



H.J. HANSEN GROUP

Wine & Recycling

ESG policy

The guidelines for the H.J. Hansen Group's work with environmental matters, social conditions, and responsible governance.

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Our policy

Our ESG approach
Our strategic ambitions
Our requirements
Our due diligence process and ESG committee



HJHANSEN
Recycling Group



PURVEYOR TO THE ROYAL DANISH COURT

H.J. HANSEN VIN

THEIS  VINE

Our policy

The H.J. Hansen Group consists of H.J. Hansen Holding with the subsidiaries HJHansen Recycling Group, including its associated companies, and Wine-Group, which is made up of H.J. Hansen Vin and Theis Vine.

We are among Denmark's largest players in our two respective industries, and our activities extend beyond the country's borders. Therefore, responsibility and social accountability are a natural part of our business operations. This policy forms the framework for our work with environmental matters, social conditions, and business conduct.

Our ESG approach

We work purposefully with responsibility throughout the entire group. Although we are not covered by the CSRD (Corporate Sustainability Reporting Directive) and the ESRS (European Sustainability Reporting Standards), we use selected principles as voluntary guidelines to strengthen our work with transparency, data quality, and accountability.

Our strategic ambitions

We aim to build strong and resilient businesses that combine quality, innovation, and responsibility. Our goal is to set industry standards for responsibility and development. ESG is a strategic tool for us, enhancing our transparency, strengthening our quality, and ensuring that we invest in technology, smart solutions, and relationships.

Our requirements

We develop the Group with care – economically, socially, and environmentally. We prioritise quality, service, resource efficiency, and responsible behaviour throughout the entire value chain. We value an open and ongoing dialogue with our stakeholders about ambitions, progress, and improvements.

Our ESG policies guide both employees and business partners in how we work with responsible development. Through our *Code of Conduct for Business Partners*, we ensure that our value chains meet our expectations regarding, among other things, working conditions, environmental protection, and anti-corruption.

Our due diligence process and ESG committee

We work actively to identify and prevent risks related to human rights violations, breaches of occupational health and safety regulations, corruption, and negative environmental impact – both internally and across our value chains.

Environment

Climate policy
Pollution policy
Policy for the protection of water and marine resources
Biodiversity policy
Policy for resource use and circular economy



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Climate policy

H.J. Hansen Group recognizes the seriousness of climate change, and we are working systematically to reduce our climate footprint. Our approach is based on the European Sustainability Reporting Standards (ESRS) and the objectives of the Paris Agreement.

Scope of application

The policy applies to the entire H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Risks and opportunities related to climate change

Risks:

- More frequent and extreme weather events may damage our facilities, disrupt our supply chains, and impact our production.
- Rising sea levels may, over time, pose a threat to our port facilities.
- Stricter climate regulations and legislation may lead to increased compliance costs.

Opportunities:

- Products and services developed with a focus on environmental responsibility and efficient resource use strengthen our reputation and open new markets.
- Energy optimisation and electrification reduce operating costs, CO₂ emissions, and reliance on fossil fuels.
- Investments in renewable energy sources create long-term benefits and resilience.

Climate targets

- **2033/2034:** Halve our scope 1 and 2 emissions compared to the 2023/24 baseline year.
- **2050:** Climate neutrality in scope 1, 2, and 3.

Strategies and actions

To achieve our goals, we focus on three main areas:

- **Energy efficiency:** Optimising equipment and processes.
- **Fuel:** Phasing out fossil fuels in favour of electricity and biofuels.
- **Renewable energy:** Investing in green electricity – either through our own production or through procurement.

In practice, this means:

- We use the (mandatory) energy and climate assessment to identify and prioritise improvement opportunities.
- Action plans for phasing out fossil fuels.

Monitoring and reporting

- Annual calculation of greenhouse gas emissions (in accordance with the GHG Protocol).
- We publish the results in the companies' ESG reports.

Training and communication

- All employees and relevant stakeholders are introduced to the policy.
- Awareness and engagement are strengthened through internal campaigns and training.
- We participate in industry initiatives and networks related to climate-related topics.

Responsibilities

- **Policy Lead:** The Sustainability Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy Owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- **Governance:** The ESG Committee oversees the climate policy.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing and implementing climate strategies and actions within their respective areas.
- **All employees** are responsible for supporting the implementation of this policy in their daily work.

Revision

The climate policy must be updated at least every three years to reflect changes in our business, legislation, and the development of best practices.

Pollution policy

H.J. Hansen Group aims to minimise pollution and protect the environment. We recognise that pollution can harm both people and nature. This policy outlines our approach to preventing pollution and is aligned with relevant environmental regulations and best practices.

Scope of application

The policy applies to the entire H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Pollution sources and impacts

We continuously identify and assess our potential sources of pollution, including:

- **Air:** Emissions from production, transportation, and energy use.
- **Water:** Discharges of wastewater from processes and surface water.
- **Soil:** Spills, leaks, and improper waste handling.
- **Noise:** Noise from machinery, transportation, material handling, and demolition activities.

We will evaluate the potential environmental and health impacts of these pollution sources, considering factors such as:

- Impacts on air and water quality.
- Harm to wildlife and ecosystems.
- Health risks to humans.

Objectives

- **Overall objective:** Continuous reduction of pollution from our activities.
- **Specific objectives:** Establish KPIs based on identified pollution sources and their impacts.

Strategies and actions

Prevention:

- Optimise processes to reduce emissions.
- Substitute hazardous substances with safer alternatives.
- Prevent leaks through systematic maintenance.

Control:

- Install air-cleaning equipment (e.g., filters, scrubbers).
- Treat wastewater before discharge.

- Ensure effective stormwater management.
- Use noise-reducing technology.

Monitoring and reporting

- We continuously measure air, water, and noise pollution.
- We track our progress through KPIs.
- We publish the results in the companies' ESG reports.

Training and communication

- All employees and relevant stakeholders are introduced to the policy.
- Internal communication campaigns and training are used to build awareness.
- We participate in industry initiatives and networks related to pollution-related topics.

Responsibilities

- **Policy Lead:** The Head of QHSE is responsible for ensuring the follow-up and updating of the policy.
- **Policy Owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee oversees the pollution policy.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing and implementing strategies and actions for pollution prevention within their respective areas.
- All employees are responsible for supporting the implementation of this policy in their daily work.

Revision

The pollution policy must be updated at least every three years to reflect changes in our business, legislation, and the development of best practices.

Policy for the protection of water and marine resources

H.J. Hansen Group recognizes that water and marine environments are essential to both nature and people. We have a responsibility to protect these resources and minimise our impact through responsible operations and management.

Scope of application

The policy applies to the entire H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Risks and opportunities

Risks:

- **Water and marine pollution:** Contamination of aquatic environments due to wastewater, spills, and seepage.
- **Water resources:** Overconsumption of water resources in production and operations.

Opportunities:

- **Water efficiency:** Water-saving initiatives can reduce both consumption and environmental impact.
- **Responsible water management:** Treatment and reuse of wastewater can reduce our dependence on freshwater resources.
- **Marine conservation:** Marine conservation initiatives strengthen biodiversity and contribute to long-term ecosystem health.

Objectives and targets for water and marine resources

- **Overall objective:** Minimise our impact on water and marine resources.
- **Specific targets:**
 - Reduce water consumption through defined KPIs.
 - Improve wastewater treatment and reduce discharges to water and marine environments.

Strategies and actions

Water conservation:

- Implement water-saving technologies and processes across all activities.
- Prevent water waste and address inefficient installations.
- Increase employee awareness of water conservation.

Responsible water management:

- Invest in effective wastewater treatment.
- Implement water-reuse strategies, where possible, to preserve freshwater resources.

Protection of marine environments:

- Support initiatives for marine conservation and the protection of ocean environments.
- Conduct regular environmental assessments and implement corrective measures.

Monitoring and reporting

- We continuously monitor our water consumption, wastewater management, and any discharges.
- Monitoring includes:
 - Measuring water consumption across locations and activities.
 - Sampling and analysing wastewater where relevant.
 - Documenting operational disruptions and deviations.
 - Assessing improvement opportunities at locations and within processes.
- Data is used primarily internally to assess developments, prioritise improvement initiatives, and meet regulatory requirements. We track our progress through KPIs.
- We do not necessarily publish the results, but the documentation may form the basis for future reporting requirements.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- Internal communication campaigns aim to increase understanding of responsible water management.
- We engage in relevant networks and initiatives.

Responsibilities

- **Policy lead:** The Head of QHSE is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee oversees this policy for the protection of water and marine resources.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing and implementing strategies and actions within their respective areas.
- All employees are responsible for supporting the implementation of this policy in their daily work.

Revision

The policy for the protection of water and marine resources must be updated at least every three years to reflect changes in our business, legislation, and the development of best practices.

Biodiversity policy

H.J. Hansen Group recognizes the crucial role that biodiversity and healthy ecosystems play in maintaining a healthy planet and supporting human well-being. This policy outlines our approach to business practices that promote biodiversity and ecosystem health.

Scope of application

This policy applies to all locations within the H.J. Hansen Group where potential for maintaining or improving biodiversity has been identified. See the appendix to this policy on [Sharepoint](#).

Risks and opportunities for biodiversity and ecosystems

Risks:

- **Loss or degradation of habitats:** Our activities may directly or indirectly contribute to the loss and/or degradation of habitats, affecting the diversity and abundance of plant and animal species.
- **Pollution:** The release of pollutants can harm ecosystems and the species they support.
- **Climate change:** Our CO₂ footprint may contribute to climate change, which can lead to ecosystem disruptions and biodiversity loss.

Opportunities:

- **Sustainable land management:** By using nature-friendly methods, we can reduce our impact and, in some cases, enhance existing natural areas.
- **Integration of biodiversity:** When biodiversity is embedded in our business decisions, we can prevent harm and create long-term value.
- **New locations:** When acquiring new sites, biodiversity considerations are included during establishment or takeover.

Goals

Overall goal:

Limit our negative impact and contribute to protecting and restoring biodiversity and ecosystems.

Specific targets:

- **Reduction of biodiversity impact:** Define targets to reduce our negative impact on biodiversity.
- **Ecosystem restoration:** Establish goals to contribute to the restoration of degraded ecosystems on our sites.

Strategies and actions

- **Sustainable land management:** Develop and implement land-management methods that take nature into consideration. The aim is to reduce our impact and, where possible, improve existing conditions.
- **Biodiversity assessment:** Conduct ongoing environmental assessments to identify impacts on biodiversity. We act quickly with mitigating and compensatory measures when necessary.
- **Value chain:** We prioritise collaboration with partners who work with responsible solutions and minimise their impact on biodiversity.

Monitoring and reporting

We focus on taking action where we can clearly see an opportunity to make a positive difference.

- We continuously screen our activities and locations in order to:
 - Identify risks or opportunities to improve biodiversity
 - Consider local conditions in our planning and operations
 - Implement concrete measures where relevant and meaningful

Monitoring is carried out to the extent that it is relevant, and the data is used internally as a basis for ongoing improvements.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- Internal communication campaigns aim to increase awareness of the importance of biodiversity protection.
- We engage in relevant networks and initiatives.

Responsibilities

- **Policy lead:** The Sustainability Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee oversees the biodiversity policy.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing and implementing biodiversity strategies within their respective areas.

- All employees are responsible for supporting the implementation of this policy in their daily work.

Revision

The biodiversity policy must be updated at least every three years to reflect changes in our activities, new knowledge, and developments in environmental laws and regulations.

Policy for resource use and circular economy

H.J. Hansen Group recognizes the value of using resources efficiently and responsibly. We work actively with the principles of the circular economy, where we minimise waste and extend the lifespan of materials.

Scope of application

The policy applies to the entire H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites.
- Wine-Group, including its subsidiaries and stores.
- All other activities where the Group has operational control.

Principles of circular economy

We work according to two shared fundamental principles:

- **Resource optimisation and selection:** Use renewable and/or recyclable resources, reduce the use of scarce resources, and minimise resource waste.
- **Circularity:** Extend the lifespan of products through reuse, repair, and recycling.

Goals and targets for circular economy

Overall goal:

Strengthen our resource efficiency and contribute to a more balanced use of natural resources.

Specific targets:

- **Recycling:** Increase the amount of materials that are recycled.
- **Resource use:** Increase the share of reused and recycled materials in the goods and materials we procure for our operations.
- **Reuse and repair:** Increase the amount of products that are reused and repaired.

Strategies and actions

- **Policies and action plans:** Integrate the principles of the circular economy by incorporating the waste hierarchy into our policies and action plans.
- **Responsible procurement:** We prioritise suppliers and materials in our strategic procurement that support circular solutions and demonstrate documented responsibility.
- **Reuse and repair:** We explore and implement solutions that make it possible to extend product lifespans and minimise resource waste.
- **Communication:** We communicate the circular potential of products and promote responsible sorting and disposal.

Monitoring and reporting

- We monitor our waste, consumption, and recycling rates through KPIs.
- We publish the results in the companies' ESG reports.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- Internal communication campaigns aim to increase awareness of circular principles.
- We engage in relevant networks and initiatives.

Responsibilities

- **Policy lead:** The Sustainability Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee oversees the policy for resource use and circular economy.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing and implementing circular strategies within their areas.
- All employees are responsible for supporting the implementation of this policy in their daily work and seeking opportunities to minimise waste and maximise resource efficiency.

Revision

This policy must be updated at least every three years to reflect changes in our activities, technological advancements, and best practices within the circular economy.

Social

Employee policy
Policy on workers in the value chain
Community policy
Policy for consumers and end users



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Employee policy

At H.J. Hansen Group, our employees are key to the success and development of our company. We strive to create a work environment characterised by well-being and development, and to ensure that everyone is treated fairly and with respect. This policy sets the direction for how we protect our employees' rights and support their potential. In addition, we have an internal personnel policy that describes employees' rights, responsibilities, and conditions in greater detail.

Scope of application

This policy applies to all employees employed within the H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Code of conduct

We strive to create a work environment based on the following core values:

- **Fairness and equal opportunities:** Everyone must be treated fairly — regardless of background, gender, age, religion, or any other characteristic.
- **Respect and inclusion:** A culture where collaboration and mutual respect form the foundation.
- **Work-life balance:** We support initiatives that promote mental and physical well-being and safeguard balance between work and free time.
- **Professional development:** We invest in our employees' development through training and career-enhancing opportunities.
- **Open dialogue:** We encourage employees to raise concerns and suggestions. All inquiries must be received openly and responded to with feedback.
- **Communication to employees:** We ensure timely communication throughout the organisation, so everyone has the opportunity to stay informed.
- **Human rights:**

We respect fundamental human rights and reject child labour and forced labour. We follow:

- The UN Guiding Principles on Business and Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises

Our employees are familiar with these principles and must help ensure they are upheld in practice.

Key principles

- **Recruitment:** We hire based on qualifications and experience. We ensure a fair and as objective a process as possible.
- **Pay and benefits:** We offer compensation packages that reflect the job level, as well as employee benefits that support well-being.
- **Performance management:** We set clear performance expectations and provide ongoing feedback and guidance to help employees succeed in their roles and develop.
- **Training and development:** We invest in training and development programmes to expand employees' skills and knowledge.
- **Health and safety:** We ensure a safe and healthy working environment.
- **Diversity and inclusion:** We actively work to promote diversity and ensure equal opportunities across our workforce and leadership.
- **Zero tolerance for harassment:** We do not accept discrimination or offensive behaviour.

Employee rights and responsibilities

Rights: All employees have the right to fair treatment, safety, freedom of expression, and freedom of association. Employees have the right to raise concerns and seek remedy.

Employee responsibilities: Employees are expected to act ethically, perform their work in accordance with the expectations, goals, and deadlines agreed with management, and follow the company's policies and procedures.

Monitoring and reporting

- We track our progress and continuously identify areas for improvement.
- We report our performance in the companies' ESG reports in accordance with relevant reporting standards.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- All employees have access to information about their rights and responsibilities, company policies, and complaints procedures.
- Employees are involved through well-being surveys and a management system with regular meetings, including information meetings, departmental meetings, 1-to-1 meetings, and performance and development reviews (MUS).
- Internal communication campaigns aim to increase awareness of our Code of Conduct

Responsibilities

- **Policy lead:** The HR Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee will monitor the implementation of this policy.
- The HR department is responsible for developing strategies and actions for employees and associated temporary workers.
- Leaders at all levels are responsible for creating a positive work environment, complying with the management system, and implementing the agreed strategies and actions.
- All employees are responsible for supporting the implementation of this policy in their daily work.

Revision

This policy must be updated at least every three years to reflect changes in laws, regulations, and best practices.

Policy on workers in the value chain

H.J. Hansen Group takes responsibility beyond our own operations. We require proper working conditions throughout our value chain and collaborate only with suppliers and customers who share the values listed below.

Scope of application

The policy applies to all companies and activities within the H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Core values for our value chain

We expect our business partners to uphold the following core values:

- **Fair working conditions:** Comply with all relevant labour laws and regulations, including provisions on minimum wage, working hours, holidays, and overtime.
- **Respect for workers' rights:** Respect workers' rights to freedom of association, collective bargaining, and a healthy and safe working environment.
- **Non-discrimination:** Treat all employees fairly and equally, regardless of race, ethnicity, gender, sexual orientation, religion, age, disability, or similar characteristics.
- **No forms of forced labour, child labour, or human trafficking:** We do not accept any form of child labour, forced labour, slavery, or involuntary work. Our business partners must ensure that they do not participate in any form of involuntary work or exploitation of workers in their supply chain.
- **Human rights:** We expect business partners to respect human rights and comply with the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Selection and management of suppliers and customers

- We select suppliers and customers based on an overall assessment in which social and environmental responsibility is considered equally alongside price and quality.
- We conduct due diligence assessments to evaluate the working conditions and environmental performance of potential suppliers and customers.
- Our expectations are clearly outlined in our Code of Conduct for Business Partners, which must be adhered to as a minimum before entering into any collaboration. In the case of significant violations, we reserve the right to terminate the partnership.

Monitoring and compliance

- We conduct regular audits of relevant suppliers and customers to assess their compliance with this policy and with our Code of Conduct for Business Partners.

- We have clear communication channels, including a whistleblower scheme, where workers in our value chain can report potential violations.
- If we identify issues with a supplier or customer, we will ask them to implement improvement action plans.
- We will terminate cooperation with suppliers and customers who show persistent non-compliance with our code of conduct.

Monitoring and reporting

- We continuously monitor conditions for workers in our value chain. Through risk-based assessments, we identify the areas where the likelihood of breaches of workers' rights is greatest and prioritise our efforts accordingly.
- Monitoring includes:
 - Periodic supplier evaluations and audits
 - Use of questionnaires and self-assessments from business partners
 - Follow-up on whistleblower reports and complaints
- Use of third-party data, where relevant, in high-risk areas
- As a general rule, we do not publish data in this area, but we document our efforts so they can be actively used in dialogue with partners, in internal assessments, and in connection with relevant regulatory requirements.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- Our Code of Conduct for Business Partners is the key tool for communicating the standards we operate by and the expectations we have of our suppliers and customers.
- The Code of Conduct for Business Partners is available on our websites and is provided as part of the onboarding process for new partnerships.
- Relevant employees are trained in this policy as well as our Code of Conduct for Business Partners, so they know how to handle questions or uncertainties when working with external partners.

Responsibilities

- **Policy lead:** The Sustainability Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee will monitor the implementation of this policy.

- Leaders in commercial and procurement, in collaboration with the due-diligence committee, are responsible for establishing criteria for responsible purchasing and sales.
- Commercial, procurement, logistics, and strategic procurement ensure that these criteria are followed in the processes for selecting and managing suppliers and customers.
- All employees involved in procurement and sales activities are responsible for upholding the principles described in this policy.

Revision

This policy must be updated at least every three years to reflect changes in best practices and industry standards.

Community policy

H.J. Hansen Group aims to maintain positive relationships with the local communities in which we operate. We consider the people and surroundings affected by our activities, and we engage in joint solutions wherever possible.

Scope of application

The policy applies to all companies and activities within the H.J. Hansen Group:

- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries and stores
- All other activities where the Group has operational control

Principles for Community Engagement

We will engage with local communities based on the following principles:

- **Openness:** We communicate transparently about our activities, initiatives, and any potential impacts.
- **Respect:** We meet all stakeholders with respect and acknowledge their perspectives and concerns.
- **Dialogue:** We listen actively and engage in constructive dialogue with the local community.
- **Collaboration:** We will collaborate with our local communities on potential or actual impacts, including, where relevant, developing solutions and implementing initiatives together.

Stakeholder Identification and Engagement Strategies

We identify relevant stakeholders such as neighbours, local businesses, and interest organisations. We aim to:

- Build relationships and understand local expectations and concerns.
- Adjust initiatives and engagement based on local needs and contexts.

Assessment of Social Impacts

We conduct regular assessments of our impact on local communities with regard to health and safety. If significant negative impacts are identified, we develop action plans in collaboration with the local community.

Monitoring and reporting

We continuously follow up on how our activities affect the local communities around us. This is done through dialogue, observation, and the registration of enquiries.

- Our monitoring includes:
 - Feedback from neighbours and local stakeholders

- Registration and handling of complaints, both through the whistleblower scheme and local communication channels
- Internal oversight of relationships and local collaborations
- The data is used to assess the impact of our actions and adjust our efforts accordingly.

Training and communication

- The policy is communicated to employees and relevant stakeholders.
- We share information about our community engagement through relevant channels.
- We participate in relevant networks and initiatives.

Responsibilities

- **Policy lead:** The Head of QHSE is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee oversees this community policy.
- The management teams in HJHansen Recycling Group and Wine-Group are responsible for developing strategies and actions to integrate community engagement.
- All employees are responsible for adhering to the principles of this policy in their interactions with members of the local community.

Revision

This policy must be updated at least every three years to reflect changes in best practices, the needs of local communities, and stakeholder feedback.

Policy for consumers and end users

The purpose of this policy is to ensure responsible and respectful interaction with the consumers and end users of the H.J. Hansen Group. We aim to strengthen trust in our products and services through high quality, honest communication, and the protection of customer rights and data.

Scope of application

This policy applies to all interactions with consumers and end users of our products, including:

- Marketing and advertising activities
- Sales and customer service interactions
- Product labelling and information
- Product safety and quality
- Consumer data, privacy, and security

This applies primarily to the Wine-Group, as there are no equivalent customer groups in HJHansen Recycling Group.

Core values

We base our customer interactions on the following principles:

- **Transparency:** Customers must receive clear and accurate information about our products.
- **Responsible marketing:** All communication must be truthful and not misleading.
- **Respect:** All customers are treated with respect and courtesy.
- **Privacy:** Customer data is handled securely and in accordance with applicable legislation.
- **Quality and service:** We strive to create unique customer experiences through professionalism, quality, and personal service.

Marketing and sales practices

- Marketing material must be accurate and verifiable.
- Prices and any fees must be clearly stated.
- Guarantees and return policies must be communicated clearly and comply with relevant legislation.

Product safety and quality

- We have quality controls in our procurement and handling processes.
- Any safety or health issues are addressed promptly and communicated to consumers as quickly as possible.

Data protection

- Personal data is collected and used lawfully and with respect for privacy.
- We inform customers about purposes and rights related to data use.
- We safeguard customer data against misuse and unauthorised access.
- We comply with applicable data protection laws and regulations.

Customer service and complaints

- Complaints and enquiries are answered promptly and professionally.
- We offer easily accessible channels for feedback and questions.
- Conflicts are handled fairly and with a focus on resolution.
- Consumers and other stakeholders can anonymously report serious concerns through our whistleblower scheme.

Monitoring and reporting

- We follow up on customer satisfaction, complaints, and product feedback through internal systems and dialogue with customers.
- The data collected is used primarily internally to identify areas for improvement, ensure high quality, and train employees and adjust workflows.

Training and communication

- The policy is communicated to all relevant employees in sales, marketing, and customer service functions.
- Employees receive ongoing training in customer service, data protection, and ethics.
- We maintain open communication channels with consumers via a customer service hotline and FAQ on our website.

Responsibilities

- **Policy lead:** The Sustainability Manager is responsible for ensuring the follow-up and updating of the policy.
- **Policy owner:** The CEO of HJHansen Recycling Group and the CEO of Wine-Group hold the overall responsibility and approve the policy.
- The ESG Committee will oversee the implementation of this policy.
- Leaders in commercial and procurement, in collaboration with the due-diligence committee, are responsible for establishing criteria for responsible purchasing and sales.

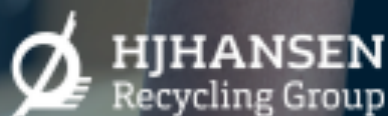
- Commercial, procurement, logistics, and strategic procurement ensure that these criteria are followed in the processes for selecting and managing suppliers and customers.
- All employees involved in purchasing and sales activities are responsible for upholding the principles described in this policy.

Revision

- This policy must be updated at least every three years to reflect changes in best practices, consumer needs, technological developments, and legal requirements.
- We continuously improve our customer interactions by seeking feedback from consumers, benchmarking against others in the industry, and implementing new approaches to build trust and strengthen customer relationships.

Governance

Business conduct policy



Business conduct policy

The purpose of this policy is to ensure that everyone in the H.J. Hansen Group acts responsibly and in accordance with applicable legislation. This policy outlines the fundamental principles that guide our interactions with customers, suppliers, competitors, and all other stakeholders.

Scope of application

This policy applies to all employees and board members in the H.J. Hansen Group:

- H.J. Hansen Holding, including its subsidiaries
- HJHansen Recycling Group, including its subsidiaries and sites
- Wine-Group, including its subsidiaries, warehouses, and stores
- All other activities where the Group has operational control

Fundamental principles of business conduct

- **Integrity:** We act honestly, fairly, and responsibly in all business relationships.
- **Compliance with laws and regulations:** We comply with applicable laws, regulations, and industry standards in the countries where we operate.
- **Fair competition:** We act fairly and demonstrate healthy competitive behaviour.
- **Conflicts of interest:** We avoid situations where personal interests may influence our judgement.
- **Anti-corruption:** We do not tolerate bribery, extortion, or any form of corruption.
- **Accurate records:** We ensure accurate and legally compliant documentation of our activities and accounts.
- **Confidentiality:** We protect confidential information about customers, business partners, and the Group.
- **Work environment:** We contribute to an inclusive workplace free from discrimination or harassment.
- **Environmental considerations:** We make decisions with consideration for the environment and society.
- **Social responsibility:** We act responsibly and ethically throughout our value chain and respect human rights.

Gifts and entertainment

- Gifts or entertainment must not be used to influence business decisions.
- Any gifts must be modest and in accordance with the company's internal guidelines.

Political activities

- We will comply with all applicable laws and regulations regarding political contributions and lobbying.

Reporting concerns

- If there are concerns or suspicions of violations of this policy or any other unethical behaviour, anyone can report through our whistleblower scheme.
- There is no risk of retaliation for reports made in good faith.

Monitoring and reporting

- We continuously monitor compliance with the business conduct policy through:
 - The number and types of reports received via the whistleblower scheme
 - Records of breaches of internal Code of Conduct or the Code of Conduct for Business Partners
 - Results from audits and internal controls
 - Participation in mandatory training on the Code of Conduct, GDPR, and communication
 - Dialogue within management groups
- We continuously analyse the results of our monitoring to identify trends, risks, and specific areas for improvement.
- We report our performance in the companies' ESG reports in accordance with relevant reporting standards.
- Serious violations of our standards for business conduct may result in disciplinary measures.

Training and communication

The policy is communicated to employees and relevant stakeholders.

All employees have access to information about their rights and responsibilities, company policies, and complaints procedures via the intranet.

Employees receive regular training in business conduct through our internal Code of Conduct.

Internal communication campaigns aim to increase awareness of our Code of Conduct.

Responsibilities

- **Policy lead:** The Group CEO of the H.J. Hansen Group has the day-to-day responsibility for implementing the policy, ensuring follow-up and maintenance, and ensuring that the policy is complied with in daily operations.
- **Policy owner:** The Chair of the Board of H.J. Hansen Holding has the formal ownership and overall responsibility for the policy. The policy is submitted for approval by the Board of H.J. Hansen Holding.

- The ESG Committee oversees the policy and its implementation.
- All department managers are responsible for ensuring that the principles are integrated into daily operations and behaviour.
- All employees are responsible for complying with the principles.

Revision

This policy must be updated at least every three years to reflect changes in legal requirements, technological developments, best practices, or an altered risk landscape.

Administration

Implementation
Reporting
Documentation

Implementation

Our work with sustainability is anchored throughout the H.J. Hansen Group through:

- Engagement from management and employees
- ESG risk assessments integrated into existing business procedures
- Updates to policies, procedures, and guidelines to ensure they reflect sustainability considerations
- Establishment of ESG goals and ambitions
- Ongoing monitoring and measurement of progress and impact
- Internal and external communication of results and initiatives

The ESG policy is implemented through procedures and guidelines that ensure compliance with the EU sustainability requirements that apply to us.

Reporting

The Group's subsidiaries report annually on their ESG efforts to ensure transparency for both internal and external stakeholders.

Reporting includes, among other things:

- How our ESG policies are translated into practice in operations
- Results of materiality assessments, risks, and preventive measures
- Status on targets and key ESG metrics
- Identified improvement areas and future focus areas

We follow the ESRS principles and work on the basis of a double materiality assessment approved by the Board. This analysis forms the foundation for our ESG priorities going forward and ensures that we focus on the areas where we have the greatest significance and impact.

We are not subject to CSRD, but we have aimed to align with the requirements as closely as possible. Our ambition is to strengthen both internal learning and external trust by making our work documented and transparent.

Documentation

As part of our ESG efforts, we use management systems and digital tools to document resource consumption, social matters, and environmental results. We use KPIs and data-driven analyses, including through HJH360 and Power BI, to measure the impact of our initiatives and ensure continuous improvements. The systems are continuously adapted to the needs of the business and the requirements for transparency.

Complaints procedure

Whistleblower scheme
Complaints procedure

Our whistleblower scheme

The H.J. Hansen Group offers a whistleblower scheme that allows employees, business partners, and other stakeholders to report any suspected or alleged illegal, unethical, or inappropriate behaviour related to the Group's activities or those of our business partners. This includes, for example, legal violations, financial crime, serious breaches of internal guidelines, violations of Codes of Conduct, or violence and harassment. Internally, the scheme supplements the usual communication channels such as management or HR.

The whistleblower scheme is administered by an external, independent third party to ensure anonymity and confidentiality. This means that reports can be submitted safely and securely without risk of retaliation.

All reports received are assessed, and necessary investigations are initiated. If a report falls outside the scope of the scheme, the whistleblower is directed to the relevant internal contact persons.

The scheme can be accessed via a digital system, with links to the reporting platform and user guidance available on the subsidiaries' websites and intranet.

The H.J. Hansen Group considers the whistleblower scheme an important resource for ensuring responsible business conduct and protecting the Group's values.

Our whistleblower scheme and related policy can be accessed on the following websites:

[Whistleblower - HJHansen Recycling Group](#)

[Whistleblower - H.J. Hansen Vin](#)

[Whistleblower - Theis Vine](#)

Complaints channels

Employees also have the opportunity to raise concerns with their immediate manager, HR, or QHSE

We require our business partners to provide their employees with a channel to raise legal or ethical concerns without fear of retaliation. This is particularly important where their activities may have caused or contributed to significant negative impacts on human rights, the environment, or in cases of corruption.