



**Danish Crown**

# Human and Labour Rights Policy

Governance	
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Contact details	Group Sustainability, <a href="mailto:sustainability@danishcrown.com">sustainability@danishcrown.com</a>

# Contents

<b>1.</b>	<b>Introduction.....</b>	<b>3</b>
1.1.	Purpose .....	3
1.2.	Scope of application .....	3
1.3.	Roles and Responsibilities .....	3
<b>2.</b>	<b>Our approach to human and labour rights .....</b>	<b>4</b>
2.1.	Freedom of association and collective bargaining agreement .....	4
2.2.	Forced labour and modern slavery .....	4
2.3.	Child labour and young workers .....	4
2.4.	Non-discrimination and fair treatment.....	4
2.5.	Working conditions.....	4
2.6.	Working hours .....	4
2.7.	Wages and Benefits .....	5
2.8.	Layoffs .....	5
2.9.	Occupational health and safety.....	5
2.10.	Subcontracting.....	5
2.11.	Local people and communities .....	6
2.12.	Right to privacy .....	6
<b>3.</b>	<b>Implementation, reporting and documentation .....</b>	<b>7</b>
3.1.	Implementation .....	7
3.2.	Reporting.....	7
3.3.	Documentation .....	7
<b>4.</b>	<b>Our complaints procedure.....</b>	<b>8</b>
4.1.	Our whistleblower scheme.....	8
4.2.	Grievance mechanisms .....	8

# 1. Introduction

## 1.1. Purpose

Respect for human and labour rights is fundamental in all Danish Crown operations and activities. It is essential to avoid causing or contributing to adverse impacts on human rights, both within our own business and in our supply chain. Additionally, we seek to prevent or mitigate any adverse impacts that may be directly linked to our operations, products or services.

Generally, we impose the same fundamental requirements on our suppliers as we impose on ourselves. However, we acknowledge our responsibility as a global food company with a great impact and believe that we have an obligation to exceed fundamental requirements in certain human and labour rights matters.

Danish Crown is a signatory to the UN Global Compact, and we fully support the Sustainable Development Goals (SDGs) and the United Nations' Guiding Principles on Human Rights. Furthermore, we commit to respect internationally recognised human rights standards, including the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work and are guided by the International Bill of Rights.

Through our Code of Conduct, Human and Labour Rights Policy, Supplier Code of Conduct and Business Partner Code of Conduct, we aim to implement these internationally recognised principles throughout our organisation and our supply chains.

## 1.2. Scope of application

Our commitment and responsibility to respect human and labour rights applies throughout the entire Danish Crown Group regardless of size, sector, operational context and structure of a Business Unit.

We believe the greater the scale and complexity of a business unit the greater the obligation to meet the commitment and responsibility accordingly.

If a human and labour rights violation were to be identified in our value chain, depending on the severity of the violation, our actions could also include the suspension or termination of the business relationship with a supplier. In the event of fact-based knowledge of a violation at one of our indirect suppliers, we will take appropriate measures depending on the individual case.

This policy applies equally to our management, employees and contract workers at all entities. They must engage and take responsibility for complying with this policy. This should be done through ensuring that initiatives are developed and implemented, but also by building a human and labour rights awareness culture. The latter includes being open to raise issues through existing channels.

## 1.3. Roles and Responsibilities

Group Sustainability is owning the policy and is supporting its implementation throughout Danish Crown. This policy and any adjustments made to it must be approved by the Board of Directors. Relevant stakeholders are advised on the policy content.

# 2. Our approach to human and labour rights

## 2.1. Freedom of association and collective bargaining agreement

We respect the freedom of association and the right to collective bargaining of all our employees. Our employees, without exception, have the right to join or form trade unions of their own choosing and to bargain collectively.

Where the right of freedom of association and collective bargaining is restricted under law, we facilitate, and will not hinder, similar means of independent and free association and bargaining. Our employee representatives are not discriminated against and have access to conduct their representative functions in the workplace.

## 2.2. Forced labour and modern slavery

We do not tolerate any form of forced labour, including bonded labour, indentured labour and slave labour, or human trafficking. Danish Crown does not require employees to lodge deposits, or any government issued identification or original ID papers.

Danish Crown adheres to the principle that it is not acceptable for any employee to be requested to pay a recruitment fee at any time during the recruitment process.

Our employees must not work against their will and shall be allowed to move around freely and leave the workplace at the end of their working hours.

Danish Crown must allow employees to leave the company freely upon giving reasonable notice.

## 2.3. Child labour and young workers

Danish Crown adheres to the principle that no child should be harmed by any related business operation neither directly nor indirectly and is committed to effectively abolish any form of child labour whether in our own operations or in our supply chain.

The minimum age of an employee should not be less than the age where compulsory schooling is generally completed and, as a general rule, not less than 15 years for the standard work if permitted by law. Young workers are defined as young people older than the minimum age of compulsory schooling, but under the age of 18 years.

If any incident of child labour is identified in our own operations or in our supply chain, Danish Crown will take appropriate measure for remediation and prevention.

We may allow young workers to be employed through approved internships, apprenticeships or other programmes. However, it is not permitted under any circumstances to expose them to work that may be harmful to their health and safety or may hinder their education.

## 2.4. Non-discrimination and fair treatment

We are committed to creating a diverse and inclusive working environment and to offer equal opportunities, and we do not tolerate discrimination and harassment.

We work to maintain workplaces that are free from discrimination and harassment on the basis of race, national or social origin, religion, age, disability, sexual orientation, gender identification, marital status, political opinion or any other status protected by applicable law.

Qualifications, performance, skills and experience form the basis of recruitment, hiring, placement, development, training, compensation and advancement with the company.

We do not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind.

Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.

Additionally, we have developed a policy on [Diversity and Inclusion](#).

## 2.5. Working conditions

We compensate employees competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with laws governing applicable wage, working hours, overtime and benefits. Working conditions are defined in an understandable written contract of employment.

## 2.6. Working hours

We promote a healthy work/life balance. Employees are entitled to reasonable breaks in working hours and sufficient rest periods between shifts.

We understand the importance of clearly defined working hours. Therefore, we ensure that an agreement on working hours is established between employees and their immediate superiors and set out in a written contract of employment. Generally, working hours are agreed in compliance with national or local laws or collective bargaining agreements, whichever affords the greater protection for the employee.

Working hours, excluding overtime hours, must be defined in the employment contract and must not exceed 48 hours per week. The total number of hours worked in any seven-day period must generally not exceed 60 hours.

In exceptional circumstances, working hours may, however, exceed 60 hours/week in a seven-day period if all the following criteria are met:

- This is permitted by law.
- This is permitted under a collective bargaining agreement freely negotiated with an employee organisation representing a significant portion of the workforce.
- Appropriate safeguards are taken to protect the employee's health and safety.
- The Supplier can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents or emergencies.

Employees must be provided with at least one day off in any consecutive seven-day period or, where allowed for by law, two days off in any 14-day period.

Overtime must be voluntary and used responsibly, considering the extent, frequency and hours worked by the individual employee and the workforce in general. Overtime hours may not be used to replace regular working hours due to inadequate production planning.

Overtime must as a minimum be compensated in accordance with local legislation or at such higher premium as required under a collective bargaining agreement.

## **2.7. Wages and Benefits**

We ensure that wages and benefits paid for a standard working week meet, as a minimum, national legal standards or food industry benchmark standards. In any event, wages should always be sufficient to meet basic needs and should be based on collective bargaining agreements.

Danish Crown ensures that all employees are provided with an employment contract stating all terms of employment including their wages, prior to entering into employment, and a fully understandable pay slip for each pay period.

We do not tolerate any deductions from wages as a disciplinary measure, nor is any deduction permitted that is not provided for by law without the express acceptance of the employee concerned. Any disciplinary measures taken must be documented.

Danish Crown ensures that all employees have the right to sick leave, annual holiday and parental leave, as provided by national legislation. Employees that make use of such benefits will not face dismissal or threat of dismissal.

## **2.8. Layoffs**

In the event of major layoff or redundancies, Danish Crown is required to ensure compliance with applicable local and national laws and industry standards.

## **2.9. Occupational health and safety**

We are committed to ensure the health and safety of all our employees with the aim that everyone returns home safely.

We take adequate steps to prevent accidents and injuries to health arising out of, associated with, or occurring in the course of the work, by minimising, so far as reasonably practicable, causes of hazards inherent to the working environment.

Danish Crown is obligated to ensure occupational health and safety conditions throughout the Group at any and all times. This means that the working environment in the Danish Crown Group is prioritised and rooted locally in the working environment organisation established in every company of the Group.

Danish Crown is providing access to clean toilet facilities and potable water.

## **2.10. Subcontracting**

Danish Crown adheres to the principle that obligations to the employee under labour or social security laws and a regular employment relationship cannot be avoided through the use of subcontracting or home-working agreements with a third party for production related to Danish Crown or through apprenticeship schemes where there is no real intent to impart skills or to provide regular employment.

Any employee recruited via suppliers or employment agencies must be legally authorised, which is to be documented appropriately prior to engaging the employee to work in the applicable location/country.

To every extent possible, work performed must be on the basis of a recognised employment relationship established through law and practice.

### **2.11. Local people and communities**

Danish Crown acknowledges that we are part of the communities in which we operate. We engage with communities on various matters. Our aim is to ensure constructive dialogue from which we learn and get insights into other views. However, the extent of engagement is defined at local level.

Danish Crown also engaged with political stakeholders to understand their positions while ensuring knowledge sharing. We aim to make constructive contributions. To ensure the correctness of such an involvement, we have developed a [Political Engagement and Expenses Policy](#).

### **2.12. Right to privacy**

Danish Crown respects its employees' right to privacy and protects the privacy of employees' personal information. We ensure that appropriate technical and organisational measures are implemented to protect personal information against unauthorised or unlawful access.

# 3. Implementation, reporting and documentation

## 3.1. Implementation

In implementing our sustainability work, we focus on management commitment, ESG risk assessments, definitions of ESG ambitions, targets and policies, execution through activities and adjustment of practices, measuring and monitoring progress and impacts achieved, as well as communication and reporting.

The Human and Labour Rights Policy is implemented through applicable laws and standards like the UN Global Compact and UN Guiding Principles, selected UN SDGs, the UK Modern Slavery Act and the German Act on Corporate Supply Chain Due Diligence ("Lieferkettensorgfaltspflichtengesetz").

The Human and Labour Rights Policy is supplemented by relevant ESG policies. An overview of our public policies is available on our website ([Policies - Danish Crown](#)).

Human and labour rights-related risk assessments are carried out as an integral part of business-relevant risk assessment schemes and procedures.

## 3.2. Reporting

Danish Crown's annual report and our website demonstrate how this Human and Labour Rights Policy and related policies are transformed into activities supporting the corporate strategy, the fulfilment of sustainability goals, including the results of risk assessments and steps taken to prevent, mitigate or eliminate risks, as well as applied indicators, achieved results and expected progress.

Main results are also disclosed in the annual report of the Danish Crown Group. An overview of our reports is available on our website ([Reports - Danish Crown](#)).

## 3.3. Documentation

In implementing our sustainability efforts, we use and develop management tools which are intended to optimise and document the employment of resources, social and environmental efforts and performance to ensure continuous improvements. Systems are selected and optimised with reference to the needs of our business.

We apply KPIs to document the results and achievements of our sustainability efforts and activities. The indicators are inspired by the Global Reporting Initiative standards as well as other relevant frameworks and legislation.

# 4. Our complaints procedure

## 4.1. Our whistleblower scheme

Danish Crown has established a whistleblower scheme for the reporting of any perceived or suspected illegal, unethical or inappropriate conduct in relation to our business operations and the activities of our business partners, especially our suppliers.

The whistleblower scheme provides both employees and anyone outside our Group with a safe channel for raising a concern.

The whistleblower scheme 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. Concerns received are investigated thoroughly and appropriate preventive or corrective actions are initiated, if necessary.

Information from our employees, suppliers and third parties help us to identify violations and take appropriate action to protect people and the environment, and to avoid future violations.

Reports submitted via the above-mentioned channel are reviewed by a small group of authorised employees.

Our whistleblower scheme for reporting concerns and the related policy is available on our website ([Whistleblower - Danish Crown](#)).

## 4.2. Grievance mechanisms

Employees are also able to file concerns as part of the formalised health and security system and through managers or trade union representatives in the workplace.

We require our direct suppliers to provide employees with a channel for raising legal or ethical issues or concerns without fear of retaliation; and to provide access to remedy through effective grievance mechanisms where their operations may have caused or contributed to a material adverse impact on human rights, the environment, or corruption, including, where necessary, reporting to and collaborating with the appropriate authority.

### [Contact details](#)

In case of questions regarding the Human and Labour Rights Policy, please reach out to Group Sustainability at [sustainability@danishcrown.com](mailto:sustainability@danishcrown.com)



**Danish Crown**