



**Danish Crown**

# Export Controls and Sanctions Policy

<b>Governance</b>	
Version	1.0
Application date of present version	20-12-2023
Approved by	Board of Directors, Danish Crown A/S
Accountable for implementation of policy	Vice President, Group Treasury
Scope	Danish Crown Group
Review frequency	Every second year



# Content

<b>1. Our Policy</b> .....	<b>4</b>
1.1 Our commitment.....	4
1.2 Our culture.....	4
1.3 Our trading partners.....	4
<b>2. Sanctions and Export Controls</b> .....	<b>5</b>
2.1 Sanctions.....	5
2.2 Export Controls.....	5
<b>3. Practical Guidance</b> .....	<b>6</b>
3.1 How to seek further advice.....	6
3.2 How to report a concern .....	6
3.3 Danish Crown's Whistleblower .....	6



# 1. Our policy

## 1.1 Our commitment

The management of Danish Crown is strongly committed to ensure the Group's compliance with all laws and regulations in force, including laws and regulations for regulating the import, export, or re-export of goods ("Export Controls") and or imposing economic or financial sanctions or trade embargoes or related restrictive measures on countries, individual persons, or legal entities ("Sanctions").

This commitment is part of our general commitment as a responsible group to act with integrity and to satisfy the requirements of the laws in force in the countries in which we operate.

The consequences of non-compliance may be severe to the entire Danish Crown Group. Penalties for a violation of applicable Export Controls and/or Sanctions may include substantial fines and/or imprisonment. In addition, violations could make Danish Crown Group subject to administrative actions, including the denial of export privileges. Accordingly, Export Controls and Sanctions must be fully complied with.

## 1.2 Our culture

In Danish Crown we support a compliance culture and provide the necessary guidance and training to all relevant employees. In this way, we ensure that all relevant employees have a strong awareness of the rules and the ability to comply with the guidance provided.

In Danish Crown we have a culture where "playing by the rules is business as usual" and we urge employees to raise compliance issues openly.

## 1.3 Our trading partners

Danish Crown requires all trading partners to comply with Export Controls and Sanctions. If a trading partner does not comply with this, Danish Crown will terminate the relationship with the trading partner.



# 2. Sanctions and Export Controls

## 2.1 Sanctions

Sanctions are restrictive measures on trade adopted by the UN Security Council and the EU against countries and/or persons or legal entities. The extent of the trade restrictions varies, but restrictions most often encompass a weapons embargo, entry ban and/or freezing of funds and economic resources. In some cases, sanctions also involve a ban on import and export of other products.

No transaction may be made with any individual or entity appearing on an applicable sanctioned parties list issued by the United Nations, the European Union or national governments including the United States of America.

Freezing of assets is defined as restrictions on the free access to any funds and economic resources owned or controlled by physical or legal persons, groups or entities appearing in the annexes to the relevant EU regulations. No financial funds or economic resources may be made available to such designated persons or entities. Neither may financial services be supplied to the designated persons or entities.

Danish Crown has a system for screening of business relations against the applicable sanctioned parties lists. If a finding shows that a person or legal entity with whom Danish Crown trades is registered on a sanctioned parties list, and that the sanctions are relevant for Danish Crown, Danish Crown will terminate the business relationship.

Danish Crown requires that its customers likewise comply with the rules. Danish Crown General Terms and Conditions for Sale and Delivery provide that our customer is obliged to obtain any necessary export license or other documentation required and shall not knowingly sell, export or re-export or otherwise dispose of Danish Crown's goods directly or indirectly to any person or entity, or country or countries, prohibited by the applicable Export Controls or Sanctions.

All relevant Danish Crown employees are instructed to ensure compliance with the Export Controls and Sanctions within their sphere of responsibility. The failure of an employee to comply with the applicable rules and regulations will be regarded as a breach of the employee's obligations towards Danish Crown.

Awareness-raising and training are important elements to embed Danish Crown's policies and procedures. Danish Crown has ongoing compliance training for its employees on Group policies.

## 2.2 Export Controls

Danish Crown is a leading food processing company focusing primarily on the production and sales of meat and food. Accordingly, the products of Danish Crown are not subject to restrictions under the applicable Export Controls.



# 3. Practical guidance

## 3.1 How to seek further advice

As an employee in Danish Crown, it is your right and responsibility to obtain guidance regarding any business decision you are uncertain about. The first point of contact for guidance should always be your direct line manager. If you are not comfortable with this, contact the Group General Counsel.

## 3.2 How to report a concern

A violation or suspected violation of this policy must be reported immediately to the Group General Counsel.

A concern may also be reported as a whistleblower report, as set out in section 3.3 below.

## 3.3 Danish Crown's 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.

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.

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

Reports that are submitted via the above-mentioned channel are reviewed by a small group of authorized employees. Concerns received are investigated thoroughly and appropriate preventive or corrective actions are initiated, if necessary.

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