

Human Rights and Sustainability Policy

LAKRIDS BY JOHAN BÜLOW A/S, CVR-no. 33041586

1. Introduction

This Human Rights and Sustainability Policy (the “Policy”) sets out the fundamental principles governing the approach of LAKRIDS BY JOHAN BÜLOW A/S (“**LAKRIDS BY BÜLOW**”, “**LBB**” or the “**Company**”) together with its subsidiaries (the “**Group**”) to environmental, social and governance (“**ESG**”), human rights, and sustainability.

In accordance with LBB purpose in its business and operations, where the Company aims to have a material positive impact on society and the environment as a whole, this Policy ensures that human rights and sustainability considerations are integrated into the Group’s strategy, decision-making and operations.

2. Scope

This Policy applies to all facilities and operations of the Group and covers all individuals and communities across its value chain, and it must be applied in conjunction with other relevant Group policies. Where stricter legal requirements apply, those requirements shall prevail.

3. Roles and Responsibilities

- The Board of Directors is responsible for the approval of this Policy, reviews it periodically and oversees progress against its objectives.
- The Chief Executive Officer (the “**CEO**”) has overall responsibility for the implementation of the Policy and for ensuring that sustainability considerations are integrated into the Group’s strategy and decision making.
- The Head of Quality & Regulatory Affairs is responsible for the maintenance of this Policy and its implementation into the Company’s operations.
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4. Focus Areas

The Group’s sustainability commitments span five key areas. Under each, the Group shall:

- Sourcing and raw materials: source raw materials from suppliers that demonstrate a commitment to quality, sustainable and ethical production, wherever feasible;
- Packaging: prioritize the use of recycled materials and promote responsible consumption across its product range, wherever feasible;
- Production and operations: continuously reduce its environmental footprint, including CO₂ emissions, energy and water consumption, and waste production;
- Social impact and employees: foster a safe, inclusive and stimulating work environment, and consider the well-being of individuals across its value chain.
- Transportation: minimize the use of air travel across both goods’ transportation and business travel, and select the most environmentally friendly transportation mode, wherever feasible.

Detailed information on the Group’s performance and initiatives across these areas shall be disclosed annually in the Company’s Annual Report, in accordance with the Danish Financial Statements Act, Section 99a. Further details on specific topics can also be found in the Company’s Climate Action Plan, Diversity Policy, Whistleblower Policy, and Double Materiality Assessment.

5. Commitments and International frameworks

The Group's commitments are aligned with the UN Guiding Principles of Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, and to the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). Thus, the Group respects and protects internationally recognized human rights, recognizing that human dignity applies to everyone within the value chain, and avoiding any type of discrimination or human rights harms.

The United Nations' Sustainable Development Goals (UN SDGs) further guide the Group's progress towards preserving environmental, social and economic value, and ultimately the Group's long-term value creation. In addition, the Standards from the non-profit organization B Lab and its B Corp movement also guide the Group's performance, demonstrating its commitment to aligning with international sustainability frameworks and incorporating ESG considerations into its strategy and operations.

6. Actual and Potential Environmental and Human Rights Impacts

Actual and potential environmental and human rights impacts shall be assessed across the Company's operations and value chain, prioritizing issues based on severity and likelihood. Severe impacts, such as salient human rights issues, shall be escalated and addressed in detail. LBB is committed to remediating all negative impacts the Company has caused or contributed to, to the greatest extent possible.

Further details regarding collection, identification and escalation of severe impacts and stakeholder involvement can be found in the Social and Environmental Impacts Management Procedure, while impact assessment findings can be found in the Company's Double Materiality Assessment.

7. Public Accessibility

This Policy shall be publicly accessible in the Company's website or annual report.

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Approved by the Board of Directors of LAKRIDS BY JOHAN BÜLOW A/S on [●] 08/07/2026.