



CSR Policy

Adopted by the Board of Directors of Arcus-Gruppen Holding AS on September 21st 2016

CSR Policy for Arcus ASA and subsidiaries (Arcus)

1. About our Corporate Social Responsibility Policy

Arcus develops its approach and systems in line with the expectations that are placed on a large player in the Nordic wine and spirits sector. We define our corporate social responsibility (CSR) relative to the world around us, and within the areas of human rights and labour, the environment, anti-corruption, risk management and the consumption of alcohol. This approach is based on international guidelines and the principles set out in the UN Global Compact¹. We also place clear requirements on ourselves and our employees through the company's Ethical Guidelines, Environmental Policy, work rules and campaigns.

Arcus supports and participates actively in the Nordic Alcohol Monopoly's (NAM) CSR initiative, and complies with all requirements set out in the NAM Code of Conduct. We place the same requirements on all of our suppliers and partners, and monitor their compliance. Also, the NAM Code of Conduct is included in all of the purchasing contracts and agreements entered into by Arcus and its subsidiaries.

1.1. Purpose

The purpose of this policy is to define clear areas of focus for the company's approach to CSR and clarify the responsibilities and expectations with regard to our most important stakeholders.

1.2. Scope

Arcus' CSR Policy applies to board members, managers, employees and consultants in Arcus, as well as all wholly and partly owned subsidiaries. It is the responsibility of the management team to ensure that the policy is known and complied with across the company. All Employees of Arcus are obliged to become familiar with and follow the CSR policy.

2. Main areas of focus for Arcus's CSR approach

Arcus supports the human rights and labour standards that are set out in the UN Global Compact and, as such, commits to complying with and promoting the Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption.

¹ The United Nations Global Compact is a [United Nations](#) initiative to encourage businesses worldwide to adopt sustainable and [socially responsible](#) policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of [human rights](#), [labour](#), the [environment](#) and [anti-corruption](#).

2.1. Human rights and labour

- No employee of Arcus shall in any way cause or contribute to a violation or circumvention of human rights as they are set out in the UN Global Compact. Arcus shall uphold its employees' fundamental rights as set out in the International Labour Organization's (ILO) fundamental conventions.
- Arcus requires all of its suppliers to comply with the principles of the UN Global Compact. It will actively contribute to the development and follow-up of systems that facilitate such compliance, and places a special focus on upholding human rights, freedom of association, employees' fundamental rights and the prohibition of child labour.
- Arcus respects individual employees' right to a private life and private interests, but also requires openness and loyalty with regard to Arcus and Arcus' business interests. Personal gain may never come before work for Arcus.

2.2. Environment

- As a major player in the Nordic wine and spirits sector, Arcus takes an active responsibility to reduce the impact of its operations on the environment. Arcus supports a precautionary approach to environmental challenges and works methodically to reduce its impact on the environment.

2.3. Anti-corruption

- In accordance with the tenth principle of the UN Global Compact², Arcus avoids discriminatory treatment and works against any form of corruption in conjunction with its operations. Arcus also places the same demands on all of its suppliers and partners.
- Arcus's Ethical Guidelines set out the requirements and expectations for the conduct of all employees, including board members, managers, employees and consultants, including those of the company's wholly and partly owned subsidiaries.

2.4. Relationship to alcohol

- All of the company's marketing must always comply with applicable laws and industry standards in the countries where it is active.
- Because Arcus is a major player in the alcohol trade, it is important that the company takes a clear position on responsible consumption. All of the audiences and stakeholders

² The tenth principle of the UN Global Compact states that: businesses should work against corruption in all its forms, including extortion and bribery

who are relevant to Arcus should be able to easily understand the company's approach to alcohol and responsible consumption.

- Arcus actively works against the abuse of alcohol among its own employees and expects all employees to uphold the company's Drugs Policy.

3. Health Safety and the Environment – Safety work

- Arcus has a major focus on health, safety and the environment (HSE). A central goal is to prevent accidents and injuries, and the company therefore conducts risk assessments, job safety analysis and root cause analyses on a regular basis.
- Arcus's business entails the handling of flammable liquids. In addition to the high level of security in place in its buildings, production processes and procedures, Arcus also has comprehensive contingency plans in place to enable it to respond to any unintended incidents.

Relevant employees are required to take part in courses and training on how best to prevent and react to any accidents. Also, an in-house emergency response team conducts annual training in hypothetical but comprehensive crisis situations, ideally in cooperation with the police department, the fire department and ambulance services.

- Arcus is a member of Inkluderende Arbeidsliv (the Norwegian agency that seeks to promote inclusivity) and works closely with the occupational health service and the Norwegian Labour and Welfare Administration (NAV) to reduce absence due to illness. Individual follow-up and facilitation are important disciplines in this regard.
- Statistics regarding absence due to illness and HSE events are reported every month at departmental meetings and presented on bulletin boards.

4 Notification of irregularities and unacceptable conditions

- Arcus has a formal procedure in place for employees to report any potential irregularities, including failures to comply with company policies, as well as any illegal or otherwise unacceptable situations. This procedure clearly sets out the steps to be followed, and the criteria by which any such situations will be judged.
- Employees are encouraged to notify the management about any potential irregularities. Employees who exercise this 'whistle blower' right are not subject to any form of retaliation. Also, the burden of proof that their notification relates to situations that are in violation of the provisions of the Working Environment Act rests with the company.

5 Sanctions in the event of breaches to Arcus' CSR Policy

Conduct that is in violation of our CSR Policy and accompanying guidelines can have widespread, negative consequences for Arcus, and any such breaches will therefore be

investigated. For employees, the consequences can take the form of verbal or written reprimands or, in more serious cases, legal action, resignation or termination of employment.