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 2023 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, 1664, 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 services directly from suppliers and have an 'in-house' logistics operation and depot network.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

The Carlsberg Group is committed to meeting its responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights (UNGP). We acknowledge our responsibility to respect all internationally recognised human rights across our own activities and business relationships.

As a signatory of the UN Global Compact (**UNGC**) since 2008, the Carlsberg Group is committed to adhering to its 10 principles, which include a strong focus on human rights. As part of the Carlsberg Group, CMBC Supply is aligned with these commitments.

Our commitment to respect human rights is reflected in our policies, including our Human Rights Policy (the **Policy**), which will be updated again in 2024. The Policy sets out our commitment to human rights and our expectations for all members of the Carlsberg Group (including CMBC Supply in the UK), its employees and business partners globally, with further guidance being provided in an internal Human Rights Manual that explains how the Policy applies in real-life situations.

Our Executive Committee, chaired by the Group CEO, is responsible for our performance on ESG, including human rights. It provides strategic guidance and approval of our Human Rights Policy. Implementation of the Policy is overseen by our ESG Steering Committee, made up of leaders from across the Carlsberg Group. The Policy covers topics such as working hours, benefits and wages, freedom of association, non-discrimination, harassment, forced labour and child protection.

The Carlsberg Supplier & Licensee Code of Conduct lays down requirements for suppliers in the areas of human rights, including the prevention of forced and child labour, non-discrimination, health and safety, and environmental sustainability. To work with us, suppliers must meet these requirements and ask the same of their own suppliers. We seek to work with our suppliers to help them mitigate risks, and we also collaborate through industry partnerships to provide supplier training and build capabilities in order to deliver a positive impact. In cases where our suppliers are unwilling to improve their practices or demonstrate alignment with our policies, we reserve the right to terminate the business relationship.

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

At least once a year, the Carlsberg Group reviews the human rights that our business and value chain could potentially impact globally. This process builds on the formal identification of salient human rights risks we conducted with Shift in 2020, which considered industry trends, public research, best practices from peers and input from internal stakeholders. Salient human rights are those at risk of the most severe human rights impacts. We refresh our assessment of salient human rights risks annually.

In 2023, the salient human rights risk assessment was also informed by the results of our latest ESG materiality assessment (our first using a double materiality process in line with forthcoming reporting regulations, see our ESG Policy. These inputs helped to sharpen our focus on the areas, relationships and markets where salient human rights risks are more likely to occur.

Our salient human rights risks can affect different stakeholders in different stages of our value chain – from the sourcing of ingredients, materials and services to the production and consumption of our beer. The Carlsberg Group partners with tens of thousands of suppliers around the world and some of our salient human rights risks are in our supply chain. We strive to partner with suppliers that share our commitment to respecting human rights and we believe that together we can have a positive impact on people.

Sourcing responsibly is a key component of our human rights approach, and we have joined two global organisations, AIM-Progress and Sedex, to support our due diligence of suppliers. As a member of AIM-Progress, we share best practices for responsible sourcing with other manufacturers of fast-moving consumer goods and suppliers of these companies.

Sedex is a membership platform that enables companies to manage and improve working conditions in their global supply chains, and we are using tools developed by Sedex to screen, assess and audit relevant suppliers for human rights risks.

In 2023, we established a new Responsible Sourcing Programme – with accompanying guidance sessions for global and local procurement teams – to enhance our oversight of supplier practices in areas covered by our Supplier & Licensee Code of Conduct and in relation to other identified salient human rights risks. The programme includes a three step process to identify, assess and audit higher-risk suppliers and uses tools developed by the Sedex platform that we can access as members.

An initial screening determines a supplier's level of risk based on its location and the service or product it provides. To conduct this screening, we use the Sedex Radar tool, which draws on a range of sources to define risk levels for human rights, labour conditions, the environment, ethics, and health and safety. Suppliers in categories and countries identified as high-risk through the initial screening

process are then asked to complete the detailed Sedex self-assessment questionnaire, which generates a risk profile specific to that supplier.

Suppliers classified as high- or medium-risk in this phase of the process are asked to go through a rigorous third-party audit that includes site visits and uses the Sedex Members Ethical Trade Audit (SMETA) methodology. The four pillar SMETA audits cover labour, ethical, environmental, and health and safety risks, including the revision of areas like child and forced labour.

If a Carlsberg Group employee believes that our policies, including those related to human rights, have been breached, we encourage them to discuss it with their manager, our compliance team or a human resources representative. If such discussions do not resolve the issue or the employee does not feel comfortable sharing their concerns with their manager, compliance team or human resources representative, they can also raise their concerns anonymously using our Carlsberg Speak Up platform. This 24-hour helpline is run by an independent service provider, and is available by phone or online everywhere we operate. The helpline is also available to third parties who would like to speak up. The Speak Up system includes more than 300 languages and an explanatory Speak Up Manual is available online. All claims that potentially constitute a breach of our policies are investigated, and we have measures in place to prevent retaliation of any kind against anyone reporting a concern.

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. UK procurement employees (who are not people managers and who did not complete it in 2023) will complete this e-learning in 2024. In terms of responsible sourcing training, group and regional procurement were trained last year.

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 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 antibribery 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, 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. It, therefore, indirectly contributes to modern slavery compliance and a respect for human rights.

In connection with the launch of the Carlsberg Group's new Responsible Sourcing Programme accompanying guidance sessions for global and local procurement teams were held and will continue throughout 2024.

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 2023.

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.



Paul Thomas Davies
Chief Executive Officer
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