



Code of Conduct

MIKKELLER



1. Objective and Purpose

- 1.1. At Mikkeller, our Code of Conduct is rooted in our values and guides how we operate in a responsible and ethical way. It sets out our expectations, commitments, and key requirements.
- 1.2. Mikkeller respects human rights and treats all people with dignity, equality, and fairness. This includes rights to safety, fair working conditions, equal pay for equal work, and equal value, freedom from unfair restrictions, freedom of association, the right to rest, and the right to freely choose one's occupation.

We are committed to continuously understanding and managing our impact on human rights, and to addressing any concerns promptly, transparently, and responsibly.

1.3. Mikkeller's Mission

Through the passion and talent of Mikkeller, we create exceptional, adventurous beer experiences that unite a diverse global community around innovation, quality, fun, and a love for beer.

- 1.4. This Code should be read in conjunction with other Mikkeller policies, including the Diversity, Equity & Inclusion Policy and the Anti-Harassment & Bullying Policy. It aligns with internationally recognized human rights standards, including the Universal Declaration of Human Rights and the ILO core conventions.

All policies and procedures referred to in this Code are accessible at all times via the Mikkeller app or, where publicly available, on the [Mikkeller website](#).

2. Scope

- 2.1. This Code of Conduct applies to all employees of the Mikkeller Group globally, including all employees of Bjergsø Holding ApS and all subsidiaries and associated companies (collectively referred to as "Mikkeller").
- 2.2. Overall responsibility for the effective implementation and operation of the policy rests with Mikkeller's Board of Directors, HQ management team, retail management team and the P&C team. Managers are expected to lead by example and uphold the highest ethical standards.
- 2.3. All employees share responsibility for respecting this Code and for preventing prohibited activities in any Mikkeller workplace or activity.
- 2.4. The principles of this Code of Conduct are reflected in separate Codes: one for franchisees (Franchise Code of Conduct) and one for suppliers and partners (Supplier & Partner Code of Conduct). These Codes set out how the principles apply to franchise operations, suppliers, distributors, and service providers.



3. Principles

3.1. Corporate Governance and Ethical Management

Mikkeller is committed to transparent, responsible, and accountable governance. Management ensures compliance with applicable legal requirements, defines clear roles and responsibilities, and promotes a culture of integrity and responsible decision-making.

The Board and the management team demonstrate ethical leadership, and key decisions are documented and aligned with Mikkeller's values. Management is responsible for ensuring decisions comply with this Code and that ethical considerations are integrated into business operations.

What this means to you

- Speak up if you notice decisions, actions, or practices that seem unethical or not aligned with this Code.
- Raise concerns if roles, responsibilities, or processes are unclear or inconsistent with good governance.
- If you are in a management role, lead by example, ensure transparency in decision-making, and support a culture of integrity.

3.2. Integrity and Anti-Corruption

Mikkeller has zero tolerance for bribery, corruption, or unethical business practices. Employees must comply with applicable anti-corruption laws and sanctions and avoid facilitation payments, kickbacks, or any improper influence. Conflicts of interest must be avoided and disclosed where relevant.

Employees must follow the [Gifts, Bribery, and Benefits Policy](#) and the [Sanctions Policy](#), and conduct all business interactions in line with these standards.

What this means to you

- Do not offer, accept, or request bribes, personal benefits, or improper advantages.
- Be mindful that gifts or hospitality may create a conflict of interest; decline anything that could influence your decisions.
- Disclose any potential or actual conflicts of interest to your manager or relevant department.

3.3. Fair Competition and Compliance

Mikkeller is committed to complying with all relevant laws and industry standards, including those relating to fair competition, taxation, data protection, and employment. Employees are expected to conduct business ethically and lawfully in all interactions with customers, colleagues, suppliers, and public authorities.

What this means to you

- Always follow applicable laws, regulations, and internal policies.
- Do not engage in practices that restrict fair competition, such as price fixing or sharing sensitive information with competitors.
- Handle personal and business data responsibly and in line with data protection requirements.
- Ensure your communications and business practices are honest and transparent.
- Raise concerns if you become aware of potential compliance risks or violations.

3.4. Data Protection & Privacy

Mikkeller is committed to protecting personal data and respecting the privacy of employees, partners, customers, and other individuals we interact with. Personal data is processed responsibly, transparently, and in accordance with applicable data protection laws, including GDPR and relevant internal policies.

Mikkeller only collects and uses personal data for legitimate purposes and implements appropriate technical and organizational measures to protect it against unauthorized access, loss, or misuse.

What this means to you

- Respect privacy and only access personal data when necessary for your role.
- Handle personal data securely and in line with internal guidelines.
- Do not share personal data with unauthorized individuals.
- If your role involves handling personal data, ensure you are familiar with relevant requirements and training.



3. Principles - Continued

3.5. Human Rights

Mikkeller upholds internationally recognized human rights, as outlined in [Section 1](#). We are committed to preventing child labor, forced labor, human trafficking, and any form of exploitation within our operations. We promote non-discrimination, equal opportunity, and respect for diversity, and take reasonable steps to ensure safe and healthy working conditions.

Respect for human rights applies across all Mikkeller operations and business relationships, and we seek to identify and address potential human rights impacts across our operations, products, and value chain.

What this means to you

- Treat everyone with dignity, fairness, and respect.
- Do not tolerate or participate in any form of forced labor, child labor, or exploitation.
- Be mindful of human rights risks in your work and business relationships.
- Speak up if you observe or suspect any human rights violations.

3.6. Labor and Fair Working Conditions

Mikkeller ensures that all employees receive written contracts specifying their terms of employment before starting work. Employment conditions comply with applicable local labor laws, including minimum wages, working hours, and relevant collective agreements where applicable. Mikkeller is committed to fair and lawful employment practices and to providing working conditions that respect employees' rights and well-being.

What this means to you

- Make sure you understand your employment terms and follow agreed working hours and conditions.
- Respect your own and others' working time, breaks, and agreed arrangements.
- Raise concerns if you believe working conditions do not comply with applicable laws or agreements.
- Expect fair and lawful treatment in all aspects of employment.

3.7. Respectful Workplace, DEI and Anti-Harassment

Mikkeller is committed to a workplace free from discrimination, harassment, and bullying. We value diversity, equity, and inclusion (DEI) and strive to create an environment where everyone feels respected, safe, and able to participate fully.

Employees must treat colleagues, customers, and stakeholders with dignity, fairness, and respect, and comply with relevant Mikkeller policies, including the [Diversity, Equity & Inclusion Policy](#) and the [Anti-Harassment & Bullying Policy](#).

What this means to you

- Treat everyone with dignity, fairness, and respect in all interactions.
- Do not engage in or tolerate any form of discrimination, harassment, or bullying.
- Be mindful of how your words and actions may affect others.
- Speak up and report any behavior that does not align with this Code.

3.8. Workplace Health and Safety

Mikkeller is committed to providing a safe and healthy work environment. This includes both physical safety and mental well-being. We comply with all applicable local health and safety laws and regulations, follow established sickness and absence procedures, and take reasonable measures to prevent accidents and injuries. Health and safety is a shared responsibility, and employees are expected to follow safety procedures and act responsibly to protect themselves and others.

What this means to you

- Follow all health and safety procedures and instructions at all times.
- Take responsibility for your own safety and that of others around you.
- Report hazards, unsafe conditions, or incidents immediately.
- Do not take unnecessary risks that could cause harm.
- Reach out to your manager or the P&C team if you are experiencing stress, mental health challenges, or other well-being concerns.



3. Principles - Continued

3.9. Well-being and Community

Mikkeller promotes health and well-being through initiatives such as its running club, which brings people together for regular social runs that encourage both physical activity and social connection. These initiatives reflect Mikkeller's belief that beer can be enjoyed responsibly as part of a balanced lifestyle and a vibrant, connected community.

What this means to you

- Take care of your own well-being and encourage a healthy balance between work and life.
- Participate in or support initiatives that promote physical and social well-being, when possible.
- Enjoy Mikkeller's products responsibly and be mindful of how your behavior affects others.

3.10. Social Responsibility

Mikkeller contributes positively to society beyond its business operations. Since its founding, the company has engaged in social responsibility initiatives, including charity projects, donations, and community programs. These initiatives are voluntary and reflect Mikkeller's commitment to contributing positively to the communities in which it operates.

What this means to you

- Support and contribute to social initiatives when possible.
- Be mindful of how your actions and decisions can positively impact the community.
- Represent Mikkeller in a way that reflects our values of responsibility and community engagement.
- Respect and support initiatives that aim to give back to society.

3.11 Environmental Responsibility

Mikkeller is committed to operating in an environmentally responsible way and expects employees to consider the environmental impact of their work. This includes taking appropriate steps to reduce waste, use resources efficiently, and comply with applicable environmental laws and internal requirements.

Employees are expected to support Mikkeller's efforts to reduce its environmental footprint in day-to-day operations.

What this means to you

- Use water, energy, and materials responsibly.
- Reduce waste and follow recycling and waste-sorting procedures.
- Follow applicable environmental laws and internal guidelines at all times.
- Consider the environmental impact of your actions when making operational decisions.

3.12. Responsible Drinking

Mikkeller promotes the responsible consumption of alcoholic beverages. As a company producing and serving alcohol, we recognize our responsibility to minimize alcohol-related risks and to promote moderate and informed consumption.

Non-alcoholic alternatives are offered at internal events, public events, and at Mikkeller locations where alcohol is served. Employees are expected to promote responsible enjoyment of our products in all communications and interactions. Managers, in particular, are expected to act as role models and support a culture of moderation and responsibility.

What this means to you

- Consume alcohol responsibly and be mindful of your own and others' limits.
- Encourage responsible behavior and do not pressure others to drink.
- Offer and support non-alcoholic alternatives where appropriate.
- Ensure your behavior reflects Mikkeller's commitment to responsible consumption.



4. Responsibility

4.1. Policy Ownership and Updates

The Mikkeller HQ Management Team is responsible for maintaining, updating, and communicating this Code of Conduct. The Code is reviewed periodically to ensure alignment with applicable laws, regulations, and best practices.

4.2. Management Accountability

Managers play a key role in upholding this Code by fostering a respectful, safe, and inclusive environment. They are responsible for ensuring that concerns are taken seriously, addressed appropriately, and escalated where necessary. Managers are expected to act as role models and to support the consistent application of this Code across Mikkeller operations.

4.3. Employee Responsibilities

All employees are expected to understand and comply with this Code of Conduct and to contribute to a safe, respectful, and responsible working environment. Employees are also expected to report concerns or potential violations through the established reporting channels (see Section 5 for details).

4.4. Consequences of Non-Compliance

Violations of this Code may result in appropriate action, depending on the severity of the case. This may include guidance, warnings, or disciplinary measures up to and including termination of employment, in accordance with applicable laws and internal policies. Where appropriate, Mikkeller may also take steps to prevent similar incidents in the future.

5. Reporting

5.1. Complaints-handling Mechanism

Mikkeller encourages employees, partners, and external stakeholders to raise concerns about conduct or activities that may violate this Code. Raising concerns helps maintain a safe, fair, and respectful environment across all Mikkeller workplaces, events, and operations.

Concerns can be raised through the following channels:

- **Direct Reporting:** Contact your manager, employee representative, or the People & Culture department at Mikkeller HQ via PC@mikkeller.dk. Reports should follow the [Mikkeller Reporting Grievance and Concern Procedure](#).
- **Whistleblower Form:** All employees, volunteers, and external stakeholders can also use the Mikkeller Whistleblower Form to report concerns confidentially or anonymously. Use this [Whistleblower](#) link.

5.2. Protection and Fair Process

All reports are treated seriously, fairly, and confidentially, if requested. Individuals who raise concerns in good faith, as well as those facing allegations, are entitled to a fair process and protection against retaliation.



6. Transparency and Improvement

6.1. Transparency

Mikkeller aims to be open and transparent about its human rights, ethical, and compliance practices. Relevant information is shared with employees, partners, and stakeholders to support accountability, understanding, and trust.

6.2. Continuous Improvement

Mikkeller is committed to continuously improving its practices. This includes reviewing policies and procedures as needed, taking feedback into account, and adjusting processes to better address ethical, human rights, and operational considerations.

6.3. Remedy

Mikkeller takes reported issues seriously and works to address negative impacts that occur within its operations and franchise network. Lessons learned from such situations are used to strengthen policies and practices and reduce the risk of similar issues occurring in the future.

7. Using the Code in Practice

The Mikkeller Code of Conduct provides guidance on how we work responsibly, ethically, and with integrity. While it sets out key principles, it cannot cover every situation that may arise in day-to-day work.

Employees and business partners are expected to use sound judgment and common sense when making decisions on behalf of Mikkeller.

7.1. Self-check Questions

If you are unsure about the right course of action, consider asking yourself:

- Is it legal and in line with Mikkeller's values?
- Would I be comfortable if my decision were made public?
- Does it treat people fairly and with respect?
- Could it have unintended negative consequences for others, Mikkeller, or the wider community?

7.2. Seeking Guidance

When guidance is needed, employees can seek advice or clarification from:

- Their manager
- People & Culture (P&C) department
- Legal or compliance contacts

Following these steps helps ensure decisions are consistent with Mikkeller's values, even in situations not explicitly covered by this Code.



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