MODERN SLAVERY ACT COMPLIANCE STATEMENT

CMBC SUPPLY LIMITED

INTRODUCTION FROM THE BOARD OF CMBC SUPPLY LIMITED (CMBC SUPPLY)

We are proud of the steps we have taken to combat slavery and human trafficking within our business and our supply chain to date and are committed to continually improving our practices. We are opposed to all forms of modern slavery including forced and compulsory labour, human trafficking, and child labour, and will continue to work to prevent modern slavery in our business and in our supply chains.

WHAT IS THE MODERN SLAVERY ACT AND HOW DOES IT AFFECT CMBC SUPPLY?

The Modern Slavery Act (**Act**) is a pioneering piece of legislation that was passed into law by the UK Parliament in 2015. The objective of the Act is to encourage greater transparency for consumers and amongst businesses about steps taken to combat slavery and human trafficking within businesses and their supply chains.

Following the introduction of the Act, companies that exceed certain thresholds must complete an annual statement which explains the steps that the organisation has taken during the preceding financial year to address slavery and human trafficking.

CMBC Supply's statement for the financial year ending 31 December 2022 is set out below and includes an overview of our company structure and practices during that period.

ORGANISATION'S STRUCTURE

We brew, package and deliver certain alcoholic and non-alcoholic drinks in the UK with our well-known brands including Carlsberg Danish Pilsner, Carlsberg Export, Tetley's, Hobgoblin and Marston's Pedigree, as well as licensed brands. We are a part of the Carlsberg group (the **Carlsberg Group**), and until 31 October 2020 our ultimate parent company was Carlsberg A/S, which has its head office in Denmark and is listed on the Copenhagen stock exchange.

On 30 October 2020, Carlsberg UK Holdings Limited and Marston's PLC completed a 'joint venture' transaction to create a new beer company group, the '**Carlsberg Marston's Brewing Company Group**' or '**CMBC Group**'.

From 31 October 2020, CMBC Supply became part of the CMBC Group. Please see our website and the "Our business" section of Marston's PLC's 2020 modern slavery statement for more details on the creation of the CMBC Group.

Following completion of the joint venture, we have two ultimate parent companies: (1) Carlsberg A/S (this is our ultimate majority owner with a 60% shareholding in the joint venture); and (2) Marston's PLC which has its head office in England, is listed on the London Stock Exchange and owns 40%.

We remain a part of the Carlsberg Group because Carlsberg A/S is the ultimate majority shareholder of CMBC Supply.

OUR BUSINESS

Carlsberg Group's business is organised into three regional business units: Western Europe, Eastern Europe, and Asia, with additional areas reached via licensing arrangements and exports. Please see the Carlsberg Group website for more details.

OUR SUPPLY CHAINS

Our supply chains include the manufacture, distribution and packaging of our products. Our affiliate company, Carlsberg Supply Company AG (**CSC**), is responsible for global planning, procurement, production and logistics in the Carlsberg Group. We also procure goods and supplies directly from suppliers and have an 'in-house' logistics operation and depot network.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to respecting human rights and ensuring that there is no modern slavery or human trafficking in any part of our business. As a signatory of the UN Global Compact (**Compact**) since 2008, the Carlsberg Group is committed to supporting its 10 principles, which include a strong focus on human rights, and is also committed to the UN Guiding Principles on Business and Human Rights (**UNGP**). CMBC Supply aims to act in compliance with these principles as we are a part of the Carlsberg Group.

Our commitment to respect human rights is reflected in our policies, including our Human Rights Policy, which was revised in 2021. The Human Rights Policy applies globally to management, employees, and contract workers of all members of the Carlsberg Group (including CMBC Supply in the UK) and is overseen and approved by the Carlsberg Group Executive Committee. This Policy is our human rights governance document which, amongst other things, communicates our commitment to respect human rights across all our business activities and relationships (throughout our value chain) and provides guidance on appropriate behaviour when it comes to labour and human rights issues. It covers topics such as working hours, benefits and wages, freedom of association, non-discrimination, harassment, and child and forced labour.

To enable us to enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain and implement our commitment to respect human rights in all our business activities and relationships throughout our value chain (as communicated in the Human Rights Policy), we expect our suppliers, vendors, agents, contractors, and licensees to comply with the Carlsberg Group Supplier and Licensee Code of Conduct. The Carlsberg Group Supplier and Licensee Code of Conduct includes requirements in respect of labour and human rights (e.g. a prohibition on forced and child labour), health and safety and environmental sustainability. If these requirements are not met, we must be informed and the third party must act quickly to fix the problem. Failure to meet these requirements or remedy non-compliances may result in termination of the contract.

Compliance clauses and a reference to the Supplier and Licensee Code of Conduct are included in all of the Carlsberg Group's procurement contract templates including its general terms and conditions of procurement. These templates are used by local markets as the basis for the majority of their contracts including by CMBC Supply in the UK. Where a third party's contract template is used, equivalent wording is added to ensure the same level of contractual protection.

OUR DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MEASURING EFFECTIVENESS IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In 2020, the Carlsberg Group carried out an assessment process with Shift, an organisation of global experts on the UNGP, to identify, assess and prioritise human rights risks including potential areas of impact and saliency. This process was repeated in 2022 and will be repeated annually going forward. The assessments incorporate stakeholder views, lessons learned and any changes to the business that could have an impact on human rights. In 2022, a human rights roadmap was also developed to enhance the management of the most salient human rights issues in response to the latest assessment. The responsible sourcing programme was also refined to increase the focus on salient human rights issues in the supply chain. In 2023, human rights progress will be monitored with oversight from the new ESG Steering Committee appointed in 2022. The ESG Steering Committee comprises leaders and experts from across the business.

In 2022, the Carlsberg Group strengthened its responsible sourcing programme by joining two external platforms, AIM-Progress and Sedex to help identify and mitigate human rights risks in its supply chain. AIM-Progress is a forum of fast-moving consumer goods manufacturers and suppliers that share best

practices for responsible sourcing and sustainable supply chains. Sedex is a membership platform that enables companies to manage and improve working conditions in their global supply chains by helping them to better understand risks and target improvements where they are most needed. As a member of the Carlsberg Group, CMBC Supply has access to the Sedex platform and risk assessment tools.

In 2023, Carlsberg Group will launch a new supplier risk assessment process using Sedex risk assessment tools. High-risk suppliers will be identified based on their location and type of business, taking into consideration risks related to human rights, ethics, the environment and health and safety. Suppliers flagged as high-risk will be subject to further scrutiny including comprehensive self-assessment questionnaires and, if required, an audit. CMBC Supply's ambition is to work with Carlsberg Group in 2023 to identify and ensure the relevant UK suppliers, who haven't been assessed centrally under the new process (if any), are captured.

In 2022, CMBC Supply adopted an enhanced anti-bribery, trade sanction and key ethical risks screening process as part of its commitment to combat unethical behaviour and ensure compliance with applicable laws. An automated tool screens third parties (including agents, consultants and suppliers), prior to engagement, against a range of "red flags" and enables us to take appropriate follow-up action where potential issues are identified. Examples of potential "red flags" are bribery or corruption risks, such where third parties have been subject to bribery-related investigations or adverse media exposure about their past behaviour. The results of the screening are saved in the screening tool and the tool continuously monitors the third party for potential changes in their risk profile. Should new red flags occur, the business will be notified so that they may review the changes to determine appropriate next steps. If the third party poses a disproportionate risk to CMBC Supply, we are not permitted to enter into a commercial relationship with them.

We encourage our employees, contract workers and business partners (including suppliers and their workers) to always "Speak Up" if they have ethical concerns, without fear of retaliation. Employees can report potential breaches of, or situations or conduct that is not in line with, our Code of Ethics and Conduct, policies or applicable laws (e.g. human rights violations) by talking to their manager, their local human resources or local legal and compliance representative. Anyone can report concerns directly to our senior managers or anonymously through our "Speak Up" mailbox or telephone line, which is operated by an independent third party. Investigations are conducted by locally trained representatives and overseen by the Carlsberg Group's Internal Audit Team. The Carlsberg Group's Integrity Committee oversees investigations of the most serious allegations. This Committee is made up of senior executives and is chaired by the Chief Financial Officer of Carlsberg Group. Information received through the Speak Up process is used by Carlsberg Group to continually improve processes and, in 2022, a campaign was launched to remind our employees of the need to "Speak Up" about suspected misconduct.

TRAINING FOR STAFF

We allocate e-learning on our Human Rights Policy to people managers and human resources professionals when they join the company. We also allocate this e-learning to employees when they are promoted and become a people manager. Our ambition for 2023 is to require UK procurement employees (who are not people managers) to complete this e-learning.

In addition to the Human Rights Policy e-learning outlined above, to reflect our commitment to act ethically and with integrity, all employees at CMBC Supply undertake a Code of Ethics and Conduct e-learning training module when they join the company. Whilst this e-learning module does not directly address specific modern slavery topics, it covers a wide range of ethical and legal and compliance issues, including anti-bribery and corruption, competition law, data protection and privacy, conflicts of interest, political activities, discrimination and harassment and reflects the requirements contained within the Carlsberg Group's Code of Ethics and Conduct. Completion of this e-learning training is monitored, and additional training and awareness activities undertaken on a regular basis. It is our belief that a knowledge of other ethical and legal and compliance issues challenges our employees' decision making, encourages a culture

of compliance and embeds the commitment to acting ethically and with integrity within the business therefore indirectly contributing to modern slavery compliance and a respect for human rights.

We allocate e-learning on Anti-Bribery and Corruption to people managers and employees in commercial functions (e.g. roles which involve communicating with suppliers) when they join the company. We also allocate this e-learning to employees when they are promoted and become a people manager. The aim of the e-learning is to help employees identify different types of bribery, what they can do to protect themselves and the business, how to resist bribery and how to raise concerns if they know or suspect wrongdoing.

In 2023, it is Carlsberg Group's ambition to train relevant internal stakeholders, including procurement, HR and legal teams on the revised responsible sourcing programme.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2022.

For further information on our / the Carlsberg Group's business, our / the Carlsberg Group's economic contribution to society and sustainability efforts, visit https://www.carlsbergmarstons.co.uk and www.carlsberggroup.com.

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Paul Thomas Davies

Chief Executive Officer

Date: [insert date] 2023