

POLICY FOR ENVIRONMENT, SOCIAL AND GOVERNANCE



BY APPOINTMENT TO
THE ROYAL DANISH COURT

Harboe

HARBOE BREWERIES

POLICY FOR ENVIRONMENT, SOCIAL AND GOVERNANCE (ESG)

Introduction

As an international brewing company, we are aware of the impact our activities have on our surroundings and the stakeholders we are in contact with. Therefore, it is crucial for us that Harboe's growth and development happens on a sustainable basis, and in accordance with applicable regulations and standards for good ethical behaviour and social responsibility.

Our ESG policy is based on the principles of the UN Global Compact and we are committed to selected UN Sustainable

Development Goals where we have a responsibility and can contribute to positive development. This policy applies to all of Harboe's activities.

Strategic goals for ESG

It is our ambition to contribute to responsible and sustainable development. Throughout the value chain, we rely on critical resources, and we focus our efforts on promoting ESG by minimising negative impacts and maximising positive ones. Our strategic goals are based on four focus areas with associated goals:



Policies and Systems

Harboe works in accordance with national and international legislation as well as international guidelines, conventions and standards for ESG. Our policies and systems ensure that we comply with applicable regulations and standards.

Work is under way to implement processes and procedures to ensure that Harboe can communicate according to the six environmental goals within the EU Taxonomy.

Harboe is working to prepare for the new enhanced reporting requirements resolved in the EU in 2022 with the new Corporate Social Responsibility Directive (CSR-D). Since the 2019/20 financial year, Harboe has followed the recommendations from the guide ESG key figures in the annual report,

which was prepared in a collaboration between FSR – Danish Auditors, CFA Society Denmark (Finansforeningen) and Nasdaq, for reporting on the work with CSR, sustainability and ESG. With the new directive, the requirements will increase significantly, and this will mean that more resources must be found to meet the many requirements for data and documentation.

Harboe continuously monitors the development of new legislation in the area. We know that new corporate due diligence directives are being worked on for ESG reporting, packaging materials and packaging material waste, as well as new climate labelling.

	Environment & climate	People	Consumer & products	Business ethics
UN Global Compact	Principles 7, 8 and 9	Principles 3, 4, 5 and 6	Principle 8	Principles 1, 2 and 10
Policies	Environmental policy Energy management policy Packaging materials policy	Diversity, equality and inclusion policy Working environment policy	Quality and food safety policy Responsible marketing policy	Whistleblower policy
Systems and procedures and guidelines	Energy management based on the ISO 50001 principles	Working environment management at group level Code of conduct – employees Job satisfaction survey Employee master data	Global Food Safety Initiative (GFSI) / International Featured Standards (IFS)	GDPR Tax compliance and transfer pricing Code of conduct – employees and suppliers

ESG organisation and management

The ultimate responsibility for the ESG strategy lies with Harboe's CEO. The day-to-day sustainability work is handled by the RD & Sustainability Director and the Sustainability Steering Group.

Harboe's Sustainability Steering Group consists of leaders across the business, and these are involved in sustainability decisions. The Sustainability Steering Group, in collaboration with the RD & Sustainability Director, will ensure that the accelerating requirements and new legislation are implemented and transformed into value and opportunities in relation to Harboe's ESG and sustainability programmes.

Ownership of the specific focus areas, cf. Harboe's ESG strategy, is anchored in relevant functions in the respective areas. This is to ensure that Harboe can continue to deliver results in relation to the set targets.

Sustainability and ESG results, initiatives and policies are followed up on by senior management, including Harboe's Board of Directors. Overall strategic issues are routinely discussed and agreed with the company's senior management and board of directors.

ESG reporting and communication

Harboe's statutory social responsibility statement is included as part of the management's review section of the annual report, cf. sections 99a and 99b of the Danish Financial Statements Act.

The statement also constitutes Harboe's Communication on Progress (CoP) in accordance with adherence to the ten principles under the UN Global Compact.

This policy and the ESG report are available on Harboe's website www.harboe.com.

Approval

This policy was approved by the Board of Directors of Harboes Bryggeri A/S in June 2023.

Harboes Bryggeri A/S

Spegerborgvej 34

DK-4230 Skaelskoer

Tel +45 58 16 88 88

VAT-no: 43 91 05 15

post@harboe.com

harboe.com