



QUALITY & FOOD SAFETY POLICY

INTRODUCTION AND PURPOSE

This policy sets out the commitment of Carlsberg India Private Limited (“CIPL”/“Company”) together with any subsidiary of CIPL from time to time (“CIPL Group”) to produce high-quality products that meet internationally recognized quality and food safety standards, to comply with all applicable external legal and regulatory requirements, and to comply with all internal quality and food safety requirements as stated in the Carlsberg Operational Manual (COM). Compliance with these requirements ensures that the CIPL Group’s products are safe and meet consumer and customer quality expectations.

From time to time, the CIPL Group’s activities and transactions may result in claims, whether contractual or non-contractual. This policy also regulates the handling of claims by customers, consumers and other parties related to the CIPL Group’s suppliers or the quality of our products with a view to preventing, mitigating and recovering Group losses.

SCOPE

This policy applies to the management, employees and contract workers of all entities in the CIPL Group, including all CIPL-owned/licensed/co-packing sites where Carlsberg and/or CIPL brands are produced. This policy is particularly relevant for employees working in production departments.

The policy covers claims arising from transactions with the CIPL Group’s suppliers relating to delivery of goods or services, as well as claims relating to the quality of the Group’s products. Other types of claims, e.g. relating to HR or M&A, are not covered by this policy and should be handled by the entities and/or functions in question in accordance with the Legal and Intellectual Property (IP) Policy.

REQUIREMENTS

1. CARLSBERG OPERATIONAL MANUAL

1.1. The beer and beverage products produced and supplied by the CIPL Group must meet all internal quality requirements, as defined in COM, as well as all applicable legal and international quality requirements.

1.2. All relevant employees must be trained in and/or familiarize themselves with COM, which contains all the technical standards for the CIPL Group, including global quality and food safety requirements.

2. QUALITY AND FOOD SAFETY MANAGEMENT

2.1. The quality management systems in place across the CIPL Group are designed to be consistent with ISO 9001 principles.

2.2. All products, materials and technologies used by the CIPL Group must ensure that our end products are safe for customers and consumers and meet all applicable food safety laws and regulations.

2.3. The food safety management programmes in place across the CIPL Group are designed to be consistent with ISO 22000 principles.

2.4. CIPL Group sites pursuing formal certification must utilise a GFSI-recognised food safety standard. The default standard for the CIPL Group is FSSC 22000. Sites that elect to utilise another GFSI-recognised standard must obtain prior approval from VP Group Quality and CIPL Quality.

2.5. CIPL Group production sites currently certified to ISO 22000 food safety standards must have a specified timeline for upgrading their certification to FSSC 22000. Sites that elect to utilise another GFSI-recognised standard must obtain prior approval from VP Group Quality.

2.6. VP Group Quality and CIPL Quality should meet with the CIPL Group leadership at least twice a year to review the status of quality and food safety performance.

3. CLAIMS HANDLING

3.1. Claims can be made against, or reported to, the CIPL Group by customers, consumers, suppliers, authorities or media, or they can be identified by internal stakeholders. When a potential claim has been identified, it must be assessed, reported and handled as described in the Claims Handling Manual.

3.2. Each legal entity of the CIPL Group must have in place a structure that ensures timely identification of claims that are made against the Group and/or that should be made against the Group's suppliers, or in the event that there are quality issues with the Group's products.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
CIPL Board of Directors (BoDs)	Responsible for policy approval.
Director – Operations (on the Board of CIPL)	Owns, endorses and ensures the implementation of the policy. Overall responsibility to CIPL BoDs for claims handling issues in the CIPL Group related to suppliers or product quality and for ensuring that material claims handling issues in the Group are duly attended to and communicated to CIPL BoDs as relevant.
CIPL Quality	Policy owner with overall responsibility to CIPL BoDs for quality and food safety issues in the CIPL Group and for ensuring that material quality and food safety risks in the CIPL Group are duly attended to and communicated to CIPL BoDs. Maintains all associated written quality documents in COM.
Heads CIPL Procurement, CIPL Quality and CIPL Legal	Functionally and jointly responsible for implementing, monitoring and developing the claims handling requirements, including the supporting Claims Handling Manual.
CIPL Quality	Ensure awareness and implementation of the policy across their organisations and that specific COM requirements are understood and observed.
Brewery Heads	Responsible for ensuring that the local quality and food safety management programme is implemented, effective and consistent with Group Quality requirements as defined in COM.
Quality Manager (Brewery)	Ensures that all site employees and visitors are trained in and aware of applicable food safety and hygiene requirements and procedures.
All entities, managers and employees in the CIPL Group, especially in production sites and departments	Responsible for adhering to this policy.
Managing Director, CIPL Functional Heads at Corporate Office, 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

COM

Carlsberg Operational Manual

Food safety

Food safety refers to the conditions and practices that ensure the production and delivery of safe products. These practices focus on preventing accidental environmental contamination.

Food defence

Food defence is the protection of food products from intentional contamination or adulteration with biological, chemical, physical or radiological agents. It addresses additional concerns, including physical, personnel and operational security.

FSSC 22000

Food Safety System Certification provides a framework for effectively managing food safety and quality responsibilities. FSSC 22000, recognised by the Global Food Safety Initiative (GFSI), is based on existing ISO standards. It demonstrates that a company has a robust and effective food safety management system in place to meet the requirements of regulators, food business clients and consumers.

GFSI

The Global Food Safety Initiative (GFSI) is a collaboration of the world's leading food safety experts representing a broad range of participants in the supply chain, from primary producers to retailers.

Launched in May 2000, this international initiative used benchmarking to establish the key components necessary for good food safety standards and operating protocols for the delivery of third-party certification. GFSI promotes continuous improvement in food safety management systems to ensure the delivery of safe food to consumers.

HACCP

Hazard analysis and critical control points (HACCP) is a systematic approach to food safety that aims to identify biological, chemical and physical hazards in production processes that could cause the finished product to be unsafe, and designs actions to control, reduce or eliminate those hazards.

ISO 9001

ISO 9001 is an international standard that sets out requirements for an organisation's quality management system (QMS).

ISO 22000

ISO 22000 is an international standard that sets out requirements for an organisation's food safety system, namely a system that involves interactive communication, system management, prerequisite programmes and HACCP principles.

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 owners. The policy owners must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

CIPL Quality must review this policy annually with input from Brewery Heads. 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

- Carlsberg Operational Manual (COM)
- Claims Handling Manual
- Crisis Management Policy
- Legal & Intellectual Property (IP) Policy

CONTACT

For more information, please contact the Director – Technical (on the Board of CIPL). For more information regarding claims handling, please contact CIPL Legal or CIPL Quality.

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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