



OLYMPIC
B R E W E R Y

Part of the Carlsberg Group

ENVIRONMENTAL SOCIAL & GOVERNANCE

REPORT **2024**



TABLE OF CONTENTS

intro

E
nvironmental

S
ocial

G
overnance

03 MESSAGE
FROM OLYMPIC BREWERY'S
MANAGING DIRECTOR

04 OLYMPIC BREWERY
AT A GLANCE

05 TOGETHER TOWARDS
ZERO AND BEYOND

07 ZERO
CARBON
FOOTPRINT

11 ZERO
FARMING
FOOTPRINT

13 ZERO
PACKAGING
WASTE

15 ZERO
WATER WASTE

17 ZERO
IRRESPONSIBLE
DRINKING

19 ZERO
ACCIDENTS
CULTURE

22 PEOPLE ORIENTED
PHILOSOPHY

25 DIVERSITY, EQUITY
& INCLUSION

27 CODE OF ETHICS
& CONDUCT



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Driven by **our people** and with solid **allies** across the value chain –from **producers** and **suppliers** to **customers** and **consumers**– we continued in 2024 to **brew with purpose, consistency** and **responsibility**.

2024 was a year that tested the dynamics and resilience of the brewing industry. Volatility in weather conditions, pressure on agricultural production, rising energy costs and increasing consumer demands for transparency and sustainable operations made it clear that adaptability alone is not enough. Clear strategic priorities and conscious choices are needed at every stage of production and the value chain. Regardless of this environment, at Olympic Brewery we constantly demonstrate that sustainability is the beacon for the way we choose to brew - responsibly, consistently, and with a vision for the future. In this context, last year we steadily continued to implement our ESG strategy «Together Towards ZERO and Beyond», which is an integral part of the Carlsberg Group's broader SAIL'27 strategy. The initiatives and results reflected in the 2024 Report demonstrate that our strategy is effectively embedded in our day-to-day

operations, with significant actions and progress across all three ESG pillars.

On the environment, we continued to invest with consistency in reducing our footprint throughout the value chain. With regard to our own production, it is worth mentioning that energy interventions at our Sindos and Ritsona facilities yielded savings of almost 1,000 MWh in 2024, driving an overall reduction in carbon dioxide emissions of 19% over the last six years. Similarly, having already achieved a significant reduction of 19% in water consumption in production over the last six years, we have made new investments that will further reduce consumption by approximately 8,500 m3 on an annual basis.

On the social aspect, we focused on empowering our people, investing in a work environment that encourages personal development, participation and well-being. We delivered more than 9,500 hours of training in areas such as leadership, technical skills, wellbeing and diversity, while over 5,400 hours were dedicated exclusively to Health and Safety. At the same time, we remained firmly committed to promoting responsible consumption, ensuring it is accompanied by moderation and prudence.

In terms of governance, we emphasize transparency, integrity and accountability. Our Code of Conduct is a cornerstone, ensuring that our decisions and practices are aligned with the Carlsberg Group's values.

Driven by our people and with solid allies across the value chain - from producers and suppliers to customers and consumers - we continued in 2024 to brew with purpose, consistency and responsibility.

We brew with a clear mission: to add lasting value to our business, our people and the society we belong to - for a better today and tomorrow.

Marcin Burdach
Managing Director,
Olympic Brewery



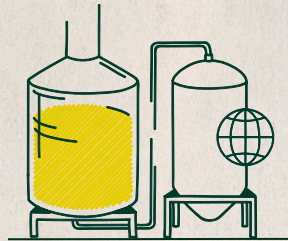
MESSAGE FROM OLYMPIC BREWERY'S MANAGING DIRECTOR

OLYMPIC BREWERY AT A GLANCE



With full consciousness, empathy and respect, in Olympic Brewery we are constantly seeking for new ways to return value back to our people, our partners and suppliers, to the market and the society. We aim at a truly sustainable future, serving our Purpose, to **brew for a better today and tomorrow!**

With steady pace, outward-looking vision, innovation and mainly our people, we represent a strong and reliable scheme, which essentially contributes to the development of the brewing sector in our country!



19
products produced
in Greece



2,2 M
hl. annual production
capacity



>450
employees



>800
wholesalers



>36.000
points of sales
throughout Greece



Exports to
39 in **5**
countries continents

TOGETHER TOWARDS ZERO AND BEYOND

Our ESG program “Together Towards ZERO and Beyond” (TTZAB) supports our Purpose and our commitments, including 11 focus areas, to make the most positive impact possible on our people and society in general. At the same time, it helps us manage the social and environmental effects, as well as support our sustainable business development. We are acting across the whole spectrum of our business and value chain, with the significant cooperation of our suppliers, customers, consumers and of the communities in which we operate, in order to move forward and achieve our aim for ZERO and beyond.

Our ESG program is constantly evolving and refers to an integrated framework on Environment, Society and Corporate Governance (ESG), aiming for:



ZERO Carbon Footprint

Zero CO2 emissions and focus on the usage of alternative energy resources.



ZERO Farming Footprint

Use of raw materials grown through sustainable farming and processing practices.



ZERO Packaging Waste

Use of environmentally friendly and fully recyclable packaging materials.



ZERO Water Waste

Elimination of water waste during the production process.



ZERO Irresponsible Drinking

Continuous promotion of Responsible Consumption & expansion of the “non-alcohol” & “low alcohol” products’ categories.



ZERO Accidents Culture


Fostering a culture of zero accidents in the workplace.

Purpose


SAIL'27
priorities


ESG
programme


Brewing for a better today and tomorrow

 Our portfolio
choices

 Our geographical
priorities

 Our execution
excellence

 Our winning
culture

 Funding
our journey

> Creating value
for all our stakeholders

Together Towards ZERO and Beyond

ESG focus areas



ZERO
Carbon Footprint

2040 >
2030 >

Net ZERO value chain
ZERO carbon emissions at our breweries
30% reduction in value chain carbon emissions
All renewable electricity must come from new asset *(e.g. via power purchase agreements)*



ZERO
Farming Footprint

2040 >
2030 >

100% of our raw materials are from regenerative agricupractices and are sustainably sourced
30% of our raw materials are from regenerative agriculturapractices and are sustainably sourced



ZERO
Packaging Waste

2030 >

100% recyclable, reusable or renewable packaging
90% collection and recycling rate for bottles and cans
50% reduction in virgin fossil-based plastic
50% recycled content in bottles and cans



ZERO
Water Waste

2030 >

Water usage efficiency **2.0 hl/hl** globally and **1.7 hat** breweries in high-risk areas
100% replenishment of water consumption at breweri in high-risk areas



ZERO
Irresponsible Drinking

2030 >


100% responsible drinking messaging through packaging and brand activations
100% of our markets run partnerships to support responsible consumption
100% availability of alcohol-free brews
35% of our brews globally are low-alcohol or alcohol-free





ZERO
Accidents Culture

2030 >


ZERO lost-time accidents

 Diversity, Equity & Inclusion

 Living By Our Compass

 Human Rights

 Responsible Sourcing

 Community Engagement

In these areas, we focus on the continuous enhancement and implementation of policies, partnerships and other initiatives that address the additional ESG topics having material impacts on our employees and operations, as well as on our value chain and wider society.

While we have an established ambition and ongoing actions to promote Diversity, Equity and Inclusion (DE&I), in 2022 we introduced additional DE&I targets that are quantitative and shorter-term: **30%** women in senior leadership positions by 2024, ramping up to **35%** by 2027 and a minimum of **40%** over time.

We continuously strive to Live By Our Compass and maintain a high-integrity culture through a robust compliance programme, and we have long-standing ambitions to source responsibly, respect human rights along the value chain, and engage communities responsibly.



ZERO CARBON FOOTPRINT

We aim at eliminating carbon emissions from our breweries by 2030 and reach net ZERO for our entire value chain by 2040.

Carlsberg Group ESG targets:

By 2040

NET ZERO
VALUE CHAIN

By 2030

ZERO
CARBON
EMISSIONS AT
OUR BREWERIES

30% REDUCTION
IN VALUE CHAIN
CARBON EMISSIONS

ALL
RENEWABLE ELECTRICITY
MUST COME FROM NEW
ASSETS (E.G. VIA POWER PURCHASE
AGREEMENTS)

At Olympic Brewery, **reducing** our **environmental footprint** is a comprehensive and ongoing **effort** that applies to every **stage** and **aspect** of our operation.

Our two production sites are fully incorporated with the Carlsberg Group's Integrated Management System (IMS), and certified in accordance with the ISO 14001:2015 standard for environmental protection by an authorized body.



01 Production Process

CARBON FOOTPRINT REDUCTION INITIATIVES AT OUR BREWERIES



SINDOS

- ENERGY RECOVERY from rejected steam of the boiler house deaerator ➤ SAVINGS OF **278 MWh**
- OPTIMIZATION of the beer filter sterilization system through the implementation of a closed-loop recirculation process ➤ SAVINGS OF **138 MWh**
- ENERGY RECOVERY from the boiler water blowdown system (conductivity reduction) ➤ SAVINGS OF **185 MWh**
- OPTIMIZATION of the hot water production unit ➤ SAVINGS OF **92 MWh**



RITSONA

- UPGRADE of the steam condensate collection system ➤ SAVINGS OF **150 MWh**
- UPGRADE of the boiler burner ➤ SAVINGS OF **100 MWh**
- EXTENSIVE REPLACEMENT of factory steam traps and implementation of a continuous efficiency monitoring program ➤ SAVINGS OF **45 MWh**



02 Supply Chain

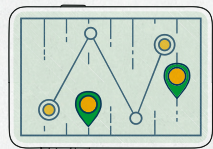
CARBON FOOTPRINT REDUCTION INITIATIVES IN OUR SUPPLY CHAIN



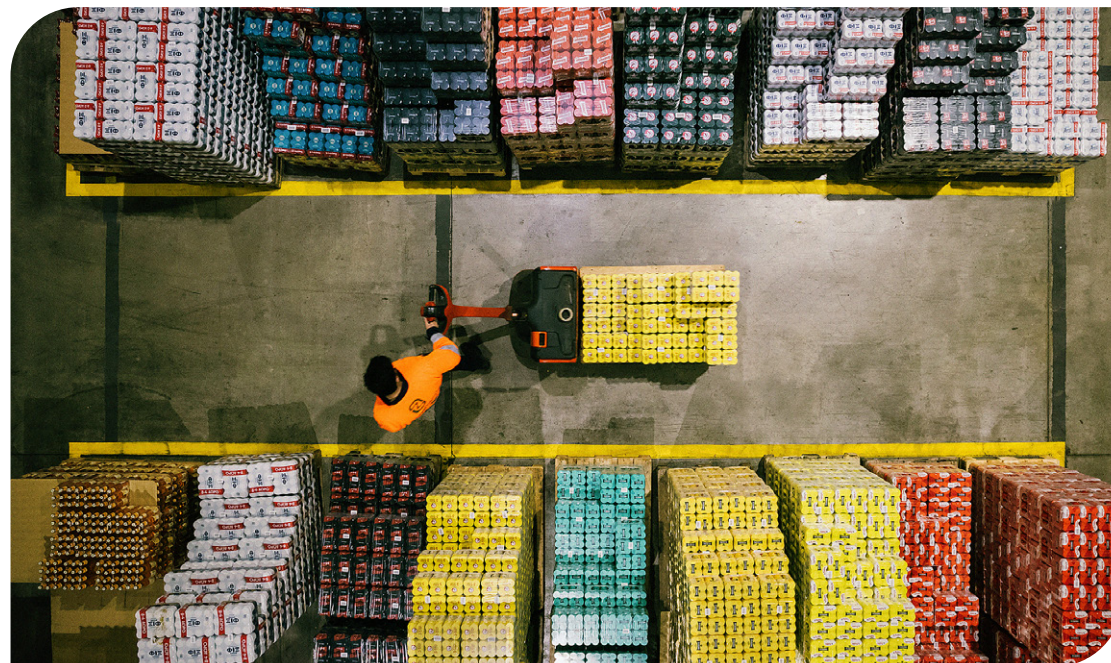
**ONGOING RENEWAL
OF FORKLIFT FLEET**
with LPG-fueled
vehicles



**NEW PARTNERSHIPS
WITH TRANSPORT
COMPANIES**
operating lightweight
and alternative fuel
vehicles



**USE OF NEW TECHNOLOGIES
AND ROUTING SOFTWARE**
to optimize distances and delivery
times, and to group orders efficiently
30% REDUCTION
(km per transported ton)
OVER THE PAST FOUR YEARS



03 Points of Consumption

CARBON FOOTPRINT REDUCTION INITIATIVES AT POINTS OF CONSUMPTION



FRIDGES

UPGRADE
OF OUR FLEET WITH
NEW-GENERATION
TECHNOLOGY UNITS



SAVINGS OF
1.787 MWh



DRAFT BEER COOLERS

UPGRADE
OF OUR FLEET WITH
NEW-GENERATION
TECHNOLOGY UNITS

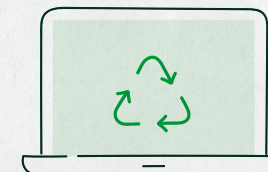
WITHDRAWAL AND
RECYCLING OF OLD
COOLERS

SAVINGS OF
788 MWh

SAVINGS OF
1.468 MWh

**DIGITAL MANAGEMENT
OF CUSTOMER LOAN
AGREEMENTS**

SAVINGS OF
18.000
SHEETS OF PAPER



CARBON EMISSIONS IN OUR VALUE CHAIN

With a holistic and visionary approach, we are looking beyond the limits of brewing. Our key goal is to fully understand and reduce our products' environmental footprint throughout the value chain: from the farming and processing of raw materials, to brewing, packaging, transportation, and cooling of products at their final point of consumption.



OUR GOAL FOR 2030
IS TO ACHIEVE

30%
REDUCTION

OF CARBON EMISSIONS
COMPARED TO THE BASE YEAR
(2015)

THE PERCENTAGE OF GREENHOUSE GAS EMISSIONS AT EACH STAGE OF OUR PRODUCTS' LIFE CYCLE

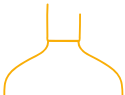
2024

% of total emissions in our value chain, including their packaging, transportation, and refrigeration at final points of consumption



17%

FARMING OF INGREDIENTS
(E.G. BARLEY) AND THEIR
PROCESSING, INCLUDING
MALTING



9%

BREWING AND
PRODUCTION,
INCLUDING
REFRIGERANTS



58%

PRODUCTION AND USE
OF ALL PACKAGING
MATERIALS



10%

INBOUND TRANSPORT
OF RAW MATERIALS
AND OUTBOUND
DISTRIBUTION OF OUR
FINISHED PRODUCTS

6%

REFRIGERATION
OF OUR PRODUCTS
IN CONSUMPTION
END-POINTS

AT A GLANCE



19% REDUCTION

OF CARBON EMISSIONS
AT OUR PRODUCTION SITES,
DURING THE LAST SIX YEARS



19% REDUCTION

OF THERMAL ENERGY CONSUMPTION
AT OUR PRODUCTION SITES,
DURING THE LAST SIX YEARS



8% REDUCTION

OF ELECTRICITY CONSUMPTION
AT OUR PRODUCTION SITES,
DURING THE LAST SIX YEARS





ZERO FARMING FOOTPRINT

We work closely with suppliers and specialized partners to address climate change and loss of biodiversity, aiming at a ZERO farming footprint.

Carlsberg Group ESG targets:

By 2040

100%

OF OUR RAW MATERIALS
TO BE PRODUCED WITH
REGENERATIVE AGRICULTURAL
PRACTICES AND TO BE
SUSTAINABLY SOURCED

By 2030

30%

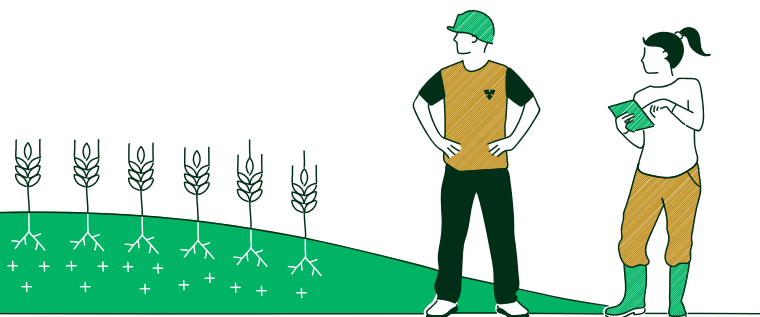
OF OUR RAW MATERIALS
TO BE PRODUCED WITH
REGENERATIVE AGRICULTURAL
PRACTICES AND TO BE
SUSTAINABLY SOURCED



As an integral part of our value **chain**, our suppliers **are expected** to formally **commit** to and fully **comply** with the Carlsberg Group's **Supplier Code of Conduct**.

In accordance with the Code, our suppliers are required, among others, to:

- 💧 **comply with** environmental laws, regulations, and international standards such as ISO 14001, and implement an effective Environmental Management System (EMS)
- 💧 **manage** carbon emissions, water use, and waste, while focusing on biodiversity, deforestation prevention, sustainable agriculture, and responsible energy consumption



By 2040,
we aim for 100% of our raw materials to come from sustainable farming and processing practices sourced exclusively from farms that meet at least the **“Bronze”** level of the Farm Sustainability Assessment (FSA), supported by the Sustainable Agriculture Initiative Platform (SAI Platform), or from farms certified under equivalent schemes.



ZERO PACKAGING WASTE

We collaborate with the right suppliers to also offer packaging with sustainability benefits, alongside our products.

Carlsberg Group ESG targets:

By 2030

100%
RECYCLABLE,
REUSABLE OR
RENEWABLE
PACKAGING

90%
COLLECTION AND
RECYCLING RATE
FOR BOTTLES
AND CANS

50%
RECYCLED CONTENT
IN BOTTLES AND
CANS

50%
REDUCTION
OF VIRGIN
FOSSIL-BASED
PLASTIC

In Olympic Brewery, our **environmental footprint reduction program** is also supported by **adopting sustainable practices** in our product **packaging**.

Specifically, we have implemented:

- ♦ **Transition to transparent DraughtMaster kegs,** which enhance recyclability, offer a lower carbon footprint, and require less water and maintenance
- ♦ **Replacement of Virgin PET** (Polyshield) by 50% EcoClear rPET in DraughtMaster packaging
- ♦ **Replacement of the raw material** used in DraughtMaster Preforms with 50% recycled content
- ♦ **Replacement of the printed shrink film** used for Carlsberg can packaging in Greece with 100% recycled material
- ♦ **Gradual reduction of stretch film** on finished product pallets. In 2024 alone, we achieved a 30% reduction by using advanced materials.

Recycling Volumes 2024 (IN TONS)



GLASS

985



METALS
& IRON

59



OTHER RECYCLABLE
MATERIALS
(paper, plastic, wood)

726



PLANT
BY-PRODUCTS
(grains - used for animal feed)

17.374





ZERO WATER WASTE

Everyone needs water, and so do we. Simply put:
without water, there is no beer.

Carlsberg Group ESG targets:

By 2040

100%

REPLENISHMENT OF WATER
CONSUMED AT BREWERIES IN
HIGH-RISK AREAS

By 2030

2,0 hl/hl
WATER USAGE
EFFICIENCY
GLOBALLY AND

1,7 hl/hl
AT BREWERIES
LOCATED IN
HIGH-RISK AREAS

Saving water during the **production** process is one of the **key goals** we have set at Olympic Brewery, across **both** of our **production sites**.

AT A GLANCE



19%
REDUCTION

OF WATER CONSUMPTION
DURING THE PRODUCTION
PROCESS IN BOTH OUR
PRODUCTION SITES, DURING
THE LAST SIX YEARS

WATER SAVING INITIATIVES AT OUR BREWERIES



SINDOS

REUSE
of beer filter cooling
water in the
brewing process

SAVINGS OF
4600m³

IMPROVED WATER
CONSUMPTION
during lautering process
and minimization of water
in by-product discharge

SAVINGS OF
920m³

REDUCTION OF LOSSES
during the boiling process
by minimizing evaporation

SAVINGS OF
300m³



RITSONA

UPGRADE
of the water pre-treatment
and filtration system prior
to reverse osmosis

ESTIMATED
SAVINGS OF
1800m³

INSTALLATION
of a central cleaning
system with "satellite"
units for brewhouse areas

SAVINGS OF
350m³

MODERNIZATION
of electronic systems / PLCs for
osmosis to improve operation
efficiency and water savings

SAVINGS OF
600m³





ZERO IRRESPONSIBLE DRINKING

We promote responsible drinking and offer delicious products for every occasion as more people embrace healthy lifestyles and moderation.

Carlsberg Group ESG targets:

By 2030

100%

RESPONSIBLE
DRINKING MESSAGING
ON PACKAGING
AND AT BRAND
ACTIVATIONS

100%

PROMOTION OF
RESPONSIBLE
CONSUMPTION
ACROSS ALL OUR
OPERATING MARKETS

100%

AVAILABILITY OF
ALCOHOL-FREE
PRODUCTS

35%

OF OUR PRODUCTS
GLOBALLY TO BE
LOW-ALCOHOL
OR ALCOHOL-FREE

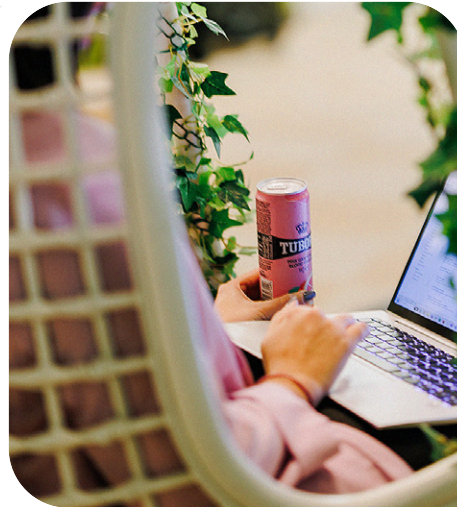


At Olympic Brewery, brewing **great beers** is not our only **priority**. It is equally important to us that consumers **enjoy** our products **responsibly** and in **moderation**.

This commitment is central to everything we do and is clearly reflected in our adherence to the Carlsberg Group's Marketing and Communications Policy (MCP).

According to this policy, we are committed to the following principles:

- 💧 **We foster** a culture of transparency, enabling consumers and customers to make informed decisions with confidence and trust in the quality and safety of our products.
- 💧 **We design** our advertising communications to target adults exclusively.
- 💧 **We always encourage** consumers to enjoy our products in moderation, as part of a balanced and healthy lifestyle.
- 💧 **We promote** our non-alcoholic products as a positive choice for adults who wish to enjoy our refreshing beverages.
- 💧 **We ensure** that the enjoyment of our drinks is never associated with potentially dangerous activities or situations.
- 💧 **We never imply** that alcohol consumption contributes to social success or provides health benefits.



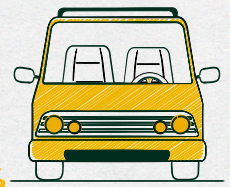
INITIATIVES FOR PROMOTING RESPONSIBLE CONSUMPTION



We continuously expand our portfolio of low- and non-alcohol products, offering more alternatives for individuals who choose not to consume alcohol.



100% OF OUR PRODUCTS carry responsible consumption messages on their packaging and communication materials.



100% OF OUR CORPORATE VEHICLE FLEET is equipped with alcohol ignition interlock devices, focusing on the importance of safe driving.



ZERO ACCIDENTS CULTURE

We are fostering a ZERO Accidents Culture with the goal of ensuring everyone returns home safely, every single day. Carlsberg Group ESG targets:

Carlsberg Group ESG targets:

By 2030

ZERO
WORKPLACE ACCIDENTS



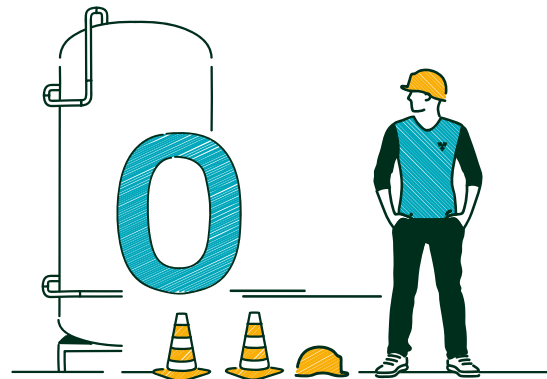
ΟΛΥΜΠΙΑΚΗ
ΣΥΘΟΡΘΙΑ ΑΕ

At Olympic Brewery, ensuring that our **employees** are - and feel - safe at work, and return home **safely** is a **top priority**. This is why we are **deeply committed** to **cultivating** a ZERO Accidents **culture**, encouraging every team member to fully **embrace** and **embody** it.

As part of our continuous improvement efforts, and having recorded four Lost Time Accidents (LTAs) in 2024, we reinforced our training programs, with a particular focus on hazard identification and safe workplace behaviors.

Specifically, we implemented the following actions:

- 💧 **5.415 hours of employee training** on Health & Safety topics
- 💧 **100% of new hires trained** on our Health & Safety Policy and Life Saving Rules
- 💧 **Online training** on safe driving practices delivered to over 200 employees
- 💧 **Hands-on, real-life conditions training for 130 drivers**, including corporate vehicle users, heavy vehicle operators, and forklift drivers
- 💧 **Training for new colleagues** and employees from the Commercial and Administrative Support divisions on risk assessment during driving



- 💧 **Interactive training** for all our employees during the annual Health & Safety Day
- 💧 **New training program** for all Supply Chain employees focused on raising awareness of slip, trip, and fall hazards
- 💧 **First Aid training** for members of our in-house emergency response teams
- 💧 **Two-day “Safety Leadership – Lead with Care in H&S” training** for the leadership team of the Production and Supply Chain Function (ISC)
- 💧 **Implementation of “Safety Stand Downs”** at our Production and Logistics facilities, featuring short training sessions to reinforce safe behaviors and the Life Saving Rules
- 💧 **Deployment of a system for identifying** and documenting “near miss” incidents and “safety observations,” fully aligned with Carlsberg Group’s standards



Both of our production sites are fully incorporated with the “IMS” system

(Integrated Management System) of the Carlsberg Group, and certified in accordance with the ISO 45001:2018 standard on Health & Safety by an authorized body.



AT A GLANCE

4%
INCREASE

OF COMPLIANCE RATE
TO LIFE SAVING RULES,
DURING THE LAST FIVE YEARS

22%
INCREASE

IN SAFETY OBSERVATIONS
FOR POSSIBLE UNSAFE BEHAVIORS,
AIMING TO PREVENT LTAs
DURING THE LAST FIVE YEARS

72%
INCREASE

IN SAFETY WALKS
IN ALL INTEGRATED SUPPLY
CHAIN FACILITIES (ISC),
DURING THE LAST FIVE YEARS

A photograph of a modern lounge or office environment. In the foreground, a woman with long dark hair is sitting on a brown leather armchair, working on a laptop. She is wearing a black long-sleeved top and a patterned skirt. In the background, two other people are seated at a table, and a large, green, three-dimensional sign on the wall reads "AND TOMORROW". The scene is lit with warm, ambient lighting from pendant lamps.

PEOPLE ORIENTED **PHILOSOPHY**

Our people, partners, and consumers are the driving force behind our continued dynamic presence in the market.

At Olympic Brewery,
we are committed to **building**
and sustaining the **trust** of our
consumers, business **partners**,
employees, and other
stakeholders, as we continue
brewing for a **better today**
and **tomorrow** every day.

For our consumers and customers:

- 💧 **Certification** of our two production sites
with the FSC 22000 food safety management
system and ISO 9001 quality management system
- 💧 **Operation** of an integrated consumer
and customer call management system
via dedicated Support Lines
- 💧 **Zero product** withdrawal or recall incidents
- 💧 **Customer Satisfaction Survey 2024 score: 4.46/5**



4.46 ★★★★★



For our employees:

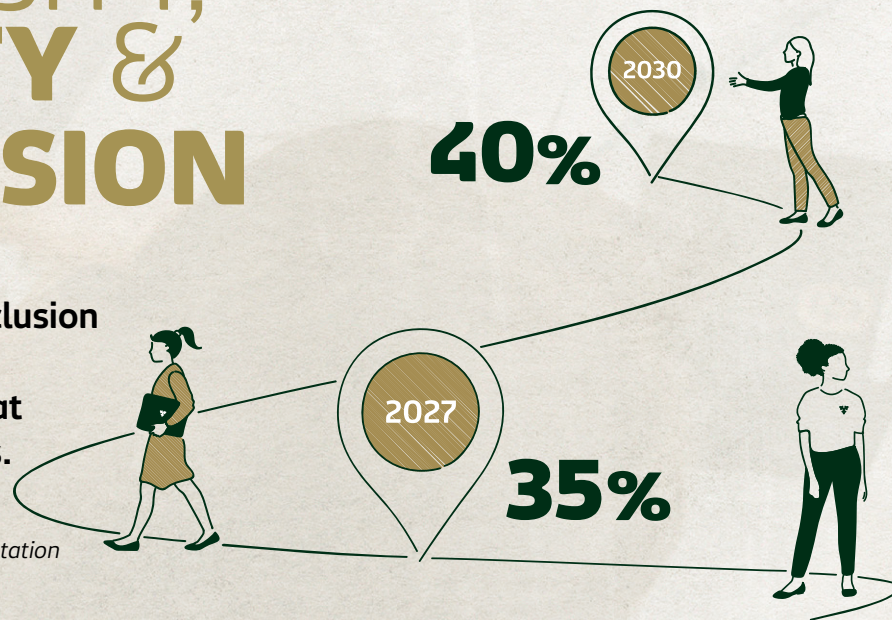
- 💧 **9.573 hours of training** delivered across various areas and topics, including leadership, technical skills, Diversity, Equity & Inclusion, and more
- 💧 **Remote work and flexible start time programs**, where role requirements permit
- 💧 **Annual “My Voice Pulse” employee survey**, leading to action plans for further improvement
- 💧 **Employee recognition** initiatives rewarding outstanding results and performance
- 💧 **Organization of the 24-month “Brew Your Career Path”** program for the second year, supporting young professionals at the start of their careers
- 💧 **Implementation of the “Brew Your Wellness”** initiative, including seminars on stress management, ergonomics, and mindfulness
- 💧 **Team bonding initiatives** such as Townhalls, Sales Conferences, Friday Bars, festive events, team-building activities, and more
- 💧 **Participation in major sports events** such as the Athens Authentic Marathon and the No Finish Line charity run, actively promoting physical activity and social contribution
- 💧 **Organization of volunteer initiatives**, including blood donations in Athens and Thessaloniki



DIVERSITY, EQUITY & INCLUSION

Our approach
to diversity and inclusion
is what defines us,
and ultimately what
leads us to success.

*Carlsberg Group ESG targets
regarding the female representation
percentages:*



At Olympic Brewery, **Diversity, Equity** and **Inclusion** (DE&I) are not just a matter of compliance - they are an integral **part** of our **DNA** and a **driving force** behind our success.

More specifically, we have developed and are actively implementing an evolving action plan, guided by clear objectives and timelines, and centered around the following key pillars:



We bring these pillars to life through initiatives such as:

- Participation in a Career Day and conducting interviews with candidates on the autism spectrum
- Participation in a Career Day at the Ritsona refugee camp, aiming to recruit candidates for seasonal positions at our brewery
- Collaboration with “Project Parenting” to deliver a seminar for employee-parents on “Managing Parental Stress and Strengthening the Parent-Child Relationship,” with emphasis on bullying prevention and awareness
- Partnership with the NGO “Lara”, the first guide-dog school founded in Greece, to fund the training of guide dogs and organize awareness events
- Ongoing promotion of our DE&I campaign under the core message “#NoLabel: No label can neither define nor exclude us!”
- Active member of the Diversity Charter since 2021



AT A GLANCE

60%
WOMEN

IN SENIOR LEADERSHIP
POSITIONS

35%
OF OUR TOTAL
WORKFORCE

ARE WOMEN



CODE OF ETHICS & CONDUCT

Trust is earned through consistency and meaningful action. Guided by clear principles and an unwavering commitment to our policies, we are building the foundation of a “winning culture”.



ΟΛΥΜΠΙΑΚΗ
ΖΥΘΟΠΟΙΙΑ Α.Ε.
Part of the Carlsberg Group

The “**winning culture**” is grounded in doing what’s right— demonstrating **integrity** and **responsibility** in every action we take.

Key tool in this commitment is the Carlsberg Group’s Code of Ethics & Conduct.



OUR COMPANY’S CODE OF ETHICS & CONDUCT
IS GUIDED BY THE FOLLOWING

ETHICAL VALUES

WE ARE HONEST

We tell the truth to ourselves and to others.

WE ARE COMPLIANT

We comply with the law and our policies.

WE HAVE A SENSE OF RESPONSIBILITY

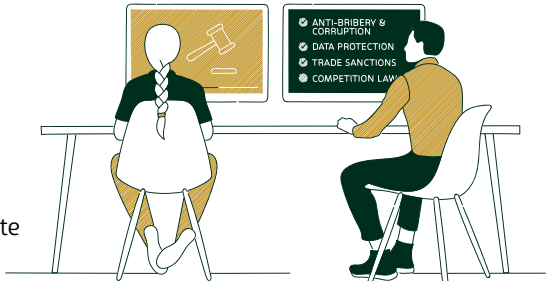
We recognize that doing the right thing is not always easy.

SHOW PEOPLE RESPECT

We are tolerant, empathetic, and appreciate differences.

Specifically, we implement:

- Training of all new hires on the Code of Ethics & Conduct
- Refresher training for all employees working in high-risk departments on the issues of personal data and bribery
- Implementation of third-party screening process and intensive support for high-risk departments
- Deployment of the “Speak Up” process to eliminate behaviors that potentially violate our Code





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