

# Data Ethics Statement 2024

Statutory Data Ethics Statement for 2024, cf. the Danish Financial Statements Act § 99 d

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## Policy

Royal Unibrew has adopted and implemented a General Data Protection and Data Ethics Policy, including aspects of GDPR, IT-security and Data Ethics. It was reviewed and updated by the Board of Directors in 2024.

The policy outlines the overall guidelines for considering data ethics in the use, design, and implementation of technologies, especially when using AI and new technologies, at Royal Unibrew for processing of but not limited to personal data.

The policy follows the 10 principles on data ethics from the Danish Council for Digital Security, covering legality, ethical design, data processing consequences, security, transparency, and human rights. The policy is supported by additional guidelines, including guidelines for Data Protection and guidelines for use of generative AI.

## Governance

Royal Unibrew's Information Security Committee (ISC), consisting of the CFO, CIO, CHRO and Group General Counsel, is responsible for the General Data Protection and Data Ethics Policy and its implementation, while the practical compliance of the policy is incorporated in the existing data protection and IT security compliance program in Royal Unibrew.

## Activities in 2024

Royal Unibrew's activities in 2024 did not by its nature trigger any need for specific initiatives involving more in-depth aspects of data ethics. Royal Unibrew continued the application of our data ethics principles which entailed continued focus on internal controls, IT-security, AI and further inclusion of data ethics principles into the Royal Unibrew general compliance programs. Among other initiatives in 2024 Royal Unibrew further enhanced its specific guidelines for use of generative AI.

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## **Employee training program**

Our employee training program is differentiated to accommodate the diverse nature of our business and potential exposure to data ethical and GDPR related issues. All employee groups where IT-security, GDPR or other data ethical aspects is relevant, are annually required to complete mandatory GDPR, cybersecurity and IT-security training, which includes aspects of data ethics. The program will be continued and further developed in 2025.