

## Asahi Breweries Europe Group (“ABE Group”) Anti-Bribery Policy - Supplier version

Issue Date: 1 December 2017

### Introduction

Asahi Breweries Europe Ltd. (“ABEL”) is a holding company for various entities. Together with such entities ABEL forms the ABE Group. The ABE Group has an utmost interest to the set standards of integrity and business ethics within the ABE Group.

**We are committed to conducting our business responsibly and in accordance with the highest legal and ethical standards. Operating transparently and ethically is not only the right thing to do, it is the right thing for business.**

ABE Group’s Code of Business Conduct and Ethics states that *“We do not permit the direct or indirect offer, payment, solicitation or acceptance of any improper payments (for example bribes or illegal gratuities) in any form”*.

Most countries in which ABE Group operates have laws that prohibit improper payments, such as bribes. An increasing number of countries have also adopted laws that prohibit bribery even when it is committed outside these countries’ own borders (particularly in the case of payments to public officials). Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties.

### To whom does this policy apply?

This policy applies to all suppliers of ABE Group or its subsidiaries and sets out the minimum standards to which they must adhere at all times.

### What is bribery?

Bribery can be described as the giving to or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business or any other benefit. Bribery can take place in the public sector (e.g. bribing a public official) or private sector (e.g. bribing the employee of a customer). Bribery can also take place where an improper payment is made by or through a third party.

Bribes and kickbacks can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses
- payments, whether by employees or business partners such as agents, introducers or consultants
- other ‘favours’ provided to public officials or customers, such as engaging a company owned by a member of a public official’s or customer’s family
- the uncompensated use of company services, facilities or property

### Our policy on bribery:

#### (i) General

*No supplier is permitted to pay or offer a bribe in any form on behalf of ABE Group. You must never, whilst involved in work for ABE Group:*

- **Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to ABE Group.** "Public official" should be understood very widely, and broadly means anyone paid directly or indirectly by the government or performing a public function, including officials of state owned enterprises and public international organisations.
- **Attempt to induce a public official, whether local or foreign, to do something illegal or unethical. Pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official.** You should therefore be careful when selecting third parties, such as agents and consultants (see guidance below).
- **Establish an unrecorded ('slush') fund for any purpose.**
- **Otherwise use illegal or improper means** (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or offering anything of value when you know it would be **contrary to the rules of the recipient's organisation** for the recipient to accept it.
- **Do anything to induce, assist or permit someone else to violate these rules.**
- **Ignore, or fail to report, any suggestion of a bribe.**

As well as complying with the specific prohibitions in this Policy, suppliers must exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.

## **(ii) Facilitation payments**

• ABE Group's policy is that so-called "facilitation" or "grease" payments are prohibited. Such payments should not be made to public officials, even if they are nominal in amount and/or common in a particular country.

## **(iii) Agents and Sub-contractors**

- Suppliers should not sub-contract their work for ABE Group to any party who they have reason to suspect will pay bribes on ABE Group's behalf.
- Suppliers should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of ABE Group. All fees and expenses paid to third parties should represent appropriate and justifiable remuneration for legitimate services to be provided. Accurate financial records of all payments in relation to ABE Group's business must be kept.

## **Reporting of bribery and suspicious activity**

*If suppliers become aware of any actual or suspected breach of this Policy, they should report this to their usual ABE Group contact or, if that is not appropriate, to the ABE Group whistleblowing helpline or to the Head of Legal, ABEL and to the Head of Internal Audit, ABEL.*

Processes are in place to ensure that such complaints are investigated and appropriate action is taken.

## **Contacts**

Whistleblowing hotline:

**CZ: 800 142 428**

**SK: 0800 004461**

**PL: 00800 442 1245**

**HU: 06800 14863**

**RO: 08008 94440**

**S Korea: 00308 442 0074**

<https://wrs.expolink.co.uk/asahibreweries>

Owner:  Tomáš Krčil	Finance Director:  Andrew Bailey	Approver/Issued by:  ABEL Board	Documentation Administrator:	Effective from:  1.12.2017
Signature:	Signature:	Signature:	Signature:	
<b>Revision</b>				
No.	Date:	Change description:	Revised by:	