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## **1. INTRODUCTION**

- 1.1 AB InBev EfesEfes JSC, together with its direct and indirect subsidiaries, (collectively, “AB InBev EfesEfes”) has a zero-tolerance policy toward bribery and corrupt conduct in any form. Bribes, kickbacks, and other improper inducements involving public officials, customers, Business Partners, or all other counterparties are strictly prohibited. This prohibition includes “facilitation” payments (i.e., small payments made to a government official who performs routine, non-discretionary official duties).
- 1.2 This Business Partner Anti-Corruption Policy (“Policy”) applies to all parties, individuals and entities (who supply goods or services to AB InBev Efes, including third party suppliers that any Business Partner might engage in connection with its supply for AB InBev Efes (collectively, “Business Partners”).

## **2. PREVENTING BRIBERY**

- 2.1 In connection with goods or services provided to AB InBev Efes pursuant to any agreement, Business Partners must agree that none of their directors, officers, employees, affiliates, agents, and third parties they engage will offer, promise, authorize, give, solicit or accept bribes or kickbacks in any form.
- 2.2 Business Partners must, and must ensure that their directors, officers, employees and agents will:
  - 2.2.1 Comply with all applicable anti-corruption laws;
  - 2.2.2 Not directly or indirectly offer, promise, or authorize the payment of any money, advantage, or other thing of value to any persons (including any government officials, AB InBev Efes employees or representatives, or any other third parties) in order to secure an improper advantage;
  - 2.2.3 Not solicit, accept, or agree to accept any money, advantage, or other thing of value from an AB InBev Efes employee, director, officer, or any third party in exchange for an improper advantage;
  - 2.2.4 Not pay or provide anything of value to a third party where there is reason to suspect that all or part of the payment or thing of value may be provided to a person for an improper purpose;
  - 2.2.5 Not do anything to induce, assist, or permit someone else to violate these prohibitions.

## **3. ACCURATE BOOKS AND RECORDS**

- 3.1. Business Partners must keep accurate and complete books and records, including supporting documentation, relating to their business relationship with AB InBev Efes. Business Partners must maintain accurate, detailed, and itemized invoices, with receipts and other adequate supporting documentation for any fees or disbursements paid on behalf of the AB InBev Efes.

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#### **4. THIRD PARTIES**

- 4.1 Business Partners must conduct risk-based integrity due diligence on individuals or entities they engage who may interact with government officials in connection with their business relationship with AB InBev Efes. This diligence must be conducted prior to any engagement of any such third party and the records of such diligence must be maintained for at least five years after such engagement. A model due diligence questionnaire can be provided upon request. Business Partners must also require such third parties to comply with the principles contained in this Policy.

#### **5. TRANSPARENCY AND DISCLOSURE**

- 5.1 Subject to applicable laws, Business Partners must promptly disclose to AB InBev Efes the details of any allegations (including whistleblower reports), reports, or evidence of bribery or corruption (including demands for improper payments, regardless of whether any payment was made in response) that relate to their supply to AB InBev Efes. This includes the details of any notice, subpoena, legal demand, investigation, enforcement action, court proceeding, or other communication from any government authority concerning bribery or corruption.
- 5.2 Business Partners must also promptly disclose to AB InBev Efes if any of its owners, partners, officers, directors, employees, affiliates or agents is or will become an official or employee of any government, government agent, department or instrumentality (including state-owned enterprises), political party, or public international organization.
- 5.3 AB InBev Efes has the right to terminate or restrict relations with counterparties in a situation of identification of relationship with representatives of government bodies that were not properly disclosed and reported, as well as identified situations of bribery or other corrupt actions. AB InBev Efes reserves the right to withhold payments due to business partners or to return payments that were made as part of actions that violate the norms of anti-corruption legislation.
- 5.4 AB InBev Efes, if necessary and at its discretion, may periodically require from the Business Partners re-confirmation of certification, an element of the due diligence assessment program, in order to confirm that the counterparty has complied with the applicable anti-corruption laws, the provisions of this Policy and other contractual conditions over the process of implementing various initiatives on anti-corruption compliance.
- 5.5 If any Business Partner believes that it may have identified a bribery or corruption issue, or any other matter that requires disclosure, it should immediately submit a confidential report electronically through <http://talkopenly.ab-inbev.com>. Our Helpline is available 24/7 and is toll-free. It is available to everyone and able to report CONFIDENTIALLY and, if you choose, ANONYMOUSLY on any concern in relation to potential breaches of Anti-Corruption compliance. It is a secure means of reporting, provided by an independent company GAN Integrity. It is available anywhere in the world and you can file your report in your language by phone using a toll-free telephone number based on the country from which you are calling. A list of international numbers can be found by web. A confidential message can also be directed electronically via the website, this resource allows you to preserve the complete anonymity.

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## **6. COOPERATION**

- 6.1 Business Partners must cooperate fully with AB InBev Efes at their own expense in connection with any internal or government-led investigation, or review into their compliance with this Policy, or any potential bribery or corruption issues, relating to their supply to AB InBev Efes, including by appointing a representative with sufficient seniority and authority to respond to requests.

## **7. TRAINING**

- 7.1 Business Partners must provide appropriate training to their officers, directors, employees and business partners, and conduct sufficient monitoring of their activities to secure their compliance with this Policy. If a Business Partner needs assistance with such training, AB InBev Efes representatives may be able to assist. Business Partners must distribute this Policy to all officers, directors, employees or business partners who work on AB InBev Efes matters.

## **8. GIFTS AND HOSPITALITY**

- 8.1 By the provisions of this Policy, we notify our Business Partners that employees of the AB InBev Efes company are not allowed to accept anything of value including gifts of any nominal value. This rule applies, inter alia, to souvenirs, small gifts, signs of attention; gifts of gratitude, invitations to entertainment events and dinners, payment of travel from existing or potential business partners with whom the Company has concluded contracts or intends to enter into contractual relations, as well as gifts from representatives of government officials or other third parties, with which the Company is in business relations.
- 8.2 Gifts that cannot be returned to the gift giver for any reason, as well as received in connection with the participation or undertaking incentives by AB InBev Efes employees or in protocol events (conferences, seminars and other formats of meetings), business trips and other official events, must be transferred to Ethics and Compliance Department or the People Department of the company.
- 8.3 Business partners of the Company or other third parties involved, cannot pay the expenses for employees on business trips costs, recreational activities, including the organization of business dinners. The specified expenses incurred in the course of employees' duties maintenance are compensated by the company in accordance with local regulations governing the reimbursement of expenses in connection with a business trip in the form of advance reports or reports on hospitality expenses.
- 8.4 We draw the attention of our current and future business partners to the fact that receiving gifts by employees of the AB InBev Efes company is a violation of existing anti-corruption provisions; it creates conditions for a conflict of interest, casts doubt on the objectivity of decisions made by employees of the company, and entails liability under the provisions of internal documents and acting legislation.
- 8.5 We therefore call upon our current and future business partners to abandon the generally accepted standards of business etiquette, dictating the necessity to demonstrate attention, respect, loyalty and the development of partnerships through an act of gift.

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8.6 Any exclusion from the indicated provisions should be preliminary notified and agreed upon with representatives of the Ethics and Compliance department. If you have questions or doubts, you could contact the ethics and compliance department directly, using the email address [RU.Compliance@ab-inbev.com](mailto:RU.Compliance@ab-inbev.com).

## **9. CONSEQUENCES FOR VIOLATIONS**

- 9.1. If the AB InBev Efes receives a reasonable suspicion that the Business Partner has violated the provisions of this Policy, including situations in which the Business Partner does not maintain a proper level of transparency in disclosing incidents related to bribery or corruption, the AB InBev Efes company has the right to terminate or restrict business interaction with this counterparty, in particular by suspending payments or refunding any payments.
- 9.2. The AB InBev Efes company reserves the right to transmit information about any illegal activities to authorized law enforcement agencies.
- 9.3. Any employee found in violation of the provisions of this Policy may be subject to disciplinary action, which includes such aspects as a written or oral reprimand, removal from office, demotion or dismissal.