




Modern Slavery Statement 2021

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the approach taken by HEINEKEN UK Limited and its group companies during the year ending 31st December 2021 to prevent modern slavery in its business and supply chains.

This statement applies to all HEINEKEN UK Limited group companies. At the time of publication the following group companies meet the reporting threshold contained in the Modern Slavery Act 2015:

HEINEKEN UK Limited
Red Star Pub Company (WR III) Ltd
Punch Partnerships (PTL) Ltd

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Name: Lynsey Nicoll

Function: Director of Legal Affairs

Date: 30th June 2022

What is Modern Slavery?

Modern slavery describes situations where someone is being exploited and controlled by a person or organisation, without the ability to leave or change their situation, such as forced labour, debt bondage or bonded labour, human trafficking and child slavery. It can affect people of any age, gender or race. Most commonly, slavery affects people and communities who are vulnerable to being taken advantage of.

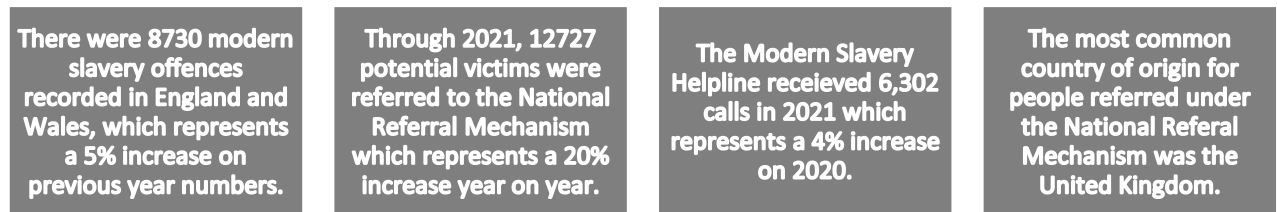
HEINEKEN UK is committed to the highest standards of business conduct, ethical behaviour and integrity throughout its business. We have adopted a zero-tolerance approach to modern slavery in our organisation and are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or within our wider supply chain network.

Modern Slavery World Wide



[International Labour Organization - Global Estimates of Modern Slavery: Forced Labour and Forced Marriage Report](#)

Modern Slavery in the UK

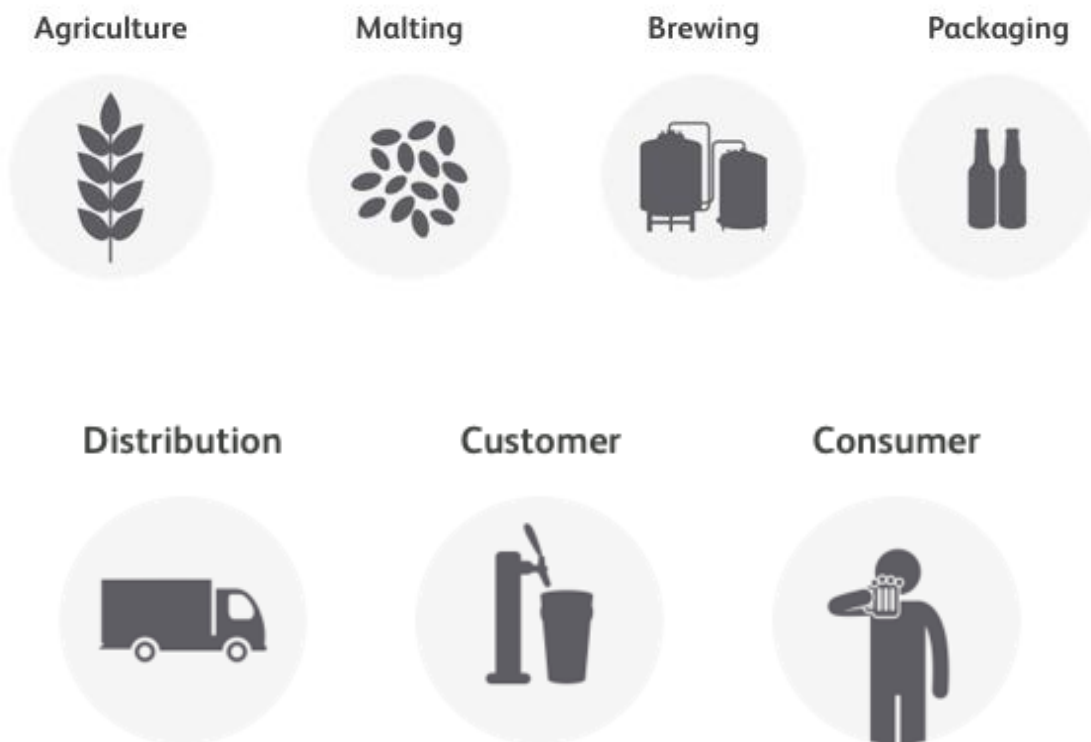


[Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2021 - GOV.UK \(www.gov.uk\)](#)
[2021 UK Annual Report on Modern Slavery \(accessible version\) - GOV.UK \(www.gov.uk\)](#)
[Unseen-Helpline-Annual-Assessment 2021-FINAL.pdf \(unseenuk.org\)](#)

Our Business and Supply Chain

We are the UK's leading pub, cider and beer business and the name behind iconic drinks brands such as Strongbow, Bulmers, Heineken, Foster's, John Smith's, Birra Moretti and Desperados, together with a full range of speciality brands. We employ 2,236 people in the UK and have breweries, cider plants and offices in Edinburgh, Tadcaster, Manchester, London, Hereford and Ledbury. We also own a nationwide pub estate of 2,417 outlets.

Our end-to-end supply chain comprises many different elements:



We work with suppliers across our brewing, logistics and commercial operations, including sales and marketing. We recognise that there is always a risk of modern slavery occurring in our supply chain and have taken steps to understand and to mitigate those risks (as further detailed below).

Our Human Rights Policy

Respect for human rights is embedded throughout our business. Our Human Rights policy has been in place since 2012 as part of our [Code of Business Conduct](#) which applies across the entire worldwide HEINEKEN organisation.

Our policy is aligned with international standards including 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) of 2010, and the United Nations (UN) Guiding Principles on Business and Human Rights, and incorporates the following 10 key human rights standards as a foundation to help us to understand, avoid and address human rights-related risks:

- Health and safety
- No forced labour
- Child protection
- Rest and leisure
- Access to water
- Non-discrimination
- No harassment and violence
- Freedom of association and collective bargaining
- Fair wages and income
- Respect for human rights in high risk contexts

Our Human Rights Policy can be viewed [here](#).

Risk Management

In order to comply with the high standards we have set for our business and supply chain, we are constantly reviewing and assessing our processes. We take a risk based approach to identifying and eradicating modern slavery and human rights abuses. Some of the measures we adopt are set out below.

A. Supplier Code and Brew a Better World

We require all of our suppliers to abide by our Supplier Code which outlines the key behaviours we expect of our suppliers, including ensuring safe working practices, fairly remunerating employees, and complying with the standards set by the International Labour Organisation. Suppliers must confirm that they will agree to abide by our Supplier Code before they are permitted to enter into the tender process.

One of HEINEKEN'S Brew a Better World commitments is to ensure fair and safe workplaces. Beyond our direct employees, HEINEKEN continues its work to ensure fair living and working standards for third party employees in line with its commitment to the [Consumer Good Forum Human Rights Coalition](#).

B. Risk Assessing Third Parties

In 2021, HEINEKEN deployed a new third party due diligence programme called SHINE which is used to assess all new suppliers for the HEINEKEN UK business. SHINE is designed to identify, assess and remediate risks and automatically performs instant due diligence on suppliers across over 50 risk categories that include sanctions, watchlists and enforcements, corruption, human rights violations, terrorism and trafficking. A report and risk rating are assigned to each supplier and these are then reviewed by our internal compliance teams to ensure that appropriate actions are taken. The SHINE tool monitors suppliers on a real time basis to ensure that we only do business with suppliers who share our values and commitments to responsible business conduct. In the event of a supplier being deemed a risk, alerts are issued to our Procurement department, our Legal Director and our Head of Assurance, Risk and Compliance to review and take appropriate action.

C. Speak Up Policy

We have embedded a [Speak Up](#) policy across the HEINEKEN organisation. If anyone (whether it be an employee, supplier, customer or consumer) has a concern about a possible violation of our Code of Business Conduct, including any of the underlying policies, they can report their concerns anonymously online or over the phone. We actively promote our Speak Up policy across the organisation and encourage individuals to report any concerns, including any possible human rights violations, through this channel.

Ongoing Activities specific to HEINEKEN UK

Set out below are some of the actions and events that have taken place in 2021.

Brand Promoters Policy

As part of our commitment to human rights, we have embedded our Brand Promoters Policy across the organisation. Mandatory training for all Commerce, Procurement and HR employees has been rolled out. The Brand Promoters Policy outlines key principles that we expect any supplier who engages brand promoters (defined as those that provide samples, serve or sell drinks in bars, restaurants, shops or at events on behalf of HEINEKEN UK) to adhere to, such as:

- ensuring the safety of Brand Promoters at all times;
- providing support to Brand Promoters and making them aware of our Speak Up policy; and
- requiring Brand Promoters to complete mandatory training provided by HEINEKEN so that they are clear on what is and what is not expected of them acting on behalf of the Company.

Mandatory Training

HEINEKEN UK runs an annual mandatory training program on its Code of Business Conduct, which incorporates its Human Rights policy, and a range of underlying policies that include Anti Bribery and Corruption, Competition Law, Data Privacy and Fraud Awareness. All HEINEKEN UK colleagues are required to complete training on our Code of Business Conduct to ensure that colleagues are familiar with their responsibilities regarding respecting people and the planet and conducting business with integrity and fairness.

Chartered Institute of Procurement and Supply (CIPS) Ethics Course

In 2021, all Procurement personnel in our organisation successfully completed the [CIPS Ethics Course](#). The course covered a wide range of human rights and ethical topics, including:

- Corruption, fraud, bribery and exploitation;
- Human rights and forced labour in supply chains;
- Ethics and transparency in procurement; and
- Environmental awareness.

Our certification is noted in the [CIPS Corporate Ethics Register](#) and we have been awarded an Ethics Kite Mark from CIPS. The certification and the training will be renewed and updated annually.

Wider Industry Engagement

We have engaged with other industry leaders to discuss what precautions they are taking to ensure that their organisations remain free of modern slavery and other abuses of human rights. We believe that modern slavery is best tackled with a collaborative approach from the industry as a whole.

We are committed to continuing to work with our peers and competitors to stay on top of what is considered best practice and to share in each other's learnings as to how to eradicate modern slavery from our business and supply chains.

Assessment of Effectiveness

This statement constitutes our modern slavery statement for the financial year ending 31 December 2021. We will continue to assess the effectiveness of the measures we take and we regularly review and refine our policies and procedures in relation to modern slavery and human rights.

This statement has been approved by the Management Team of HEINEKEN UK Limited. A revised statement, detailing the steps taken and improvements made, will be published on our website each year at www.heineken.co.uk.