



Data Ethics Statement 2023

Statutory Data Ethics Statement for 2023, cf. the Danish Financial Statements Act § 99 d

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Policy

Royal Unibrew has adopted and implemented a General Data Protection and Data Ethics Policy, including aspects of GDPR, IT-security and Data Ethics. It was reviewed and updated by the Board of Directors in 2023.

The Policy establishes the overall guidelines and principles for how data ethics is considered and included in the use of data as well as in design and implementation of technologies, especially when using AI and new technologies, used for processing of but not limited to personal data in Royal Unibrew.

The Policy is based on the 10 principles on data ethics elaborated by the Danish Council for Digital Security and sets the general guidelines as well as specific details on relevant topics, such as legality, ethical design, consequences of processing data, security, transparency, and respect for human rights

Governance

Royal Unibrew's Information Security Committee (ISC), consisting of the CFO, CIO, CHRO and Group General Counsel, is responsible for the General Data Protection and Data Ethics Policy and its implementation, while the practical compliance of the policy is incorporated in the existing data protection and IT security compliance program in Royal Unibrew.

Activities in 2023

Royal Unibrew's activities in 2023 did not by its nature trigger any need for specific initiatives involving more in-depth aspects of data ethics. Royal Unibrew continued the application of our data ethics principles which entailed continued focus on internal controls, IT-security, and further inclusion of data ethics principles into the Royal Unibrew general compliance programs. Among other initiatives in 2023 Royal Unibrew adopted specific guidelines for use of online tools and AI.

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Employee training program

Our employee training program is differentiated to accommodate the diverse nature of our business and potential exposure to data ethical and GDPR related issues. To further strengthen the focus on IT security and data protection, including aspects of data ethics, Royal Unibrew has invested further in developments of its digital training platform. During 2023 all employee groups where IT-security, GDPR or other data ethical aspects are relevant, completed GDPR and IT-security training, which included aspects of data ethics. The program will be continued and further developed in 2024.