

CARLSBERG MALAYSIA GROUP WHISTLEBLOWING POLICY

PURPOSE

Carlsberg Malaysia Group (Carlsberg Malaysia and its subsidiaries collectively referred herein as ‘Carlsberg Malaysia’) is committed to ensuring its business is conducted in an ethical and compliant manner. This Policy represents Carlsberg Malaysia’s commitment to encourage employees, customers, suppliers, business partners and any individual to report any unethical or non-compliant practices that are not in line with Carlsberg’s Code of Ethics & Conduct and policies, including any regulatory requirements. Individuals and entities who report in good faith are protected under this Policy without the risk of retaliation. However, Carlsberg Malaysia will not tolerate any report that is made with malicious intent and Carlsberg Malaysia reserves the rights to pursue any action deemed legally appropriate.

Carlsberg Malaysia being a multinational organization, observes the Speak Up Manual (which is essentially a set of guidelines governing the whistleblowing process) established by Carlsberg Global. This Policy serves as an extension to the Speak Up Manual and provides additional guidance on the principles and framework to whoever wishes to make a report (*referred herein as ‘Reporter’*) and also sets out what the reporter can expect from Carlsberg Malaysia, upon lodging a report.

SCOPE

This Policy shall be observed by all employees, appointed contractors and agencies/business partners of Carlsberg Malaysia. The Speak Up channels provided under this Policy are also accessible to members of the public.

PRINCIPLES AND GUIDANCE

1. Misconducts that may be reported

Employees, customers, suppliers, business partners and any individual may report any unethical or non-compliant practices. The following are examples of practices that are deemed unethical or non-compliant:

- ✓ Fraud
- ✓ Asset Misappropriation
- ✓ Corruption/Bribery
- ✓ Violations of Laws and Regulations
- ✓ Conflict of Interest
- ✓ Breach of Code of Ethics & Conduct
- ✓ Theft or Embezzlement
- ✓ Unethical Sales Practices
- ✓ Money Laundering
- ✓ Improper Use of Company Resources
- ✓ Insider Trading
- ✓ Disclosure of Confidential Business Information
- ✓ Environmental, Health and Safety Concerns
- ✓ Abuse of Power
- ✓ (Sexual) harassment, bullying or discrimination
- ✓ Other Breaches of Company’s Policies
- ✓ Concerns relating to alcohol or drug misuse

2. Speak Up Channels

A Reporter can choose one of following options:

- 2.1. Lodge a report via email to a secured mailbox at whistleblow.cbmb@carlsberg.asia (if the Reporter wishes to report directly to the Whistleblowing Committee), **or**
- 2.2. Lodge a report via email to a secured mailbox at speakup@carlsberg.com (if the Reporter wishes to reach out directly to the Speak Up Review Team), **or**
- 2.3. Lodge a report via the Speak Up system (which is operated by an independent third party) by calling toll-free telephone lines (+60(0)15 4877 0383 for Malaysia and 800-852 3912 for Singapore). Reports using the Speak Up system, enable the Reporter to remain anonymous, should the Reporter chooses to do so.
- 2.4. Lodge a report via the Speak Up Line webpage at [Carlsberg SpeakUp Line - Powered by Convercent](#).

Notes:

- i. The Whistleblowing Committee is setup at market level to review allegation(s) reported and handle the subsequent investigation, if deemed appropriate. The committee comprises the Managing Director, Audit Committee Chair, Legal & Compliance Director (who is also the Local Compliance Representative), Human Resources Director as well as Head of Internal Audit.*
- ii. The Speak Up Review Team comprises a team of trained investigators who have the necessary expertise to handle investigations globally.*

3. Important and Useful Information

Detailed information relating to instances of unethical or non-compliant practices should be provided, where possible and applicable:

- Description of the misconduct.
- Date and location of the incident.
- Identity of the person(s) involved.
- Name and contact information of witnesses (if any).
- Evidence and/or supporting documents.
- Other details deemed useful in facilitating an investigation.

The Reporter is encouraged to provide his or her contact information (telephone number and/or email) to enable investigation personnel to contact him or her for further information. If the Reporter chooses to report on a named basis, his or her identity will nonetheless not be disclosed unless with the prior consent of the Reporter. However, a Reporter may choose to remain anonymous.

4. Speak Up Review Process

4.1 Overview

Carlsberg Global has a comprehensive speak up framework that is designed to register any allegation of misconduct and non-compliant practices, be it received at market level or at the global level. All allegations and subsequent investigations (if required) are either handled by the Whistleblowing Committee or Speak Up Review Team (as part of Group Internal Audit), depending on the severity and nature of the allegations.

Being a member of the Whistleblowing Committee, the Audit Committee Chair (an Independent Non-Executive Director) acts as a representative of the Board of Directors. For Key Matters (*as defined in Section 5*), the investigation will be handled by the Group Integrity Committee that is well equipped with the necessary resources and expertise for such purposes.

4.2 Report Intake and Investigation

When a report is received, both the Local Compliance Representative and Speak Up Review Team will be notified. Assessment on the report will then be performed to establish if it qualifies as a Speak Up case. If yes, the report will either be classified as a key matter or a non-key matter.

Prior to the commencement of the investigation, the Local Compliance Representative will highlight to the investigation team about the key inputs (if any) provided by the relevant stakeholders so that all important aspects of the case are taken into consideration. Throughout the investigation, the Local Compliance Representative will provide periodic updates on the progress and any matter arising to the Whistleblowing Committee and Audit Committee. Upon completion of the investigation, the outcome and recommendation will be presented to the Board of Directors for approval.

Notes:

**If the Local Compliance Representative is named in the allegations, the Speak Up Review Team's point of contact will be the Head of Internal Audit.*

***If a senior person is implicated i.e. the Managing Director or any member of the Board, then he/she shall abstain and his/her involvement will be excluded from the entire process.*

4.3 Case Closure

The Investigation Team shall close the case in accordance with the guidelines as per the Speak Up Manual. The outcome of the investigation is either substantiated, partially substantiated, not substantiated, closed due to lack of information or it is classified as a non-Speak Up case. Thereafter, the Investigation Team shall inform the Reporter (if the Reporter is known) through a closing notification, about the completion and the outcome of the investigation.

5. Key Matters

Key Matters are defined as:

- Matters where Senior Management (Leadership Teams of Group Functions, Regions or Markets) might be involved.
- Matters that may cause reputational damage at national and/or global level (e.g. allegations on governmental bribery, competition compliance, trade sanctions or data protection);
- Matters related to allegations of workplace harassment including sexual and discrimination.
- Matters that could exceed a value of EUR 250,000.

CONFIDENTIALITY

All disclosed information, including the Reporter's identity shall be treated with strict confidentiality, unless otherwise required by law or for purposes of any legal proceedings. All personnel involved in the investigation shall strictly protect all the information in relation to the case, Reporter and witnesses. The relevant records and documents must be properly retained by the Local Compliance Representative in accordance with the requirements on data protection and record retention, as established by Carlsberg Malaysia.

REFERENCES

Speak Up Manual

Speak Up Review Manual

Misconduct Investigation Handbook