



## **I. PURPOSE**

At Anheuser-Busch InBev SA/NV (the “Company”, including its subsidiaries and affiliates in which Anheuser-Busch InBev SA/NV has management control), we dream big to create a future with more cheers, building a company to last on a foundation of responsible business practices, policies, and commitments. This Global Human Rights Policy (“Policy”) outlines the Company’s approach to respecting human rights. In developing this Policy, AB InBev consulted with both internal and external stakeholders.

## **II. POLICY**

### **A. Our Commitment**

The Company is committed to respecting human rights across our global operations and our value chain through the implementation of the UN Guiding Principles on Business and Human Rights. In addition, our Policy commitments are further based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Convention on Civil and Political Rights (“ICCPR”) and the International Covenant on Economic, Social and Cultural Rights (“ICESCR”), in addition to the International Labor Organization’s (“ILO”) Declaration on the Fundamental Principles and Rights at Work, the Children’s Rights and Business Principles, the UN Declaration on the Rights of Indigenous Peoples, the International Convention on the Elimination of All Forms of Racial Discrimination, and the Voluntary Principles on Security and Human Rights.

### **B. Legal Compliance**

We adhere to all applicable local, national, and international laws and regulations relating to and impacting the exercise of human rights. In those situations where there is no law or regulation covering a particular situation or where conflicts exist between the Company’s policies and such laws and regulations, we endeavor to operate in accordance with the principles of this Policy, while continuing to respect the laws and regulations of the host country. Should there be differences between the content of this Policy and national laws or other applicable standards, the more stringent standard shall apply<sup>1</sup>. In circumstances when there is a question as to whether this Policy can be followed, or there is a conflict between applicable law and these standards, colleagues must seek guidance from the local Ethics & Compliance team before taking action.

---

<sup>1</sup> Zones can apply to the Global Ethics & Compliance Committee for exceptions from this standard on a case by case basis (e.g., to adhere to local law or labor agreements).



### C. Human Rights Principles

The following human rights principles are based on international frameworks and are those that the Company considers to be the most salient.

#### 1. Child Labor and Young People

The Company prohibits the employment and exploitation of children within its facilities and will not engage in or support the use of child labor as defined by the ILO, which is work that is mentally, physically, socially or morally harmful to children, or work that interferes with their schooling. This includes depriving children of the opportunity to attend school, obliging children to leave education prematurely or requiring them to combine school attendance with excessively long hours. The Company will take reasonable steps to verify the age of job applicants and workers in its own operations.

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. We are aware that per the ILO guidelines, young people with a minimum age of 15 are entitled to work in certain defined and protected circumstances, such as government-approved apprenticeship programs. The Company will take steps to verify that the work conditions for any employment of young people under 18 meets the requirements of ILO conventions and applicable laws, as well as endeavor to ensure that adequate procedures and processes are in place to reduce and mitigate risks of issues that could affect young people and children in the workplace.

#### 2. Forced Labor and Freedom of Movement

The Company prohibits all forms of forced or compulsory labor and thus all employment relationships must be voluntary in nature. The use of prison labor or indentured or bonded labor is strictly forbidden, and workers must not be required to relinquish identity papers, passports, or work permits as a condition of employment. Workers must not be obligated to work overtime. Workers also must not be required to lodge deposits or pay recruitment fees to the Company or any recruitment agent working on behalf of the Company.

Workers are free to withdraw from the employment relationship with reasonable notice and are allowed to leave the work premises off working hours. Workers should receive payment for work regularly, in full and on time and should have access to a pay slip, which should be communicated in writing in a language that workers understand, explaining their wage and any deductions.



The Company also prohibits the trafficking of persons, including arranging or facilitating the travel of another person with a view to that person being exploited.

3. **Freedom of Association**

The Company respects the right of all its workers to form and join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests.

The Company does not discriminate in any way against workers that choose to form or join trade unions, or against those workers that choose not to form or join trade unions. In those countries or situations in which the legal system prohibits or severely restricts the right of freedom of association, the Company will support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers' interests and communication between workers and management.

4. **Working Hours and Compensation/Adequate Standard of Living**

The Company respects the need for workers to have a balance between work and leisure. Working hours and overtime shall comply with applicable wage, work hours, overtime and benefits laws and regulations and local labor agreements. All workers will receive at least one continuous 24-hour rest period during a seven-day work period, and an annual leave period shall be provided to every employee regardless of whether or not it is mandated in local or national law. The Company strives to provide workers with a pay and benefits package that supports an adequate standard of living. Wages and benefits shall be equal or superior to the applicable minimum legal and regulatory requirements. During or prior to onboarding, Company employees will be provided with the terms and conditions of their employment.

5. **Discrimination and Harassment**

The Company prohibits all forms of discrimination based on, but not limited to, race, religion, culture, gender, age, political opinion, national origin or extraction, social origin, pregnancy and maternity, sexual orientation, gender identity or expression, or any other arbitrary means. Hiring and employment decisions, including those related to compensation, benefits, promotion, training, discipline, and termination, are made solely on the basis of the skill, ability, and performance of workers. Nothing in this Policy



should be interpreted against laws related to affirmative actions.

The Company prohibits all forms of physical, verbal, and written harassment, and will not engage in corporal punishment or take disciplinary-related deductions from workers' pay. All Company employees and personnel are subject to our Global Anti-Harassment & Anti-Discrimination Policy, which outlines in greater detail the Company's expectations and available grievance mechanisms with respect to these issues.

6. **Workplace Health and Safety**

The Company strives to ensure high standards of occupational health and safety throughout the organization, as articulated in our Health and Safety Policy. We strive to prevent all accidents, injuries and occupational illnesses within our operations through management leadership and employee involvement. We are committed to complying with all applicable health and safety laws and regulations, company standards and other requirements to which we subscribe and apply international best practice where local laws and regulations may not meet our minimum standards.

7. **Security**

The Company is committed to fostering and maintaining a secure workplace and protecting all authorized individuals on our premises with reasonable and responsible security systems, measures and procedures in all facilities and events. The Company periodically conducts security risk assessments to identify and address security risks. Each Zone must comply with all relevant laws and regulations in carrying out the Company's security responsibilities. In addition, we expect all security providers to respect human rights and follow relevant industry practices on human rights.

8. **Environment**

The Company believes that a clean and healthy environment is essential for sustainable economic growth and human development. We are committed to working in partnership with communities where we operate to understand and take reasonable approaches to managing natural resources, including water, and to helping provide access to natural resources such as water to communities in need. The Company also observes all applicable laws and regulations concerning the environment. Additional information is available in our Environmental Policy.

9. **Land Rights**

The Company endeavors to follow international standards as well as all applicable national laws relating to the rights of land and national resources ensuring land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. We conduct due diligence around land rights and title during the development of new business opportunities. We seek to secure free, prior, and informed consent.

**D. Independent Contractors and Temporary Workers**

We recognize the Company has responsibility to ensure safe, secure, environmentally sound, and harassment and discrimination-free working conditions for not only our employees but in many cases for temporary workers and independent contractors as well. Temporary workers and independent workers include all individuals who are non- employees and are directly contracted to provide services to the Company.

For the avoidance of doubt, sections of this Policy relating to working conditions apply fully to the working conditions of temporary workers and independent contractors while (i) working on AB InBev premises and (ii) all such workers and contractors over whom an AB InBev colleague exercises supervisory authority, whether or not the work is completed on Company premises<sup>2</sup>. The Grievance Mechanism and Non-Retaliation Provisions of this Policy also apply to temporary workers and independent contractors, and they are encouraged to raise claims through the [Compliance Helpline](#) or other available means as described in this Policy.

**E. Stakeholder and Community Engagement**

The Company believes that engaging with affected and potentially affected stakeholders is critical for building and maintaining a robust human rights approach. We are committed to engaging in meaningful dialogue with stakeholders to assess potential or actual human rights impacts, or their legitimate representatives. We use appropriate channels to build ongoing dialogue with employees, community members and relevant external stakeholders who may be impacted by our actions.

We also recognize the need to take special consideration of those who are vulnerable or marginalized and potentially at greater risk of experiencing negative

---

<sup>2</sup> The Responsible Sourcing Policy governs issues concerning payment, compensation and other concerns around the engagement of independent contractors and temporary workers and therefore in effect replaces those parts of this Policy for those workers.



human rights impacts. The Company also believes that stakeholder engagement is important when this Policy is periodically updated, and when the Company undertakes periodic human rights risk assessments.

#### **F. Grievance Mechanisms and Non-Retaliation**

We recognize that effective grievance mechanisms are an important channel to provide access to remedy. Where we have caused or contributed to an impact, we are committed to providing or facilitating access to remedy. The Company will strive to ensure that our grievance mechanisms follow the effectiveness criteria of the UNGPs.

As part of this commitment, the Company requires that any violations of this Policy be reported through one of the available reporting channels as described in Section V – Reporting Misconduct.

The Company has a zero-tolerance policy toward any threatened or actual retaliation against any and all persons, or their legitimate representatives, who, in good faith, (i) raises concerns, (ii) formally or informally reports to the Company, (iii) assists another colleague to report to the Company, or (iv) participate in an investigation or litigation regarding a possible violation of this Policy.

Questions about this Policy may also be made online through AB InBev's Compliance Channel: <http://compliancechannelglobal.ab-inbev.com>.

### **III. APPLICABILITY**

This Policy applies to directors, officers, and to all full-time, part-time and temporary employees of AB InBev (collectively, Employees). Whenever they are acting on the Company's behalf, contractors, agencies, and other third parties, including but not limited to community managers and influencers (collectively "Third Parties") are expected to comply with the Policy, in addition to all other policies and applicable laws and regulations.

Failure to comply with the requirements to the Policy may result in disciplinary action, up to and including termination. Third Parties representing the Company should similarly expect to have their contracts terminated if they violate the Policy.

Our Responsible Sourcing Policy cascades the expectations of this Policy to the Company's suppliers, vendors, agents, and contractors. We encourage our retailers, business partners, and consumers to likewise follow the commitments contained herein.



#### IV. ADMINISTRATION

The Policy is primarily the responsibility of the Chief Legal and Corporate Affairs Officer with oversight by the Audit Committee of the Board of Directors. The human rights team is responsible for periodic updates to this Policy, to be approved first by the Global Human Rights Steering Committee. Considering human rights are a cross-functional responsibility, our approach is overseen by this committee and through the Company's sustainability governance structures.

All questions regarding the interpretation and administration of the Policy should be directed to the Chief Legal and Corporate Affairs Officer.

Additionally, our internal [Compliance Channel](#) allows colleagues to have direct contact with the Ethics & Compliance team to ask questions, access internal policies, request approvals for certain compliance matters or access the [Compliance Helpline](#) to file a report.

#### V. REPORTING MISCONDUCT

Employees and Third Parties are encouraged to report to the Company any activity or requested action that they believe to be, even potentially, in violation of applicable laws or this Policy. Such reports should be made to a line manager, to the Legal or Ethics & Compliance team, or to our confidential [Compliance Helpline](#).