

MODERN SLAVERY ACT COMPLIANCE STATEMENT

CARLSBERG MARSTON'S BREWING COMPANY LIMITED

INTRODUCTION FROM THE CEO OF CARLSBERG MARSTON'S BREWING COMPANY LIMITED (CMBC)

CMBC is committed to ensuring all our business and partners are free from slavery and human trafficking. 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.

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 2025.

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.

A handwritten signature in black ink, appearing to be 'PTD', with a long horizontal stroke extending to the right.

Paul Thomas Davies

Chief Executive Officer

Date: 30 June 2026

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

The Modern Slavery Act (**Act**) was passed into law by the UK Parliament in 2015. The objective of the Act is to encourage greater transparency for consumers and among businesses about steps taken to prevent 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's statement for the financial year ending 31 December 2025 is set out below and includes an overview of our company structure and practices during that period.

ORGANISATION'S STRUCTURE AND BUSINESS

The Carlsberg Group is present in different regions, and primarily in Europe and Asia. Please see the [Carlsberg Group website](#) for more details.

CMBC produce, market, promote, and supply alcoholic and non-alcoholic drinks in the UK including Carlsberg Danish Pilsner, Carlsberg Export, 1664, Tetley's, Hobgoblin and Marston's Pedigree, as well as licensed brands, such as Erdinger. We are a part of the Carlsberg group (the **Carlsberg Group**), which has its headquarters in Copenhagen, Denmark and is listed on the NASDAQ.

CMBC controls five production sites (own operations) and in these efforts is supported by a network of business partners (supply chain).

CMBC is entirely integrated into Carlsberg Group via Carlsberg UK Holdings Limited.

This commercial integration also means that with regards to human rights commitments and due diligence activities, CMCB follow the Group's policies and processes related to addressing modern slavery risks.

GOVERNANCE

Human Rights is a focus area of Carlsberg's ESG programme, which is an integral part of Accelerate SAIL, our business strategy. Responsibility for and oversight of human rights, including issues related to modern slavery, lie with our Executive Committee, which is chaired by the Group CEO.

Implementation of related activities is overseen by our ESG Steering Committee, while Group Sustainability and our ESG team is responsible for driving our global human rights due diligence work, providing advice on human rights issues, and measuring and reporting on human rights performance.

The relevant Group VPs, country managing directors, and regional and local management are responsible for ensuring that actions related to modern slavery are implemented and that all employees are aware our requirements.

Management, employees and contract workers of all entities in the Carlsberg Group, as well as our business partners, are responsible for adhering to our expectations vis-à-vis human rights, including modern slavery.

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 MODERN SLAVERY

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) and implemented by OECD Guidelines for Responsible Business Conduct. To this effect, we acknowledge our responsibility to respect internationally recognised human rights across our own activities and business relationships, including modern slavery.

Further, 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.

Our commitment to respect human rights is reflected in our policies, including our [Human Rights Policy](#) (the **Policy**). The Policy sets out our commitment to human rights and our expectations for all members of the Carlsberg Group, its employees and business partners globally, with further guidance being provided in an internal Human Rights Manual that explains to relevant stakeholders how the Policy should be applied

The Carlsberg Supplier & Licensee Code of Conduct lays down specific requirements for suppliers in the areas of human rights, including the prevention of modern slavery.

To work with us, suppliers must meet these requirements and cascade the same to their suppliers and beyond. To support with the uptake of expectations, we work with our suppliers to help them mitigate risks and remediate impacts.

We also collaborate through industry partnerships to provide supplier training and build capabilities 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 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 most of their contracts including by CMBC in the UK.

Where a third party's contract template is used, equivalent wording is added to ensure the same level of contractual protection. In 2024 we updated our Supplier and Licensee Code of Conduct to better reflect our current approach to this area.

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

The Carlsberg Group regularly assesses and identifies the most significant human rights risks across our global operations and value chain, based on an evaluation of both severity and likelihood.

This process considers industry trends, public research, best practices from peers and input from internal stakeholders. To date, we have relied on the support of external specialists to support use in these efforts.

This was last delivered in 2025 and outputs identified modern slavery as a key potential risk within our operations and supply chains.

Own operations

To support and address this risk within our own operations, Group Internal Audit delivers first-party audits on a mix of operations on an annual basis. Sites are selected to undergo internal audits based on their human rights risk profiles.

Where we identify higher risk profiles within our own operations, we commission third-party specialists to deliver human rights impact assessments.

Whether internal or third-party, each assessment concludes with a corrective action plan and monitoring to ensure identified gaps are addressed.

Supply chain

To manage, mitigate and eliminate risks in our supply chain, internal specialists at CSC manage and deliver an integrated Responsible Sourcing Programme. The programme includes a three-step process to identify, assess and audit high-risk tier one 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-risk in this phase of the process are asked to go through a third-party audit that includes site visits and uses the Sedex Members Ethical Trade Audit (SMETA) methodology. The four pillar SMETA audit covers topics included in our SLCOC, including

human rights labour conditions, health and safety, environmental management, ethical business, including checks to prevent child and forced labour.

We did not identify any forced labour issues in 2025 in own operations or supply chain.

SPEAK UP MECHANISM

If any internal or external stakeholder 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 supports more than 300 languages, and an explanatory Speak Up Manual is available online. All claims that may represent a breach of our policies are thoroughly investigated, and we have safeguards in place to protect anyone who raises a concern from any form of retaliation.

In 2025, no allegations related to modern slavery were submitted via this platform.

TRAINING

Own operations

In 2025, our human rights e-training was revised and deployed globally to all salient employees.

In addition to the Human Rights Policy e-learning outlined above, to reflect our commitment to act ethically and with integrity, all employees undertake a Code of Ethics and Conduct e-learning training module when they join the company. Completion of this e-learning training is monitored. This training embeds the commitment to acting ethically and with integrity within the business.

Supply chain

Carlsberg proactively trains suppliers on our expectations linked to human rights, and, as such, modern slavery.