OUR RESPONSIBILITY

Arla's Code of Conduct

Our dedication to responsible business conduct, healthy food, and taking action for climate and nature is deeply rooted in our cooperative culture, guiding our actions and inspiring us to make a positive impact for people and the planet.

Foreword

At Arla, we are committed to Feed Life™ and to developing our business in a responsible manner. As a strong farmer-owned co-operative and a major food producer, we recognise that the products we make and the actions we take have the power to make a lasting, positive change for people and planet.

This sense of responsibility is deeply rooted in our co-operative culture, and it is reflected in two key ambitions that are close to our core as a global dairy group owned by local farmers:

Taking action for healthy food, by providing access, knowledge, and inspiration that enable people to make better food choices for themselves and their families.

Taking action for climate and nature by making use of science, data, innovation, and incentivised on-farm actions to provide dairy's nutritional goodness with continuously more care for nature and planet.

This Code of Conduct - **Our Responsibility** - is the foundation of how we operate. It sets out the principles that guide our behaviour, the expectations we hold for ourselves and for those we work with, and our commitment to openness, transparency, and dialogue. It challenges us to live up to our ambitions, every day.

We invite all colleagues to engage with this document - not just to read it, but to reflect on what it means for your role, your choices, and your contribution to Arla's journey. As we evolve, so will this Code. Together, we will continue to Feed Life™ with integrity, care, and purpose.

Let us take action with responsibility. To Feed Life™.

Jan Toft Nørgaard

Chair of the Board of Directors

Peder Tuborgh

CEO

Aarhus, Denmark,
December 2025

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Guiding principles

Guided by our Code of Conduct and the following principles and statements, we ensure our actions consistently reflect our core values.

Arla holds a unique position as a global dairy company, owned by dairy farmers across multiple countries. We provide healthy and nutritious dairy products to people worldwide, we work towards reducing our business practices' adverse impact on climate and nature, and are committed to ethical and responsible business practices that create long-term value for people and society.

Guided by our Code of Conduct and the following principles and statements, we ensure our actions consistently reflect our core values.

A value driven organisation

Our *Vision* and *Mission* explain our reason for being and the goal for our work, and our Culture defines who we are, how we act and take leadership.

Vision
Creating the future of dairy to bring health and inspiration to the world, naturally.

Mission
Arla's mission is to secure the highest value for our farmers' milk while creating opportunities for their growth.

The Arla Culture

Our *Good Growth DNA* is based on our cooperative and collaborative philosophy, our responsible working practices, our natural milk, our healthy products, and our responsibility towards society, the environment and our colleagues. Together, these cornerstones form the basis of our identity. Our values *Lead, Sense, Create* guide us in our behaviour together with our defined Leadership competences.

Meeting customers' and consumers' expectations

At Arla, we recognise that our customers and consumers expect us to act with integrity in all our operations. This means:

Transparency
We communicate and act in an open, honest and transparent manner.

Quality
We ensure that our products meet the highest standards of safety and quality.

Responsibility
We take accountability for our actions and their impact on the environment and society.

Trust
We build and maintain trust by consistently adhering to ethical practices and legal requirements.

By upholding these principles, we not only meet the expectations of our customers and consumers but also strengthen our reputation and commitment to responsible business practices.

International guiding principles and standards

Arla adheres to international organisations' guiding principles. Since 2008, Arla is a participant of the *UN Global Compact*. We adhere to the *OECD Guidelines for Multinational Enterprises, The UN Universal Declaration of Human Rights, The UN Guiding Principles on Business and Human Rights* and *the core conventions of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.

Arla's climate targets are reviewed and approved by the Science Based Targets initiative, and our materiality assessment and prioritization of impacts on nature follows the *SBTN framework*.

Working responsibly in Arla

The Code of Conduct helps identify potential areas of risk and conflict, serving as a guiding principle for decision-making.

How do we live our Code of Conduct?

Living **Our Responsibility** means putting Arla's values and commitments into practice, ensuring everyone acts with integrity and in the best interest of Arla. Our customers and consumers expect us to act with integrity.

Arla's Code of Conduct, **Our Responsibility**, serves both as a tool and a compass. It guides Arla's ethical and responsible practices across our entire value chain from farms and suppliers to customers and consumers. It focuses on four key themes: Business integrity, Product & health commitments, Environment & supply chain, Workplace & community engagement.

Our Responsibility applies to all Arla colleagues and Arla sites worldwide, expressing the principles employees should comply with and take responsibility for. To ensure internal adherence, Arla has policies, established routines, and statements guiding employees in their conduct and responsibilities. Top management and leaders on all levels are expected to role model a responsible culture, and to ensure our commitments are embedded throughout the organisation.

This Code of Conduct and other Arla guiding documents cannot represent all legal rules and ethical standards that Arla and its employees are exposed to.

What does this mean for you as an employee

We set high ethical standards for everyone who acts on Arla's behalf, and you are expected to:

- Use common sense and good judgement to comply and uphold the spirit of **Our Responsibility**, policies and guidelines, and applicable laws.
- Familiarise yourself with **Our Responsibility** and other relevant documents.
- Act comfortably within ethical standards and the law.
- Apply the most stringent standard, when there is a difference between a legal requirement and **Our Responsibility.**

What if you can't find the answer you need?

As an employee you should use common sense and professional judgement. When in doubt if a situation or behaviour is aligned with **Our Responsibility**, ask yourself a few simple questions like:

- Does this feel right?
- Is this legal?
- Is this in line with our company values?
- Is this in the best interests of Arla and our commitments to people and planet?

Remember: When in doubt, we encourage you to ask your line manager or colleagues for further clarity and understanding.

Speak up

Your voice matters

Your voice matters and raising concerns helps us uphold our values and protect our people, products, and reputation. Together, we foster a culture of integrity, accountability, and trust.

If you have a concern that something may not be in line with **Our Responsibility**, we encourage you to speak up. You can report any unlawful behaviour, financial malpractice, or any activities posing a danger to the environment or to anyone working for Arla.

Employees and external stakeholders are always encouraged to discuss any concerns they may have directly with their relevant point of contact. This could be line manager, HR Business Partner, or other relevant function in Arla. However, if you do not feel comfortable with these options, Arla's Whistleblower Service, Ethics Line, provides a confidential reporting opportunity.

The Whistleblower Service is available in multiple languages and can be accessed at: arla.whistleblowernetwork.net, and it can be used anonymously if needed.

There will be no retaliation against anyone who reports a concern in good faith. All cases will be appropriately investigated and, where breaches are found, appropriate actions will be taken.

1 BUSINESS INTEGRITY

Business principles

What does responsible company mean?

A responsible company acts with integrity, transparency, and respect for laws, regulations, human rights, and ethical standards, and for us as a responsible business, our conduct also comes from living our company values, through our company culture.

Legislation and compliance

- Arla and its employees must comply with all applicable laws, rules, and regulations in the countries in which we operate.
- We respect the legal rights of others.
- We respect and support international agreements on human rights.
- We guide all employees through principles set out in our global internal policies to ensure our values are upheld. If legal requirements and our Code of Conduct or policies differ, we always follow the higher standard.
- Arla undertakes to use reasonable efforts to ensure compliance with the commitments set out in this Code of Conduct, and will address alleged breaches in accordance with its internal policies and procedures.

Bribery and corruption

- We have a zero-tolerance approach to bribery and corruption.
- We do not give, offer or receive bribes or other improper advantages for business or financial gain, nor do we allow agents, intermediaries or other third parties to do so on our behalf. Similarly, we never accept anything of value in return for preferential treatment.
- We never offer or accept any gifts, entertainment, or hospitality taking the form of cash, loans, kickbacks, or other cash equivalents, regardless of their value. All other gifts, hospitality, sponsorships, and donations must be provided in accordance with our global internal policies.
- We strive to ensure that risks of bribery and corruption are identified and addressed, and we ensure our employees know how to report unethical behaviour.

Conflicts of interest

- We expect from our employees that personal interests or relationships do not compromise the interests of Arla. We ask them to be transparent and honest about conflict-of-interest situations and report them promptly, so they can be managed.

Confidentiality

- We take our responsibilities of confidentiality seriously, and we ensure that confidential information received is not disclosed to unauthorised persons or companies.
- It is the responsibility of all employees to ensure proper and efficient use of our digital devices to protect our information from cyber threats and loss, and to operate in compliance with our IT and security policies.



We act credibly and with integrity in all of our operations.

Accounting and fraud

- We conduct our accounting, financial, and sustainability reporting in accordance with applicable legislation, accounting principles, and relevant international standards.
- We ensure our reporting is accurate, balanced, and transparent. We do not tolerate fraudulent or deceptive practices such as manipulation of data or misrepresentation of the truth.
- We are dedicated to maintaining integrity and accountability in our financial operations. Asset misappropriation, including theft or misuse of company assets, is strictly prohibited. Employees must safeguard company assets and report any suspicious activities, misstatement or omission immediately.

Tax

- We comply with the tax laws and regulations of each country in which we operate, and we pay the taxes and other duties legally due and don't engage in tax avoidance.
- We act credibly and with integrity in our relations with the tax authorities and have a transparent approach towards society about our tax position.

Sanctions

- We comply with applicable sanction laws and regulations in countries where we do business.
- We do not engage in business with individuals, entities, or countries that are subject to sanctions or embargoes as imposed by relevant authorities.
- We screen our customers and suppliers to ensure compliance with sanctions requirements.

Data ethics and the use of Artificial Intelligence

Why does data ethics matter?

We are committed to using data and technology, including emerging tools such as artificial intelligence, in an ethically responsible, transparent, and fair manner. Our actions consistently respect individual privacy, safeguard information, ensure robust information security, and foster trust. We strive for accuracy, actively work to mitigate bias, and ensure that our technologies serve the legitimate interests of individuals and society as a whole.

We use data and artificial intelligence responsibly to ensure privacy, security, and fairness.

Ethical data handling

- We are committed to being transparent about how and why data is collected, processed, and used.
- We handle and protect personal information with care and in strict accordance with applicable laws, regulations, and recognised best practices.
- We are dedicated to preventing bias and discrimination in all technological processes and decisions, and we regularly review and update our practices to promote fairness, inclusivity, and compliance.

Ethical data use

- We are accountable for our data-driven decisions and uphold rigorous standards of information security to prevent unauthorised access, loss, or misuse of data.
- We ensure that all colleagues receive adequate training and understand their responsibilities regarding data and technology.
- We respect the rights and dignity of every individual and use data only for legitimate, clearly specified purposes that are consistent with our values, legal obligations, and societal expectations.

Operational principles

How do we create value for our owners?

Our owners, who are also our primary suppliers, form the foundation of our company. The company and the owners are mutually dependent. The owners supply milk and elect representatives who govern the company and decide its strategies, which are then executed by the company's employees. In return, the company's main objective is to create value for its owners.

We manage our business in a responsible and cooperative way that promotes the financial interests of our owners.

Efficiency

- We operate the value chain efficiently and continuously optimise the use of raw materials, capital, and human resources to create value for our owners.

Governance

- Our management is responsible for ensuring that the Board of Directors receives sufficient information to make decisions on the business strategy and to monitor company management.
- We facilitate our owners' participation in important decisions and provide our owners with the relevant information in time.
- We enable our owners to direct questions to the Board of Directors to raise issues at the Board of Representatives.

Membership

- Arla has equal and fair terms for entering and exiting the cooperative.
- We protect and provide clarity on our owners' rights as members.
- We provide support to members of Arla Foods, who can contact the Arla agriculture organisation.

Insight

- We provide our owners with relevant information concerning significant corporate issues and market conditions.
- We provide our owners with easy access to our statutory rules, elected members, and relevant employees.
- Elected members and company management must declare a conflict of interest and may not participate in matters where they have a personal direct, indirect or material interest.

Market conduct

Why is responsible market conduct important?

Trust is a prerequisite for responsible business conduct. Wherever we operate, we want to have open and transparent relationships with our consumers, customers, competitors, business partners, and other stakeholders. We achieve this by communicating openly and maintaining ongoing dialogue.

Consumers

- We enable consumers to make well-founded decisions about our products with clear nutritional information and relevant product information.
- We always aim to have trustworthy, transparent, responsible marketing and always avoid being misleading in claims or advertising, evolving industry standards and laws.
- We have efficient procedures for handling questions, feedback, and complaints from consumers with the aim of resolving such issues within a reasonable period of time and in a reliable manner.
- We have effective procedures to ensure data privacy, including personal data in line with global data protection laws.

Competitors

- We support fair competition on equal terms and respect competition legislation in all of the countries in which we operate.
- We only collaborate where legally permitted.
- We avoid infringements of competitors' trademarks, patents, or equivalents.
- We only collect competitor intelligence ethically and legally.

Customers

- We always aim for fair dealings with customers, respecting competition- and antibribery legislation.
- We are clear and honest in our pricing structures and promotional deals, as well as on data and information provided on products, our company or services, including quality or supply.
- We have effective procedures to ensure that data and information about customers is respected and protected.
- We avoid misleading practices and aim to build mutually beneficial relationships founded on respect and with open and on-going dialogues.



We have open and honest relationships with all of our stakeholders.

Stakeholders

- We engage in accurate and honest dialogue with relevant stakeholders to ensure that mutual views and positions are put across for joint learning and direction setting.
- We provide accurate financial and data reporting.

Business partners

- We only enter into contracts with business partners who comply with local laws and who respect and support internationally recognised human rights.
- We conduct integrity due diligence before deciding to collaborate with new business partners, for example when establishing new joint ventures.
- We disclose and manage potential conflicts of interest with partners.

New markets

- Before entering a new market, we evaluate our potential impact on local stakeholders and local production from a social, business, and human rights perspective.
- We aim to act ethically, including understanding and respecting cultural sensitivities.

Procurement and supplier relations

How do we collaborate with our suppliers?

At Arla, our suppliers are essential partners in delivering quality products and upholding our values. The way we work with them reflects our commitment to integrity, fairness, and sustainability.

Selection and collaboration

- We select suppliers based on professional, fair, and transparent criteria, focusing on quality, value, resilience, and environmental and social performance..
- We build relationships founded on mutual respect, honesty, and integrity.
- We treat all suppliers fairly and ensure that personal interests or relationships do not influence our decisions.

Expectations of suppliers

- We expect suppliers to comply with all applicable laws and regulations, including those related to corporate social responsibility, labour, anti-corruption, and environmental protection.
- We expect suppliers to meet Arla's standards for quality, food safety, ethics, and responsible business conduct.
- We encourage suppliers to continuously improve on social, environmental, and ethical issues.
- Detailed requirements for suppliers are outlined in Arla's Code of Conduct for Suppliers and Business Partners.

Responsible buying

- We expect colleagues to purchase responsibly and in compliance with our policies and processes.
- We expect both colleagues and suppliers to speak up if they experience or witness misconduct - whether it involves Arla or a supplier. This includes any behaviour that violates laws, ethical standards, or Arla's Code of Conduct.

Confidentiality and data protection

- We protect confidential information received from suppliers and follow Arla's policies on data privacy and information security.
- We expect suppliers to maintain robust cybersecurity practices.



We build strong, respectful partnerships with our suppliers, guided by our values and responsible business practices.

2 PRODUCT & HEALTH COMMITMENTS

Food safety

What does food safety mean to us?

At Arla, food safety is non-negotiable. It is not only a legal obligation, it is a must. We maintain certified food safety systems and robust quality programs, supported by our dedicated employees who ensure our products are safe and of high quality, regardless of where they are produced. This is achieved through expertise, professional commitment and a strong quality and food safety culture.

End-to-end approach

- We safeguard food safety at every stage throughout the entire food chain.
- We actively identify and manage risks across our supply chain to protect our products and processes.

Commitment

- We are dedicated to ensuring food safety and consistent product quality.
- Every employee has a responsibility for contributing to food safety and product quality.
- We expect our employees to understand their role in safeguarding food safety.

Manufacturing standards

- We have systems, processes, and monitoring in place to ensure safe products.
- Our products meet requirements set by laws, agreed with customers, and defined by ourselves, including standards to prevent contamination. These include control measures for hygiene, allergens, microorganisms and other contaminants.
- All our manufacturing sites are certified according to internationally recognised food safety standards based on HACCP principles (Hazard Analysis and Critical Control Points), which is the backbone of food safety.



We provide safe products to our consumers, while protecting their health and well-being.

Product quality

- We produce and verify product quality to meet agreed customer requirements and consumer expectations.

Product incident management

- We maintain traceability systems for products and raw materials, enabling us to identify and manage any product incident. These systems ensure that we do not release affected products or that we can efficiently withdraw or recall them from customers and consumers, if necessary.

Ensuring our position

- We stay updated on new legislation, risks, research, and food standards to ensure we remain at the forefront of food safety.

Food and health

How can we support consumers' food choices?

We support consumers in making informed dietary choices and strive to ensure access to nutritious food. Our profound knowledge about the link between dairy and health, and our passion for good food habits, will continue to be present in our message to consumers. We are dedicated to providing nutritious, natural dairy products to people around the world, and we support healthy food choices by offering clear information and inspiration. We do so by meeting labelling standards, and we stay aligned with best practices by maintaining ongoing dialogue with consumers and experts. We aim to empower consumers to make informed, healthy choices by offering nutritious food and clear information.

Product development

- We adjust the content of our products to fit the nutritional needs of our consumers.
- Natural ingredients are always our first choice, and we limit the use of additives in our products to only when necessary for legal, food safety or functional purposes.

Research

- We collaborate with independent nutrition experts to investigate the nutritional value of dairy products and the role of dairy products in a healthy diet.
- We conduct research to document specific health benefits of our products, and to develop new products that fit into a healthy diet.

Information

- We clearly label our products with the ingredients and nutritional information to help consumers make well-informed decisions.
- We inform our consumers about the health benefits of our products in accordance with local legislation.

Health communication

- We communicate and act in accordance with official dietary guidelines and scientific consensus.
- We only make claims of health benefits in accordance with local legislation, when nutritionally relevant to our consumers, and when we have strong scientific evidence.

Role of dairy

- We share comprehensive information with consumers about the role dairy products play in a healthy diet.

Inspiration

- We encourage people to make food choices that enable them to live healthier lives.
- We provide inspiration for people to explore new cooking and food experiences.

Dialogue

- We stay in close contact with health authorities, health experts, consumer groups and other stakeholders about nutritional issues and have an open dialogue on relevant topics.

We make products based on nutritious milk and natural ingredients available to consumers around the globe to enhance the quality of people's lives.



3 ENVIRONMENT & SUPPLY CHAIN

Nature, climate, quality and animal welfare

How do we take action for climate and nature?

At Arla, caring for nature is fundamental to who we are and what we do. Our commitment is rooted in our cooperative's traditions and guides us in producing high-quality dairy products while safeguarding the environment and the welfare of animals and the land we depend on.

Respect for nature

- Arla's environmental ambitions are science-based and informed by the planetary boundaries framework.
- We want to create a resilient dairy production, inspired by regenerative farming practices that aim to support health and reduce environmental and climate impacts.
- We understand our impact on nature and strive to protect and improve biodiversity.

Farm quality programmes

- We ensure that all our farmer owners comply with our quality programme, Arlagården®, which is audited by a third party company, as well as any national requirements.
- We apply fair payment principles for raw milk, based on content, quality and market value.
- Non-owner milk suppliers must comply with Arla recognised national quality assurance programmes.

Animal welfare

- We influence animal welfare and work to ensure that dairy herd health is at the centre of milk production.
- Our farmer owners are dedicated to ensuring the health of their animals, investing time and resources in maintaining high standards and focusing on the quality of life of the animals in their care.



We collaborate throughout our value chain to take actions for climate and nature.

Driving actions

- We support global efforts to limit climate change and improve environmental performance in line with international agreements and science-based targets.
- We encourage our owners to reduce their environmental impact by providing necessary tools and guidance.
- We incentivise actions to mitigate climate change, also generating synergies with other nature areas.



Collaboration and knowledge sharing

- We collaborate with our farmer owners to host open farm events and inform consumers about the life on a dairy farm.
- We work with our farmer owners to integrate actions that support nature, improve environmental performance and animal welfare on farm.
- We collaborate with scientific institutions, industry partners, and stakeholders to ensure our practices are informed by the latest science.



Monitoring and reporting

- We report openly and transparently, following global standards on sustainability.
- We continuously improve our data systems to maintain integrity, accountability, and scientific best practices.

Direct operations

- We promote use of renewable energy and materials, while avoiding the use of fossil virgin sources to the extent possible.
- We strive for an efficient production in terms of energy, water and other resource use for operations and logistics.
- We seek to improve circularity by reducing waste, increasing recycling, and ensuring responsible management of by-products

Responsible sourcing and value chain collaboration

- We work with our suppliers to reduce environmental impacts across our value chain.
- We work to achieve a deforestation and conversion free supply chain aligned with the Accountability Framework Initiative.
- We acknowledge that a sustainability transition comes with a cost and support the journey through strategic partnerships with customers, bringing back finance from customers to our farmer owners.
- We inspire consumers to reduce food waste through campaigns and collaboration with relevant organisations.

4 WORKPLACE & COMMUNITY ENGAGEMENT

Workplace

What makes Arla a great place to work and grow?

Working at Arla includes great possibilities as well as obligations for all employees. We believe a great workplace enables development, collaboration, and real impact. We set clear standards for working together so everyone can thrive, perform and develop while contributing to our purpose. We want everyone at Arla to feel proud of their contribution. Our leaders are responsible for ensuring a safe and healthy working environment, while engagement and dedication from each of us helps us continually improve our workplace and achieve both personal and company goals.

Safety and good health for all

- We proactively prevent accidents, injuries, and work-related illnesses.
- We foster both physical safety and psychological wellbeing for all.
- We maintain robust safety standards and expect our business partners to do the same.
- We have clear procedures and support systems to ensure safety at all sites, with particular focus on high-risk areas.

Inclusion and respect

- We expect everyone to treat each other with openness and mutual respect.
- We provide equal opportunities throughout recruitment and employment to support our business objectives.
- We do not tolerate any form of discrimination or harassment.
- We recognise achievements on merit, regardless of gender, ethnic, social, and national background, race, colour, religion or belief, sexual orientation, political opinion, age, disability, or marital status.

Ways of working and digital innovation

- We continuously improve our ways of working to simplify processes and remove barriers.
- We provide relevant, intuitive, and accessible resources, including digital tools and technologies.
- We embrace AI and technical innovation to streamline workflows and enhance the employee experience.



We are guided by our values to aim high, deliver good growth, and keep our workplace safe, healthy, and inclusive.

Valuing contributions

- We offer fair and competitive pay and compensation, which satisfy, as a minimum, the basic needs of our employees and their families in all countries in which we operate.
- We encourage open feedback and recognise efforts that drive shared goals.
- We want everyone at Arla to find meaning in their work and feel proud of their contribution.

Growth and potential

- We invest in continuous learning and development opportunities for all employees.
- We provide opportunities and support for everyone to develop their skills and realise their potential.
- We support career progression and personal ambitions.

Leadership and impact

- We train leaders to live the Arla Leadership principles: envision the future, engage people, and deliver performance to ensure impact.

Human rights

How do we demonstrate our commitment to human rights?

We respect human rights worldwide and conduct due diligence in all countries where we operate. Our commitment extends beyond providing food products, as we also foster a culture that actively supports and promotes internationally recognised human rights.

We respect and support internationally recognised human rights.

Commitment

- We respect and support international agreements on human rights.
- We embed our commitment to all aspects of human rights in all business areas and processes.
- We collaborate with suppliers, business partners, and communities to uphold human rights.

Responsibility

- We contribute to the progress of human rights, and we aim to provide an example of good human rights practices wherever we operate. We expect our business partners to demonstrate the same.
- We continuously work with policies and processes to identify, prevent and mitigate any possible adverse impacts our operations may have on people and/or communities.
- We support our employees in understanding what human rights are, and we expect them to make a positive human rights impact when acting in an Arla context.

Responsibility towards employees

- We aim to provide an example of good labour practices throughout our business activities, and we expect the same from our business partners.
- We ensure working hours allow time for leisure and rest.
- We respect our employees' freedom of association, the right to freely form and join organisations of their choice, and to engage in collective bargaining.
- We respect our employees' right to freedom of expression.
- We provide suitable conditions and solutions for dialogue and collaboration with our employees and their representatives everywhere we operate to ensure continuous development of people and business.
- We do not accept child labour, defined as work conducted by people under 15 years of age, or a higher age if local legislation stipulates a higher age limit and/or longer compulsory schooling.
- We do not accept forced, bonded or trafficked labour, and employees are not required to pay deposits or surrender identification documents when we employ them.
- We aim to provide conditions that enable our employees to enjoy an adequate standard of living.



Society and community relations

What is responsible community engagement?

As a farmer owned cooperative, we believe cooperation creates better outcomes. We play a positive role in the communities where we operate and aim to create long-term shared value. We cannot change the world on our own, but we believe we can make a difference wherever we get involved.

Community development and long-term impact

- We contribute to sustainable development in the communities where we operate through our role as employer, dairy producer, and active corporate citizen.
- We identify, assess, and address significant sustainability challenges in local communities connected to our business, and we measure and learn from outcomes.
- We engage with key stakeholders to take their aspirations into account in our decision-making processes.

Meaningful engagement

- We engage early, inclusively, transparently and in culturally appropriate ways with local communities and stakeholders, including those who may be affected by our operations.
- We use clear, accessible communications and build long-term relationships with stakeholders in the communities in which we operate, to support our business and as part of our responsible approach.
- We follow up on our actions and performance and share the results in an open and honest manner.
- Engagement with NGOs is an important pillar of our society and community relations. We have internal principles and policies in place for our engagement with these organisations.

Public debate and responsible advocacy

- We engage in public debate, locally, nationally, and globally, to promote dairy farming that balances environmental, social and economic considerations, and other areas relevant to our business.
- Our advocacy is fact-based, collaborative, proactive, transparent, and honest, and complies with applicable laws and our internal standards.
- We never offer or give corporate contributions to political parties.
- Only designated colleagues may engage policymakers on Arla's behalf.



We engage in open, respectful, and constructive community relations.

Personal political views and civic engagement

- We respect colleagues' right to hold and lawfully express personal political views. At the same time, we maintain a neutral, inclusive, and productive workplace where everyone feels safe and respected.
- We separate personal political activity from Arla's business. No one may speak or act on behalf of Arla, perceived or otherwise, on political matters unless authorised.

Civic participation and public roles

- We support lawful civic participation (e.g., voting) in line with local law and company policies.
- Colleagues seeking or holding public office or leadership roles in political organisations must disclose potential conflicts of interest and agree appropriate safeguards.

References

Want to know more?

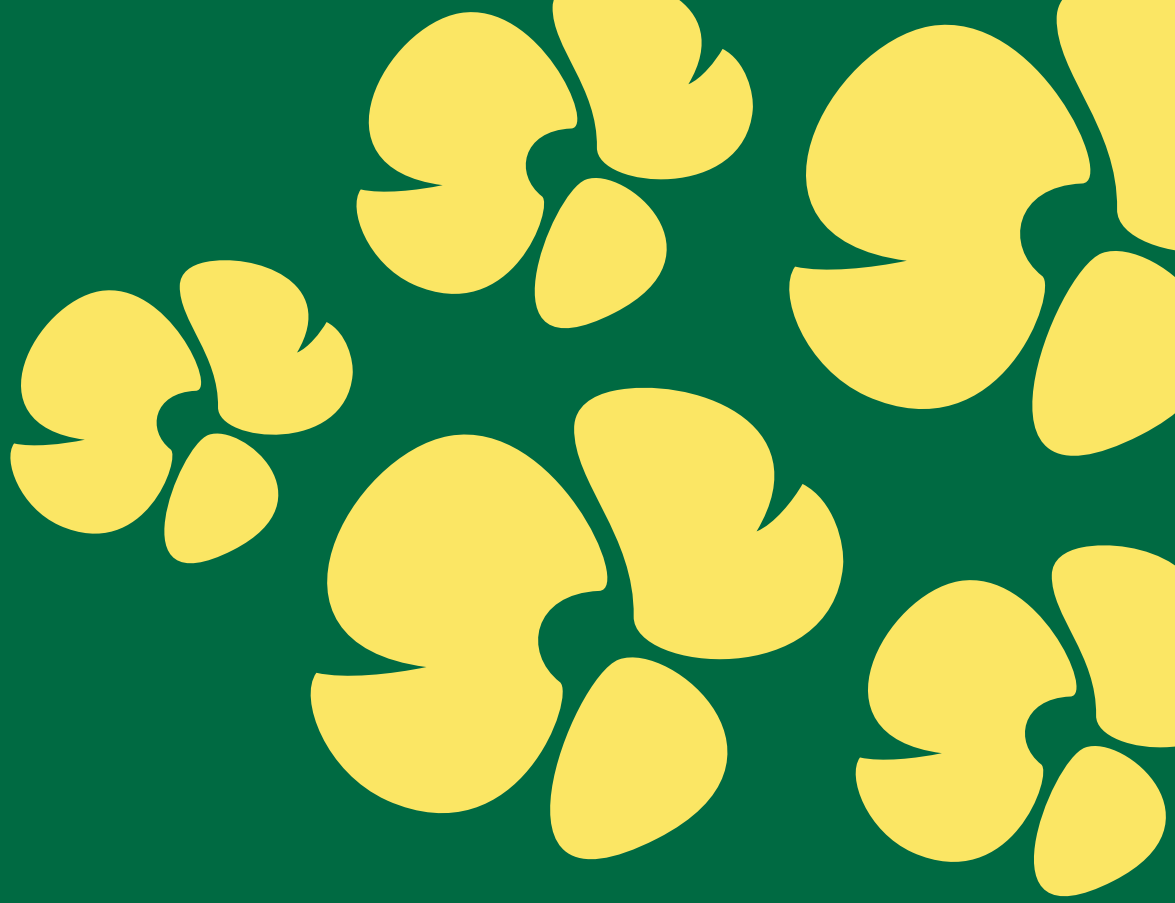
In addition to this Code of Conduct, there are more sources of information regarding Arla's general policies and, for Arla colleagues, more information on practices and how to act, on Arla's intranet.

Definitions and expectations
By *Arla*, we mean Arla Foods amba and its subsidiaries, which are owned and/or controlled by Arla Foods amba. *We* in this document, covers both the company and all its people. When we use *employees*, we refer to all employees in Arla, at all organisational levels and in all organisational units.

An Arla representative of a governing body of a company in the Arla group that is not fully owned and/or controlled by Arla is expected to work with the ambition to develop understanding of and commitment to the Code of Conduct.

General information
Follow up on how we work responsibly in Arla is reported in our Annual Report. Reports and public statements are available at www.arla.com, as is this document and key strategies.

Our Responsibility is available in several languages and can be downloaded from www.arla.com. The English version always takes precedence. This edition of the Code of Conduct replaces all previous versions.



References

UN Global Compact, www.unglobalcompact.org
UN Guiding Principles on Business and Human Rights, www.ohchr.org
OECD Guidelines for Multinational Enterprises, www.oecd.org/corporate/mne
ILO, www.ilo.org

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Arla's Code of Conduct

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