

HUMAN RIGHTS POLICY



We respect the dignity and human rights of all people

WHY THIS POLICY?

At HEINEKEN we do business with respect for people's fundamental dignity and their human rights.

This is anchored in our:

- Values, reflected in 'We Are HEINEKEN'.
- Code of Business Conduct, the underlying policies, and the HEINEKEN Supplier Code.
- Commitment to international standards as listed below.

Our policy is aligned with the following international standards:

- The Universal Declaration of Human Rights.
- The Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO).
- The Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD).
- The United Nations (UN) Guiding Principles on Business and Human Rights.

This policy sets out ten standards for those human rights topics that HEINEKEN considers most significant.

These ten standards are based on a global identification of our 'salient' human rights issues in our Operating Companies (OpCos) and in their local value chains. The standards in relation to forced labour and respect for human rights in high risk contexts are based on external commitments we made. Our respect for human rights is not limited to these ten standards.

We expect our employees, our management, individuals working for HEINEKEN through a third party contract, our suppliers and business partners, to respect human rights in line with this policy and to ensure that our work complies with our Company's commitments to human rights.

Our Human rights Policy is the foundation to help us to understand, avoid and address human rights related risks.

OUR HUMAN RIGHTS STANDARDS

1. Health and safety

At HEINEKEN, people are at the heart of our Company. This means that we always put health and safety first. Nothing matters more than the safety of our people. Our Life Saving Rules cover our highest safety risks and these need to be strictly followed. The company undertakes to provide a safe and healthy working environment. We provide protective equipment and training and set rules and procedures to prevent accidents. We provide specific programs for road safety. Our employees and any other persons working directly or indirectly with us or visiting our sites, are responsible to behave safely and must always follow safety rules and procedures.



We care for the health and wellbeing of our employees and their families. We provide our employees access to medical care and establish or arrange employee healthcare programmes to provide basic healthcare in countries where this is lacking.

2. Non-discrimination

We respect cultural and individual diversity and promote inclusiveness. We treat people equally and fairly, based on the principle of non-discrimination, without distinction according but not limited to: race, colour, gender, sexual orientation, religion, national or social origin, age and disability. We employ, reward and promote based on the principle of equal opportunity. This means that we make employment decisions – including hiring, placement, promotion, development, training and compensation – based on factors such as qualifications, experience, performance, skills and potential.

3. No harassment and violence

A key aspect of safeguarding the personal dignity and equality of each employee is to ensure that harassment and violence, in whatever form, do not occur or are addressed adequately. We do not tolerate physical, verbal, sexual or psychological harassment, bullying, abuse or threats. We do not tolerate such acts in the workplace, nor in any work-related circumstance outside the workplace, such as work-related events.

4. Child protection

We respect the rights of the child as stated in the United Nations (UN) Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. We will not engage in, or allow, child labour within our facilities or in those of our suppliers. We are also committed to supporting the elimination of child labour in our value chain.

We follow the ILO definition of the minimum age for admission to employment or work. This age shall not be lower than the age of completion of compulsory schooling and in any case not be under 15 years of age, except in some countries, where it is 14. We comply with local law if it sets a higher age to define child labour.

5. Freedom of association and the right to collective bargaining

We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognised labour union, we will establish a constructive dialogue with this labour union. Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.

6. No forced labour

We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. This means that none of our employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by HEINEKEN. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.

7. Rest and leisure

We recognise the right to rest and leisure and will therefore always comply with local laws, regulations and local customs with regard to working hours, overtime and rest. We support a healthy balance between the working and private lives of our employees.

8. Fair wages and income

All of our employees should be paid sufficiently for a decent standard of living, enough to satisfy basic needs for the employee and his/her family. Where the local statutory minimum wage is non-existent or not sufficient to ensure a decent standard of living, we will pay our employees enough to meet this standard.

9. Access to water

We acknowledge the right to water as a basic human right. Our employees and others working on our sites need to have access to safe drinking water and sanitary facilities.

As part of our Brew a Better World sustainability programme, we work to reduce our consumption of water. This involves increasing water efficiency and treating waste water in our own facilities, as well as encouraging responsible water usage in our value chain. We focus our efforts on water-stressed areas, where we invest in water stewardship projects and engage with stakeholders for collective action.

10. Respect for human rights in high risk contexts

We recognise that we may face human rights dilemmas in countries that are politically less stable or where human rights are compromised. In such circumstances we critically review whether we can continue to operate in such countries, and if so, how. Our OpCos should never knowingly contribute to human rights violations by others.

We will always protect the security of our employees, their relatives and of our facilities. We work with security staff who are properly instructed and trained to respect human rights.

REMEDICATION AND GRIEVANCE PROCEDURES

Respect for human rights includes preventing human rights issues or addressing them at an early stage or to seek adequate remedy in case human rights are violated.

We promote an open feedback culture. Employees who observe or suspect a possible violation of these standards in our own operations or in the value chain are encouraged to report their concerns to their manager, to a colleague in the Human Resources or Legal function or to a Trusted Representative.

Our employees and all interested stakeholders can also report concerns through our internal Speak Up service, which can be reached online (<http://speakup.heineken.com>) or by phone through the Integrity Line in their country. All reporting is done confidentially and they can share their concerns anonymously (if allowed by the laws of their country) or not.

The logo consists of the words "SPEAK" and "UP" in a green, sans-serif font. "UP" is enclosed in a green speech bubble shape.

WHAT IF LOCAL LEGISLATION IS NOT IN LINE WITH OUR HUMAN RIGHTS POLICY?

The HEINEKEN Human rights Policy is a minimum standard. Where local legislation is stricter than this policy, our OpCos will adhere to the applicable stricter standards.

If obeying local law means that our employees or our OpCos cannot comply with the standards of this policy, the OpCos are expected to deal with this situation as follows:

- The OpCo must seek ways to honour the standards laid down in this policy and try to act according to these standards as much as possible, without violating local law;
- If an OpCo is aware of the risk to unwillingly contribute to or cause human rights violations, OpCo management should seek the advice of the Director Global Business Conduct and/or the Manager International Labour Relations.

WHAT ABOUT OUR SUPPLIERS AND OTHER BUSINESS PARTNERS?

Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.

We will also seek ways to engage relevant stakeholders in our value chain to respect the standards in this policy. It is more difficult to influence human rights issues further down and up our value chains. Despite this difficulty, it is our aim to contribute to respect for human rights by preventing or otherwise addressing human rights issues at our suppliers and further down and up the value chain.

We inform our business partners, such as joint venture partners, of our Code of Business Conduct and our Human rights Policy and encourage them to respect the standards laid down in these documents.

STAKEHOLDER ENGAGEMENT

We recognise that effective dialogue with relevant external stakeholders is an integral element of assessing our own human rights performance. We value the perspectives of affected stakeholders, in particular local communities. Their input helps to inform our approach to human rights on a global and local level.

IMPLEMENTATION

It is important to integrate and implement the HEINEKEN Human rights Policy and practices throughout all our OpCos in line with the United Nations Guiding Principles on Business and Human Rights. The implementation is supported with communication materials, translation of the policy in the relevant languages, online training, guidelines on how to implement this policy and human rights workshops in selected markets.

QUESTIONS AND FURTHER GUIDANCE

The Human Rights Guidance document provides further detailed guidance on how to apply this HEINEKEN Human rights Policy.

For questions and support you can contact the Manager International Labour Relations:

humanrights@heineken.com.

This Policy is effective as from 1 September 2018 and supersedes any previous policies.

