性的比较、关于环境目标的无根据的主张、未经适当授权的第三方的暗示认可。任何必要的合格信息均应突出且清晰地呈现。

7.6 信息安全、数据保护和负责任的人工智能（AI）

供应商必须遵守与信息 and 网络安全、数据保护和人工智能相关的所有适用法律法规。供应商应遵守相关的行业标准，并在收集、共享和使用嘉士伯委托给予的消费者和员工个人数据以及机密商业信息的过程中，以及人工智能系统的开发和运营过程中，执行最先进的行为规范。

供应商必须对人工智能系统进行稳健性、弹性与安全性的设计和维护。供应商应以负责任且透明的方式运营人工智能系统，并以文件形式证明AI设计与应用是公平且合乎道德的，确保其人工智能系统不会对个人或社会造成危害。未经嘉士伯明确许可，供应商不得将嘉士伯委托给予的消费者和员工的个人数据以及机密商业信息用于人工智能模型培训和高级分析用途。

应嘉士伯的要求，供应商必须及时完成相关评估，并提供有关其信息和网络安全、数据保护和负责任的人工智能计划、政策及管控措施的信息。嘉士伯有权审查供应商的政策和规范，以确认供应商是否符合本部分概述的要求。

7.7 贸易制裁和进出口限制

供应商必须遵守与其业务活动有关、涉及贸易制裁和进出口限制的所有适用法律法规。供应商必须确保所有相关员工和第三方了解并遵守所有适用的贸易制裁法律法规和进出口限制。



2024年12月

丹麦嘉士伯啤酒厂有限公司 (Carlsberg Breweries A/S)

J.C. Jacobsens Gade 1

1799 Copenhagen V

Denmark