

Anheuser-Busch InBev Global Human Rights Policy

At Anheuser-Busch InBev, we strive to be the Best Beer Company in a Better World by providing a portfolio of distinctive brands built on a foundation of responsible business practices, policies and commitments, and we recognize the responsibility of the business community to respect human rights.

Our Commitment

As a signatory to the United Nations (UN) Global Compact, we are committed to business practices that do not infringe on human rights and do align with various international standards of responsible business conduct, including the Universal Declaration of Human Rights¹ and the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work². AB InBev's Global Human Rights Policy ("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 the 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.

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.

Implementation

The implementation of this Policy 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 Responsible 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, Legal Global Compliance, 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.

Assessment

AB InBev will assess the compliance of its operating units with its human rights commitments by implementing due-diligence mechanisms, including self-assessment questionnaires and auditing protocols, as appropriate. We work to engage with external stakeholders, including governments and suppliers, on issues that impact human rights and reports 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, the Policy will be periodically reviewed and, when necessary, modified.

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¹ http://www.un.org/en/documents/udhr/

² http://www.ilo.org/declaration/lang--en/index.htm

Human Rights Principles

The following human rights principles are those which AB InBev considers the most significant within its realm of influence.

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, except for government-approved apprenticeship programs.

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 should not be required to relinquish identity papers, passports, or work permits as a condition of employment. Similarly, workers are free to withdraw from the employment relationship with reasonable notice and are allowed to leave the work premises off-shift.

FREEDOM OF ASSOCIATION

AB InBev supports the right of all its workers to form and join 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.

DISCRIMINATION AND HARASSMENT

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

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 shall generally 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.

WORKPLACE SAFETY AND HEALTH

AB InBev strives to ensure high standards of occupational health and safety throughout the organization. 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.

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 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.

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