



# HEALTH & SAFETY POLICY

## **INTRODUCTION**

The Carlsberg Group proactively strives to protect human health and wellbeing, to provide a healthy and safe working environment and to ensure the highest level of protection and preservation of its assets and the environment.

The Group 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.

This policy defines the fundamental requirements for the management of Health & Safety performance in all Carlsberg Group's business activities, thereby eliminating or mitigating risks in order to prevent occupational injuries and illnesses, avoid industrial accidents, and to protect the people in the communities in which we operate.

## SCOPE

This policy applies globally to all personnel of all entities controlled by the Carlsberg Group while performing duties at Carlsberg Group sites and at offsite locations. It also applies to contractors, suppliers and members of public whilst at Carlsberg Group sites.

Where the Carlsberg Group participates in existing joint ventures as a noncontrolling shareholder, the other shareholder(s) must be made specifically aware of the importance of this policy to the Group and encouraged to apply the same policy or a similar standard to the joint venture. Where new minority joint-venture cooperations are contemplated, the Carlsberg Group will strive to commit the other shareholder(s) to adopting this policy or a similar standard for the joint venture.

## REQUIREMENTS

## **1. HEALTH AND SAFETY MANAGEMENT SYSTEM**

**1.1.** Carlsberg Group sites must have a certified health and safety management system in place in accordance with OHSAS 18001 (or its superseding version ISO 45001), with the same scope as this policy.

**1.2.** Multi-site integrated systems (e.g. Health & Safety, Environment and Quality) are encouraged in order to improve consistency and efficiency globally.

### 2. HEALTH AND SAFETY ORGANIZATION

**2.1.** In order to support a robust zero-accident culture, the Carlsberg Group establishes local health and safety organizations to provide specialist advice to all relevant personnel.

### **3. INCIDENT REPORTING AND ANALYSIS**

**3.1.** All relevant health and safety incidents, including occupational injuries and illnesses, as well as process safety incidents, must be recorded, analysed and communicated as required by local legislation and by the Carlsberg Group's standards and procedures. Deliberate and wilful concealing of incidents is not acceptable and may result in disciplinary action.

**3.2.** Management must keep accurate records of reported incidents, ensuring proper classification, reporting, communication, analysis and follow-up.

**3.3.** Management must ensure that reasonable and appropriate actions are taken to contain the consequences of an incident and prevent its reoccurrence.

## **4. COMPLIANCE**

**4.1.** All Carlsberg Group subsidiaries must comply with national and local laws and regulations, as well as with the provisions of this policy, the loss prevention Group standards and the Health & Safety Group standards.

**4.2.** In the event of any discrepancies between this policy and national laws or other applicable standards, the more stringent requirements will apply. In the event of any doubt, the case must be evaluated jointly by Group H&S and Group Legal.

### **5. LIFE SAVING RULES**

The Life Saving Rules are ways of working for activities in which a serious threat to life is concerned, based on serious and/or fatal events in the Carlsberg Group's history or on general industry experience.

**5.1.** All personnel must follow the Life Saving Rules at all times. Deliberate and wilful violation of the rules may result in disciplinary actions up to and including termination of employment.

The Carlsberg Life Saving Rules		
LSR 1	Always follow traffic rules, including those specific to on-site traffic and operation of powered industrial trucks.	
	traffic and operation of powered industrial tracks.	
LSR 2	Always follow lock out / tag out procedures.	
LSR 3	Never impair, bypass or remove machinery safety interlocks	
	and/or installed barriers with the equipment in operation.	
LSR 4	Always follow procedures and requirements for working at	
	height and use the required fall protection equipment.	
LSR 5	Always follow procedures and requirements for confined space	
	entry.	

#### 6. EMERGENCY PLANNING AND RESPONSE

**6.1.** Emergency response procedures must be established, maintained and tested annually at all Carlsberg Group sites. These procedures must describe the appropriate measures to be taken during the emergency in order to minimize the consequences for site personnel and to surrounding communities.

**6.2.** Instruction and training on how to proceed in an emergency must be provided for all relevant personnel, including contractors and members of the public visiting Carlsberg Group sites.

**6.3.** Carlsberg Group sites must communicate with local communities and their emergency services, providing them with the relevant information to allow adequate planning for a response at community level.

**6.4.** Emergency scenarios may escalate to crisis scenarios. The Carlsberg Group's Crisis Management Policy (CGCMP) and procedures describe the structure and requirements of the crisis management processes.

#### **7. LEADERSHIP AND PARTICIPATION**

As an integral part of managing the business, managers at all levels are responsible and accountable for managing workplace health and safety with strong leadership and credibility. They must lead by example and ensure that employees are actively involved in Health & Safety programmes and initiatives.

At the same time, employees are expected to engage with those activities, contributing to a sustainable zero-accident culture.

**7.1.** All people leaders must regularly observe work in progress and give feedback to their teams, acknowledging safe behaviours and addressing unsafe conditions and behaviours.

7.2. Employees are empowered to:

- stop production, warehousing and distribution activities and/or put any task on hold if they judge that it is not safe enough to proceed, until a competent person takes appropriate risk control measures;
- communicate unsafe conditions in the working environment to management;
- challenge any unsafe acts that they observe.

**7.3.** Behavioural observation and feedback programmes must be implemented by all relevant sites, in conjunction with unsafe conditions communication and treatment processes.

**7.4.** All sites must have systems in place in order to proactively communicate with employees, contractors and other stakeholders about health and safety. Where appropriate, education and training must be provided to ensure that they are prepared to perform their tasks safely.

### 8. CONTRACTOR MANAGEMENT

**8.1.** Health and safety management must always be taken in consideration in supplier and contractor selection processes. The contracts must be explicit about the H&S requirements to be fulfilled.

**8.2.** Contractors and other third parties entering Carlsberg Group sites must have sufficient relevant information and training and be properly equipped to execute their tasks safely.

**8.3.** Contractors must follow all applicable Carlsberg Group rules and procedures while at Carlsberg managed sites.

## **ROLES AND RESPONSIBILITIES**

Body/function/individuals	Roles and responsibilities
ExCom	Responsible for policy approval.
EVP Carlsberg Supply Chain (CSC)	Owns, endorses and ensures the implementation of the policy.
Group Health & Safety	Policy owner with overall responsibility to ExCom for health and safety issues in the Carlsberg Group and for ensuring that health and safety risks in the Group are duly attended to and communicated to ExCom as relevant. Has overall responsibility for the Group Health & Safety strategy, direction, performance management, management system, policies and standards.
Group VPs/Country Managing Directors/Production Directors/Customer Supply Chain Directors/regional and local management	Responsible for leading by example and ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Ensure that health and safety risks are properly assessed, controlled and communicated, and that all relevant personnel receive the required training to perform their tasks safely and with sufficient knowledge of the related risks and applicable controls.
Management, employees and contract workers of all entities in the Carlsberg Group including contractors, suppliers and visitors	Responsible for adhering to this policy and reporting any occupational health and safety incidents, process safety incidents and substandard conditions.

## **GLOSSARY**

#### **Carlsberg Group site**

Any owned or leased location directly managed by Carlsberg Group subsidiaries, or where construction and/or installation work is being carried out on behalf of the Group.

#### Crisis

A situation that is not planned or prepared for or where the preparation is insufficient to deal with the scale of the event and the result has the potential to seriously damage the organisation's reputation and strategic objectives.

#### **Process safety**

Process Safety concerns the prevention and control of incidents that have the potential to release hazardous materials or energy. Such incidents can cause toxic effects, fire, or explosion, and could ultimately result in serious injuries, property damage, lost production, and environmental impact.

### OHSAS 18001 / ISO 45001

International standards for occupational health and safety management systems that provide organisations with a framework for identifying and controlling their health and safety risks, reducing the potential for accidents, complying with legislation and improving operational performance.

## **DEVIATIONS**

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

## **POLICY REVISION**

This policy must be reviewed and approved by ExCom at least every two years. It may be amended at any time with the approval of ExCom. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

## **ASSOCIATED POLICIES AND MANUALS**

- Carlsberg Operational Manual (COM)
- Health & Safety standards and loss prevention standards
- SHAPE (Safety, Health and Environment Assessment Program Excellence)
- CSC Integrated Management System Policy
- Responsible Drinking Policy
- Crisis Management Policy
- Risk Management Policy
- Insurance Manual
- Security Policy
- Travel Security Manual

## CONTACT

For more information, please contact Group Health & Safety.

ENGLISH



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