

AB InBev's Commitment to Human Rights

At AB InBev, we Dream Big to Create a Future with More Cheers. We believe that respecting human rights is fundamental to creating healthy, thriving communities, and a sustainable business.

Human Rights | Our Four Pillars

As a business, we are committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs) across our operations and along the value chain. We do this by focusing on four pillars:

- Governance structure with oversight of Policies, Processes and Human Rights risks
- Identification of human rights impact of our business operations
- Training and communication to drive awareness across our operations and supply chain
- Grievance management

Human Rights Governance

Our Policy Landscape

Our Global Human Rights Policy, which is based on international frameworks including UNGPs, the International Labour Organization (ILO) fundamental conventions and was created through a process of internal and external stakeholder engagement and feedback. To cascade the principles of our [Human Rights Policy](#) throughout our value chain, we developed a [Global Responsible Sourcing Policy](#) and [Responsible Sourcing Principles for Farms](#) which applies to farmers within our direct agriculture programs. We have further embedded respect for human rights and relevant principles across our policy landscape through the following policies:

- [Responsible Marketing and Communications Code](#)
- [Diversity and Inclusion Policy](#)
- [Global Anti-Harassment and Anti-Discrimination Policy](#)
- [Global Health and Safety Policy](#)
- [Global Whistleblower Policy](#)

To see AB InBev's wider policy framework, [click here](#).

In addition to our Policies, we have made additional commitments to human rights as signatories of the [UN Global Compact](#) and the [Women's Empowerment Principles](#).

Governance Structure

The Audit Committee assists the Board in its responsibility for oversight of, among other things, the Company's compliance with legal and regulatory requirements and the Company's risk management function which includes oversight of human rights. The Audit Committee is regularly updated on the Company's performance of its anti-discrimination and anti-harassment policies. As a result of these presentations and the feedback and guidance from the Board of Directors, we revise our policy provisions and training curriculum for employees as needed.

In addition, we have a global cross-functional Human Rights Steering Committee to provide greater visibility and collaboration on human rights topics. The Steering Committee provides strategic direction and enhances the level of visibility of our progress on human rights throughout the business and value chain. It brings together leaders from our Supply and Procurement, Legal, Corporate Affairs, Sustainability, Security and People teams and is chaired by our Global Vice President for Corporate Affairs. This committee structure reflects our belief that human rights must be a shared focus across the business and should not be the responsibility of one function or Zone.

In our zones, our Compliance Committees are responsible for the governance of human rights. These committees are chaired by the Zone Presidents and bring together cross-functional leaders within the respective Zones.

Responsibility for human rights is shared across our functions, this is based on the role of the function or team within the business, geographic scope and relevant human rights issues. For example, the Ethics & Compliance and People teams are responsible for ensuring that the Policies are communicated to all employees and that employees within our operations consistently meet expectations of each Policy. This is achieved through regular trainings, human rights assessments, investigations into reports of potential negative human rights impacts, and remediation plans. Our Ethics & Compliance teams coordinate across our functions to support the embedding of human rights practices.

Members of the Global Legal Compliance and ESG teams have performance targets tied to progressing our human rights due diligence across our operations and value chain, furthering our understanding of salient human rights issues and building internal capacity on human rights. Our Global Sustainable Agriculture Director also holds targets related to living income for smallholder farmers. In addition, every Zone-level Compliance team in our business has regional accountability for the application of our Global Human Rights Policy. Zone Compliance Directors in high-risk geographies have performance targets linked to the completion of country-level human rights due diligence. Our D&I team also carry targets on human rights, linked to the development of guidance for consideration of vulnerable groups within our business decision making and due diligence processes. In our Supply function our Global and Zone Safety Directors carry targets on safety. In addition, safety is a core element of our management system, Voyager Plant Optimization (VPO). Safety contributes towards

the overall performance score for the zone and individual operations, and our teams carry targets on the overall score.

Identifying & Understanding Human Rights Impacts

Through the work of the Human Rights Steering Committee in 2021, we improved visibility into the areas where our operations and value chain could impact human rights. We conducted human rights risk assessments that helped us identify salient human rights issues and analyzed findings based on human rights due diligence processes, data from our grievance mechanism and input from stakeholders; including through NGO, union reports and bilateral engagements and projects. We also worked with each of our zone teams to conduct regional human rights assessments taking into consideration the context of our countries of operation. Output from these exercises contributed to our risk assessment process. We will continue to work to improve our process, including by engaging with external stakeholders. Working with Shift, a leading human rights organization, we have developed a country-level human rights due diligence model, which we are rolling out to our operations.

In 2021, we developed and launched a new supplier risk management process that integrates core risk areas within our supply chain, including human rights risks. Suppliers representing over 30% of our global procurement spend were included in the pilot phase of the process. We understand that risks can emerge at any time during a relationship, so to improve our visibility of emerging issues in our supply chain, we have adopted the use of digital tools that monitor our key suppliers and flag potential human rights and labor-related issues. To support the implementation of our new risk management processes, we have enhanced our contract clauses around human rights, aligning them more closely with the UNGPs and clarifying our expectations beyond first-tier suppliers. We require all suppliers and business partners to comply with our Responsible Sourcing Policy. We have visibility of all our first-tier suppliers and have further mapped high risk supply chains to farm level.

Training and Communication

Our Human Rights Policy is the foundation of our approach, and our policy has been translated into 11 languages to drive understanding of employees and contractors, as required. Our policies are shared with colleagues through internal communications channels, which includes employee onboarding processes, and e-learning modules for human rights that form part of our on-going training curriculum for our colleagues. In 2020, we rolled out our online human rights awareness training to all employees from manager level and above. We have since complemented this with issue specific trainings including on discrimination and harassment for all employees. Our Responsible Sourcing Policy, Responsible Sourcing Principles for Farms and Responsible Marketing and Communications Code are communicated to our business partners during the contracting process and are included in our contract clauses. We have also provided specific training for our raw materials team, including those working with suppliers and agronomy teams who work directly with farmers.

Our Compliance teams across all zones have been trained on key human rights principles and how they apply to our operations.

Grievance Management

When, despite our best efforts and intent, human rights issues emerge in our operations or our value chain, we are committed to taking prompt action to provide effective remedy and reviewing our processes to avoid recurrence. Our grievance mechanisms and reporting channels are available to all colleagues and business partners to raise human rights concerns or complaints, which supports our ability to identify and investigate potential human rights issues and to put in place relevant measures.

Under our Global Whistleblower Policy, no one may be restricted or impeded from exercising protected rights or otherwise disclosing information to law enforcement agencies, regulatory, or administrative agencies as permitted by law. Our Global Whistleblower Policy additionally reinforces our commitment to non-retaliation against those who raise concerns or complaints through our grievance mechanisms and channels. We also cooperate in good faith with state-based judicial and non-judicial mechanisms, which we believe can be an important part of the remedy actions.

In 2019, our team in India has worked in cooperation with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tourism, Tobacco and Allied Workers' Associations (IUF) through voluntary participation in a mediation process held in compliance with guidelines from the Organisation for Economic Co-operation and Development (OECD). Following the successful mediation, an amicable resolution was achieved in 2020. During 2021, we continued to implement the agreed actions with oversight from an independent third party. The final report can be found [here](#).

Stakeholder Engagement

We conduct regular engagements with stakeholders on issues identified through our human rights risk mapping. In addition, when we conduct human rights-assessments we identify stakeholders and experts within the community, including but not limited to farmers community members, local government, unions, cooperatives, medical or educational professionals; stakeholders are selected based on local context and issues. For example, we engaged with farmers, health workers, cooperatives, and teachers in our value chain in Brazil, Zambia, and Uganda to help with studies into the role of children on farms. We also engaged with farmers, cooperatives, local government, community leaders and NGO representatives to help study living income in Uganda.

Within our own operations, we engage employees through a variety of channels including our annual employee engagement survey which includes questions relating to anti-discrimination, respect in the workplace, fair compensation, D&I, health & safety and non-retaliation. Employees are encouraged to participate in the confidential survey, the results of which are reviewed by our Chiefs as well as leaders of teams, with the focus on identifying how to improve employees experience of working at AB InBev. More information on our employee engagement survey can be found in our [ESG report](#).

Our Work on Human Rights Issues

Safety

Our global safety team is committed to ensuring safe working conditions throughout the organization and embedding a culture where safety is not only a priority but a core value. Health and safety is central to our management system, Voyager Plant Optimization (VPO). VPO provides our teams and operations with a structure to embed safety and monitor performance. Health and safety risks are identified through a rigorous risk assessment process, which is supported by detailed procedures in our management system. This risk assessment process must identify specific hazards related to disability, gender or other factors which may impact safety considerations in order to define adequate risk mitigation measures. All zones are required to complete safety self-assessments in addition to audits that are conducted with our safety teams at least once every three years.

Our Supply function is accountable for overall health and safety performance within our own operations and have safety target setting processes and define safety strategies to be executed throughout the business. The Supply function closely monitors safety performance by holding monthly safety meetings and requiring detailed reports on strategy execution, severe incidents, fatalities, lost injury time (LTIs) and total recordable injuries (TRIs). To lead implementation of our health and safety program, we have a Global Safety Director for Supply and a Global Safety Director for Distribution, who are supported by Safety Directors in each of our zones with additional safety teams strategically deployed throughout each region.

In Europe, we have also taken steps to create more inclusive workplaces with the introduction of non-binary bathrooms in key office locations. In our breweries we are working to re-locate women's bathrooms so they are as accessible from the workplace as men's.

We aim to continually improve our safety performance. For more information on our safety performance, visit our [ESG report](#).

Circular Packaging

We ran an implementation pilot of our Social Impact in Circular Packaging Framework, focused on understanding the needs of informal recycling collectors, with our teams in Brazil and Mexico, supported by Oxfam Business Advisory Service. The aim was to identify potential vulnerable groups involved in our recycling supply chains, understand the issues that they potentially face and create impact roadmaps specific to the context of each program.

Agriculture

We worked with partners in 2021 to conduct research in our Brazil, Zambia, and Uganda sourcing regions. The results highlighted interconnections between poverty and low incomes with negative human rights impacts related to farm safety, the role of children on farms and the continued impact



of COVID-19 in farming communities. We are working to develop action plans around the findings. In partnership with the Sustainable Food Lab, we created a living income assessment tool for farms and used the tool in 2021 to conduct living income research with smallholder farmers in our Uganda barley sourcing regions.