

HUMAN RIGHT POLICY AND GUIDELINES



BY APPOINTMENT TO
THE ROYAL DANISH COURT

Harboe

HARBOE BREWERIES

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Introduction

Doing business responsibly and sustainably supports that purpose and drives efforts to deliver value for our shareholders and society. Given our footprint and scale, we recognize that our operations and value chain impact people, and that we have a responsibility to respect the human rights of our employees, workers in our supply chain, our consumers and end users and the communities in which we operate. Harboe Group's Human Rights Policy articulates our commitment to respect human rights, our approach to continuous human rights due diligence and rightsholder engagement, including the provision of grievance channels, our human rights governance, and our commitment to provide and cooperate in access to remedy in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

Scope

Harboe Group's Human Rights Policy applies to our entire value chain, including our employees, contractors, consultants and other individuals working on the Group's premises or working for or on behalf of the Group, as well as to our global business partners. Our business partners include our customers, suppliers, service providers, consultants and all other parties with whom we have a commercial relationship. The principles of this Policy are embedded in the Harboe Code of Conduct, which describes in detail how these principles apply to employees and suppliers. and in the Harboe Brand Safety Policy and guidelines, which includes specific guidance on how the principles of this Policy apply to the people promoting our products.

Our commitment to human rights

We are committed to respecting internationally recognised human rights across our operations and value chain. As a signatory to the UN Global Compact, we are committed to its Ten Principles, which incorporate human rights, and we follow the framework provided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct to inform our approach to human rights due diligence. We recognise that respecting human rights is a dynamic and complex process within the context of emerging regulations on mandatory due diligence and evolving stakeholder expectations. We are therefore committed to conducting ongoing human rights due diligence in line with the UNGPs, and we strive to continuously improve our ability to identify potential and actual human rights impacts connected to our business and take appropriate action to prevent and mitigate those impact.

We operate in diverse contexts around the globe, including in some environments where human rights risks may be higher than in others. Where there are areas of conflict between national and international human rights standards, we seek ways to respect international human rights to the greatest extent possible. We are committed to communicating this Policy internally to our employees and management and externally to our business partners and other stakeholders. We will continue to review and update this Policy by incorporating insights from rightsholders and stakeholders, as well as learnings from our ongoing human rights due diligence work.

Implementation of policy

To implement the Harboe Group Human Rights Policy, we have a human rights due diligence process that consists of four core steps, aligned with the requirements of the UNGPs. The first step of our human rights due diligence process focuses on identifying potential human rights risks associated with our business and value chain and prioritizing them based on saliency. In the second step of our human rights due diligence process, we manage the risks identified by integrating the results of our due diligence work into our policies and processes. This is supported by regular training. As a third step, we track our progress by monitoring advancement towards defined targets and tracking human rights claims raised by employees and other stakeholders through our Whistleblower solution. As a final step, we are committed to reporting publicly on our due diligence process and our overall approach to human rights through the Sustainability & ESG report. The latest version of the ESG report can be found on our public website.

Organization and management

Our governance structure covers also the Harboe Group Human Rights Policy. Human Rights is a focus area of Harboe's ESG & Sustainability program. The policy is approved by Harboe's executive management. Implementation of this Policy is handled by the Code of Conduct Team. The ESG team is responsible for driving the human rights due diligence work, providing advice on human rights issues, and measuring and reporting on human rights performance.

Reporting

We encourage employees who experience or witness misconduct, including human rights concerns, to talk in the first instance to their nearest manager or raise their concern with HR, code of conduct team or legal function. If neither of these options is possible or you are not an employee of Harboe Group, you may consider raising your concerns via our

Whistleblower solution, which enables employees and external parties worldwide to report any breach of our Code of Conduct, including possible human rights violations, anonymously, confidentially and without fear of retaliation. The Whistleblower solution is available in both Danish, English and German and can be found on the Harboe website and intranet. The Whistleblower solution is hosted by an independent third party appointed by Harboe. You can find the Whistleblower solution [here](#).

All issues raised through the Whistleblower solution are monitored, reviewed and investigated independently. The Harboe Group does not retaliate and does not tolerate retaliation in any form. Therefore, we have developed mechanisms to protect our whistleblowers from retaliation. If you experience retaliation in any form, we encourage you to report this via the Whistleblower solution, as retaliation represents a separate form of misconduct and breach of our Code of Conduct that should be investigated and addressed appropriately.

Remedy

We are committed to providing or cooperating in the remediation of any adverse human rights impact on workers that we have caused or contributed to.

Approval

The policy is approved by Harboes executive management
– April 2025.

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