

Asahi Europe and International Anti-Bribery Policy - Supplier version

Issue Date: 1 January 2022

INTRODUCTION

AEI & International has utmost interest in setting standards of integrity and business ethics.

Asahi Group Holdings Code of Business Conduct and Ethics states that "We will refrain from acts that give rise to suspicion of bribery, including providing entertainment, gifts, or donations that violate laws and regulations or would exceed commonly accepted social standards with the objective of winning or retaining business".

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, but also the right thing for business.

Most countries in which AEI & International operates have laws that prohibit improper payments, such as bribes. An increasing number of countries have also adopted laws that prohibit bribery even when it is committed outside these countries' own borders (particularly in the case of payments to public officials). Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties.

TO WHOM DOES THIS POLICY APPLY?

This policy applies to Asahi Europe & International Ltd., its subsidiaries as well as other companies it directly and indirectly owns or manages ("AEI") and sets out the minimum standards to which they must adhere at all times.

WHAT IS BRIBERY?

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.

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.

Bribes and kickbacks can therefore include, but are not limited to:

- a. gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- b. payments, whether by Employees or business partners such as agents, introducers or consultants;
- c. 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
- d. the uncompensated use of company services, facilities or property.

OUR POLICY ON BRIBERY:

(i) General

No supplier is permitted to pay or offer a bribe in any form on behalf of AEI. You must never, whilst involved in work for AEI:

- a. Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to AEI. "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.
- b. Attempt to induce a public official, whether local or foreign, to do something illegal or unethical.
- c. 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).
- d. Establish an unrecorded ('slush') fund for any purpose.
- e. 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.
- f. Do anything to induce, assist or permit someone else to violate these rules.
- g. Ignore, or fail to report, any suggestion of a bribe.

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.

(ii) Facilitation payments

AEI's 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. If relevant, Group Companies should provide Employees with training and support in resisting payments.

(iii) Agents and Sub-contractors

Suppliers should not sub-contract their work for AEI to any party who they have reason to suspect will pay bribes on AEI's behalf.

Suppliers should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of AEI. 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 AEI's business must be kept.

REPORTING OF BRIBERY AND SUSPICIOUS ACTIVITY

If suppliers become aware of any actual or suspected breach of this Policy, they should report this to their usual AEI contact or, if that is not appropriate, to the AEI whistleblowing helpline or to the AEI Legal Director and to the AEI Head of Internal Audit.

Processes are in place to ensure that such complaints are investigated and appropriate action is taken.

CONTACTS

Whistleblowing hotline web report: asahieuropeinternational.ethicspoint.com

Whistleblowing hotline phone numbers:

COUNTRY	PHONE NUMBER
Argentina	8 003 458 171
Austria	800 068 741
Brazil	8 007 645 023
Canada	(800) 451-5686
Colombia	18 005 189 922
Czech Republic	800 144 478
Finland	800 413 790
France	0 805 08 93 54
Germany	0800 1802079
Hong Kong	800 963 779
Hungary	80 088 299
China	4 001 204 702
Ireland	8 000 608 788
Italy	800 582 753
Japan	0800-100-9058
Korea, Republic of South	080 880 4971
Netherlands	0 8 000 226 683
Norway	800 62 298
Poland	0-0-800-4911988
Romania	800 890 298
Russia	8 800 301 37 68
South Africa	800 983 095
Slovakia	0800 002 589
Spain	900 999 390
Sweden	020 88 15 87
Switzerland	800 834 772
Taiwan	00801 49 1536
United Kingdom & Northern Ireland	8 000 608 788
United States	(800) 451-5686