



Danish Crown

Data Ethics Policy

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1. Our policy

1.1 Our commitment

Danish Crown complies with both Danish and EU law on data and privacy protection. In addition, Danish Crown recognizes that the technological development, along with evolving benefits and risks from large scale data use, require thoughtful and responsible decision making.

This Policy describes Danish Crowns approach to good data ethics and the principles that exist on how Danish Crown treats data ethically correct, responsible, and transparent.

Danish Crown takes its responsibility as a data controller seriously, as we want to be perceived as a respected and competent company who complies with applicable legislation and follows developments in good data ethics.

1.2 Data ethics principles

At Danish Crown we have adopted a set of data ethics principles to support ethical decision-making when using data across the value chain.

The data ethics principles cover all types of data collected, analyzed, stored, shared, deleted and otherwise processed.

The principles draw on established concepts in privacy, human rights, and business ethics to ensure we work with data in a way that maximizes benefits and minimizes harm for individuals and society.

Our principles are as follows:

- a) Danish Crown must process data with transparency and openness.
- b) Processing of data must always comply with national applicable law and regulations.
- c) Processing of data must be done in a sufficiently secure, robust and reliable way that complies with international best practice standards.
- d) Data must not be used in a way that can misguide our customers, employees, society, or other stakeholders.

- e) Danish Crown must possess the necessary competencies to handle data ethics dilemmas.
- f) Processing of data must not discriminate based on gender, ethnicity, sexuality,, socioeconomic background, disability, health-related data, or other
- g) Computer programs, algorithms, artificial intelligence and other technologies must be used in a fair and responsible way.

1.3 Globally consistent high standards

This policy covers the entire Danish Crown Group and obliges all employees to follow Danish Crowns data ethics principles. The policy reflects the need for globally consistent and high standards so that Danish Crown can demonstrate our commitment to conduct business in accordance with Danish Crown's values.

1.4 Data in Danish Crown

In Danish Crown we process personal data as a data controller. In our role as a data controller, we process personal data from e.g., job applicants, employees, owners, and customers. In addition to personal data, we also process non-personal data such as financial, marketing, production, sales and sustainability data.

1.5 Responsibility

The overall responsibility for Data Ethics rests with the Group Executive Management Team

A Data Ethics Committee, consisting of functional leaders within Compliance, Legal, Finance, IT and GDPR, has been appointed to ensure implementation of and compliance with this policy.