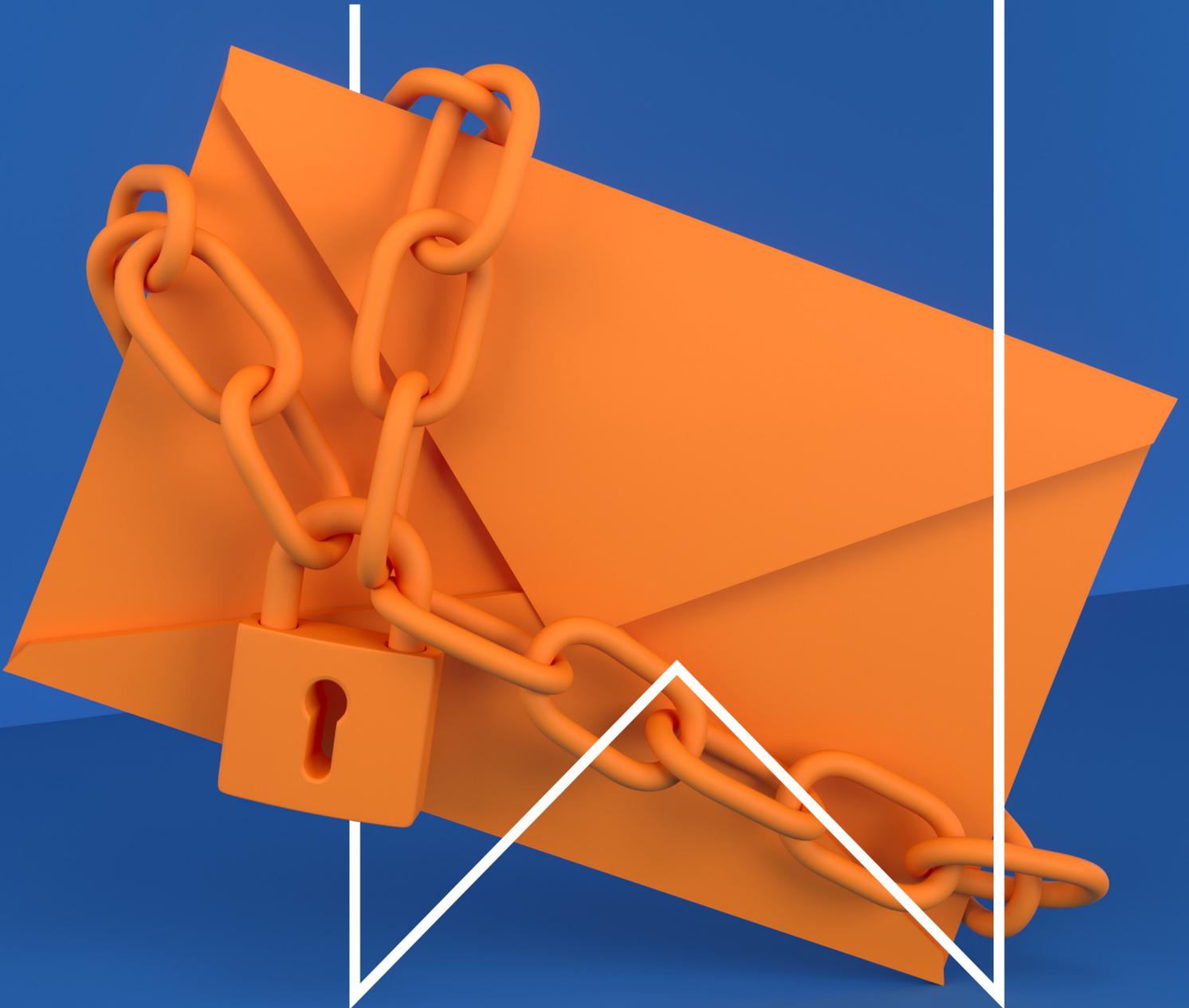


POLICY ON CONFIDENTIAL INFORMATION



We respect and protect confidential information

WHY THIS POLICY?

We all have the duty to respect and protect information that is valuable to our Company. During our day-to-day work we come across all kinds of confidential information. Losing confidentiality or violating confidentiality obligations usually means losing our competitive advantage or ability to grow. It could lead to reputational damage and in certain situations even to fines and legal claims. So we must protect our confidential information.

This policy is intended to clarify matters and explain how to deal with confidential and secret information.

WHAT IS CONFIDENTIAL INFORMATION?

Confidential information means information belonging to a company or person that should not be publicly available. It includes amongst others:

- Budget and audit reports
- Product recipes
- Designs
- Business plans
- Strategies
- Commercial information (such as pricing, upcoming marketing campaigns)
- Undisclosed financial information
- Legally privileged information
- Personal data and other similar information

Simply put, these are all valuable items that we, as a company, wish to protect or keep to ourselves. Certain information can also be qualified as secret information. This is company information that should be shared only with a very limited group of employees and treated with utmost care; for instance the recipe of a beer.



DO'S AND DON'TS

Do's

- Use our confidential and secret information in a professional manner.
- Take adequate precautions to protect confidential and secret information:
 - ✓ Classify all company information that is not or should not be publicly available based on the information's value and sensitivity and the intended audience (for instance as *secret* or *confidential*).
▶▶▶ You can find more guidance in the [HEINEKEN Information classification guidelines](#)
 - ✓ Only make such information available to those within or outside our Company who have a business need to know. This means only if they require access to such information in order to perform their duties.
 - ✓ Use strong passwords, and keep these and your user identifications secure and private.
 - ✓ Prevent misuse of confidential information, for instance by having your recipient sign a confidentiality or non-disclosure agreement.
 - ✓ Keep received documents that are marked 'legal privilege' or 'legally privileged' or similar, in a separate folder.
- Remember that both during and after termination of your employment, confidentiality obligations remain intact without limitation in scope or time.
- Bear in mind that certain confidential information can be intellectual property and should be properly protected and respected. ▶▶▶ You can find more guidance in the [HEINEKEN IP Policy](#)
- If you receive confidential (or even secret) information from others, only share and use it to the extent allowed (for instance as described in a written licence or contract).

Don'ts

- Do not look at, talk about or work with confidential or secret information in a non-secure setting.
- Do not leave confidential or secret information unattended.
- Do not disclose confidential or secret information, even not to other HEINEKEN employees, if they do not need such information to perform their duties.
- Do not use your private email (Gmail, Hotmail), social media (Facebook), messaging services (WhatsApp), cloud storage (Dropbox/WeTransfer) or open cloud services (YouTube, Prezi) to store or transfer confidential information.
- Do not throw away broken or disused hard drives, USB sticks and telephones, but send these to IT for appropriate destruction.
- Do not use or disclose 'inside information', this is non-public information of a precise nature which, when disclosed, could have a significant effect on the share price, to decide or advise someone whether or not to buy or sell shares in our Company, as this is prohibited. ▶▶▶ You can find more guidance in the [HEINEKEN N.V. Policy on insider trading](#)

Q: I am going to be on a holiday for three weeks and do not want to take my laptop and work phone with me. I know I will be able to get access to my personal email on my personal phone, so to avoid bringing my workphone, can I just set up a rule in my HEINEKEN inbox to auto-forward all my emails to my personal e-mail address?

A: No, you should not autoforward your HEINEKEN emails to a personal address. This can put the security of our information at risk, as emails could contain confidential information which is not properly protected in your personal email inbox.

SPEAK UP

If you have any concern regarding a possible violation of this policy, speak up! Raise any concern you have through your manager, Trusted Representative, Global Business Conduct or through our internal Speak Up service: online (<http://speakup.heineken.com>) or by phone through the Integrity Line in your country. All reporting is done confidentially and you can share your concerns anonymously (if allowed by the laws of your country) or not; Whatever feels comfortable to you.

The logo consists of the word "SPEAK" in a light blue, sans-serif font, followed by the word "UP" in a white, bold, sans-serif font inside a green speech bubble shape.

▶▶▶ You can find more guidance in the [HEINEKEN Speak Up Policy](#)

QUESTIONS?

If in doubt, discuss any questions you may have with your colleagues or consult your manager or Legal function.

For further guidance and support you can contact Global Business Conduct (businessconduct@heineken.com).

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- Note that not acting in accordance with this policy may lead to disciplinary measures, including dismissal.
 - ▶▶▶ You can find more guidance in the [HEINEKEN Policy on disciplinary measures](#)
 - This policy applies to all individuals as described in the HEINEKEN Code of Business Conduct.