



SABMiller Human Rights Policy

Introduction

SABMiller learned early on that our growth depends on putting sustainable development at the heart of our approach to business. Our businesses are strongly rooted in their local communities: our suppliers, contractors, employees, retailers and consumers are all locally connected. When the society we are a part of thrives, our business thrives. The need to respect and promote human rights is central to this understanding.

The Conventions, principles and guidelines agreed internationally, including through UN agencies and processes, enable businesses to apply a consistent approach to human rights in countries with widely varying cultures, laws and norms across the world. The international human rights framework has emerged from a deep engagement by civil society, governments and businesses from within those diverse settings. SABMiller is committed to respecting the rights enshrined in this framework, as set out below. This policy is part of that commitment, and we are working hard to ensure that this policy (and the human rights principles within it), is applied throughout our operations and our value chain.

Our international commitments

SABMiller is a participant in the UN Global Compact. In line with the UN Guiding Principles on Business & Human Rights, we are committed to respecting internationally recognised human rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

In developing our approach, we draw on relevant guidance from the OECD Guidelines for Multinational Enterprises, the UN Women's Empowerment Principles, and the International Labour Organisation (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

The UN Guiding Principles on Business and Human Rights seek to implement the UN's 'Protect, Respect and Remedy' framework, which sets out the respective role of States and companies towards human rights. While protecting against human rights abuses is the responsibility of the State, companies have a clear responsibility under the Guiding Principles to respect human rights, to avoid contributing to adverse human rights impacts through its own activities and to seek to address adverse human rights impacts that are directly linked to their operations, products or services by their business relationships.

These documents have informed the SABMiller Human Rights Principles set out below, which were also shaped by internal and external consultation. SABMiller and its subsidiaries are committed to implementing the Human Rights Principles in the course of existing business and in the assessment and development of new business opportunities. For associates and joint ventures, SABMiller will promote the adoption of an approach consistent with the Human Rights Principles.



Where national law and international standards differ, we will follow the higher standard; except where they are in direct conflict, when we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

This policy is made available to all SABMiller employees via our website www.sabmiller.com

Our principles and guidelines

SABMiller seeks to deliver positive human rights impacts through our economic activities and contribute to the sustainable development of the communities within which we operate.

We recognise our responsibility to identify and seek to address potential or actual human rights impacts that are directly linked to our operations, products or services by our business relationships.

As a business, we interact with a wide range of stakeholders including employees, suppliers, distributors, retailers, farmers and members of local communities in which we operate. In particular, we need to focus on individuals or groups who may be at a heightened risk of being vulnerable or marginalised, including women, children, indigenous peoples, minority groups, persons with disabilities and/or migrant workers and their families. Where we operate in environments or situations where governance is weak, we recognise the need to assess specifically the potential or actual human rights impacts that this creates.

We are committed to respecting the human rights, including core labour standards, of both our employees and contractors in the workplace, and to promoting human rights within our value chain and in the communities of which we are a part. Those principles referring to employees will also be applied to contract workers and to any workers without a formal contract of employment.

In relation to our value chain, we expect our suppliers to follow our human rights principles to the same standards: further guidance for suppliers is set out in our Supplier Code of Conduct, and forms part of supplier contracts.

1. Freedom of association and recognition of the right of collective bargaining

We respect the rights of our employees to choose whether or not to form or join a lawful trade union, without fear of intimidation, reprisal or external pressure.

Guidance:

Where employees are represented by a sufficiently representative union, we will establish a genuine dialogue with freely chosen employee representatives, to enable both employees and management to understand each other's concerns and find ways to resolve them.

The collective bargaining process is a voluntary process that determines terms and conditions of work and establishes the effective working relationship between management, employees and unions. We engage in the collective bargaining process in good faith, and recognise the value of developing and maintaining harmonious labour relationships. SABMiller prohibits intimidation, harassment, retaliation and violence against union members and union representatives.



Where the right to freedom of association and collective bargaining is restricted under law in contravention of international human rights standards, SABMiller will seek ways to honour these rights by establishing alternative means of dialogue with employees.

We recognise that people can exercise their right to freedom of expression, association and peaceful assembly and there may be circumstances where some people protest against our business or its operations. In such cases, we seek to build dialogue with them and work with stakeholders to develop solutions.

2. Prohibition of Forced and Compulsory Labour

SABMiller prohibits all forms of slavery, whether in the form of forced and compulsory labour, prison labour, indentured labour, bonded labour, slave labour or any other non-voluntary labour. SABMiller also prohibits the trafficking of persons, including arranging or facilitating the travel of another person with a view to that person being exploited.

SABMiller is committed to expanding its process for monitoring and screening the conduct of its suppliers in this regard to ensure that their operations also meet the standards of its Human Rights Policy, including in relation to human trafficking, forced or compulsory labour.

Guidance:

Workers are not required to pay fees, lodge "deposits" or surrender their identity papers with our businesses. They are free to leave their employment after reasonable notice and free to leave work without restriction at the end of their daily shift. Workers are free to choose their own accommodation and are not obliged to stay at or pay for accommodation provided by the company.

3. Abolition of Child Labour

The use of child labour is strictly prohibited by SABMiller. Child labour, as defined by the ILO, refers to work that is mentally, physically, socially or morally harmful to children; or work that interferes with their schooling.

Guidance:

We adhere to minimum age provisions of national labour laws and regulations, and, where national law is insufficient, we take account of international standards. Young people under 18 are not to be employed at night or in hazardous conditions and must not be involved in the manufacture, packaging, marketing, distribution or sale of alcohol products. In addition, adequate and verifiable mechanisms are used for age verification in recruitment procedures.

We are aware that young people under 18 are entitled to work in certain defined and protected circumstances, as set out in the ILO conventions and within the limits of national law. We recognise that some participation in work by young people under 18 can be important to a family and can contribute positively to skills development. This is acceptable as long as it is conducted in line with the requirements of the ILO conventions and national law and adequate steps are taken to ensure that it does not negatively affect the health or personal development of the child and that it does not interfere with their schooling.



4. Intolerance of Discrimination

SABMiller is committed to supporting the principle of equal opportunities, and opposes all forms of unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic origin, sex, marital status, disability, part-time or fixed term status, parental responsibilities, age, religion/belief, gender reassignment, pregnancy and maternity or sexual orientation.

SABMiller takes seriously any allegation or suspicion of any form of discrimination as between any two employees or other workers.

Guidance:

SABMiller does not discriminate on any of these grounds in decisions on hiring, compensation, access to training, promotion, termination or retirement. In addition, we make reasonable accommodations in the employment of qualified people with disabilities.

We implement clear policies, processes and targets to ensure we both recruit and treat people fairly, and promote diversity across our organisation.

Employees with any concerns related to potential discrimination in the company's employment practices are encouraged to raise them through formally established processes and are assured that there will be no reprisal against anyone who raises such a concern.

5. Employees are Treated with Dignity and Respect

SABMiller does not permit any harsh or inhumane treatment of employees. All employees are expected to treat each other with dignity and respect. Harassment by an employee of another employee will not be permitted, tolerated or condoned and is an act of misconduct.

Guidance:

Physical, psychological or emotional abuse or discipline, the threat of physical abuse, sexual or other harassment, bullying, verbal abuse and all other forms of intimidation or inhuman or degrading treatment are prohibited.

6. Establishing Fair and Competitive Wages, Benefits and Working Hours

SABMiller compensates its employees fairly and appropriately for their contribution, in full compliance with minimum wage legislation and other applicable wage and working time laws.

Guidance:

Working hours must comply with national laws and benchmarked industry standards, whichever affords greater protection.

In countries where the legislated minimum wage is set below a level that is consistent with a decent standard of living for a worker and family, the company will aim to pay a wage that is at least sufficient to meet the basic needs of workers and their families. The company will also offer benefits, overtime pay and written information about pay (payslips) in line with



legal requirements. We will ensure that terms and conditions of employment are free from any forms of discrimination.

We also aim to offer employees opportunities to develop their skills and capabilities, and to provide advancement opportunities where possible.

7. Providing Safe and Healthy Work Environments

SABMiller strives to provide safe and healthy work environments for its employees. Our global health and safety programme, Safety Around Beverages, sets out minimum standards to which all businesses should adhere.

Guidance:

At a minimum, these meet legal requirements, including in relation to the frequency of checks, reviews and inspections. Every reasonable effort is made to ensure that risks of accidents, injury, and exposure to health risks are minimised.

We seek to maintain a work environment free from violence, threats, harassment, intimidation, and other disruptive behaviour. We recognise that providing a safe and healthy work environment is fundamental both to productivity and to quality of life.

Employees receive regular and recorded health and safety training, and this training is repeated for new or reassigned employees. Responsibility for health and safety is assigned to a senior management representative.

8. Employee Security

We seek to provide a secure work environment, where employees are not encumbered by concerns for their personal safety or security due to internal or external threats.

We adhere to relevant national laws and international standards in carrying out our security responsibilities.

We seek to ensure that maintaining the security of our employees and operations does not harm the safety or security of local community members and other third parties, or undermine our respect for their human rights.

Guidance:

To ensure the safety of employees, security safeguards are provided as needed, through both collective bargaining agreements and local company policies and practices. These safeguards must not jeopardise the safety or security of third parties.

9. Water

We are committed to working in partnership with local communities where we operate to understand and tackle risks to water and to secure shared water supplies so that community members have uninterrupted access to safe, clean water



Guidance:

Within Prosper, we are working towards a resilient world where our business, local communities and ecosystems share uninterrupted access to safe, clean water. Implementing this principle calls for effective implementation of our approach to understanding and managing water risk.

10. Land Rights within our Value Chain

SABMiller follows all applicable national laws relating to the rights of land and national resources. Land acquisitions are made respecting the rights of individuals and communities impacted.

In contexts where land ownership and governance structures are weak or undefined, we seek to strengthen the land rights of people and communities affected by or otherwise part of our supply chain.

Guidance:

Our operations who own, acquire or control land are required to respect land rights in line with the FAO Voluntary Guidelines on the Responsible Governance of Tenure by:

- a) Demonstrating legal or customary ownership or land use rights.
- b) Obtaining the free, prior and informed consent of all affected communities before acquiring or developing land.
- c) Putting in place a grievance mechanism to resolve disputes over land ownership.

SABMiller aims to strengthen land rights by developing a global approach to due diligence in this area, improving processes for consulting with affected communities and helping smallholder farmers in its supply chain to obtain legal title or secure access to their land.

We follow all applicable laws in relation to acquiring land and demonstrating land ownership in the case of any threats or disputes.

We seek to work with governments, companies, suppliers, farmers and communities to improve the recognition and effectiveness of land rights and promote security of tenure for women who may be particularly vulnerable in certain contexts.

11. Community Engagement and Operational-Level Grievance Mechanisms

In any instances where we have fallen short of the standards set out in these principles, we will seek to put right whatever has gone wrong and mitigate any negative consequences. We recognise grievance mechanisms are an important channel for the provision of remedy, wherever negative human rights impacts may occur. We establish mechanisms for our employees to raise concerns freely without fear of action or retaliation. We use appropriate channels to build ongoing dialogue with employees, community members and relevant external stakeholders who may be impacted by our actions.



Guidance:

Approaches to remedy will be developed in consultation with employees, the local community and, where appropriate, any other interested party. Should any human rights allegations be lodged against the company, SABMiller will engage with those who are making the allegation to understand the issue, will investigate internally, will co-operate fully with any external investigation and will take appropriate measures to provide remedy where needed.

How we make sure these principles and guidelines are followed in practice

The SABMiller Executive Committee is responsible for approving our policy on human rights, and ensuring implementation. Oversight is provided by the Board Corporate Accountability and Risk Assurance Committee.

The Sustainable Development (SD) team is responsible for informing policy and guiding strategy on human rights in the context of: emerging external best practice; actively engaging with stakeholder and civil society concerns; and global policy dialogues. The SD team is responsible for collecting and reporting the group's performance externally, including data, case studies, targets and goals. The team also develops risk evaluation tools and guidelines to enable our businesses to apply the principles of the human rights policy within widely differing contexts.

The Managing Director of each business is responsible for implementing the Human Rights Principles within our operations and value chain on a local level, including integration into business planning

The Group Human Resources function and the Human Resources Executive Forum review the management of human rights issues within the group's operations, recommending changes to procedures where necessary to enable improved due diligence and implementation and helping to provide effective remedy where human rights impacts occur

Regional Hub Human Resources Directors are responsible for ensuring that the Human Rights Principles and relevant tools are rolled out to all operations and, where relevant, integrated into hub business planning.

The Head of Procurement Sustainability is responsible for application of the human rights policy within our supplier base, by ensuring suppliers are aware of and committed to our principles.