



PUBLIC & GOVERNMENT AFFAIRS POL- ICY

INTRODUCTION AND PURPOSE

The beer category is heavily regulated within markets in order to tackle alcohol misuse, arrest alcohol-related crime, grow the economy and revenue, protect the vulnerable from harm and educate around appropriate consumption. All manufacturers of beverage alcohol have a role to play in working with political stakeholders and civil society to help develop appropriate interventions in delivering change in these areas. As with most companies, our business therefore requires political and governmental relationships.

The purpose of this policy is to ensure compliance with all applicable regulations and laws regarding public policy advocacy on behalf of the Carlsberg India Private Limited (“CIPL”/“Company”) together with any subsidiary of CIPL from time to time (“CIPL Group”).

SCOPE

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

The policy is specifically intended for individuals dealing with external representatives who may have an influence on the regulatory environment in which we operate. The latter include government officials, local establishment representatives, members of regulatory organisations and senior officials of non-governmental organisations, especially in the field of health.

REQUIREMENTS

1. REGISTRATION

Where appropriate, you must sign up to public lobbying registers.

2. POLITICAL POSITIONS

2.1. CIPL should limit its comments on political developments to policies that affect the CIPL Group as a company or its industry. We should not comment on political elections or party manifestos.

2.2. CIPL may not make any political contributions to obtain improper business advantages, but we do actively support charitable and other community projects.

Employees must not imply that their personal, political or policy views are those of the CIPL Group. The CIPL Group remains a non-political organization and does not comment on any political party positions, except in circumstances that may affect its industry or the company. Corporate Affairs colleagues will only represent those views if required.

3. SCIENTIFIC EVIDENCE

3.1. Health or scientific evidence from public or other respectable sources should be respected. However, commenting on factual elements or on the application and communication of evidence is accepted when done in a respectful and responsible way.

3.2. It is recommended that any input to health and scientific discussions is executed through industry associations.

3.3. We must not influence scientific conclusions or analysis, and any cooperation with scientific bodies should be done with respect to the arm-length principle.

4. COMPETITION

4.1. Our business practices must always comply with existing competition law. CIPL has a competition compliance policy with which all employees must comply. Relevant employees must ensure that their understanding of competition law is up to date and proactively familiarize themselves with the competition compliance manual.

At any cross-industry event, CIPL Group representatives must ensure that the necessary competition laws are clearly identified and adhered to.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
CIPL Board of Directors (BoDs)	Responsible for policy approval.
CIPL Corporate Affairs Committee	Policy owner with overall responsibility to CIPL BoDs for public and government affairs issues in the CIPL Group and for ensuring that material public and government affairs risks in the Group are duly attended to and communicated to CIPL BoDs.
CIPL Corporate Affairs Director	Responsible for representing the CIPL Group at senior executive level with key senior executives from brewers and key regional stakeholders (if required). Responsible for understanding the top-line regulatory issues impacting the region and prioritising the markets most at risk from regulatory change. Responsible, in conjunction with the CIPL Managing Director, for overseeing government and public affairs capabilities in markets.
CIPL Managing Director	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. Responsible for representing the CIPL Group in a professional manner and building relationships with key external stakeholders in order to enhance the Group's reputation as a responsible brewer.
CIPL Corporate Affairs Director	Responsible, in conjunction with legal colleagues, for ensuring compliance with the policy. Responsible for developing a public affairs plan to build on the company strategy by identifying key regulatory risks. Responsible for managing the regulatory environment in the local market, working with trade associations and key internal stakeholders.
Management, employees and contract workers of all entities in the CIPL Group particularly in external facing roles	Responsible for adhering to this policy and recognising the impact that external stakeholders have on policies that can influence alcohol, for representing the CIPL Group in a professional manner when dealing with these stakeholders. Responsible for referring any specific government-related enquiries to colleagues in Corporate Affairs.
CIPL Managing Director, Corporate Affairs Director, local Management	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.

GLOSSARY

Commitments

Our long-term and transparent programme of activities to help reduce harmful drinking.

Government relations

The process of influencing public and government policy at all levels: local, regional, national, European and global. This involves advocating for those interests of our Group and/or industry that may be affected by the decisions of government leaders. We may choose to approach stakeholders locally, as a Group-wide public affairs network, with public affairs colleagues from other beer companies and/or other drinks categories, or through international and local trade associations to share knowledge and persuade governments that we have a role to play in working with them to develop best solutions.

Political contributions

Any financial contributions made to a political party, regardless of that party's policies and manifesto on alcohol. The CIPL Group is proud to remain a non-political organisation. Group Legal's screening of a business partner following a request from a relevant employee using the Trade Sanctions Information and Screening Results Sheet.

Public affairs

Any communication with external stakeholders, including government officials, brand ambassadors, celebrities, local communities, media, customers etc. that has an impact on the reputation of the CIPL Group and its brands. The development of key strategies in how we portray ourselves as the CIPL Group and/or the industry to effectively deal with external regulatory impacts.

Regulations

Issues defined by government, co-defined with government or self-regulated by the industry that can impact our freedom to operate.

Stakeholder management

Our ability to proactively build strong relationships with key stakeholders in order to maintain, defend and develop our licence to operate.

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, in alignment with CIPL Managing Director, assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

This policy must be reviewed by Corporate Affairs Committee whenever required or 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

- Public Affairs Manual
- Public Affairs best practice guideline
- Donations Manual
- Competition Compliance Policy

CONTACT

For more information, please contact CIPL Corporate Affairs Director.

GOVERNING LAWS

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

ENGLISH



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