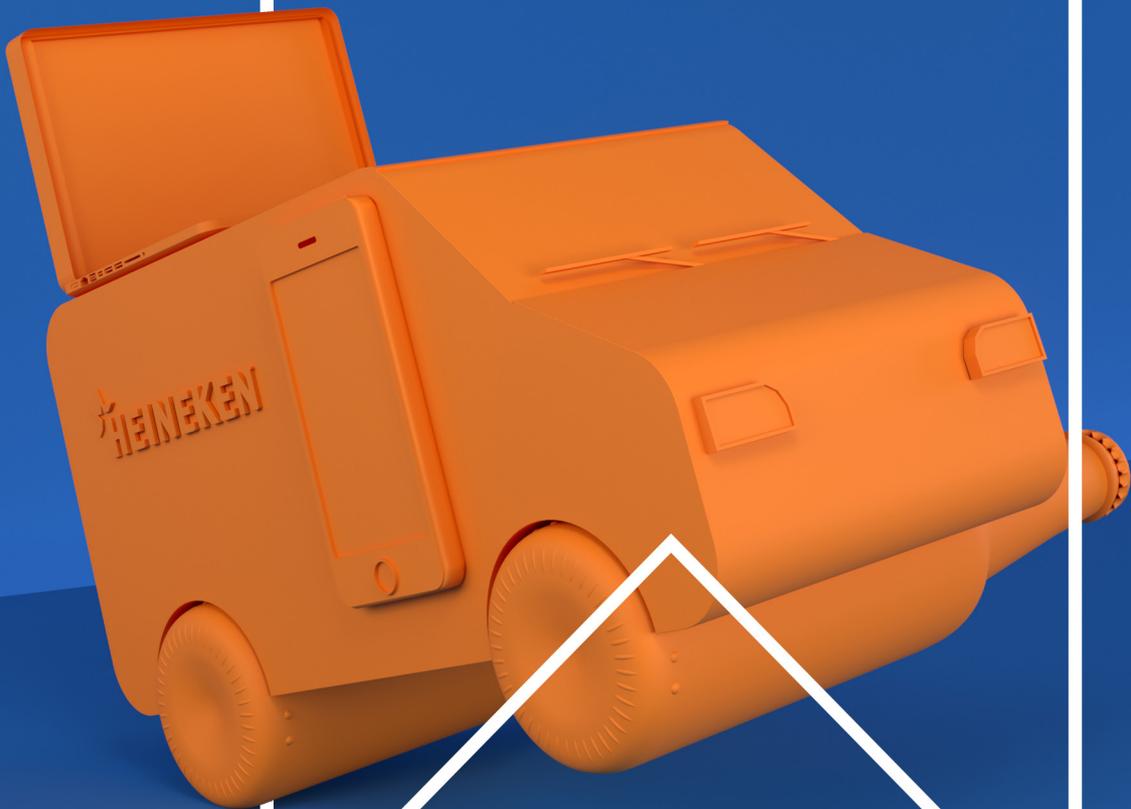


POLICY ON THE USE OF COMPANY RESOURCES



We safeguard our company resources

WHY THIS POLICY?

Wherever we work and whatever our role, numerous company resources are entrusted to us. We all are required to use these resources in a careful and professional manner. Misuse or waste of company resources hurts us all and damages our operational and financial performance.

All of us share the responsibility to safeguard our company resources. This policy is intended to clarify matters and explains how to use them responsibly.

WHAT ARE COMPANY RESOURCES?

Company resources are all tangible assets belonging to our Company, as well as employees' time and effort. Examples of our company resources are:

- Buildings and equipment
- Inventory
- Computers, laptops and mobile phones
- Computer networks (even if managed by third parties) and accessories
- Products and facilities
- Marketing material
- Company cars and other vehicles
- Bank accounts
- Cash and other financial assets
- Files
- Records
- Other similar items of value



DO'S AND DON'TS

Do's

- Make use of company resources only for their intended business purposes, unless other use is specifically permitted.
- Use company resources correctly and professionally and in the same careful manner as you would expect others to handle your private possessions.
- Occasional personal use of certain company resources is sometimes unavoidable. However, when doing so use your common sense and professional judgment. For example, a personal phone call or email from your workplace is acceptable. However, excessive personal calls or emails (or those which could easily be avoided) constitute a misuse of company resources.
- Always act with integrity and in a careful and professional manner when spending HEINEKEN's money or making financial commitments on behalf of our Company, including submitting your travel and expense claims and approving those of others.
- Always check relevant rules in your OpCo to make sure that you are using resources appropriately.
- Certain company assets require specific care and warrant detailed rules. This includes various intangible assets, such as our intellectual property and confidential information. Examples are:
 - Information developed by employees or agents of our Company not generally known to the public (such as business secrets and/or know-how)
 - Intellectual and industrial property rights
 - Technologies
 - Other confidential informationTake extra care to protect these company assets. ▶▶▶ [You can find more guidance in the HEINEKEN IP Policy and the HEINEKEN Policy on confidential information](#)
- Special care is also required when it comes to the use of IT resources. ▶▶▶ [You can find more guidance in the HEINEKEN Policy & rules of conduct for the usage of HEINEKEN IT systems](#)

Don'ts

- Do not misuse any company resources.
- Do not take, sell, lend, borrow or give any company resource away without proper authorization of your manager.
- Do not use company resources for personal commercial activities.
- Do not engage in theft, fraud, embezzlement, or misappropriation of company resources. Such acts are clearly not in line with this policy and could qualify as a criminal act.
▶▶▶ [You can find more guidance in the HEINEKEN Policy on fraud](#)

Q: I have to help my sister to move into her new apartment next weekend. It would be very helpful to use the HEINEKEN car I drive during worktime. Is it allowed to use the HEINEKEN car for this next weekend?

A: This is not allowed without the proper prior authorization. Discuss with your manager whether this may be allowed in your Company.

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.



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

QUESTIONS?

If you are 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).

- 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.