

# **MODERN SLAVERY ACT COMPLIANCE STATEMENT**

**Carlsberg UK Limited**

**2019**

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## CARLSBERG UK LIMITED

### INTRODUCTION FROM THE BOARD OF CARLSBERG UK LIMITED (CARLSBERG)

The prevention of slavery and human trafficking is important to Carlsberg. We are proud of our record in this area, but as part of constantly striving for better, we continually review our practices. Slavery can take many forms including forced labour, human trafficking and child labour. We are opposed to all forms of servitude and oppression 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 CARLSBERG?

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. As one of the largest brewers in the UK, Carlsberg's statement is set out below and includes an overview of our company structure and current practices.

### ORGANISATION'S STRUCTURE

We market, promote and supply certain alcoholic and non-alcoholic drinks in the UK with our well-known brands including Carlsberg, Carlsberg Export and Tetley's. We are a part of the Carlsberg group (the **Carlsberg Group**), and our ultimate parent company is Carlsberg A/S which has its head office in Denmark and is listed on the Copenhagen stock exchange.

### 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 our [Carlsberg Group website](#) for more details.

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### OUR SUPPLY CHAINS

Our supply chains include the manufacturing, distribution, marketing and sales of our products. Our sister company, Carlsberg Supply Company AG (CSC) is responsible for global planning, procurement, production and logistics in the Carlsberg Group.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Carlsberg Group Supplier and Licensee Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We are continually reviewing and assessing the role and impact of the Supplier and Licensee Code of Conduct and it is our ambition to review and update this material in 2019.

Our Labour and Human Rights Policy, supplemented by the Labour and Human Rights Manual, also defines the labour and

human rights standards to which all employees and contractors of the Carlsberg Group are entitled, irrespective of the country in which they work. Human resources professionals and managers are invited to complete an e-learning on the Labour and Human Rights Policy. The Carlsberg Group also encourages the application of this policy (or policies of a similar standard) to joint ventures in which it holds an interest.

Since 2008, Carlsberg Group has been a signatory to the UN Global Compact (**Compact**). The Compact intends to align companies with universal principles on human rights, labour and anti-corruption amongst others. We aim to act in compliance and support with the Compact, as reflected in our Supplier and Licensee Code of Conduct.

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### OUR DUE DILIGENCE PROCESSES AND RISK ASSESSMENT IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

As part of Carlsberg's commitment to combatting unethical behaviour and in order to comply with applicable laws, we screen all of our business partners and a fundamental part of this process is to ensure we have all the necessary details about our partners.

Carlsberg employees are obliged to maintain records of all screening procedures undertaken, and information obtained as part of 'knowing' our business partners. Without satisfactory documentation, Carlsberg will not be able to progress a business arrangement with a partner.

Carlsberg have appointed an independent third party to operate an internal "SpeakUp" process across the business. The SpeakUp system encourages and facilitates employees and contract workers speaking up about situations or conduct that are not in line with our Anti-Bribery and Corruption Policy and Manual without fear of retaliation. The SpeakUp process is activated via a telephone line or online reporting and issues are

monitored by the Carlsberg Group Legal and Compliance function.

### MEASURING EFFECTIVENESS

The Carlsberg Group is a member of Sedex, a global non-profit organisation dedicated to driving improvements in ethical and responsible business practices. The Sedex registration number for the Group is ZC1066915. As part of CSC's responsible sourcing program, CSC has access to the Sedex on-line platform where suppliers share self-assessment questionnaires, ethical audits and any non-compliance if applicable. In addition Sedex provides a risk assessment tool to evaluate the risk profile of suppliers in the area of sourcing.

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### TRAINING FOR STAFF

In addition to the Labour and Human Rights Policy e-learning outlined above, all employees at Carlsberg undertake Business Ethics e-learning training module when they join the company. The Business Ethics e-learning module reflects the requirements contained within Carlsberg's Anti-Bribery and Corruption Policy and Manual. Completion of the e-learning training is monitored and additional training and awareness activities undertaken on a regular basis.

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 2018.

For further information on the Carlsberg business, its economic contribution to society and its sustainability efforts, visit [www.carlsberggroup.com](http://www.carlsberggroup.com).



Managing Director  
Tomasz Blawat  
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