



Proudly part of  InBev

Anheuser-Busch InBev Global Whistleblower Policy

December 2019



Proudly part of Allindev

Contents

1.	Introduction	3
2.	How can reports be made?.....	3
3.	No retaliation	4
4.	How do we treat whistleblower reports?	5
5.	Legal compliance.....	5
6.	Data privacy.....	5





Proudly part of Anheuser-Busch

1. Introduction

Why do we need a whistleblower policy?

- 1.1 At Anheuser-Busch InBev SA/NV (“AB InBev” or the “Company”, including its subsidiaries and affiliates in which Anheuser-Busch InBev SA/NV has management control), we believe that the true measure of success is not just the results we achieve, but how we achieve them. For this reason, there should be no gap between what we say and what we do. A crucially important element of this is the commitment to an open culture where people feel secure in seeking advice and raising concerns.
- 1.2 We encourage you to speak up when you know or suspect that there has been a breach of applicable laws or regulations, AB InBev’s Code of Business Conduct or other Company policies, or where there has been a significant ethical lapse.
- 1.3 It may seem easier to keep silent or look the other way, but by speaking up, you could provide the Company with otherwise hidden information about illegal or unethical behavior that may introduce severe risks to our Company. Reporting does not necessarily have to involve wrongdoing around a specific bad actor but can entail reporting about a practice or procedure that you feel is inappropriate. And as owners, we should all take steps to protect the Company from these risks.
- 1.4 In addition, there are a few behaviors that the Company has deemed so important that it is **required** to be reported. For instance, managers have mandatory reporting obligations for sexual harassment allegations under our Global Anti-Discrimination and Anti-Harassment Policy. All colleagues and suppliers are required to report violations or potential violations of the Global Human Rights Policy.
- 1.5 In order to enable our colleagues and others to report their concerns through a safe and reliable means, AB InBev has implemented this policy, which outlines detailed procedures regarding the Company’s receipt, retention, and treatment of whistleblower reports. Subject to applicable laws, colleagues and others can submit whistleblower reports anonymously (meaning that the identity of the reporter will not be known by anyone) and/or confidentially (meaning that the identities disclosed and the reports received will only be known by a limited number of people – these who have a need to know for the investigation or remedial actions or under applicable laws). Individuals who make reports in good faith will be free from any retaliation or victimization for making the report.

Who are covered?

- 1.6 This policy applies to any person who uses the whistleblower channels described in this policy in good faith. However, certain provisions outlined in this policy are only applicable to our colleagues, as specified in the policy.

2. How can reports be made?

What channels can be used?

- 2.1 The easiest means to report under this policy is through our Compliance Helpline.
- 2.2 Our Compliance Helpline is a secure means of reporting, provided by an independent company. It is available anywhere in the world and 24/7, and you can file your report in your language.
- 2.3 To reach the Compliance Helpline, visit <http://talkopenly.ab-inbev.com> or call a toll-free number based on the country from which you are calling, which can be found on this website.
- 2.4 Besides, you can also report concerns in the following ways:
 - 2.4.1 directly to your line manager (if you feel comfortable doing so); or



2.4.2 directly to Global or Zone Legal or Ethics & Compliance teams.

2.5 Nothing in this policy in any way prohibits or is intended to restrict or impede colleagues from exercising protected rights or otherwise disclosing information to law enforcement agencies, regulatory, or administrative agencies as permitted by law.

3. No retaliation

3.1 AB InBev prohibits and will not tolerate any threatened or actual retaliation against any persons, or their legitimate representatives, who, in good faith, (i) raise concerns, (ii) formally or informally report to AB InBev, (iii) assist another colleague to report to AB InBev, or (iv) participate in an investigation or legally protected litigation regarding a report made under this policy.

3.2 Prohibited retaliation or victimization includes, but is not limited to, any form of adverse employment action, demotion, suspension, discipline, threats, intimidation or harassment.

3.3 Retaliation is reportable under this policy itself, which will result in disciplinary action, up to and including termination of employment. If you have been subject to any conduct that you believe constitutes retaliation, please immediately report the alleged retaliation following the guidance of this policy.

3.4 This policy does not excuse colleagues from the consequences of their own misconduct. For example, a colleague who makes a whistleblower report could still face disciplinary action for unrelated misconduct. Similarly, a colleague who self-reports misconduct can still be disciplined for the misconduct she or he has engaged in.

3.5 This policy also does not exempt colleagues who report under this policy from regular performance review, including the OPR process.

3.6 In addition, a party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

3.7 Similarly, any AB InBev colleagues who discourages or prevents another either from making such a report or seeking the help or assistance she or he needs to make such a report could be subject to disciplinary action.

3.8 Subject to applicable laws, reports can be made confidentially and/or anonymously.

Confidentiality

3.9 As a general rule, the Company will strive to maintain the confidentiality of whistleblowers or other individuals who provide information in the course of an investigation. Disclosure will only be made in certain circumstances to facilitate the investigation, take remedial action, or comply with applicable laws or regulations.

3.10 However, the Company cannot absolutely guarantee the confidentiality of the identity of the whistleblower, the allegation itself, or other participants to any investigation, as disclosure may be required under applicable laws or regulations, or may be made in the process of the investigation.

Anonymous reports

3.11 Subject to applicable laws and regulations, when using one of the reporting channels described in this policy, you are encouraged to identify yourself. However, anonymous reports can be made subject to applicable laws and regulations.

3.12 Making a report anonymously may affect that whistleblower's ability to receive feedback on the status of any investigation, if any, and may affect our ability to



Proudly part of Alcoa

investigate the matter or offer protection to the whistleblower. Anonymous whistleblowers are particularly encouraged to provide as much information and evidence as possible.

4. How do we treat whistleblower reports?

- 4.1 All reports made under this policy will be taken seriously and will be promptly and thoroughly investigated by the Global or Zone Ethics & Compliance teams, or by other teams under their supervision, in accordance with established Investigation Guidelines. In accordance with these rules, all line managers receiving a report covered under this policy should escalate the report through the Compliance Helpline or to the Global or Zone Ethics & Compliance teams.
- 4.2 The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation. If misconduct has been confirmed through an investigation, the Company will take prompt and appropriate remedial action proportionate to the seriousness of the misconduct, in accordance with its established procedures and practices, including the Investigation Guidelines. Such remedial action may include disciplinary action against the accused party, up to and including termination of employment. Reasonable and necessary steps will also be taken to prevent any further occurrence of misconduct.
- 4.3 All colleagues are expected to cooperate fully and honestly with any internal investigation. Any colleague who fails to cooperate (e.g. by not providing complete and truthful information or intentionally provides misleading information) will be subject to disciplinary action.
- 4.4 When possible and when determined appropriate, notice of the status of the investigation may be provided to the whistleblower. Given the sensitive nature of many investigations arising from whistleblower reports and certain limitations under applicable laws, we do not commit to providing whistleblowers with any update or the outcome of an investigation. Specific information will be provided on a case by case basis.
- 4.5 To the extent allowed or required by applicable laws, information reported may be communicated to public bodies or authorities competent for the prosecution of crimes. In doing so, the Company will strive to maintain the confidentiality of the identity of the whistleblower.
- 4.6 The Global Ethics & Compliance team will make periodic report to the Compliance Committee and/or Audit Committee on whistleblower reports received.

5. Legal compliance

- 5.1 This Policy seeks to establish global guidelines and provide the basis for developing local or Zone standards in consideration of applicable local laws, worker council and union agreements, and cultural norms. If any part of this Policy conflicts with applicable local laws (such as applicable data protection, labor and criminal laws), such applicable local laws must be followed.
- 5.2 In circumstances when there is a question as to whether this Policy can be followed, or whether there is a conflict between applicable local laws and this Policy, colleagues must seek guidance from Global or Zone Legal or Ethics & Compliance teams before taking action.

6. Data privacy

- 6.1 By making your report through the Compliance Helpline, you acknowledge and agree that AB InBev and our third party hotline operator may process, store and otherwise



Proudly part of  Alkermid

use the reported information as they deem appropriate to investigate and take appropriate action in response to your report, in accordance with applicable laws relating to data protection and whistleblower protection, and AB InBev's own policies.

- 6.2 To the extent it is required that additional information be provided to individuals affected by a particular whistleblowing procedure under applicable laws, the Company will comply with such requirements. However, in doing so, the Company may defer the provision of specific information to certain individuals in accordance with applicable laws. The Company will also strive to maintain confidentiality of the whistleblower to the extent applicable laws permit.
- 6.3 The Company may also use its data analytics tool to identify trends and levels of risks based on whistleblower reports. In doing so, the Company will primarily rely on data that does not contain any personal information