

**Company Name** Carlsberg  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 8.5 out of 26

| Score   | Out of    | For indicators   |
|---|-----------|--|
| <b>Governance and Policy Commitments</b>                |           |  |
| 1   | 2         | A.1.1 Commitment to respect human rights   |
| 2   | 2         | A.1.2 Commitment to respect the human rights of workers  |
| 1   | 2         | A.1.4 Commitment to engage with stakeholders   |
| 0   | 2         | A.1.5 Commitment to remedy   |
| <b>Embedding respect and Human Rights Due Diligence</b> |           |  |
| Embedding respect                                       |           |  |
| 1.5   | 2         | B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions                                       |
| Human Rights Due Diligence (HRDD)                       |           |  |
| 0   | 2         | B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts                            |
| 0   | 2         | B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)                  |
| 0   | 2         | B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action              |
| 0   | 2         | B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts |
| 0   | 2         | B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed  |
| <b>Remedies and Grievance Mechanisms</b>                |           |  |
| 1.5   | 2         | C.1 Grievance channels/mechanisms to receive complaints or concerns from workers   |
| 1.5   | 2         | C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities              |
| 0   | 2         | C.7 Remedying adverse impacts and incorporating lessons learned  |
| <b>8.5</b>  | <b>26</b> |  |

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| A.1.1          | Commitment to respect human rights                | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 1 &amp; 2: The Company 'supports the United Nations Universal Declaration of Human Rights and is a signatory to the United Nations Global Compact, which means that we support 10 principles within the following important areas: labour and human rights; health and safety; the environment; and business ethics (including anti-corruption).' [Supplier and Licensee Code of Conduct, 11/2019: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Met: UDHR: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The Company has provided comments to CHRB regarding this indicator. However, no formal statement of policy commitment to the UN Guiding Principles was found. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: OECD</li> </ul>  |
| A.1.2          | Commitment to respect the human rights of workers | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: The Company explicitly lists and explains all four ILO fundamental rights at work. The Company 'does not tolerate any form of discrimination against our employees,' 'does not tolerate any form of forced labour,' 'does not tolerate the hiring of child labour under any circumstances,' and respects 'employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively.' [Labour and Human Rights Policy, 09/2019: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Met: Explicitly list All four ILO for AG suppliers: The Company explicitly requires that its suppliers adhere to the ILO fundamental rights at work, including non-discrimination, no forced labour, no child labour, and explicitly mentions the right to collective bargain and freedom of association, where it indicates: 'Supplier must respect the right of employees to join (or not) a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.' [Supplier and Licensee Code of Conduct, 11/2019: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, the Company explicitly lists and explains all four ILO fundamental rights at work. The Company 'does not tolerate any form of discrimination against our employees,' 'does not tolerate any form of forced labour,' 'does not tolerate the hiring of child labour under any circumstances,' and respects 'employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively.' [Labour and Human Rights Policy, 09/2019: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company 'is committed to promoting a zero-accident culture and takes all reasonable measures to assess and control the potential risks of its operations, including process and occupational health and safety risks.' [Health and Safety, 01/2018: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The supplier code contains a section devoted to health and safety: 'Supplier must ensure it and its contractors provides its employees with a safe and healthy working environment including rules and procedures to be followed, protective equipment to be used and the training necessary to perform their tasks safely. In addition, Supplier must actively identify and eliminate, or adequately control, any hazards that present a risk to employees (and other persons present on its sites) and to the environment. Supplier must formulate and implement plans that clearly set out adequate measures to safeguard employees and others persons affected by its activities.' [Supplier and Licensee Code of Conduct, 11/2019: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> |

| Indicator Code | Indicator name                         | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| A.1.4          | Commitment to engage with stakeholders | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states in its website: 'In addition to updating our Labour and Human Rights Policy, we are also reviewing our overall approach to human rights due diligence, focusing initially on identifying our salient human rights, in cooperation with Human Rights experts. Furthermore, we are committed to engaging with other local and global stakeholders in our work on labour &amp; human rights, including the work on identifying and prioritising our salient human rights issues.' [Responsible Business, N/A: <a href="https://carlsberggroup.com">carlsberggroup.com</a> &amp; Sustainability Report 2019, 04/02/2020: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul> |
| A.1.5          | Commitment to remedy                   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>   |

## Embedding Respect and Human Rights Due Diligence

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.1.1          | Responsibility and resources for day-to-day human rights functions                 | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to each ILO core.</li> <li>• Met: Senior responsibility for HR: The HR Policy states that the Executive VP Group HR 'owns, endorses and ensures the implementation of the policy'. [Labour and Human Rights Policy, 09/2019: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: Employees at the rank of local management or above (regional management, Country Managing Directors and Relevant group VPs) are 'Responsible for ensuring that this [human rights] policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Ensure local compliance with the policy including adequate control measures to eliminate or reduce risks to express behaviours in breach with the policy'. Group HR 'drives the implementation of the policy, provides specific advice on labour and human rights issues and dilemmas, and ensures that labour and human rights issues are identified and addressed. Audits, reviews, measures and reports on labour and human rights performance'. [Labour and Human Rights Policy, 09/2019: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Day-to-day responsibility for AG in supply chain: The Company states: 'It is the responsibility of Supplier to ensure that its employees, sub-suppliers, sub-contractors or sub-licensees, and other third parties acting on its behalf, do not breach this Code. Carlsberg Group will periodically review the adequacy and continuing effectiveness of this Code and notify Suppliers of any resulting revisions'. However, there is no description of day-to-day responsibility allocation for managing the supply chain (within the Company). [Supplier and Licensee Code of Conduct, 11/2019: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> |
| B.2.1          | Identifying: Processes and triggers for identifying human rights risks and impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company states that the human resources department is in charge of ensuring 'that labour and human rights issues are identified and addressed,' however, no details found on the process by which it goes about this. The Company also indicates: 'In addition to updating our Labour and Human Rights Policy, we are also reviewing our overall approach to human rights due diligence, focusing initially on identifying our salient human rights, in cooperation with Human Rights experts. Furthermore, we are committed to engaging with other local and global stakeholders in our work on labour &amp; human rights, including the work on identifying and prioritising our salient human rights issues'. However, there are no details against the process of salient human rights risks identification. [Labour and Human Rights Policy, 09/2019: <a href="https://carlsberggroup.com">carlsberggroup.com</a> &amp; Responsible Business, N/A: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <ul style="list-style-type: none"> <li>• Not met: Identifying risks in AG suppliers: See above. No details found on process followed to identify potential risks and impacts in agricultural supply chain. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts: The Company indicates that the due diligence process includes consultations with experts. No further details found. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>   |
| B.2.2          | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)                  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): Although the Company indicates that 'Assessing and prioritising salient human rights risks' is one of the key areas of its due diligence process, no further details found in relation to the assessment, context, and results. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a> &amp; Sustainability Report 2019, 04/02/2020: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Public disclosure of salient risks: As stated above, the Company does not indicate the results of its assessment. [Sustainability Report 2019, 04/02/2020: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a> &amp; Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>   |
| B.2.3          | Integrating and Acting: Integrating assessment findings internally and taking appropriate action              | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company indicates that 'Tracking progress on actions taken to prevent and mitigate the risks' is one of the key areas in its human rights due diligence process. However, no details found in relation to action plans to mitigate the risks identified. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Including in AG supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>  |
| B.2.4          | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: Regarding the due diligence process, the Company states: 'Tracking progress on actions taken to prevent and mitigate the risks' is one of the key areas of the process. However, no further details found related to a system to check the effectiveness of the actions taken. [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>  |
| B.2.5          | Communicating : Accounting for how human rights impacts are addressed   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 [Responsible Business, N/A: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a> &amp; Sustainability Report 2019, 04/02/2020: <a href="https://www.carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>• Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>• Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul> |

## Remedies and Grievance Mechanisms

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers                              | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company participates in a shared mechanism called Speak Up, by People Intouch, which allows for anyone to make a complaint about the Company, in regards to anything, including human rights. Employees 'may report violations anonymously by contacting the compliance representative or filing a report via the Speak Up System.' [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates that 'in 2018, 95 suspected matters of misconduct were reported through the Speak Up system'. However no evidence found on details about number of grievances filed, addressed or resolved concerning human rights. Additional evidence was not found in more recent documents. [2018 Sustainability Report, 06/02/2019: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The Company states that 'In 2017, we promoted our new Speak Up system globally with communication materials about how and where to speak up. The system is available in over 30 languages and can be accessed via web or phone. We have also developed a Speak Up manual to give guidance to our employees'. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a> &amp; Sustainability Report 2017, 07/02/2018: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> <li>• Not met: Expect AG supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AG supplier workers: The grievance system is available online, which means anyone can access it. However, it is unclear whether or not this mechanism can be used to report human rights violations in the Company's supply chain. Additional evidence was not found in more recent documents. The Company has provided comments to CHRB regarding this indicator. However, supporting evidence has not been found in publicly available sources. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a> &amp; Contact, N/A: <a href="https://carlsberggroup.com">carlsberggroup.com</a>]</li> </ul> |
| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The SpeakUp system is publicly available to any person with an internet connection. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The mechanism is available in a variety of languages and online. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>  |
| C.7            | Remedying adverse impacts and incorporating lessons learned   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [SpeakUp: <a href="https://speakupfeedback.eu">speakupfeedback.eu</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>   |

## Performance: Responses to Serious Allegations (Not included in the overall score)

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| E(1).0         | Serious allegation No 1 |                  | No allegations meeting the CHRB severity threshold were found. |

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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