



CRISIS MANAGEMENT POLICY

INTRODUCTION AND PURPOSE

Crisis management is the process of preparing for and responding to an inherently abnormal, unstable and complex situation that presents a threat to the strategic objectives, reputation or very existence of an organization. However, a crisis can be seen as 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 organization.

Crises in Carlsberg India Private Limited (“CIPL”/“Company”) together with any subsidiary of CIPL from time to time (“CIPL Group”) must be managed in a strategic, systematic and simple way, and all executives, managers, leaders and employees must actively enforce a positive risk culture and a no-blame culture at all Group sites.

SCOPE

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

REQUIREMENTS

1. CRISIS MANAGEMENT TEAM (CMT)

1.1. A Crisis Management Team (CMT) must be set up for each CIPL Group entity. The tasks of members of the CMT must be explicitly stated in their job descriptions. A full description of the core membership of the team and the appropriate functional support roles can be found in the associated Crisis Management Manual.

2. PROTECTION HIERARCHY

2.1. The acronym PEARS describes the protection and prioritisation hierarchy of the CIPL Group and must be applied in responding to all incidents, emergencies and crises:

Priority	Principle
1. People	Save lives, prevent injury, and, if required, provide first aid and/or arrange medical assistance.
2. Environment	Contain the impact of the event to prevent harm to the environment.
3. Assets	Protect property from damage and contain the event to limit further impact. Restore essential infrastructure or provide alternative access to essential infrastructure.
4. Reputation	Protect the name and reputation of the CIPL Group.
5. Stakeholders	Protect the business and restore the CIPL Group's operational and administrative functions.

3. GENERAL

3.1. All CIPL Group operations must incorporate risk mitigation and crisis management in relation to all existing and new business operations. This should cover the planning, implementation and operational phases.

3.2. An emergency response programme must cover all CIPL Group sites and offices. All plans, procedures, instructions and guidelines must comply with local laws and regulations, and must be adapted to the relevant organisational level.

3.3. All CMTs must ensure compliance with the certification and training requirements set out by Group Security & Crisis Management.

3.4. All CMTs must have proactively identified and trained redundancy systems as outlined in the associated Crisis Management Manual.

3.5. All incidents requiring the involvement of a CMT must be analysed and evaluated. Learnings or changes in procedure resulting from the evaluation must be shared with CIPL CFO and Group Security & Crisis Management to enable the entire organisation to consider similar procedures.

4. INVOLVEMENT OF CARLSBERG CENTRAL OFFICE

4.1. The following incidents are deemed CRITICAL for the CIPL Group. CIPL CFO and Group Security & Crisis Management must be informed as soon as possible after the incident has occurred:

- Any incident involving a work-related death or multiple work-related serious injuries.
- Any incident where the CIPL Group can be held responsible for a person's death or serious injury, whether at or outside a Group location.
- Any incident involving death(s) or multiple serious injuries at events where the CIPL Group, a local company or a brand in our portfolio is the main or a major sponsor.
- Significant plant or equipment damage (greater than EUR 75,000).
- Natural catastrophes (such as earthquake or flooding), even if all employees are accounted for and production is not materially disrupted.
- Any incident involving the kidnapping (or similar) of a CIPL Group employee.
- Any extortion or blackmail attempt.
- Any terrorist threat or attack.
- Any food safety issue necessitating recall and presenting a danger to or problems with consumers' health.
- Any IT or Cybersecurity incident, which is declared as a disaster by an Emergency Response Team.

- Any incident that may lead to the recall or withdrawal of products outside the CIPL Group's area of control (e.g. recall from customers and consumers) if the product is illegal (e.g. we can incur a fine) or if the recall is expected to trigger negative media coverage.
- Disruption to or halting of production or distribution capability (i.e. an expected outage or delay of five days or more).
- Material environmental accidents and/or environmental spillage.
- Negative media coverage with the risk of international media coverage and/or a serious impact on reputation.
- Major public allegations of corporate conduct violations.
- Serious charges against or investigations of senior managers or other employees for criminal activity.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
CIPL Board of Directors (BoDs)	Responsible for policy approval.
CIPL CFO	Responsible for ensuring that a system is in place for managing crises across the CIPL Group.
CIPL CFO	Policy owner with overall responsibility for the day-to-day management and strategic framework of crisis management in the CIPL Group.
CIPL Managing Director/ CIPL Functional Heads / local management	<p>Responsible for ensuring that a system is in place for managing crises in all the CIPL Group entities .</p> <p>This includes ensuring that his/her respective organisations maintain:</p> <ul style="list-style-type: none"> • A structure for ensuring early identification of a crisis or the potential for a crisis. • Adequately trained staff for managing a crisis. • Plans and procedures for how a crisis is to be managed. • A communication system to provide early notification of a crisis or potential crisis to the Group. <p>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.</p>
Management, employees and contract workers of all entities in the CIPL Group	Responsible for adhering to this policy.

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 revised every two years. 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

- Crisis Management Manual
- Crisis Management Toolbox

CONTACT

For more information, please contact Policy Owner .

GOVERNING LAWS

This Policy shall be subject to applicable Indian Law(s).

ENGLISH



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