

POLICY ON RESPONSIBLE ALCOHOL CONSUMPTION



We always promote responsible consumption

WHY THIS POLICY?

As one of the world's leading brewers, we promote the enjoyment of our products in moderation as part of a balanced lifestyle. We market and sell our brands responsibly and work with partners to reduce harmful drinking, such as excessive drinking, drinking and driving, drinking during pregnancy and underage drinking.

We are all ambassadors for responsible consumption. This policy explains what we mean by responsible consumption and what is expected from you in that regard.

Be aware that wherever laws and regulations are more restrictive than this policy, those laws and regulations prevail. The same applies if the OpCos self-regulatory agreements are more restrictive.

WHAT IS RESPONSIBLE CONSUMPTION?

By **responsible consumption** we mean to drink in moderation, at the right time, in the right place and for the right reasons.

By **moderate consumption** we mean the level of alcohol consumption that represents a low risk to health. Guidelines on what is low risk may vary from country to country.

There are situations when someone should not drink at all, for instance if a person is pregnant or under the legal drinking age.

EXPECTED BEHAVIOURS

1. Be a responsible consumer and behave responsibly

Consuming alcohol (even a moderate amount) may have an impact on your behaviour, judgment and coordination. Beware of this and, in any case, obey the law and our Code of Business Conduct. Use common sense and be mindful of your and HEINEKEN's reputation.

2. Be an ambassador for responsible consumption

All employees are expected to be ambassadors for responsible consumption. Being an ambassador for responsible consumption means giving the right example by enjoying responsibly and encouraging others to do so as well.



3. Avoid alcohol consumption during working hours

In principle, avoid alcohol consumption during working hours.

If you drive a vehicle (for example a forklift or truck), operate moving machinery or work with dangerous equipment or substances, you are never allowed during work to drink alcohol or to be under influence of alcohol. Alcohol consumption may influence the safe performance of your duties, and may put you and others at risk.

A few roles or functions may allow for limited consumption of alcoholic beverages during work activities.

Examples are:

- Employees whose duties include the consumption of small amounts of alcoholic beverages for testing or tasting;
- Employees who are hosting guests in a representative function;
- Sales representatives who are visiting customers.

If you drink alcoholic beverages during working hours, ensure that your judgment, health, safety and performance are never impaired by alcohol.

When you attend Company events, business meals, entertainment, hospitality or afterwork drinks where alcohol is served, you are expected to always drink responsibly and be mindful of the impact on your behaviour.

The manager's responsibility

In addition to being a role model, managers must create awareness and understanding of responsible alcohol consumption and lead by example, signaling problems and addressing issues. Consumption of alcoholic beverages is never to be considered a requirement for the successful execution of one's professional duties.

If you notice that a colleague's consumption endangers their own or someone else's safety or health, or leads to behaviour or productivity issues, you should address this and, if needed, refer this colleague to the Employee Assistance Programme (EAP).

4. When you drive, never drink

Employees who will be driving a vehicle at any time (at work or privately) are strongly encouraged not to consume any alcoholic beverages, even if it is allowed under applicable laws. We expect you to be an ambassador for “When you drive, never drink”, in line with our external communication campaigns.

There are two main ways to avoid driving under influence:

- Take alternative transportation;
- Only drink alcohol-free drinks (0.0%).

In any case you should always abide by local drink-driving limits, which vary per country. If no local limit is in force in a certain country, a BAC (blood alcohol content) of 0.05% is the limit. Depending on factors such as gender, bodyweight, genes and food intake, this is reached after about 1-2 standard drinks. It will take about 1-2 hours for the alcohol to leave the body.

Q: Where can I find support if I want to change my drinking habits?

A: Each OpCo should have an Employee Assistance Programme in place to support employees for whom responsible consumption is a challenge. There are various ways to seek help, for example go to your own doctor, Company doctor, HR Advisor, Trusted Representative, or external social worker, find online support or get self-help brochures and workbooks.

Q: What should I do if I believe a colleague is drinking irresponsibly?

A: If you have a good relationship with your colleague, you can consider addressing the subject yourself. Always discuss what you have seen yourself, and weigh your words carefully and with discretion.

If you notice any situation that may pose a health or safety risk to the colleague or to others, but you find it difficult to confront your colleague, discuss it in confidence with your manager, HR advisor or Company Doctor.

CHECKS AND DISCIPLINARY MEASURES

To ensure compliance with this policy, the Company can put checks in place such as standardized alcohol breath tests in accordance with local legislation or Company policies, either at random, on suspicion, or upon entering or exiting Company premises.

Persons who have difficulty in meeting the Company's required work performance standards due to alcohol consumption, misuse or dependency will be asked and supported by the Company to follow treatment or rehabilitation through the Employee Assistance Programme. Any disciplinary measures related to alcohol misuse may be suspended pending the outcome of the treatment.

If rehabilitation is repeatedly unsuccessful, or if an employee refuses or neglects to accept or comply with advice and/or treatment, disciplinary measures will be applied - in line with the Policy on disciplinary measures – which may include dismissal.

▶▶▶ You can find more guidance in the [HEINEKEN Policy on disciplinary measures](#)

SPEAK UP

If you have any concern regarding a possible violation of this policy, speak up! Raise any concern you have through your manager, Trusted Representative, Legal function, Global Business Conduct or through our Speak Up service: online (<http://speakup.heineken.com>) or by phone through the Integrity Line in your country. All reporting is done confidentially and you can share your concerns anonymously (if allowed by the laws of your country) or not. Whatever feels comfortable to you.



▶▶▶ You can find more guidance in the [HEINEKEN Speak Up Policy](#)

QUESTIONS?

If in doubt, discuss any questions you may have with your colleagues or consult your manager or Human Resources function.

For further guidance and support you can contact Global Health & Safety at enjoyresponsibly@heineken.com.

-
- Note that not acting in accordance with this policy may lead to disciplinary measures, including dismissal.
 - ▶▶▶ You can find more guidance in the [HEINEKEN Policy on disciplinary measures](#)
 - This policy applies to all individuals as described in the HEINEKEN Code of Business Conduct.