

The logo for AB InBev, featuring the letters 'A' and 'B' in a stylized, overlapping red font, followed by 'InBev' in a dark brown, sans-serif font.

AB InBev

Anheuser-Busch InBev Global Responsible Sourcing Policy

October 2017

Contents

1.	Objective and Scope	3
2.	Our Commitment.....	3
3.	Scope of application.....	3
4.	Implementation.....	3
5.	Human Rights Principles.....	4
<i>a.</i>	Child Labor and Young People	4
<i>b.</i>	Forced Labor and Freedom of Movement.....	4
<i>c.</i>	Freedom of Association.....	5
<i>d.</i>	Discrimination and Harassment	5
<i>e.</i>	Working hours and Compensation/Adequate Standard of Living	5
6.	Workplace Safety and Health	5
7.	Security	6
8.	Environment	6
9.	Land Rights	6
10.	Business Integrity	6
<i>a.</i>	Bribery Corruption and Conflicts of Interest	6
<i>b.</i>	Economic Sanctions and Anti-Money Laundering	7
<i>c.</i>	Fair Competition	7
11.	Grievance Mechanisms	7
12.	Contact.....	7



1. Objective and Scope

At Anheuser-Busch InBev, our dream is to bring people together for a better world, building a company to last on a foundation of responsible business practices, policies and commitments.

We recognize the responsibility of the business community to respect human rights, and we seek to promote human rights as we strive to make the world a better place. This Global Responsible Sourcing Policy (“Policy”) outlines our approach to overseeing human rights and labor standards; health and safety; environmental management issues; and business integrity across our global supply chain. Anheuser-Busch InBev is committed to working with Business Partners that share these values and commit to implementing this Policy in their operations.

2. Our Commitment

Anheuser-Busch InBev is committed to upholding highest standards of responsible behaviour, integrity and ethics in its operations and expects a similar commitment amongst its Business Partners

As a signatory to the United Nations (UN) Global Compact, we are also committed to business practices that respect the human rights of workers and others impacted by our operations across the globe. We seek to ensure our business practices align with international standards of responsible business conduct, including the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights,¹ the International Convention on Civil and Political Rights (ICCPR)² and the International Covenant on Economic, Social and Cultural Rights (ICESCR)³), in addition to the International Labor Organization’s (ILO) Declaration on the Fundamental Principles and Rights at Work⁴. We seek to implement the UN Guiding Principles on Business and Human Rights⁵, and we recognize our responsibility to respect human rights and avoid contributing towards adverse human rights impacts throughout our global value chains.

We expect our Business Partners to respect the human rights of employees within their operations, and to promote human rights of all workers – whether directly engaged by the Business Partner or through third-party companies or agencies, and whether engaged formally or as casual or temporary workers – within their operations. We seek to work with our Business Partners to understand the challenges within our supply chain and work together to support improvements.

3. Scope of application

This Policy applies to all suppliers of products and services (each, a “Business Partner”). Business Partners wherever they produce materials or perform services for Anheuser-Busch InBev are required to adhere to the standards in this Policy and comply with local, national and supranational laws and regulations – if both address the same provisions then the one which affords greater protection will apply.

4. Implementation

Acknowledgement of this Policy, and an agreement to abide by the standards set forth herein, is a pre-requisite in every Anheuser-Busch InBev contract for supply. The Policy will be made available to the business partners during the sourcing process and can be accessed on our website (www.ab-inbev.com/better-world/how-we-manage-sustainability/our-policies.html)

¹ <http://www.un.org/en/documents/udhr/>

² <http://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

³ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>

⁴ <http://www.ilo.org/declaration/lang--en/index.htm>

⁵ http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

and our contracts with Business Partners commit these Business Partners to terms designed to implement this Policy. We engage with our Business Partners at an early stage in our procurement activities assessing their practices against this Policy using self-assessment questionnaires and third party on-site audits. Where possible, Anheuser-Busch InBev seeks to provide training and guidance for Business Partners to support the effective implementation of this Policy.

We expect our Business Partners to undertake the following steps:

- Communicate the Policy to their employees and, cascade throughout their supply chain;
- Report any gaps or breaches of the Policy to Anheuser-Busch InBev either via your Anheuser-Busch InBev contact or our whistleblowing lines (Section 11, Grievance Mechanisms); and
- Work with Anheuser-Busch InBev to evaluate performance against this Policy and take corrective actions if concerns are found.

When contracting with agents or traders, Business Partners must be able to disclose the primary source of origin for materials supplied to Anheuser-Busch InBev. For selected supply chains Anheuser-Busch InBev may request the mapping of the upstream supply chain back to origin to facilitate compliance assessments.

This Policy has been approved by the Chief Procurement and Sustainability Officer. Anheuser-Busch InBev Procurement oversees implementation of this Policy.

5. Human Rights Principles

The following human rights principles are those which Anheuser-Busch InBev considers to be the most salient within our global value chain.

a. Child Labor and Young People

Business Partners must prohibit the employment and exploitation of children within their operations and must not engage in or support the use of child labor as defined by the International Labour Organization (ILO), which is work that is mentally, physically, socially or morally harmful to children; or work that interferes with their schooling. This includes depriving children of the opportunity to attend school, obliging children to leave education prematurely or requiring them to combine school attendance with excessively long working hours. Young people under 18 are not to be employed at night or in hazardous conditions and must not be involved in the manufacture, packaging, marketing, distribution or sale of alcohol products. We are aware that young people under 18 are entitled to work in certain defined and protected circumstances, such as government-approved apprenticeship programs. This is acceptable as long as it is conducted in line with the requirements of the ILO conventions and national law.

b. Forced Labor and Freedom of Movement

Business Partners must prohibit, and must not benefit from any forms of forced or compulsory labor; all work must be conducted on a voluntary basis. The use of prison labor or indentured or bonded labor is strictly forbidden, and workers must not be required to relinquish identity papers, passports, or work permits as a condition of employment. Workers must not be required to lodge recruitment fees (deposits) and are free to withdraw from the employment relationship with reasonable notice. Workers must be allowed to leave the work premises off-shift. Business Partners must also prohibit the trafficking of persons, including arranging or facilitating the travel of another person with a view to that person being exploited.

c. Freedom of Association

Business Partners must support the right of all workers to choose whether to form or join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. Business Partners must not discriminate in any way against workers that choose to form or join trade unions, or against those workers that choose not to form or join trade unions. In those countries and/or situations in which the legal system prohibits or severely restricts the right of freedom of association, Business Partners must support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers' interests and communication between workers and management.

d. Discrimination and Harassment

Business Partners must prohibit all forms of discrimination based on, but not limited to, race, religion, culture, gender, age, political opinion, national extraction, social origin, pregnancy and maternity, sexual orientation or any other arbitrary means. Hiring and employment decisions, including those related to compensation, benefits, promotion, training, discipline, and termination, are made solely on the basis of the skill, ability, and performance of workers. All forms of physical, verbal, and written harassment are prohibited. Business Partners must not engage in corporal punishment or take disciplinary-related deductions from workers' pay.

e. Working hours and Compensation/Adequate Standard of Living

Business Partners must respect the need for workers to have a balance between work and leisure. Working hours and overtime shall comply with applicable wage, work hours, overtime and benefits laws and regulations. All workers will receive at least one continuous 24-hour rest period during a seven day work period. Business Partners should strive to provide workers with a pay and benefits package that supports an adequate standard of living. Wages and benefits shall be equal or superior to the applicable minimum legal and regulatory requirements.

Business Partners are encouraged to provide workers with opportunities to develop their skills and capabilities and, where possible, provide opportunities for advancement.

6. Workplace Safety and Health

Business Partners must ensure high standards of occupational health and safety throughout their organization and strive to prevent all accidents, injuries and occupational illnesses within their operations through management leadership and employee involvement. Health and safety practices must, at minimum, comply with national and local laws. If such laws do not meet minimum standards then international best practice must be applied. Business partners should at a minimum:

- Provide protective equipment to workers in accordance with their job requirements and the goal of safe working conditions;
- Establish safety procedures and training programs for workers to ensure they are aware of workplace hazards;
- Assess, identify and control potential hazards and risks associated with equipment and processes;
- Identify hazardous chemicals and ensure proper provisions are in place for handling and disposal according to applicable laws and best practices;
- Ensure policies and procedures are in place to deal with any emergency situations which must include evacuation plans, training, fire detection systems and emergency exit doors; and,
- Ensure worker accommodation is clean, safe and meet the basic needs of workers. Facilities must be constructed and maintained in accordance with the

standards set by applicable laws and regulations and must be separated from any production area.

7. Security

Business Partners should have in place measures to ensure workers, premises and equipment are secure. Any security measures in place must not harm the safety or security of local community members and other third parties, or undermine respect for the human rights of workers and third parties.

Business Partners providing security services directly to Anheuser-Busch InBev must ensure their personnel take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable law and Anheuser-Busch InBev Security Policies. In no case shall the use of force exceed what is strictly necessary. It should be proportionate to the threat and appropriate to the situation.

8. Environment

Business Partners must observe all applicable laws and regulations concerning the environment and ensure the protection of the natural environment. Business Partners should do this through integrating environmental management practices into operational and training systems.

Anheuser-Busch InBev requires Business Partners to have a focus on the following areas:

- Energy: Measure energy usage and commit to reducing it both in manufacturing operations and transporting products;
- Water: Measure and commit to reduce water usage and discharge; and
- Waste: Measure and commit to reduce the production of non-hazardous solid waste. Maintain a list of hazardous and non-hazardous substances, and establish procedures for the safe handling, transporting, and disposing of waste with international, national or local regulations.

9. Land Rights

Business Partners must follow all applicable national laws relating to the rights of land and national resources ensuring land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. Business Partners must conduct due diligence around land rights and titles during the development of new business opportunities. Business Partners must seek free, informed, prior consent and have a grievance mechanism in place to resolve any disputes over land titles.

10. Business Integrity

Anheuser-Busch InBev expects its Business Partners to adhere to the highest standards of business integrity and ethics, including by avoiding bribery, corruption, facilitation payments and conflicts of interest.

a. Bribery Corruption and Conflicts of Interest

Anheuser-Busch InBev requires its Business Partners not to engage in corruption such as bribery or any form of improper or unlawful payment under any circumstances including financial fraud, money laundering, facilitation payments or extortion. Further information can be found in the Anheuser-Busch InBev Supplier Anti-Bribery Policy available on our website (www.ab-inbev.com/better-world/how-we-manage-sustainability/our-policies.html), which details how we require our suppliers to act to ensure that our high anti-corruption standards are continually achieved.

b. Economic Sanctions and Anti-Money Laundering

We also require our Business Partners to comply with all applicable sanctions, export control, and anti-boycott laws. For example, Business Partners with Anheuser-Busch InBev SA/NV are required to comply with all sanctions, export control and anti-boycott laws, regulations, orders, directives, designations, licenses, and decisions of the United Nations, the European Union, the United Kingdom, and the United States, and anti-money laundering laws and regulations in all applicable jurisdictions. Further, Anheuser-Busch InBev SA/NV prohibits Business Partners from directing their proceeds of doing business with us to benefit persons, entities or countries that are targeted by such laws.

c. Fair Competition

Anheuser-Busch InBev is committed to the principles of lawful and free competition based on the merits of our products and services. We abide by all applicable anti-trust and competition laws in all countries in which we operate. Our expectation is that Business Partners have a similar level of commitment to fair competition.

11. Grievance Mechanisms

Business Partners must have systems in place to enable anonymous grievance reporting by workers and external individuals. The objective of any grievance mechanism should be to seek to understand allegations, mitigate any negative consequences, and provide some form of remediation, where appropriate. Business Partners should ensure that workers know how to use the grievance mechanism and explain the process for handling any issues that are raised. Issues should be dealt with in a timely manner. The business partner also should have in place a policy prohibiting retaliation against workers and other stakeholders who lodge good faith grievances or concerns.

If reasonably credible evidence of any issue is identified, via the grievance mechanism or otherwise, which is suspected to violate the provisions of this Policy, Business Partners are expected to report the issue to Anheuser-Busch InBev. Business Partners' employees or other stakeholders who are concerned that their concerns have not been addressed via grievance mechanisms may also report issues directly to Anheuser-Busch InBev via our internet-based message interface, <http://talkopenly.ab-inbev.com>, as well as our toll-free whistle-blowing line, equipped with translation services, are available 24 hours a day, 7 days a week.

12. Contact

We look forward to working with you; if you have any queries regarding the principles set out within this Policy, please reach out to your Anheuser-Busch InBev procurement contact.

