

POLICY ON POLITICAL CONTRIBUTIONS, CHARITABLE DONATIONS AND LOBBYING



We offer charitable donations in an appropriate and transparent manner, occasionally and never to unduly influence business decisions

WHY THIS POLICY?

We are committed to our communities. As the world's most international brewer we want to use our position to help create a better world. Wherever we do business, we are sensitive to social and cultural traditions. However, political contributions and charitable donations can, even if allowed in a specific country, easily be misinterpreted by others. They have the inherent risk of being categorized as a bribe. To protect our reputation and avoid accusations of improper conduct, this policy describes the do's and don'ts for making political contributions and charitable donations and for lobbying.

Be aware that stricter rules and procedures may apply in your company or country. If so, you must adhere to those rules and abide by such procedures.

WHAT ARE POLITICAL CONTRIBUTIONS, CHARITABLE DONATIONS AND LOBBYING?

Political contributions

A political contribution means any payment, financial support or donation of anything of value (other than a personal gift) to a politician, political party, political committee or campaign, candidate for political function or similar person. This also includes offering free goods or services, such as the free use of facilities.

Charitable donations

A charitable donation means any payment in cash, financial support or donation of anything of value to a humanitarian cause without a tangible business return.

Lobbying

Lobbying means trying to persuade someone, mostly someone in government, to support certain causes, laws or rules.



KEY DO'S AND DON'TS

- Do not make contributions to politicians or political parties as these are very easily perceived as an attempt to unduly influence decision making.
 - You may provide charitable donations in a transparent and professional manner and under the conditions prescribed in this policy.
 - Before you communicate with government officials or other politically exposed persons on issues that affect our Company, or let third parties do this on our behalf, always consult Corporate Affairs and the Legal function first.
-

POLITICAL CONTRIBUTIONS

Do's

- Although political contributions are not allowed, you as an individual may be politically active and/or contribute to a party, but only if all the following conditions are met:
 - ✓ You are doing so outside work and working hours;
 - ✓ You keep these activities separate from your working environment;
 - ✓ You refrain from using company assets to support them;
 - ✓ You make clear that you do not represent our Company; and
 - ✓ You are transparent about this to your manager and disclose any conflict of interest.

Dont's

- Do not make contributions or donations on our Company's behalf to politicians or political parties, or to support political parties.
 - Do not retain politicians as our advisors or appoint (former) politicians as board members or in similar (management team) positions without the prior approval of the Managing Director/General Manager (or similar level manager) and the Regional President.
-

CHARITABLE DONATIONS

We want to use our position as the world's most international brewer to help create a better world and strengthen the communities in which we live and work. Charitable donations are allowed, provided that they are made in a transparent and professional manner and cannot be perceived as a bribe.

Do's

- When making a charitable donation on behalf of our Company, make sure that all the following conditions are met:
 - ✓ You first checked limitations under the laws in your country and local policies and procedures;
 - ✓ You have received the prior written approvals of both the Managing Director/General Manager (or similar level manager) and Legal function;
 - ✓ You give openly and directly to those who benefit, and not via third-party intermediaries, agents, service providers or representatives;
 - ✓ You do so in a transparent way and keep detailed records; and
 - ✓ You exercise professional judgment.
- Always perform checks to ensure that a request for charity is not an attempt to bypass our prohibition on bribery. For instance, check the recipients' family ties.
- Avoid conditions being attached or tangible benefits received in return and do not give to charity as a 'reward' afterwards.
- Be cautious when a donation or 'sponsorship' is requested or hinted at in relation to a business transaction: avoid real sponsorship being used for wrong purposes.
- Avoid making payments in cash; it is preferred to donate goods or services instead of transferring money.

Dont's

- Do not provide charitable donations in relation to a business transaction: avoid real sponsorship being used for the wrong purposes.
- Do not give to charity as a 'reward' after receiving a tangible benefit.
- Do not use third-party intermediaries such as agents, service providers or representatives to bypass this policy.

Q: We have been asked to sponsor a table and provide products at a charity fundraising event. Can we do this?

A: Yes you can, but as with all charitable support, ensure that the organization receiving is suitable. Get prior written approval from the Managing Director/General Manager (or similar level manager) and Legal function. Record the payment for the table and the donation of the products.

LOBBYING

Do's

- Lobbying activities on behalf of our Company are permissible, but only under strict conditions. Lobbying is highly regulated by law, and we want to avoid any perception of bribery or other undue influencing.
- Before you communicate with government officials or other politically exposed persons on issues that affect our Company, or let third parties do this on our behalf, always consult Corporate Affairs and the Legal function first to make sure that these activities are in accordance with the law, are carefully documented in writing and that all lobbying efforts are coordinated.
- When meeting with government officials or other politically exposed persons it is advisable to share the agenda prior to the meeting and not to go on your own, in order to avoid any discussion or ambiguity afterwards about the purpose of the meeting and what was discussed.

Dont's

- Do not talk to government employees or politicians on behalf of our Company about issues that affect our Company, before consulting Corporate Affairs and the Legal function.
- Do not engage third parties to communicate with government employees or politicians on behalf of our Company about issues that affect our Company, before consulting Corporate Affairs and the Legal function.

Q: The government of the country I work in is considering changing the regulation regarding alcohol advertising. Can we engage a local law firm to represent our interest?

A: No, you cannot engage them directly. This requires a very sensitive approach. Obtain approval from Corporate Affairs and the Legal function before engaging the law firm and letting them represent our interests. Make sure that any such activities are in accordance with the law, are carefully documented in writing and that any lobbying efforts are coordinated.

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 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 green, sans-serif font, followed by the word "UP" in a white, sans-serif font inside a green speech bubble shape.

▶▶▶ You can find more guidance in the HEINEKEN Speak Up Policy

QUESTIONS?

If you are in doubt, be transparent and 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).

- 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.