



Asahi Breweries Europe Ltd
A subsidiary of Asahi Group Holdings, Ltd.

Asahi Breweries Europe Limited (ABEL) Supplier Code of Conduct

Issue Date: June 15, 2017

The minimum compliance requirements we expect from our suppliers form the ABEL Supplier Code of Conduct. Our approach is not just about monitoring compliance but also about working to understand challenges, encourage improvements, and empower suppliers to take ownership throughout the value chain. Equally, we are considerate of local factors and challenges faced by our suppliers in the different parts of the world where we operate and procure. The minimum standards that are set out in this document will be enforced contractually and we expect our suppliers to constantly monitor their own and their suppliers' compliance.

Scope and application

Application

The ABEL Supplier Code of Conduct defines the non-negotiable minimum standards that ABEL Procurement suppliers are required to adhere to, wherever they produce materials or perform services for ABEL. It does not prevent our suppliers from exceeding these standards. Suppliers applying this Code are expected to comply with national and other applicable law and, where the provision of law and this Code address the same subject, to apply the provision that affords the greater protection.

Promoting the Supplier Code of Conduct principles down the supply chain

Suppliers contracting with ABEL are expected to promote these principles in their own supply chain and ensure they are respected. Suppliers such as traders and agents shall ensure that supplying manufacturers and farmers become fully aware of the principles; the provisions stated therein, their meaning and implications for their manufacturing or farming practice.

Demonstration of Compliance

Acknowledgement of the Code is a pre-requisite in every ABEL Procurement contract for supply. Through the signature of the contract and acceptance of the purchase order, the supplier commits that its operations are subject to the provisions contained in this Code. Suppliers must be able to demonstrate compliance with the Code at the request and to the satisfaction of ABEL. ABEL may utilise independent auditors to



assess supplier compliance with the Code. These assessments generally include meetings with management, a tour of the facility, confidential interviews with workers on site and a review of documentation. If ABEL becomes aware of any actions or conditions not in compliance with the Code, ABEL will demand corrective measures. When contracting with agents or traders, ABEL may request to have their manufacturing or farming suppliers assessed for compliance. ABEL reserves the right to terminate an agreement with any supplier who cannot demonstrate they comply, and that they take steps to ensure their own suppliers comply, with the Code.

Human rights and labour standards

We are committed to respecting internationally recognised human rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

In developing our approach, we draw on relevant guidance from the OECD Guidelines for Multinational Enterprises, the UN Women's Empowerment Principles, and the International Labour Organisation (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

We encourage our suppliers to embrace these international standards and we expect them to respect the human rights of their employees in the workplace, and to promote human rights within their value chain. Those principles designed to cover employees also apply to contract workers and any workers without a formal contract of employment.

Freedom of association and recognition of the right of collective bargaining

Suppliers must respect the rights of their employees to choose whether or not to associate with a legally recognised labour union, without fear of intimidation, reprisal or external pressure.

Guidance:

Where employees are represented by a sufficiently representative union, the supplier will establish a genuine dialogue with freely chosen employee representatives, to enable both employees and management to understand each other's concerns and find ways to resolve them.



Where the right to freedom of association and collective bargaining is restricted under law in contravention of international human rights standards, the supplier must seek to ways to honour these rights by establishing alternative means of dialogue with employees. Suppliers should engage in the collective bargaining process in good faith and recognise the value of developing and maintaining harmonious labour relationships.

Prohibition of forced and compulsory labour

Suppliers must prohibit, and must not benefit in any way from, any form of slavery, whether in the form of forced or compulsory labour, prison labour, indentured labour, bonded labour, slave labour, or any other non-voluntary labour. Suppliers must also prohibit the trafficking of people, including arranging or facilitating the travel of another person with a view to that person being exploited.

Guidance:

Suppliers must have appropriate and effective management systems in place to ensure lawful compliance. In addition, workers must not be required to lodge recruitment fees, “deposits” or their identity papers and must be free to leave employment after reasonable notice. There should be no excessive loan repayment programmes that disadvantage workers. To every extent possible work should be performed on the basis of a recognised employment relationship established through national law and practice. Workers are free to leave their employment after reasonable notice and free to leave work without restriction at the end of their daily shift. Workers are free to choose their own accommodation and are not obliged to stay at or pay for accommodation provided by the company.

Abolition of child labour

Suppliers must strictly prohibit the use of child labour. Child labour, as defined by the ILO, refers to work that is mentally, physically, socially or morally harmful to children; or work that interferes with their schooling.

Guidance:

Suppliers must adhere to minimum age provisions of national labour laws and regulations and, where national law is insufficient, take account of international standards. Young people under 18 must not be employed at night or in hazardous conditions. In addition, suppliers must use adequate and verifiable mechanisms for age verification in recruitment procedures.



We are aware that young people under 18 are entitled to work in certain defined and protected circumstances, as set out in the ILO conventions and within the limits of national law. We recognise that some participation in work by young people under 18 can be important to a family and can contribute positively to skills development. This is acceptable as long as it is conducted in line with the requirements of the ILO conventions and national law and adequate steps are taken to ensure that it does not affect their health and personal development, or interfere with their schooling.

Intolerance of discrimination

Suppliers must create an inclusive work environment free of discrimination with respect to race, gender, colour, caste, national origin, religion, age, disability, marital status, sexual orientation, employment status, parental responsibilities, gender reassignment, pregnancy or maternal leave, political opinion, union membership, social origin, HIV/Aids status or any other arbitrary means.

Guidance:

Suppliers should not discriminate on any of these grounds in decision on hiring, compensations, access to training, promotion, or termination. The basis for recruitment, placement, training and advancement should be based on qualifications, competence and experience.

Employees are treated with dignity and respect

Suppliers should not permit any harsh or inhumane treatment of employees. The supplier should ensure that all employees treat each other with the utmost dignity and respect.

Guidance:

Physical, psychological or emotional abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse and all forms of intimidation or inhumane or degrading treatment should be prohibited by the suppliers.

Establishing fair and competitive wages and working hours

Suppliers must provide employees with fair wages and benefits that comply at least with minimum wage legislation and other applicable wage and working time laws or collective bargaining agreements.

Guidance:

In countries where the legislated minimum wage is set below a level that is consistent with a decent standard of living for a worker and family, the supplier should aim to



pay a wage that is at least sufficient to meet the basic needs of workers and their families. All workers should be provided with understandable information about their employment conditions before they enter employment. Workers must be provided with clear, understandable information on how their wages are calculated for each time they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided by the national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded. Suppliers should ensure that working hours comply with national laws and benchmarked industry standards, whichever affords greater protection. In any event, workers shall not be required to work a regular work week of over 60 hours, unless there are exceptional circumstances (which do not include predictable seasonal variations). Workers must be provided with at least one day off in every seven, overtime work must be voluntary and compensated at a premium rate.

Land rights

Suppliers must follow all applicable national laws relating to the rights of land and national resources. Land acquisitions should be made with respect for the rights of individuals and communities impacted.

Guidance:

Suppliers of agricultural materials who own, acquire or control land are expected respect land rights by: (a) demonstrating legal or customary ownership or land use rights; (b) obtaining the free, prior and informed consent of all affected communities before acquiring or developing land; (c) putting in place a grievance mechanism to resolve any dispute over land ownership.

Grievance mechanisms

Suppliers must have systems in place to enable anonymous grievance reporting by workers. The objective of any grievance mechanism should be to seek to understand and seek to put right whatever has gone wrong and mitigate any negative consequences.

Guidance:

Suppliers should develop grievance mechanisms that allow all workers to raise questions and concerns to their management easily with no fear of negative consequences. It should allow for people to report issues in confidence and be addressed in a timely manner. Suppliers should make sure workers know how to use the grievance mechanism and explain the process for handling any issues that are raised. Grievance mechanisms must be continuously monitored and records kept on the issues raised along with the appropriate actions that have been taken.



Health and safety

ABEL expects its suppliers to provide a safe and healthy work environment for their employees.

Working conditions

At a minimum, suppliers' policies and procedures for health and safety must meet legal requirements. Wherever these do not exist, the supplier must ensure that risks of accidents, injury, and exposure to health risks are minimised, adopting the prevailing knowledge of the industry.

Guidance:

Suppliers' facilities must be constructed and maintained in accordance with the standards set by applicable law and regulations. Workers must receive regular and recorded health and safety training, and this training shall be repeated for new or re-assigned workers. Potable drinking water, personal protective equipment and adequate lighting, sanitation and ventilation must be provided.

Safe and decent accommodation

When suppliers provide accommodation to their employees, it must be clean, safe and meet the basic needs of the workers.

Guidance:

Workers should be free to enter and leave dormitory buildings. Facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations. Accommodation must be segregated from the factory's production area.

Hazardous materials

Suppliers must identify hazardous materials and chemicals, and ensure their safe handling, movement, storage, recycling, reuse and disposal in compliance with applicable laws and regulations.

Emergency management

Suppliers must ensure they have policies and procedures to deal with emergency situations

Guidance:

Suppliers must assign responsibility of health and safety to a senior management representative and ensure that workers and facilities are prepared for emergency situations. This includes having in place, at a minimum, evacuation procedures, fire detection, adequate emergency exits and regular emergency drills.



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Business integrity

High standards of ethical behaviour and transparency are fundamental to ABEL. We have our own Code of Business Conduct and Ethics which applies to all employees across the group as well as to third parties acting on behalf of ABEL. We want to extend these standards throughout our supply chain by including transparency and business ethics in our Supplier Code of Conduct.

Fair, ethical and compliant business conduct

Suppliers must act ethically and with integrity at all times and comply with local, national and international laws and regulations.

Conflict of interests, gifts and entertainment

Suppliers must not engage in any improper payments, make or receive direct or indirect offers, or solicitations to our employees. Suppliers should avoid situations where a conflict of interest may occur, and must immediately disclose to ABEL any conflict of interest that do arise. ABEL Procurement does not accept gifts or offers of entertainment from current or prospective suppliers.

Anti-corruption

ABEL is fully committed to eradicate corruption from all business transactions. Suppliers must not engage in corruption such as bribery or any form of improper or unlawful payment under any circumstances including financial fraud, money laundering, and extortion or facilitation payments. Further information can be found in the supplier version of the ABEL Anti-Bribery Policy, which details how we expect our suppliers to act to ensure that our high anti-corruption standards are continually achieved and that best practice is followed.

Origin transparency

Suppliers must be able to disclose to ABEL sources of primary origin (including the country of origin) associated with the materials supplied to ABEL. ABEL may request suppliers of selected materials to map their supply chain back to origin to facilitate assessment of upstream supply chain compliance.

Environmental sustainability

ABEL requires that at a minimum, its suppliers comply with all relevant national environmental legislation, and conduct business in a way which protects and preserves the environment.

Environmental management system



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The supplier should have policies, procedures and relevant environmental management systems to identify, control and mitigate significant environmental impact.

Guidance:

Suppliers must assign responsibility for environmental impact to a senior management representative. Suppliers must report any inspection from local government bodies, along with details of any official complaint, legal action or recommendation. All required environmental permits and registrations must be legally compliant at any time.

Waste, resource consumption and pollution reduction

Suppliers must ensure they optimise the consumption of natural resources, and implement and demonstrate sound measures to prevent pollution; reduce the use of water; reduce their energy and carbon foot print; re-use and recycle packaging and reduce waste to landfill and post-consumer waste.

Working with our suppliers on meeting the Supplier Code of Conduct standards

We expect our suppliers to be transparent about their social, environmental and economic sustainability practices and actively engage in our policies and processes. We regularly monitor our suppliers and ask about their business practices through questionnaires to help us identify and assess potential ethical and social risks. We further reserve the right to verify compliance and to conduct supplier audits as part of our ongoing compliance monitoring at any point during the contractual relationship. In case of non-compliance we will work with our suppliers to address the findings through remedial actions. In case of prolonged or excessive non-compliance, we reserve the right to review business with our supplier.

We actively engage with our suppliers at a very early stage in our procurement activities to ensure the Code is put into practice and is continuously tracked. This is done through Procurement's Supplier Accreditation Process which takes place prior to supply commencing for our core materials and services.

As part of this process, we require our suppliers to disclose how they manage human rights and labour risk, health and safety, business integrity and environmental sustainability at each of their sites.



Asahi Breweries Europe Anti Bribery Policy Supplier Version

Issue Date: June 15, 2017

Introduction	<p>We are committed to conducting our business responsibly and in accordance with the highest legal and ethical standards. Operating transparently and ethically is not only the right thing to do; it is ultimately good for business.</p> <p>Our Code of Business Conduct and Ethics ("the Code") states that <i>"We do not permit the direct or indirect offer, payment, solicitation or acceptance of any improper payments (for example, bribes, or illegal gratuities) in any form"</i>.</p> <p>Most countries in which we operate have laws that prohibit improper payments, such as bribes. Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties.</p>
To whom does this policy apply?	<p>This policy applies to all suppliers of ABEL group and sets out the minimum standards to which they must adhere at all times.</p>
What is bribery?	<p>Bribery can be described as the giving to or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business or any other benefit.</p> <p>Bribery can take place in the public sector (e.g. bribing a public official) or private sector (e.g. bribing the employee of a customer). Bribery can also take place where an improper payment is made by or through a third party.</p> <p>Bribes and kickbacks can therefore include, but are not limited to:</p> <ul style="list-style-type: none">• gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;• payments, whether by employees or business partners such as agents, introducers or consultants;• other 'favours' provided to public officials or customers, such as engaging a company owned by a member of a public official's or customer's family; and• Uncompensated use of company services, facilities or property.



<p>Our policy on bribery:</p> <p>(i) General</p>	<p>No supplier is permitted to pay or offer a bribe in <u>any</u> form on behalf of our business. You must never whilst involved in work for us:</p> <ul style="list-style-type: none">• Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to Asahi Breweries Europe Limited. "Public official" should be understood very widely, and broadly means anyone paid directly or indirectly by the government or performing a public function, including officials of state owned enterprises and public international organisations.• Attempt to induce a public official, whether local or foreign, to do something illegal or unethical.• Pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official. You should therefore be careful when selecting third parties, such as agents and consultants (see guidance below).• Establish an unrecorded ('slush') fund for any purpose.• Otherwise use illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or offering anything of value when you know it would be contrary to the rules of the recipient's organisation for the recipient to accept it.• Do anything to induce, assist or permit someone else to violate these rules.• Ignore, or fail to report, any suggestion of a bribe. <p>As well as complying with the specific prohibitions in this Policy, suppliers must exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.</p>
<p>(ii) Facilitation payments</p>	<p>ABEL Policy is that so-called "facilitation" or "grease" payments are prohibited. Such payments should not be made to public officials, even if they are nominal in amount and/or common in a particular country.</p>



(iii) Agents and Sub-contractors	<p>Suppliers should not sub-contract their work for ABEL to any party who they have reason to suspect will pay bribes on ABEL's behalf.</p> <p>Suppliers should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of ABEL. All fees and expenses paid to third parties should represent appropriate and justifiable remuneration for legitimate services to be provided. Accurate financial records of all payments in relation to ABEL's business must be kept.</p>
Reporting of bribery and suspicious activity	<p>If suppliers become aware of any actual or suspected breach of this Policy, they should report this to their usual ABEL contact or, if that is not appropriate, to the ABEL legal department. Processes are in place to ensure that such complaints are investigated and appropriate action is taken.</p>