ROYAL
UNIBREW

Supplier Code of Conduct

Version 3.2
November 2026

Supplier Code of Conduct

1. Introduction

Royal Unibrew is committed to contributing positively to developments in the areas in which we operate, to encourage sustainability, establish safe and good working conditions for our employees and in our supply chain, limit our environmental and climate impact, supply consumers with products of very high quality and contribute positively to our stakeholders and society at large.

Royal Unibrew believes that by creating a more sustainable business and by working together with our suppliers, we can create shared value and a better, more resilient future. The quality and integrity of our products depend on continuity of supply and healthy supply chains. We recognize that responsible sourcing is an on-going process where improvements are achieved through engagement, cooperation and long-term partnerships with our suppliers.

Through this Supplier Code of Conduct (hereinafter referred to as the "Code"), we communicate the minimum standards and processes that we expect our suppliers to follow when conducting business with any part of the Royal Unibrew Group. This Code should be read in conjunction with the specific policies and guidelines that may apply to selected areas.

This Code outlines the expectations we have for our suppliers regarding, business integrity, human rights and labor standards, food safety and quality, and environmental sustainability. The Code includes all suppliers of both goods and services, as well as other deliveries to Royal Unibrew, licensees, partners, distributors and carriers, agents, consultants, and other vendors, etc. (hereinafter referred to as "suppliers").

Our approach to responsible sourcing is rooted in our commitments, legislation and internationally recognized conventions and guidelines such as OECD guidelines for Multinationals, UN Universal Declaration on Human rights, UN Guiding Principles on Business and Human Rights, International Labor Organization Standards, UN Global Compact, and UN Sustainable Development Goals, etc. More information can be found in the Appendix to the Code.

2. Implementation

Royal Unibrew suppliers are required to implement the principles and standards of this Code to their own business and their business partners, including sub-suppliers, contractors, agents, advisors, joint venture partners etc.

Royal Unibrew expect our suppliers and partners to adhere to all relevant laws and regulations (Applicable Laws) and prepare for future rules and regulations in due time. This Code outlines the standards that we expect our partners to uphold beyond mere legal compliance.

We expect and encourage our suppliers to develop and implement relevant management systems, appropriate for a company of their size and industry. Suppliers are responsible for controlling their own supply chain, and Royal Unibrew expects suppliers to take adequate steps to ensure that their own supply chain complies with the standards in this Code.

The suppliers must have appropriate due diligence procedures in place to comply with the requirements in this Code. Due diligence must among others include systems to avoid any adverse impact on human rights, ensure workers' rights, prevent negative influence on environment and climate and include procedures to uphold a high level of food safety.

Suppliers must keep appropriate records to demonstrate compliance with the requirements of this Code. The records must be available to Royal Unibrew upon request. We assess our suppliers' compliance with the Code through a combination of audits, self-assessments, and documentation reviews.

The objective of this Code is to establish a basis for positive development and continuous improvement of responsible procurement practices. Further, this Code is not and may not be construed as means to circumvent or undermine national legislation or authorities. In the event of any inconsistency, the more stringent requirements must be observed.

3. Business Integrity

Royal Unibrew will conduct business responsibly, with integrity, honesty, and transparency. We expect our suppliers to do the same. We maintain awareness of and comply with all applicable laws, regulations and relevant industry standards, international conventions, and guidelines.

Anti-Corruption, Anti-Bribery & Anti-Money Laundering
The supplier must comply with all applicable anti-corruption, anti-bribery and anti-money laundering laws and related rules and regulations, decrees and/or official government requirements including but not limited to the US Foreign Corrupt Practices Act 1977 and UK Bribery Act of 2010 and any local laws implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

IT-Security & Data Protection
We expect our suppliers to set ambitious standards for IT and cybersecurity to protect and safeguard information and data and maintain a high standard for data ethics. Suppliers must comply with all applicable laws relating to data protection and cyber security.

Privacy
Suppliers must be committed to protecting the privacy of personal information of everyone they do business with, including when transferring personal information to Royal Unibrew and handling personal information on behalf of Royal Unibrew. Suppliers must comply with all applicable laws relating to the protection of personal information.

Conflicts of Interest
Royal Unibrew strives to avoid situations which can directly or indirectly create a conflict between the interest of Royal Unibrew and any individual's personal interest. Suppliers must always strive to avoid activities that create conflicts of interest in their business and in the cooperation with Royal Unibrew.

Confidentiality
Royal Unibrew values the sharing of information and freedom of speech. However, we prioritize the respect and protection of confidential information. Therefore, we require our suppliers to take all reasonable and necessary precautions to safeguard any information they access. This includes not disclosing information to anyone, inside or outside of Royal Unibrew, unless the disclosure is properly authorized, based on a clearly defined legitimate business need and shared only on a strictly need-to-know basis.

Sanctions and Financial Recordings
Royal Unibrew requires its suppliers to comply with all applicable laws, regulations, or orders concerning any trade, economic, or financial sanctions or embargoes. Suppliers must not engage with persons or entities subject to such sanctions or embargoes. Additionally, all business and commercial dealings must be conducted transparently and recorded accurately in accordance with local laws.

Competition & Anti-trust
Royal Unibrew requires its suppliers to commit to vigorous, lawful, straightforward, and ethical competition. Suppliers must ensure that their business practices fully comply with competition and anti-trust laws in all regions where they operate.

Our Suppliers are expected not to offer gifts or entertainment to any business partners or related parties, including Royal Unibrew, that could inappropriately influence business decisions.

4. Human Rights & Labor Standards

Royal Unibrew will promote awareness of labor and human rights issues throughout our global organization.

Occupational Health & Safety
The supplier must ensure a safe, healthy, and secure working environment in accordance with applicable laws and other relevant industry standards and must have adequate processes and procedures for a safe working environment, protective equipment and workplace training when needed.

Labor Standards / Working Conditions
The supplier must respect the standard working hours and have transparent procedures on overtime in accordance with national legislation and in accordance with ILO's Hours of Work Convention. All employees must be entitled to at least one day off per week, sufficient rest between shifts and reasonable breaks during the day.

Freedom of Association and Collective Bargaining
Suppliers must respect the right of workers to form and join trade unions and bargain collectively and avoid any discrimination or harassment of workers because of union membership.

Non-Discrimination and Harassment
Royal Unibrew values diversity. Our suppliers must ensure equal opportunity and rights for every employee and avoid any discrimination in the recruitment, treatment, and promotion of employees on grounds of race, religion, belief, ancestry, national origin, color, gender, sexual orientation, age, marital status, pregnancy status, physical appearance, disability, or any other distinguishing characters.

The suppliers must ensure that workers are not threatened or are subjected to any form of violence or harassment.

Child Labor, Forced Labor & Human Trafficking
Royal Unibrew suppliers must never participate in or benefit from any form of child or forced labor, slavery, or human trafficking in any of our operations, including our recruitment processes.

5. Food safety and Quality

Royal Unibrew expect our suppliers, who are involved in any part of the development, handling, manufacturing, packaging, transportation, or storage of our products, to understand and follow the product safety and quality standards, policies, specifications, and procedures relevant to the products produced at their location.

The supplier must adhere to good manufacturing practices and testing protocols, comply with all applicable EU, US FDA or national food safety laws and regulations, and immediately report any issues to Royal Unibrew that could impact the safety or quality of a Royal Unibrew product.

Royal Unibrew have adopted quality management and Global Food Safety Initiative (GFSI) and we expect our suppliers to implement HACCP principles to manage traceability and plan preventive actions. We prefer suppliers that have a certified quality management system recognized by Global Food Safety Initiative (GFSI) e.g. FSSC 22000, IFS, or BRC etc.

6. Environment and Sustainability

Suppliers must comply with all applicable laws and industry standards relevant to the environmental, nature and climate impact of the supplier activities, products, and/or services.

Carbon Emission Management
We expect all our suppliers to manage and monitor energy consumption as well as transitioning towards renewable energy sources as well as having a general decarbonization roadmap.

Royal Unibrew expects suppliers reporting to be aligned with the Green House Gas Protocol and relevant PEFCRs (EU Product Environmental Footprint Category Rules) or other PCF (Product Environmental Footprint) schemes. The basic requirement is to disclose scope 1 and 2 energy consumption/emissions, the contribution from renewable energy sources, and other CO2 reduction targets. We expect our suppliers, at a minimum, to be working on the disclosure of scope 3 emissions.

Agriculturally based Raw Materials
Royal Unibrew is a multi-beverage company, where agriculture and agriculturally based raw materials are central to our supply chain. Our products must be based on a safe, high quality and affordable supply of agricultural raw material to meet the demands.

Royal Unibrew believes that focus on productivity, yields and improved farming methods, based on acknowledged science and technology without compromising environment and social standards is part of the solution.

Therefore, we expect our suppliers to develop and manage a sustainable agricultural supply chain with objectives, procedures, performance tracking and documentation and commitment to sustainability improvements over time in accordance with approved standards such as SAI (Sustainable Agriculture Initiative), Global G.A.P, or other responsible farming standards and initiatives.

Zero-deforestation is a basic requirement, We favor regenerative - sustainable farming principles and suppliers that are working to promote biodiversity, minimizing the use of artificial fertilizers, pesticides, and irrigation while building resilience and carbon sequestration.

Packaging Material
Packaging material is vital for the protection of our products and maintaining the high product quality in the entire shelf life of our products. Thereby, packaging material enables less food waste in the supply chain.

We expect all our suppliers of packaging material to develop and manage sustainable packaging materials, minimize waste, and design for reuse/recycling, both in the production process but not the least for post-consumer recyclability.

For fiber-based packaging material we will favor suppliers that can demonstrate stewardship in the entire value chain through certifications and traceability such as PEFC or FSC.

Waste and Circular Economy
We expect all our suppliers to apply a circular economy design and close the loop for materials. Royal Unibrew believes that excess use of resources may be avoided by increasing reuse and recycling of material, whenever possible. Thus, material losses in the manufacturing processes such as cut-offs or waste, must be recovered to the fullest either by reuse or recycling.
We are aware that all suppliers are not able to provide the data upfront or implement circular flows of material, but we will favor suppliers that initiate the process.

Water and Wastewater
All suppliers using water for purposes other than sanitary needs must have a water management system and work to minimize water consumption. This is especially important if the supplier is in an area with water scarcity or high water stress.

Wastewater must be managed in accordance with applicable local regulations and must undergo treatment before final discharge.

7. Report Violations

Royal Unibrew encourages our suppliers and their employees to speak up if they have any concerns regarding a possible violation of this Code, to identify and address potential misconduct.

Violations and suspicions can be reported anonymously to Royal Unibrew via the Royal Unibrew Whistleblower reporting system at **https://whistleblowersoftware.com/secure/RoyalUnibrew**

Appendix

Royal Unibrew Supplier Code of Conduct is based on the following standards, guidelines, and conventions to ensure ethical, environmental, and social responsibility.

International Labour Organization (ILO) Conventions

- ILO Declaration on Fundamental Principles and Rights at Work
- Core Conventions (e.g., Freedom of Association, Elimination of Forced Labor, Abolition of Child Labor, Non-Discrimination, Equal Remuneration)

OECD Guidelines for Multinational Enterprises

- Guidelines on responsible business conduct covering areas like human rights, labor, environment, and anti-corruption

UN Guiding Principles on Business and Human Rights

- Framework for due diligence processes for business operations to prevent adverse impact on human rights

European Union Due Diligence Regulations

- Upcoming and existing regulations on due diligence regarding human rights, climate and environmental impact – EU Taxonomy, CSRD, CSDDD

United Nations Global Compact

- Principles on human rights, labor rights, environment, and anti-corruption