

★ HEINEKEN

BUSINESS PARTNER POLICY



01

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OUR BUSINESS PARTNER POLICY



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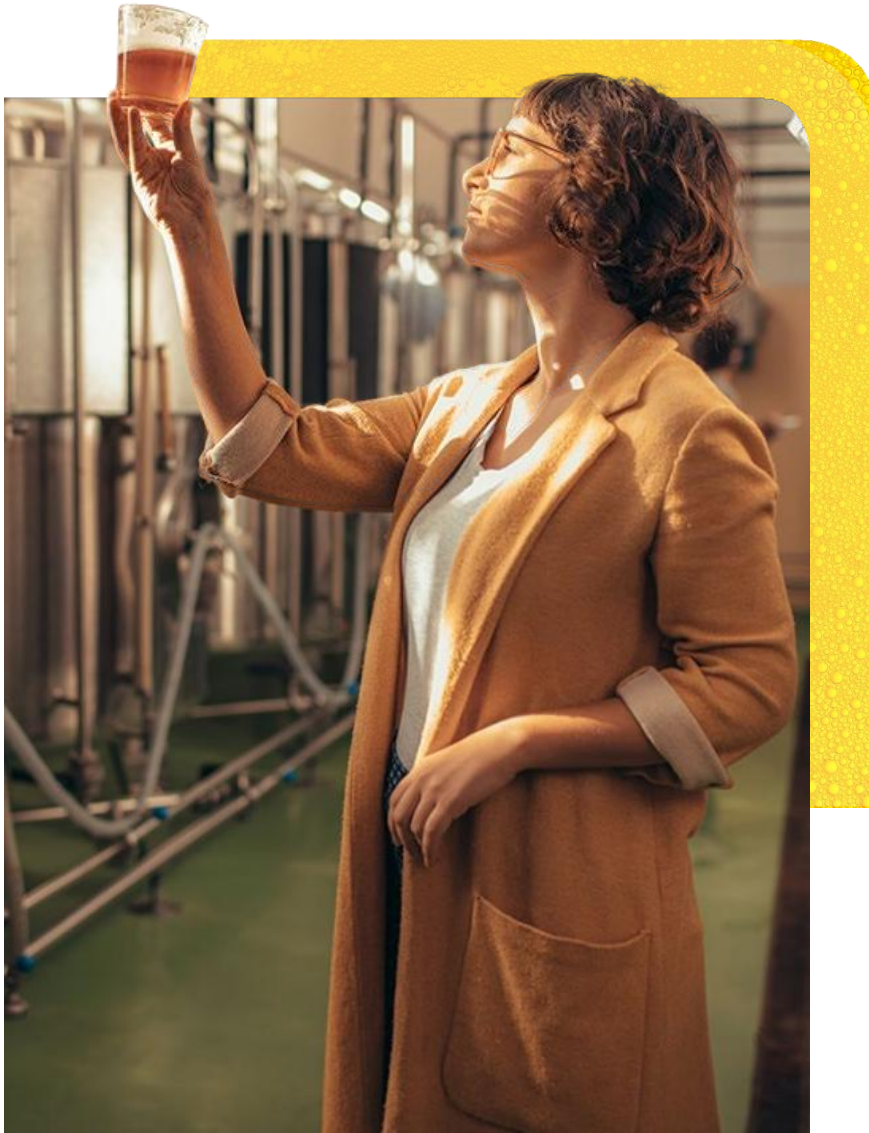
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OBJECTIVE



The success of our business relies on many thousands of partners who supply us with goods and services, and who distribute and sell our products. Working to achieve long-term sustainable value creation also includes carefully selecting and monitoring who we work with.

We expect our Business Partners (see Definitions) to adopt responsible business practices in line with the standards included in this policy. Working together, we can maximise our positive impact and grow in a sustainable and responsible way.

- ▶ The Business Partner Policy sets out the minimum standards HEINEKEN requires from its Business Partners. This policy is anchored in our Company's values and our [Brew a Better World](#) strategy. It is in line with our other policies and their supporting documentation, such as our [Code of Business Conduct](#), our Human Rights Policy Statement and our [Environmental Policy](#). It is also part of HEINEKEN's approach to wider value chain due diligence and third-party risk management.

OUR VALUES

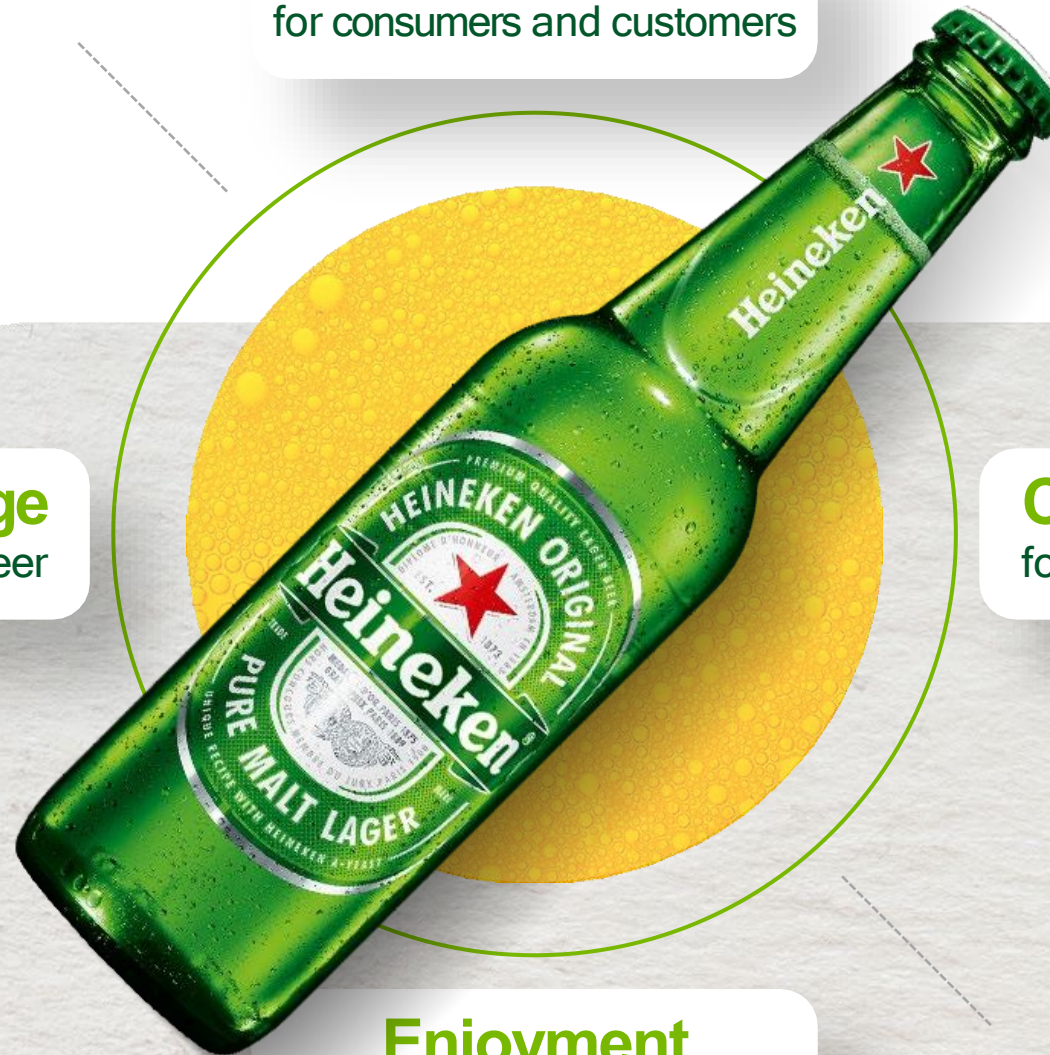
OUR VALUES
ARE WHAT WE
STAND FOR:

Courage
to dream and pioneer

Passion
for consumers and customers

Care
for people and planet

Enjoyment
of life



DEFINITIONS



The underlying standards apply to HEINEKEN's business partners ("Business Partners"), which are defined as all direct suppliers, including any supplier that invoices HEINEKEN for goods or services, and our distributors.

▼
"HEINEKEN" and "our Company" refer to each company that is majority owned and controlled, directly or indirectly, by HEINEKEN N.V.

▼
"Business Partner workers" means workers who hold an employment contract with the Business Partner; as well as self-employed workers.

This includes individual contracts who supply labour to the Business Partner, or agency workers provided by businesses primarily engaged in employment activities.



02

BUSINESS PARTNER POLICY STANDARDS





1. RESPECTING DIGNITY AND HUMAN RIGHTS



1.1 HEALTH AND SAFETY

Business Partners must ensure that conditions are in place for everyone to work safely.

This includes providing safe tools, equipment and vehicles that are suitable and in good condition for the work that is undertaken.

Business Partners should also ensure that their workers are competent and trained for the work performed. Business Partners are expected to empower their workers to stop unsafe work, and to report incidents and unsafe working practices.

When working at HEINEKEN facilities or remotely on the Company's behalf, Business Partners must comply with local legal health and safety requirements, as well as applicable health and safety rules and standards, including HEINEKEN's Life Saving Commitments.

Business Partners should maintain a medical emergency response plan to promptly respond to any health emergencies and accidents.

Business Partners must ensure that their workers are fit (physically and mentally) for their work, considering the occupational hazards, risks and working conditions in which they will be operating.

Business Partners take all the necessary steps to incorporate the key elements of the Company's HEINEKEN Policy on Responsible Alcohol Consumption in their own business practice. Business Partners ensure and instruct 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 HEINEKEN Policy on Responsible Alcohol Consumption and not 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/>.

1.2 DECENT WORKING CONDITIONS



Workers are entitled to decent working conditions, which includes the payment of appropriate wages for work performed.

Business Partners must comply with the statutory minimum wage set in the country in which they operate. Where the statutory minimum wage is non-existent or insufficient to meet basic needs, Business Partners should strive to pay their workers enough to ensure a decent standard of living, sufficient to satisfy basic needs for workers and their families.

We advise our Business Partners to assess wages in line with a recognized living wage benchmark (for example, the Fair Wage Network).

Business Partners should support a healthy balance between the professional and private lives of their workers. They must recognise the right to rest and leisure, and must therefore always comply with local laws, regulations and customs, as well as collective labour agreements on working hours.

Overtime is consensual, used in a balanced manner, and compensated at a premium rate, in line with local laws and collective agreements, where relevant. Under no circumstances may workers be coerced into working overtime through threats of pay and deductions or other forms of sanction.

Business Partners' workers should be given reasonable breaks while working and receive an annual leave period.



1.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING



Business Partners must respect their workers' freedom of choice to be legally represented by a labour union without fear of retaliation.

Where workers are represented by a legally recognised labour union, Business Partners must establish a constructive dialogue with this union.

Where local laws and practices restrict the right to freedom of association and collective bargaining, Business Partners should endeavour to find other ways to have a meaningful dialogue with workers' representatives, without breaking local laws.



1.4 NO DISCRIMINATION



Business Partners must respect cultural and individual diversity and promote inclusiveness. They must treat people equally and fairly, in accordance with the principles of non-discrimination. Business Partners must not tolerate discrimination based on race, colour, gender, sexual orientation, language, religion, national or social origin, political or other opinion, age, disability or any other status.

This also means that our Business Partners must make employment decisions, including hiring, placement, promotion, development, training and compensation, based on factors such as qualifications, experience, performance, skills and potential.

1.5 NO HARASSMENT OR VIOLENCE



Business Partners must not tolerate physical, verbal, sexual or psychological harassment, bullying, abuse, threats or gender-based violence and harassment. This zero-tolerance policy applies irrespective of who commits or receives the harassment, such as a supplier, customer, client, or a HEINEKEN employee. Business Partners must not tolerate such acts in the workplace (in person or virtually), nor in any work-related circumstance outside the workplace, such as work-related events.

Business Partners must also respect and uphold the rights of human rights defenders. This includes not tolerating threats, intimidation and attacks against human rights defenders.



1.6 NO FORCED LABOUR



Business Partners must not tolerate any practice in which individuals are forced to work, whether by using violence or intimidation, or by more subtle means such as the withholding of personal documents.

Business Partners must not permit any form of forced labour, including human trafficking, debt bondage or any other type of coerced labour.

No Business Partner worker should pay for their job or incur debt as a condition of employment. Employers are responsible for all recruitment-related fees and employment costs.

Business Partner workers work voluntarily, are fully informed of the terms and conditions of their employment in advance and receive regular and timely payment as agreed.



Business Partner workers retain their freedom of movement, without any form of restriction, whether by using physical constraints, abuse or threats, or by more subtle means such as the withholding of personal documents or valuable possessions.



1.7 NO CHILD LABOUR



Business Partners must respect children's rights, and must not engage in (or allow) child labour within their facilities.

Business Partners must follow the ILO definition of the minimum age for admission to employment or work. This age is not lower than the age of completion of compulsory schooling and, in any case, is not under 15 years of age. Business Partners must comply with local law if it sets a higher age in defining child labour. Business Partners must also maintain a strong commitment to providing decent working conditions for young workers, and must not engage any young worker under the age of 18 in overtime, night shifts or hazardous work that could compromise their health, safety or well-being.

To this end, Business Partners must verify the age of workers recruited.

If children are found at Business Partner's facilities (or if young workers are involved in hazardous work), Business Partners are required to have remediation programmes in place to end the practice.





1.8 ACCESS TO WATER AND SANITATION



Business Partners must ensure that all of their workers have access to safe and clean water, as well as hygienic sanitation facilities at their respective work sites.

1.9 RESPECT FOR LAND RIGHTS



When involved in undertaking land acquisition to support the development of HEINEKEN's operations, **Business Partners must acknowledge the formal, traditional and customary land tenures and property rights in the form of land ownership and tenancy**, as well as the right to free, prior and informed consent (FPIC) enshrined by the UN Declaration on the Rights of Indigenous Peoples (UN DRIP).

2. BUSINESS INTEGRITY AND LEGAL COMPLIANCE



2.1 ANTI-BRIBERY AND CORRUPTION

▼

Business Partners must never engage in any form of corruption, including bribery, facilitation payments, extortion, financial fraud, or money laundering. Business Partners must not offer, promise, give or accept a bribe or anything that could be perceived as such - whether in dealings with public officials or commercial dealings. Bribes are not limited only to money, but include anything of value, such as gifts, tickets or donations, when offered to improperly influence decisions or gain an unfair advantage. Any suspected or actual breach related to HEINEKEN must be promptly disclosed.

▼

Business Partners are prohibited from offering anything of value to HEINEKEN workers to improperly obtain or retain business, and must [Speak Up](#) if a HEINEKEN worker solicits a bribe from them in exchange for improper advantage.

2.2 GIFTS, ENTERTAINMENT AND HOSPITALITY



Business Partners must exercise restraint when offering gifts, entertainment or hospitality to HEINEKEN's own workforce. Such offerings must never be intended to improperly influence business decisions, such as contract awards or performance evaluations.

Any gift, entertainment or hospitality must be legitimate, proportionate and transparent.

2.3 AVOIDING CONFLICTS OF INTEREST



Business partners must ensure that all business transactions with HEINEKEN are free from conflicts of interest. Any such conflict - whether actual, potential or perceived - must be promptly disclosed, so that HEINEKEN can take appropriate action. For instance, a conflict of interest may arise if a HEINEKEN worker, or their relative or close friend, has a personal or financial interest in the Business Partner.





2.4 COMPLIANCE WITH SANCCTIONS



Business Partners must comply with all applicable sanctions related laws and regulations, including those issued by the EU and UN. Business Partners must not engage in or facilitate prohibited transactions, such as reselling HEINEKEN products to sanctioned parties or territories. Any sanctions-related concerns involving or impacting HEINEKEN must be reported immediately.

2.5 PROTECTION OF PERSONAL DATA



Business Partners must respect individuals' privacy and handle personal data – such as that of workers, consumers or customers – in accordance with applicable data protection laws. Personal data must only be processed for legitimate business purposes and protected against unauthorized access. In addition, Business Partners must enter into further agreements as required under applicable local data protection laws.

2.6 PROTECTION OF INFORMATION AND CYBERSECURITY



Business Partners must safeguard all confidential information and intellectual property owned by HEINEKEN, using it only for its intended purpose. Non-public information must not be shared with third parties or used for unauthorized purposes.

Business Partners are also expected to take reasonable cybersecurity measures to protect any data or systems handled on behalf of HEINEKEN. This includes secure password use and multi-factor authentication, timely software updates, and protection against unauthorized access or malware.

Business Partners must promptly inform HEINEKEN of any data breaches or cybersecurity incidents involving or impacting the Company.

2.7 FAIR COMPETITION

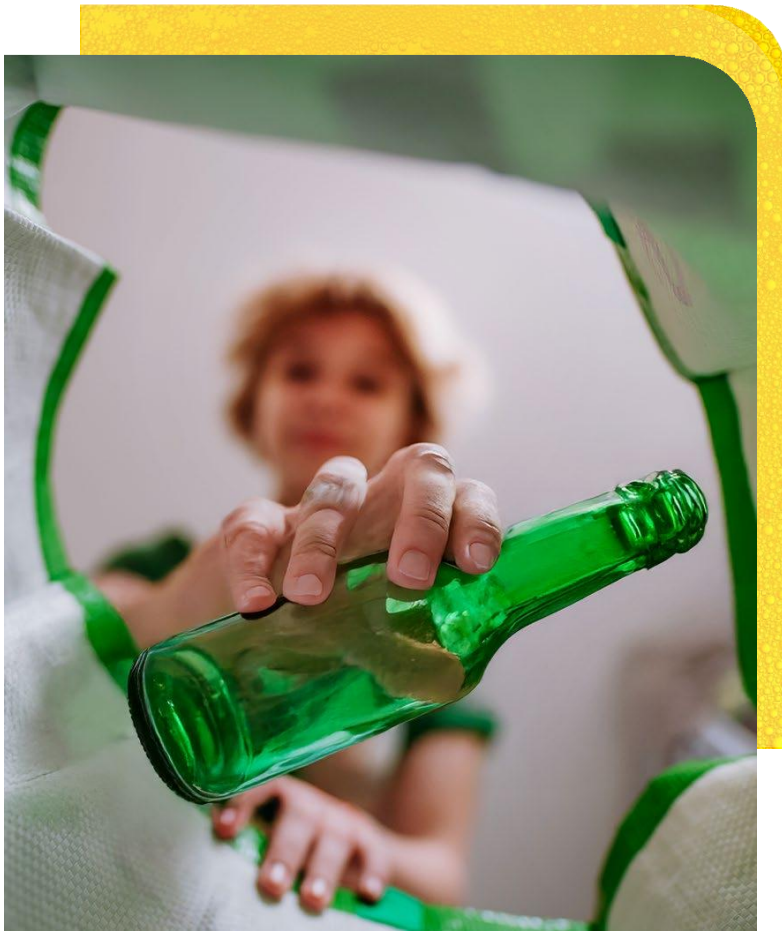


Business Partners must support a fair, open and competitive business environment, and must not engage in practices that unfairly limit competition - such as price fixing, market sharing, or any other conduct prohibited by applicable competition laws.





3. REDUCING ENVIRONMENTAL IMPACT



Business Partners must fully comply with applicable environmental laws and regulations and adhere to the standards set out in this policy at a minimum. We also encourage Business Partners to have their own environmental policy in place, with clear ambitions to reduce the environmental impact of their operations, particularly in the following areas:

3.1 ENVIRONMENTAL MANAGEMENT SYSTEM



Business Partners are encouraged to have an environmental management system in place to identify and mitigate issues related to emissions, energy, water and waste management.

3.2 CLIMATE RISKS ANALYSIS



Business Partners are encouraged to perform a value chain risk-mapping exercise to identify climate risks affecting their suppliers, own operations and customers. This climate risk assessment should incorporate both physical and transition risks. This is mandatory in cases where applicable laws and regulations require risk mapping as part of broader non-financial reporting requirements.

3.3 EMISSIONS REDUCTIONS



Business Partners are encouraged to adopt and implement a decarbonisation approach aligned with guidance by the **Science Based Targets initiative (SBTi)**. Their approach should identify and mitigate GHG emissions, and set appropriate reduction targets within their own production sites and across their value chain. To drive progress, Business Partners are also encouraged to disclose their carbon footprint and emissions reduction efforts annually. This is mandatory in cases where applicable laws and regulations require these disclosures as part of broader non-financial reporting requirements.

3.4 ENERGY CONSUMPTION STRATEGY



Business Partners are encouraged to monitor their energy consumption, identifying areas they can control or influence, and implementing **energy-saving strategies to minimize consumption**. Wherever possible, they should prioritize renewable energy sources, aligned with guidance from RE100 for renewable electricity and from the EU Renewable Energy Directive for bioenergy, and set targets to increase the share of renewables in their energy mix.





3.5 WATER AND WASTEWATER MANAGEMENT



Business Partners must comply with applicable laws and permits relating to water abstraction, water usage, surface water management and effluent discharge.

3.6 POLLUTION MANAGEMENT



Business Partners must comply with all applicable environmental laws, regulations and permit requirements to ensure that harmful emissions to air, water or soil are avoided or reduced as far as possible.

3.7 WASTE MANAGEMENT



Business Partners must comply with applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors.

3.8 SUSTAINABLE SOURCING AND STANDARDS



Business Partners are encouraged to implement sustainable sourcing practices for their own commodities. For example, our Sustainable Sourcing of Agricultural Materials Policy defines actions that our agricultural Business Partners can take to promote soil health, reduce the use of harmful inputs, and enhance biodiversity through regenerative methods. Business Partners must comply with all applicable laws and regulations related to deforestation, including, where relevant, the EU Deforestation Regulation.

When supplying products linked to HEINEKEN's primary deforestation-linked commodities, Business Partners ensure that no deforestation occurs when producing such products. All Business Partners are encouraged to adopt no-deforestation practices across the production of their products.



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ACCESS TO REMEDY



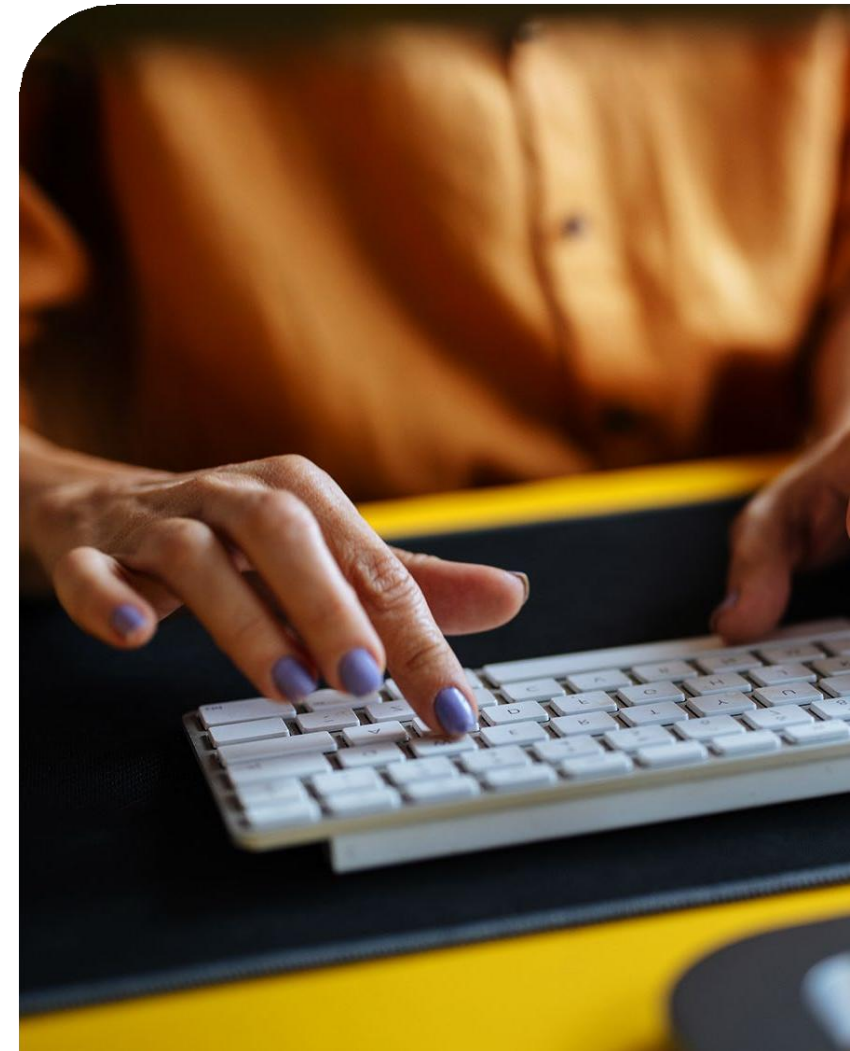


► SPEAK UP

Business Partners are encouraged to implement their own grievance mechanisms and communicate them to their own workforce and third parties, as well as external individuals and communities. Business Partners are expected to collaborate with judicial or non-judicial mechanisms to facilitate access to remedy, and are expected to inform HEINEKEN of any confirmed violations of the minimum standards set out in this policy.



We promote a culture where speaking up is safe and encouraged. Anyone who observes or suspects potential violations of the Code of Business Conduct and policies by our Company or our workforce, is encouraged to report their concerns. Reports can be made confidentially and anonymously via our external, independent Speak Up platform, available at <http://speakup.heineken.com>. Our strict non-retaliation policy applies to all reports, regardless of the reporting channel used.



04

IMPLEMENTATION



IMPLEMENTATION



We require our Business Partners to adhere to all applicable laws and regulations where they operate, at a minimum. We also expect Business Partners to meet the minimum standards included in this policy.



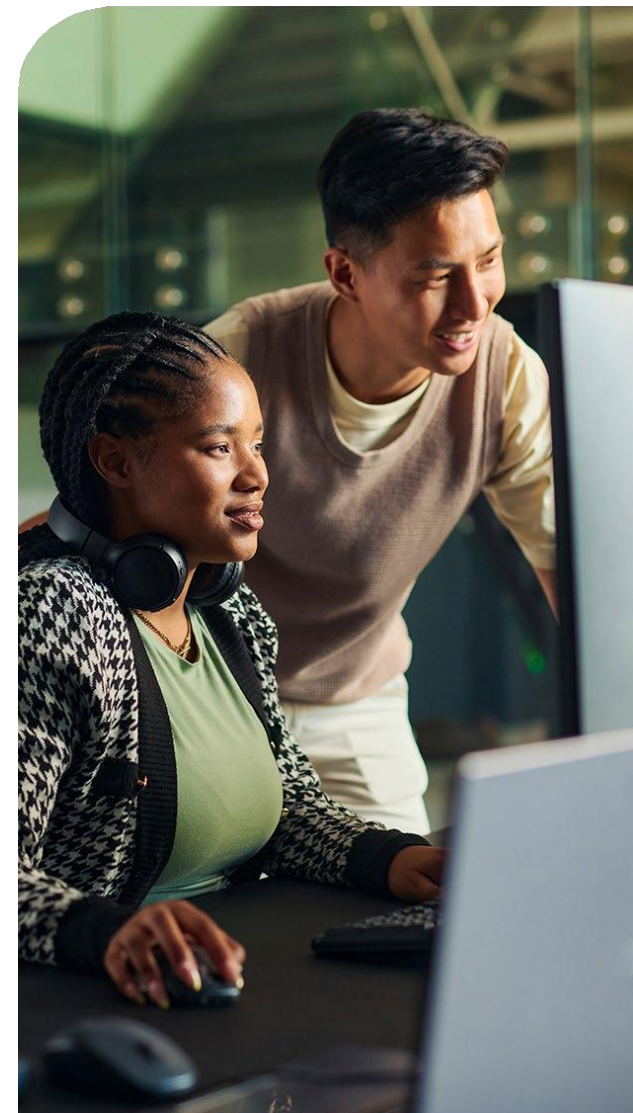
We expect Business Partners to put in place their own risk management ecosystem. This means having adequate and effective governance, policies, procedures, training programmes and risk management systems (including grievance mechanisms as stated above) implemented within their own operations. The level of what is adequate and effective will depend on the Business Partner's size, sector, location and structure. The standards contained in this policy should be appropriately communicated to individuals employed by our Business Partners, whose work and responsibilities ensure they are upheld, regardless of the type of contract or the location of their work.



We expect Business Partners to ensure that their own direct business partners that are part of HEINEKEN's value chain comply with the minimum standards of this Business Partner Policy or equivalent requirements. Depending on the size, sector, location and structure of their operations, Business Partners should also perform risk-based due diligence to ensure that these standards or equivalent requirements are embedded within their value chains.



Where local legislation and existing framework agreements are stricter than this policy, Business Partners must adhere to the applicable stricter standards. If obeying local law means that Business Partners cannot comply with the policy's standards, they are expected to seek ways to honour the standards set out in this policy and try to act according to these standards as much as possible, without violating local law.



IMPLEMENTATION



HEINEKEN undertakes due diligence across its value chain prior to engaging Business Partners, taking a risk-based approach, which also includes considerations such as whether Business Partners are operating in high-risk contexts, as well as whether certain categories of workers are particularly vulnerable to potential negative impacts. HEINEKEN's due diligence process includes screening and self-assessment questionnaires throughout the business relations cycle.



HEINEKEN reserves the right to request internal or third-party audits at any time. Business Partners are expected to cooperate with all information and documentation requests during the due diligence/screening and with all auditing processes. Business Partners are expected to work with HEINEKEN to put in place any corrective actions that are identified.



If HEINEKEN has reasonable grounds for believing that this policy has been breached, or if a Business Partner repeatedly fails to carry out corrective actions, HEINEKEN reserves the right to limit, suspend or terminate the business relationship.



In the event of any issues or non-compliance, HEINEKEN will engage in open and constructive dialogue with the Business Partner to understand the root cause and try to work towards a mutually beneficial solution, before considering potential termination of the business relationship.



This Business Partner Policy is forward-looking and is designed to guide future actions and decisions. It is not intended to retroactively assess or evaluate past decisions, actions or events against its standards.



05

**SOURCES,
FURTHER
GUIDANCE
AND
CONTACT**



The following principles, standards and conventions were used in preparing HEINEKEN’s Business Partner Policy and can be a helpful source of information to Business Partners:

UN Guiding Principles on Business and Human Rights (UNGPs)	Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)	International Bill of Human Rights	International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work	United Nations Sustainable Development Goals (SDGs)
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Functional owners Senior Director of Global Procurement and Chief Commercial Officer

Approved by Executive Board

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