

We seek to do business with partners who share our values and commitment to responsible business conduct

INTRODUCTION TO THE HEINEKEN SUPPLIER CODE

Our values:

The HEINEKEN values are passion for quality, enjoyment of life, and respect for people and for the planet. As a proud and responsible global brewer, we are committed to conduct business with integrity and fairness, with respect for the law, our values and our Company Manifesto, We Are HEINEKEN.

We expect you, our Supplier, to help us deliver on our values and commitments to responsible business conduct at all times. Working together, we can maximize our positive impact and grow together in a sustainable and responsible way.

Scope:

It is our responsibility to ensure that our Suppliers understand what is expected of them. The HEINEKEN Supplier Code ("Supplier Code") helps Suppliers to understand HEINEKEN's minimum standards. We expect our Suppliers to acquaint themselves with its contents.

We expect our Suppliers to adhere to all applicable laws and regulations where they operate, as well as the minimum standards set out in this Supplier Code. These minimum standards should be incorporated into Suppliers' own operations and communicated to all individuals employed by the Supplier, regardless of the type of contract or the location of their work, and individuals working for the Supplier through a third party contract.

HEINEKEN also expects Suppliers to take appropriate steps to ensure that their own suppliers comply with the minimum standards of the Supplier Code.

HEINEKEN reviews compliance with the Supplier Code and has the right to undertake an assessment with any Supplier. HEINEKEN expects Suppliers to undertake an assessment in its own operations and throughout its supply chain in this regard.

In the event of non-compliance with the minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe. If a Supplier is not able or fails to correct the noncompliance, HEINEKEN may end the relationship.

Responsible Sourcing

Our Suppliers play a crucial role in helping us deliver on our commitments, and we want to develop open and supportive two-way relationships that raise standards across the value chain.

Respecting and abiding by the Supplier Code is just the starting point for many Suppliers. By signing it, they agree to live up to our expectations in the field of responsible business conduct; on business conduct, human rights, health and safety, and protecting the environment.

We recognise that we have a duty to support our Suppliers to help improve standards and capabilities. The introduction of the tips for continuous improvement sections act as a reference and offers support on how to further improve on the respective fields of responsible business conduct in this Supplier Code.

Suppliers are encouraged to contact us in case of any questions about the contents of the Code or if they require further guidance or support to ensure compliance.

1. PRINCIPLES

CONDUCTING BUSINESS WITH INTEGRITY AND FAIRNESS

At HEINEKEN, we are committed to doing business with integrity and fairness. Our Suppliers play a vital role in ensuring we uphold our standards. We expect them to meet the following minimum standards:

1) Competition

The Supplier supports an open, fair and competitive business environment and will not engage in price fixing or other unfair trade practices.

2) Bribery

We do not allow any form of bribery, in any place, at any time. The Supplier never accepts, asks for, engages in, makes, offers, and promises or authorizes any bribes. With bribery we mean giving or receiving anything of value to or from any person, to obtain or retain business, influence decisions, or secure an improper advantage. We expect the Supplier to report relevant concerns immediately - either to their HEINEKEN contact or through HEINEKEN's confidential Speak Up service.

3) Conflicts of interest

We require all our employees to make decisions in the best interest of HEINEKEN. This includes avoiding situations in which a conflict could arise between the interest of HEINEKEN and a direct or indirect personal interest. We expect the Supplier to respect this requirement and to cooperate with us to ensure it is upheld. The Supplier should immediately disclose to HEINEKEN any situation in which they perceive a potential conflict of interest so that appropriate action can be taken.

4) Financial records, confidential information, money laundering and insider dealing

We expect our suppliers; to perform all business and commercial dealings transparently and record them accurately in its books and records according to local law; not to engage in or facilitate any form of money laundering; to treat all business, commercial and financial information regarding HEINEKEN and its commercial partners as confidential. The Supplier does not use confidential information it possesses regarding HEINEKEN to either engage in or support insider dealing.

RESPECTING THE DIGNITY AND HUMAN RIGHTS OF ALL PEOPLE

At HEINEKEN we are committed to doing business with respect for people's fundamental dignity and their human rights. We expect the same commitment from our suppliers and require them to meet the following minimum standards:

5) Non – Discrimination

The Supplier treats people equally and fairly, based on the principle of non-discrimination. The Supplier respects cultural and individual diversity and promotes inclusiveness. The Supplier employs, rewards and promotes based on the principle of equal opportunity, without distinction according to race, colour, gender, sexual orientation, religion, national or social origin, age and disability. This means that the Supplier makes employment decisions, including hiring, placement, promotion, development, training and compensation, based on factors such as qualifications, experience, performance, skills and potential.

6) No harassment

The Supplier does not tolerate physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace.

7) Freedom of association and the right to collective bargaining

The Supplier respects the right of employees' to freedom of association and collective bargaining. Where local laws and practices restrict the right to freedom of association and collective bargaining, the Supplier endeavors to develop other ways to have a meaningful social dialogue with worker representatives, without breaking local law.

8) Freedom of movement and no forced labour

The Supplier respects the freedom of movement of employees. None of their employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by the Supplier. All employees, including contract workers, should work freely. They should be aware of the terms and conditions of their work and be paid regularly as agreed.

9) Children's rights

The Supplier respects the rights of the child as stated in the Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. The Supplier will not engage in, or allow child labour within their facilities or in those of their suppliers.

The Supplier follows the ILO definition of the minimum age for admission to employment or work. This age shall not be lower than the age of completion of compulsory schooling and in any case not be under 15 years of age, except in some countries, where it is 14. The Supplier complies with local law if it sets a higher age to define child labour.

10) Reasonable working hours

The Supplier will always comply with local laws, regulations and local customs with regard to working hours and overtime. The Supplier recognizes the right to sufficient rest and leisure, and therefore aims to prevent their employees from working excessive hours.

11) Fair wages and income

The Supplier pays its employees fair wages for work performed. The Supplier observes the statutory minimum wage set in the country in which it operates. Where the statutory minimum wage is nonexistent or not sufficient to meet basic needs, the Supplier strives to pay employees enough to ensure a decent standard of living enough to satisfy basic needs for the employee and their families.

Tip for continuous improvement

Access to water

The Supplier is encouraged to ensure employees have access to safe drinking water and sanitary facilities in the work place.

Working hours

In the absence of local laws or collective agreements such as ILO standards, the recommendation for normal working hours would be not to exceed 48 hours per working week, or 60 hours per working week including overtime, and to allow employees at least one day of rest in every seven day period.

Fair wages & income

In the absence of statutory requirements, we recommend Suppliers to refer to WageIndicator.org for additional guidance.

12) Responsibly Alcohol Consumption

The Supplier takes all necessary steps to incorporate the key elements of the Company's Heineken Policy on Responsible Alcohol Consumption in their own business practice. The Supplier ensures, and instructs their employees, contractors and agents accordingly, that they do not consume alcoholic beverages at work or during work activities (including during delivery of goods and/or performance of services, travelling to and from work or work activities) and they are expected to be an ambassador for "When you drive, never drink", in line with the Heineken Policy on Responsible Alcohol Consumption and not to drive a vehicle if they have consumed alcoholic beverages at any time. A copy of the Heineken Policy on Responsible Alcohol Consumption is available at <https://www.heinekenmalaysia.com/corporate-governance/>.

13) Emergency response and medical care

The Supplier maintains emergency procedures to respond to health emergencies and accidents, including access to adequate medical care. Employees of the Supplier should be fit for their work in the working conditions in which they will be operating.

REDUCING THE IMPACT ON THE PLANET

Climate change is one of the greatest threats facing society while pressure on the world's resources is growing. As a leading global company, we believe it is not only our responsibility but a shared responsibility with our suppliers to use our resources wisely and reduce our impact on the environment.

14) Brewing a Better World

We believe sustainability is a driver for business success and that business can be a positive force for change. Our sustainability strategy, Brewing a Better World, is one of our business priorities. Here we focus on areas where we can make a difference towards people, planet and prosperity.

We focus on the following areas to reduce our environmental impact:

- Every Drop – protecting water resources
- Drop the C – reducing our carbon emissions from Barley to Bar
- Sustainable sourcing of our agricultural raw materials

Our own targets will help to drive change and reduce our environmental impact. We believe this is a shared responsibility and we rely on our suppliers to help us achieve this. We expect our Suppliers to adhere to local applicable laws concerning energy usage, water stewardship and waste management.

Tip for continuous improvement

Environmental Policy to reduce environmental impact

We encourage our suppliers to have their own environmental policy statement including ambitions to reduce the environmental impact of their operations with regard to:

- Reducing energy consumption and related CO2 emissions
- Responsible water and wastewater management
- Reducing waste through recycling, reusing and limiting waste to landfill
- Sourcing raw materials from sustainable sources

2. SPEAK UP

HEINEKEN encourages its Suppliers, including their employees, to speak up if they have any concerns regarding a possible violation of our Code of Business Conduct and policies, including this Supplier Code. We welcome speaking up as an opportunity to identify and repair potential misconduct, rather than turning a blind eye which may worsen a situation.

Similar to HEINEKEN employees, Suppliers can speak up either anonymously (if allowed by the laws of the country) or not by going to <http://speakup.heineken.com> and filing a report online or by phone, or by sending an email to our Global Business Conduct Office at businessconduct@heineken.com.

HEINEKEN encourages its Suppliers to implement its own grievance mechanism.

3. CONTACTS AND FURTHER INFORMATION

For further information and support related to the HEINEKEN Supplier Code, please contact your HEINEKEN contact person.