



**Danish Crown**

# Business Partner Code of Conduct

Governance	
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Approved by	Board of Directors, Danish Crown A/S
Accountable for implementation of policy	Vice President, Group Legal
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# About this Business Partner Code of Conduct

## 1. Introduction

### 1.1. Responsible business conduct

As a leading food company, Danish Crown carries a significant corporate responsibility. We strive to live up to this by managing our business in a profitable and sustainable way and by integrating environmental, social, and ethical considerations in our business operations and throughout our value chain.

Danish Crown is committed to act responsibly and comply with all applicable laws, rules, and regulations (collectively the "Law") as well as recognised international standards and treaties.

The Danish Crown Business Partner Code of Conduct (the "Code") recognise that our responsibility is linked to the cooperation we have with our Business Partners, and we therefore hold our Business Partners accountable to the same Law and standards for responsible business conduct as we hold ourselves. Those standards deriving from Danish Crown's commitment to the UN Global Compact, the UN Guiding Principles on Business and Human Rights, OECD Guidelines, and the ILO core conventions (collectively the "Standards").

### 1.2. Scope of application

The Code applies to Danish Crowns' Business Partners. A Business Partner (the "Business Partner") is defined as anyone with whom we cooperate, such as but not limited to, agents, customers, and other Business Partners.

### 1.3. Compliance with the Code

The Code defines the minimum requirements that Business Partner to Danish Crown must comply with when conducting business with the Danish Crown Group).

Compliance with this Code is a prerequisite for collaboration.

The Business Partner is required to implement and comply with the Code in its business and operations and in turn to extend the standards of responsible business conduct to its Business Partners, thus extending the standards throughout the entire supply chain.

## 2. Environment

The Business Partner is expected to take full responsibility for its impact on the climate and environment and shall as a minimum meet all applicable regulatory requirements as well as recognised international standards.

Danish Crown also expects the Business Partner to integrate environmental considerations in its activities and strive for continuous improvement, by minimizing and preventing any adverse impacts of its activities on the environment.

## 3. Social

The Business Partner must support and respect human and labour rights and ensure that it is not complicit in human and labour rights abuses. This includes compliance with legislation, including the International Labour Organization (ILO) namely:

- a) Freedom of association and effective recognition of the right to collective bargaining
- b) Elimination of all forms of forced or compulsory labour
- c) Effective abolition of child labour
- d) Elimination of discrimination in respect of employment and occupation
- e) Effective occupational safety and health
- f) Providing fair and regular working conditions

Where the Business Partner has an adverse impact on the human and labour rights of any of its

stakeholders, it must address these impacts and enable effective remediation based upon a policy endorsed at the highest management level.

## 4. Anti-corruption

Danish Crown is strongly committed to ensure compliance with the anti-corruption and anti-bribery laws in force.

Danish Crown has a zero tolerance towards corrupt behaviour of any kind in any jurisdiction in which we operate. This is part of Danish Crown's commitment to act with integrity.

Corrupt behaviour includes, among other things, bribery, extortion, facilitation payments, kickbacks, trading in influence, nepotism, and a conflict of interest.

The Business Partner shall comply with all applicable laws and regulations relating to anti-corruption and anti-bribery including UK Bribery Act.

The Business Partner shall refrain from any corrupt behaviour and any activity that may imply involvement in corrupt behaviour when cooperating with or working for Danish Crown.

This includes in specific the use of facilitation payments or the giving or receiving of preferential treatment that may be perceived as a bribe for or on behalf of Danish Crown.

The Business Partner shall not accept or provide any gifts or favours to or from government officials or commercial parties for or on behalf of Danish Crown.

The Business Partner shall take all relevant measures to ensure that its subcontractors, agents, or other third parties, subject to its control or determining influence, do not engage in corrupt behaviour.

## 5. Transparency

### 5.1. Implementation

The Business Partner shall implement and maintain management systems that are appropriate for its size and structure to ensure compliance with the Code in its business activities.

### 5.2. Reporting

If the Business Partner becomes aware of an actual or potential violation of the Standards ("Violation") in its

own operations or its supply chain, it shall immediately inform Danish Crown in writing about the Violation and the relevant circumstances. This also applies to any relevant information received by the complaint's procedure.

The Business Partner must also submit a corrective action plan to Danish Crown, for Danish Crown's consideration.

We encourage an open dialogue based on a viable corrective action plan and will seek to cooperate with the Business Partner to address any issues, to meet our commitments.

### 5.3. Documentation

The Business Partner shall comply with Danish Crown's requests for documentation based on the Code or this Section 5 within fourteen (14) working days, answer any relevant questions and truthfully and notify Danish Crown without undue delay of any material changes in writing.

Documentation may be in the form of code(s) of conduct, policy commitment(s), standard operating procedure(s), risk assessment(s), remedial schemes, including grievance mechanisms, or any other documentation of compliance.

Social audits demonstrating compliance with the Code may also be provided to validate compliance.

Danish Crown may also request the Business Partner to submit a self-assessment questionnaire regarding the compliance with the Code.

### 5.4. Audit

Danish Crown reserves the right to verify the Business Partner's compliance with the Code if there is a reasonable suspicion of the Business Partner's non-compliance with the obligations.

The Business Partner is expected to cooperate and take all actions reasonably necessary to enable the performance of the measures.

### 5.5. Sanctions

The Business Partner is required to fulfil requirements set out in this document. In the case of a Violation occurs Danish Crown is entitled to suspend the business relationship with the Business Partner and to set a reasonable period for fulfilling its obligations under this Code.

However, a severe Violation or a material breach of the Business Partner's obligations pursuant to this Section

5 shall constitute good cause for Danish Crown's termination of the business relationship.

**6. Reporting concerns**

**6.1. Whistleblower reporting**

Danish Crown's whistleblower reporting system is available for third party, including the Business Partner and its employees, to file confidential reports on illegal, unethical, or inappropriate conduct related to Danish Crown's business.

The Danish Crown's whistleblower reporting system is hosted by an independent third party, which allows for anonymous and confidential reporting in numerous languages, and which is compliant with all personal data protection regulations.

The scheme can be accessed via Danish Crown's website ([Whistleblower - Danish Crown](#)).

Date: \_\_\_\_\_

\_\_\_\_\_  
Name of Business Partner

\_\_\_\_\_  
Signature

**6.2. Grievances mechanisms**

The Business Partner is expected to provide its employees with a channel for raising legal or ethical issues or concerns without fear of retaliation; and shall provide access to remedy through effective grievance mechanisms where its operations have caused or contributed to material adverse impact on human rights, environment, or corruption, including, where necessary, reporting to and collaborating with the appropriate authorities.

**7. Contact**

The Business Partner is required to implement and comply with the Code in its business and operations and is encouraged to contact Danish Crown for advice at [sustainability@danishcrown.com](mailto:sustainability@danishcrown.com).