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Anheuser-Busch InBev Global Human Rights Policy

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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 Human Rights Policy (“Policy”) outlines our approach to overseeing human rights across our global operations and our value chain, including our employees, suppliers, contractors, retailers and consumers. AB InBev is committed to implementing this Policy in the course of existing business and in the assessment and development of new business opportunities.

2. OUR COMMITMENT

As a signatory to the United Nations (UN) Global Compact, we are committed to business practices that respect human rights and that align with various international standards of responsible business conduct. These include 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 Declaration on the Fundamental Principles and Rights at Work.⁴

The UN Guiding Principles on Business and Human Rights⁵ seek to implement the UN’s “Protect, Respect and Remedy” framework, which sets out the respective role of States and companies towards human rights. While protecting against human rights abuses is the responsibility of the State, companies bear responsibility under the Guiding Principles to respect human rights, to avoid contributing to adverse human rights impacts through their own activities and to seek to address adverse human rights impacts that are directly linked to their operations, products or business relationships. We recognise this responsibility both within our operations and our value chains.

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

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AB InBev’s Policy sets out standards, expectations and commitments in relation to our responsibility to respect human rights in our own operations, and to not knowingly contribute to violations of human rights by other parties. To that end, our commitment to human rights applies to all AB InBev operations and to full-time, part-time, and temporary AB InBev employees and independent contractors. It also applies to any subsidiaries or joint ventures where AB InBev has a majority interest or management control. In those instances where AB InBev does not have a majority interest or management control, we encourage our business partners to abide by the principles in this Policy. We also expect our suppliers to share our commitment to human rights.

Through our value chain we interact with a range of stakeholders including employees, distributors, retailers, farmers and local communities who could be impacted by our actions. We need to focus on those who are vulnerable or marginalized and therefore at greater risk of experiencing negative human rights impacts. We strive to build meaningful dialogue with relevant stakeholders to assess potential or actual human rights impacts.

3. LEGAL COMPLIANCE

We adhere to all applicable local, national, and supranational laws and regulations relating to and impacting the exercise of human rights. In those situations where there is no law or regulation covering a particular situation or where conflicts exist between AB InBev’s policies and such laws and regulations, we endeavor to operate in accordance with the principles of this Policy, while continuing to respect the laws and regulations of our host country. Should there be differences between the content of this Policy and national laws or other applicable standards, the more stringent requirements shall apply.

4. IMPLEMENTATION

AB InBev seeks to deliver positive human rights impacts through our business activities and contribute to the sustainable development of the communities in which we operate. The implementation of our human rights principles is coordinated with other relevant policies, including the AB InBev Code of Business Conduct, the AB InBev Anti-Corruption Policy, the AB InBev Global Responsible Sourcing Policy, the AB InBev Environmental Policy, the AB InBev Sanctions and Anti-Money Laundering Policy, AB InBev Responsible

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Drinking Policy, and the AB InBev Responsible Marketing & Communications Code. The Policy will be communicated in the appropriate language to all our employees and contractors through education and training programs in order to raise awareness of specific behaviors and actions that might lead to or result in human rights violations. All employees are expected to report activity that they believe is or might be a violation of this Policy to line managers or directly through the anonymous reporting mechanisms outlined in AB InBev’s Code of Business Conduct. These include an internet-based message interface (<http://talkopenly.ab-inbev.com>) that immediately notifies the Vice President, Compliance, Litigation & Antitrust, and the Vice President, Global Corporate Audit, as well as a toll-free whistle-blowing line, equipped with translation services, that is available 24/7. For a list of telephone numbers by country, please visit <https://secure.ethicspoint.com/domain/media/en/gui/13304/phone.html>.

This Policy has been approved by the Global Audit Committee. The Global Compliance Committee and Zone Compliance Committees, which include members of the Executive Board of Management, oversee implementation of this Policy.

5. ASSESSMENT

AB InBev will assess the compliance of its operating units with its human rights commitments by implementing risk-based human rights assessments, including impact assessments, self-assessment questionnaires and auditing protocols as appropriate. We engage with external stakeholders, including governments and suppliers, on issues that impact human rights and report on our efforts to support human rights in the context of the UN Global Compact principles annually via our Global Citizenship Report. To ensure its continued relevance and effectiveness, this Policy will be periodically reviewed and, when necessary, modified.

6. HUMAN RIGHTS PRINCIPLES

The following human rights principles are those which AB InBev considers the most significant within its realm of influence. AB InBev will monitor the compliance of its operating units with its human rights commitments by conducting risk-based due-diligence, monitoring and analyzing its grievance mechanisms, and conducting periodic human rights risk assessments as appropriate.

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7. CHILD LABOR

AB InBev prohibits the employment and exploitation of children within its facilities and will not engage in or support the use of child labor as defined by the ILO. 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.

8. FORCED LABOR AND FREEDOM OF MOVEMENT

AB InBev prohibits all forms of forced or compulsory labor and thus all employment relationships must be voluntary in nature. 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), workers are free to withdraw from the employment relationship with reasonable notice and are allowed to leave the work premises off-shift. AB InBev also prohibits the trafficking of persons, including arranging or facilitating the travel of another person with a view to that person being exploited.

9. FREEDOM OF ASSOCIATION

AB InBev supports the right of all its workers to form and join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. In addition, AB InBev does 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, AB InBev will 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.

10. DISCRIMINATION AND HARASSMENT

AB InBev prohibits all forms of discrimination based on, but not limited to, race, religion, gender, age, political opinion, national extraction, social origin,

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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. AB InBev prohibits all forms of physical, verbal, and written harassment, and will not engage in corporal punishment or take disciplinary-related deductions from workers' pay.

11. WORKING HOURS AND COMPENSATION/ADEQUATE STANDARD OF LIVING

AB InBev respects 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, and an annual leave period shall be provided to every employee regardless of whether or not it is mandated in local or national law. AB InBev strives 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.

AB InBev strives to provide employees with opportunities to develop their skills and capabilities and where possible opportunities for advancement.

12. WORKPLACE SAFETY AND HEALTH

AB InBev strives to ensure high standards of occupational health and safety throughout the organization, as articulated in our Health and Safety Policy. We strive to prevent all accidents, injuries and occupational illnesses within our operations through management leadership and employee involvement. We are committed to complying with all applicable health and safety laws and regulations, company standards and other requirements to which we subscribe and apply responsible standards where local laws and regulations may not meet our minimum standards.

13. SECURITY

AB InBev is committed to fostering and maintaining a secure workplace for all employees and protecting employees, visitors and assets with reasonable and responsible security systems, measures and procedures in all facilities and

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events. We recognize, and embrace, internationally recognized human rights standards and ensure compliance with all jurisdictional laws and regulations in the carrying out of our company’s security responsibilities.

14. WATER

We are committed to working in partnership with communities where we operate to understand and tackle risks to water and to helping provide access to water to communities in need.

15. LAND RIGHTS

AB InBev follows all applicable national laws relating to the rights of land and national resources. Land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. We also conduct due diligence around land rights and title during the development of new business opportunities.

16. COMMUNITY ENGAGEMENT AND OPERATIONAL-LEVEL GRIEVANCE MECHANISMS

In any instances where we have not met the standards set out in these principles, we will seek to put right whatever has gone wrong and mitigate any negative consequences. We recognize grievance mechanisms are an important channel for the provision of remedy, wherever negative human rights impacts may occur. We establish mechanisms for our employees to raise concerns freely without fear of action or retaliation. We use appropriate channels to build ongoing dialogue with employees, community members and relevant external stakeholders who may be impacted by our actions. Grievances may be filed via our internet-based message interface (<http://talkopenly.ab-inbev.com>) that immediately notifies the Vice President, Compliance, Litigation & Antitrust and the Vice President, Global Corporate Audit, as well as a toll-free whistle-blowing line, equipped with translation services, that is available 24/7. For a list of telephone numbers by country, please visit: <https://secure.ethicspoint.com/domain/media/en/gui/13304/phone.html>.

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Approved by:

Sabine Chalmers

Chief Legal Officer