

Anheuser-Busch InBev Global Responsible Sourcing Policy

Overview – What and Why

This Global Responsible Sourcing Policy (Policy) sets out Anheuser-Busch InBev's standards, general expectations, and commitments with respect to key areas of corporate responsibility. Anheuser-Busch InBev is committed to upholding high standards of responsible behavior in its own operations and encourages a similar commitment amongst its business partners.

We recognize that the circumstances in which we and our service providers operate around the world are constantly changing, and because of this we will periodically review this Policy to ensure that its content and implementation remain effective.

We aspire to work alongside our business partners to make progress in this important area of corporate responsibility and in doing so, have sought guidance from the non-profit research and consulting organization, BSR, and reviewed international standards such as SA8000: 2008 (a standard developed by Social Accountability International).

Our Dream to be the Best Beer Company Bringing People Together For a Better World

We have a dream to be the Best Beer Company Bringing People Together For a Better World.

Our plan to achieve our dream has at its foundation our people and is built on three strong unifying pillars:

- We will actively promote the responsible consumption of our products;
- We will continuously look for new ways to improve our environmental performance and;
- We will work with civic leaders and various non-governmental organizations to give back to the communities in which we operate.

We have set forward-looking goals across these pillars and will measure and report on them regularly.

We are signatories to the United Nations Global Compact and report annually on our actions to support its principles and our overall approach to corporate responsibility.

In short, this Policy reflects our pursuit to be the Best Beer Company Bringing People Together For a Better World.

Scope of Application

Anheuser-Busch InBev operates through different types of business relationships, including wholly and partially owned subsidiaries, licensees, joint ventures, and third party service providers.

This Policy applies to all business relationships of the Anheuser-Busch InBev group of companies.

Management Review

Anheuser-Busch InBev's management will periodically review the adequacy, suitability and continuing effectiveness of the company's policy, procedures and performance results vis-à-vis the requirements of this policy. When appropriate, amendments and improvements shall be implemented.

The company will ensure that the requirements of this policy are understood and implemented at all levels of the organization.

Legal Compliance

In accordance with Anheuser-Busch InBev's Code of Business Conduct (2009), we adhere to all applicable local, national, and supra-national laws and regulations. This is the minimum acceptable standard for Anheuser-Busch InBev and for our business partners. In countries, or specific situations, where there is no law or regulation governing a particular activity or operation, Anheuser-Busch InBev expects its business partners to conduct their operations consistent with the principles of this Policy.

Service providers are valued partners in the success of our business. Our relationships with service providers are characterized by honesty and fairness, and we are committed to working with them to achieve responsible business practices in line with the standards in this Policy.

Workplace – Overview

Anheuser-Busch InBev is committed to providing a workplace built on trust, honesty, and fair treatment. A successful and sustainable business requires a workforce that is given opportunities and incentives to develop professionally and to succeed. Anheuser-Busch InBev recognizes internationally accepted workplace rights based on SA8000: 2008 standards and encourages its business partners to also abide by the following principles.

Workplace - Child Labor

Child labor is not allowed under any circumstances. According to SA8000:2008, United Nations Global Compact Principle 5, and the International Labour Organization, a child is defined as any person less than 15 years of age, unless local minimum wage law stipulates a higher age for work or for the continuation of mandatory schooling, in which case the higher age would apply. An allowable exception is if national laws permit the employment of children aged 13 to 15 years (12 to 14 years for light work) if the job is not harmful to their health and development, does not interfere with attendance at school or vocation programs, and is not detrimental to their ability to learn.

Workplace - Forced Labor

All employment relationships are of a voluntary nature. Use of forced or prison labor and/or indentured or bonded labor is not allowed under any circumstances.

Workplace - Freedom of Association

In accordance with SA8000:2008, workers have the right to form and join trade unions and other organizations of their choosing, and to bargain collectively in accordance with local laws.

Workers who form and/or join trade unions or other organizations shall not be discriminated against.

Workplace - Non-discrimination

Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, are made solely on the basis of the skill, ability, and performance of workers. Discrimination is not permitted on the basis of race, religion, gender, sexual orientation, age, political opinion, national extraction, or social origin.

Workplace - Wages and Hours of Work

Wages shall be provided at least equal to the applicable legal minimum wage. Overtime hours shall be paid at either the legally mandated premium or, in the absence of laws or agreements to that effect, at the same rate as regular hours worked.

Working hours shall reflect applicable legal norms. When overtime hours are required, every effort shall be made to minimize their impact on workers. In compliance with all local laws and regulations, every worker shall receive at least one day of rest during a seven-day work period.

Workplace – Harassment

Workers shall not be subjected to physical, verbal, sexual, or psychological harassment in the workplace.

Health and Safety

Anheuser-Busch InBev places a high priority on ensuring that its facilities are safe for workers, visitors, and for the communities in which they are located.

Anheuser-Busch InBev has an extensive safety and health program that encompasses all of our global operations, and we expect our business partners to have a similar focus. Such programs must have as their foundation compliance with applicable national/local laws relating to workplace health and safety. If such national/local laws do not meet minimum standards then responsible international standards need to be applied.

Additional elements should include:

- The provision of protective equipment to workers as needed in accordance with their job requirements and the goal of safe working conditions;
- The establishment of safety procedures and training programs for workers to ensure that they are aware of workplace hazards;
- The assessment, identification, and control of potential hazards and risks associated with equipment and processes; and,
- The monitoring and analysis of all accidents, and the keeping of accurate and timely records of accidents and injuries.

Environment

Anheuser-Busch InBev observes all applicable laws and regulations concerning the environment. We are committed to continually reviewing our policies to ensure their alignment with high standards of protection for the natural environment and to integrate environmental management into operational and training systems.

We will work with our service providers and share best practices.

We are committed to measuring and minimizing our impact on the environment, while maintaining our commitment to quality, and encourage a similar emphasis on the part of our business partners in 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.

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 in accordance with international, national or local regulations.

Community

Anheuser-Busch InBev works to support the communities in which we operate through the direct involvement and volunteer support of our employees, and in some cases, investment of financial resources. We strive to have a positive impact on communities and to build relationships with local organizations. Prosperous and healthy communities are central to our view of sustainable business, and we encourage our business partners to demonstrate a similar organizational commitment to engaging in a responsible and mutually beneficial way with local communities.

Bribery and Corruption and Conflicts of Interest

Anheuser-Busch InBev adheres to the highest standards of business integrity and ethics as well as respects and complies with all applicable national and supra-national laws and regulations.

We encourage our business partners to have policies and procedures in place to ensure that they meet the same ethical and legal standards.

Gifts and entertainment, other than those of nominal value, cannot be accepted without full disclosure as set out in the Anheuser-Busch InBev and AmBev Codes of Conduct and in accordance with local laws. Further, any understandings regarding benefits in exchange for such gifts are strictly forbidden. Employees must not pay bribes or make illicit payments in order to advance Anheuser-Busch InBev's interests and must, in the course of making business decisions and carrying out their job responsibilities, avoid conflicts of interest between personal interests and the interests of the company and its business objectives.

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 will have a similar level of commitment to fair competition.

Verification and Accountability

Anheuser-Busch InBev recognizes that our operations and those of our business partners encompass many different legal, political, cultural, economic, and social environments, and, therefore, we understand that the speed and extent of implementation by service providers of this Policy will necessarily vary.

Anheuser-Busch InBev pledges to work with our business partners to assist them in implementing the Policy, and in this regard, we will:

- Advise business partners of the content of the Policy;
- Annually evaluate the level of support;
- Assist with training and other best-practice sharing measures so our business partners have the opportunity to enhance their operations.

We encourage our business partners to undertake the following steps:

- Communicate the Policy to their employees and, where possible, throughout their supply chain;
- Conduct self-assessments against this Policy;
- Work with Anheuser-Busch InBev to evaluate performance against this Policy and take corrective action if concerns are found.