



# LEGAL & IP POLICY

## INTRODUCTION AND PURPOSE

Carlsberg India Private Limited (“CIPL”/”Company”) together with any subsidiary of CIPL from time to time (“CIPL Group”) is committed to, complying with relevant laws and regulations, appropriately safeguarding its people, assets and interests, including its intellectual property rights, and appropriately managing its contractual rights and obligations.

This policy sets out the general framework for meeting these commitments. Furthermore, it defines the key roles and responsibilities of relevant stakeholders throughout the CIPL Group in this regard and provides the overall governance framework for the handling of legal issues in the Group.

Violation of laws and regulations, or of this policy, may result in financial loss or risk and may negatively affect the reputation of the CIPL Group. Breaches of this policy may result in disciplinary action being taken against the individuals involved.

## SCOPE

This policy applies to the management, employees and contract workers of all entities in the CIPL Group.

# REQUIREMENTS

## 1. COMPLIANCE WITH RELEVANT LAWS AND REGULATIONS

1.1. It is the duty of all managers and employees to familiarise themselves and comply with relevant laws and regulations. The CIPL Group must generally train and support its employees so as to ensure that the Group is able to conduct its business activities in compliance with relevant laws and regulations.

1.2. All managers and employees should consult with CIPL Legal when faced with legal/contractual risks or issues in respect of the CIPL Group's business activities.

## 2. SAFEGUARDING OF ASSETS IN THE CIPL GROUP

All relevant managers and employees must follow procedures and practices to protect the value of the assets of the CIPL Group. This applies to both physical assets (real estate, buildings, fixed assets) (2.1.) and intangible assets (trademarks, patents, know-how, confidential information, etc.) (2.2.).

2.1. Protection of physical assets must be ensured by CIPL management (in conjunction with CIPL Legal).

2.2. The same rule applies for the protection of intangible assets, except that the protection and management of intellectual property rights is centralised with the Carlsberg Global IP Team, headed by the Head of Group IP in accordance with the IP Manual, which sets out rules for the protection and management of IP rights in the Carlsberg Group, including the CIPL Group.

## 3. CONTRACTS

The following must be observed by all relevant managers and employees involved in concluding, managing and/or terminating contracts on behalf of a CIPL Group company:

3.1. Whenever a CIPL Group company enters into a relationship with a third party, you must ensure that there is a written contract.

3.2. Wherever possible, the contract must be based on a CIPL Group template<sup>1</sup> approved by CIPL Legal. If it is not, or if any significant change needs to be made to the template, you must get sign-off from CIPL Legal before entering into the contract.

3.3. Before entering into the contract, where relevant you must follow applicable third-party and trade sanctions screening requirements.

3.4. The contract must be approved and, if required, signed in accordance with the relevant Chart of Authority and signing rules.

3.5. The contract (with screening documentation, if any) must be duly archived in accordance with the relevant internal rules.

3.6. Throughout its lifetime, the contract must be duly managed by the entity/function that owns it. This entity/function must ensure that the CIPL Group's rights under the contract are properly protected and enforced, and that both our and the counterparty's obligations are complied with.

3.7. If you consider terminating a contract prematurely or if a dispute arises under it, you must consult with CIPL Legal.

## 4. ESCALATION OF LEGAL AND IP ISSUES

4.1. All managers and employees are responsible for ensuring immediate escalation to CIPL Legal (and the relevant specialists set out below) of all actual or potential legal and contractual risks that could have a material (financial or reputational) impact on the CIPL Group. Upon becoming aware of any such risk or issue, you must escalate it, either directly or through CIPL Legal. This escalation duty covers, but is not limited to, the following risks/issues.

<sup>1</sup> Or, if relevant, the Carlsberg Group's applicable terms and conditions.

Risk/issue	Immediate escalation to:
All potential or actual infringements (of): <ul style="list-style-type: none"> <li>• Competition law</li> <li>• Anti-corruption law</li> <li>• Trade sanctions</li> <li>• Stock exchange regulations</li> <li>• Money laundering laws</li> <li>• Other laws that could lead to material criminal or civil sanctions or reputational damage for the Carlsberg Group</li> <li>• Contracts that could lead to material financial or reputational damage for the Carlsberg Group</li> <li>• IP rights belonging to the Carlsberg Group by a third party</li> <li>• IP rights belonging to a third party by a Carlsberg Group company</li> </ul>	<ul style="list-style-type: none"> <li>Head of Competition Law and General Counsel</li> <li>Chief Compliance Officer and General Counsel</li> <li>Head of Competition Law and General Counsel</li> <li>Head of Competition Law and General Counsel</li> <li>Head of Competition Law and General Counsel</li> <li>General Counsel</li> <li>General Counsel</li> <li>Head of Group IP</li> <li>Head of Group IP</li> </ul>
All claims/litigations made or brought against a Carlsberg Group company in the amount of EUR 1m or higher	General Counsel
All claims/litigations made or brought against a Carlsberg Group company that could potentially lead to material reputational damage to the Group	General Counsel
Commencement of legal or arbitration proceedings by a Carlsberg Group company requires prior approval by General Counsel, with the exception of: <ul style="list-style-type: none"> <li>• employee disputes</li> <li>• debt collection</li> </ul>	General Counsel

<ul style="list-style-type: none"> <li>• proceedings against state/municipal authorities in respect of purely operational/licence matters, provided the claim in question does not exceed EUR 500,000.</li> </ul>	
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4.2. CIPL Legal should be consulted in the event of any uncertainty as to whether a legal or contractual risk/issue should be escalated in accordance with the above.

## ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
CIPL Board of Directors (BoDs)	Responsible for policy approval.
CIPL Legal	Policy owner with overall responsibility to CIPL BoDs for legal issues in the CIPL Group (to the extent they are not covered by Audit Committee, Tax, HR or EHS as set out below) and for ensuring that material legal risks in the CIPL Group are duly attended to and communicated to CIPL BoDs as relevant.
CIPL Legal	Responsible for relevant areas of law not covered by Audit Committee, Tax, HR or EHS as set out below, for advising on associated legal and contractual issues, and for monitoring and, where relevant, providing training in such relevant laws and regulations and internal rules to ensure compliance with the policy.
CIPL Managing Director, Functional Heads at CIPL Corporate Office, Local Management	Responsible for ensuring that this policy is implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. To the extent this policy requires notification and/or escalation to a representative of the Carlsberg Group outside of the CIPL Group, a representative nominated by CSAPL (Singapore) Holdings Pte., Ltd. shall be copied in such notification and/or escalation.
Audit Committee	Owner of the Code of Ethics and Conduct.
HR organization	Overall responsibility to CIPL BoDs for monitoring of and compliance with relevant labour and employment laws and regulations in accordance with the HR Policy and the Labour and Human Rights Policy.
EHS (Technical Operations)	Overall responsibility to the CIPL BoDs for monitoring of and compliance with relevant environment, health and safety rules and regulations in accordance with the Environment Policy and the Health and Safety Policy.
Tax	Overall responsibility to CIPL BoDs for monitoring of and compliance with relevant tax rules and regulations in accordance with the Tax Policy.
Management, employees and contract workers of CIPL	Responsible for adhering to this policy.

## GLOSSARY

### Head of Competition Law

The Carlsberg Group Head of Competition Law

### General Counsel

The Carlsberg Group General Counsel

### Chief Compliance Officer

The Carlsberg Group Chief Compliance Officer

### Head of Group IP

The Carlsberg Group Head of Group IP

### Intellectual property rights

The Carlsberg Group's intellectual property rights, including trademarks, domain names, patents, designs and innovations.

## 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 CIPL Legal as policy owner. CIPL Legal must assess and decide (in alignment with the Managing Director) on each request individually. The assessment must take into consideration Group-wide risks. Exemptions must be duly logged and documented by the requesting party and CIPL Legal.

## POLICY REVISION

This policy must be reviewed and approved by CIPL BoDs at least every two years. It may be amended at any time with the approval of CIPL BoDs. 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

- Code of Ethics and Conduct
- Legal Manual
- IP Manual
- Anti-Bribery & Corruption Policy
- Competition Law Policy
- Trade Sanction Screening Policy
- Stock Exchange Compliance Policy
- Corporate Governance Policy
- Records Management & Personal Data Protection Policy

## CONTACT

For more information, please contact the Local legal counsel.

## GOVERNING LAWS

This policy shall be subject to applicable Indian law(s).

ENGLISH



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Carlsberg India Private Limited

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