

## **Modern Slavery and Human Trafficking Statement**

for the financial year ended on 31 December, 2024

Asahi Europe & International Limited (**AEIL**) and its group of companies (**AEI Group** or **we**) are fully committed to a transparent and abuse-free supply chain. We acknowledge the utmost importance of properly identifying and mitigating any potential risks of modern slavery and human trafficking in our business and among our suppliers. Accordingly, the purpose of this Modern Slavery and Human Trafficking statement, prepared in accordance with section 54(1) of the UK Modern Slavery Act 2015, is to describe the steps taken within the AEI Group to ensure that slavery and human trafficking are not taking place in our supply chains and in any part of our business.

### **What is Modern Slavery?**

Modern slavery is a fundamental human rights abuse encompassing any exploitation of other people for personal or commercial gain, depriving people of their liberty and treating them as property. Modern slavery is a global issue, and no country can be considered immune. Modern slavery includes slavery, servitude, child labour, and any forced, compulsory or bonded labour, as well as human trafficking.

### **Our Corporate Structure**

AEIL and its Group are part of a larger group of companies owned by Asahi Group Holdings (**AGH**), a global beer, spirits, soft drinks, and food group with leading positions in European and Asia-Pacific markets, listed on the Tokyo Stock Exchange in Japan. The larger group of companies owned by AGH, including the AEI Group, is referred to in this text as **AGH Group** or **Asahi Group**.

AGH established its European business after a series of acquisitions in 2016 and 2017. Since then, some necessary internal restructuring took place to ensure the most effective set-up of the business. In September 2021, Asahi Breweries Europe Limited, the main Europe-based holding company, changed its name to Asahi Europe & International Ltd. (AEIL) to reflect its increased international scope in anticipation of the acquisition of the entire business of Asahi International Ltd., which became effective as of January 1, 2022. In 2024, the AEI Group announced the acquisition of Octopi Brewing LLC, a leading contract beverage production and co-packaging facility located in Wisconsin, United States.

Currently, AEIL runs, through its subsidiaries, 19 production facilities in 8 countries across Europe. The company is the custodian of some of the best beer brands in the world, such as Asahi Super Dry, Pilsner Urquell, Peroni Nastro Azzurro, Grolsch, and Kozel. Its full-portfolio markets in Europe include Plzeňský Prazdroj in the Czech Republic and Slovakia, Dreher in Hungary, Kompania Piwowarska in Poland and Ursus Breweries in Romania, Koninklijke Grolsch in the Netherlands, Birra Peroni in Italy and Asahi UK in the United Kingdom and Ireland.

The remit of the AEI Group is also to develop and manage export markets globally, outside of Japan and Oceania. Our business covers 90 markets, and it has over 10,000 passionate colleagues on board. The AEI Group has a clear ambition to accelerate its growth trajectory sustainably and solidify its global footprint.

This Modern Slavery and Human Trafficking Statement is made on behalf of the entire AEI Group and, in particular, the following AEI Group companies that meet the criteria for publishing under the UK Modern Slavery Act 2015:

- **Asahi Europe & International Ltd.**
- **Asahi UK Ltd.**
- **Asahi Premium Brands Ltd.**

## **Our Commitment and Policies**

### ***The Asahi Responsible Procurement Program***

Our engagement to responsible sourcing and transparent supply chains is shared across all Asahi companies globally. Building on well-established local policies and efforts, and acting through the strong leadership of our newly set-up global procurement organization (**AGPRO**), AGH and its group of companies, including the AEI Group, have implemented new concrete steps to leverage the nature and scale of our global business in order to drive positive social change across our supply chain worldwide. Accordingly, a set of integrated measures governing the global Asahi procurement activities have been put in place since August 2024 through the new Asahi Responsible Procurement Program.

The program is aimed at operationalizing our environmental and social ambitions through our collaboration with suppliers of goods and services across the world. It is further set forth in the Asahi Group Global Supplier Code of Conduct and the Responsible Procurement Policy. These policies are issued by the CEO of AGPRO and implemented by all regional headquarters of the Asahi Group. Furthermore, to support our suppliers in their own application of our Responsible Procurement Program, the new policies are accompanied by comprehensive Responsible Procurement Supplier Guidelines.

#### *(1) The Asahi Group Global Supplier Code of Conduct*

The [Asahi Group Global Supplier Code of Conduct](#) (**Supplier Code**) is a key tool helping us to operate in a way that promotes corporate responsibility and ethical business conduct throughout our entire supply chain. The Supplier Code sets out the minimum requirements that we expect from the suppliers providing goods or services to any Asahi entity. To ensure the widest possible positive impact of the Supplier Code, the suppliers are also expected to ensure compliance by their own officers, employees, representatives, subsidiaries, agents, contractors and upstream suppliers. Suppliers must have evidence of, and adhere to, appropriate policies, management systems, procedures, and staffing to meet the expectations of the Supplier Code. They are expected to have their own supplier code of conduct or similar policy that covers principles at least equivalent to those set out in the Supplier Code.

Asahi is committed to collaborating with the suppliers to ensure effective implementation of the standards of the Supplier Code working together towards a socially and environmentally sustainable value chain.

Among other topics, the Supplier Code contains provisions on human rights, including prohibition of child labour, any form of forced or compulsory labour, prison, indentured or bonded labour, or any other form of non-voluntary labour. It also sets out requirements with respect to safe and decent work conditions and responsible recruitment practices. Suppliers must be able to demonstrate compliance at request. Independent auditors can be used by Asahi to further assess supplier compliance. Such

assessments may include meetings with the management, facility tours, confidential interviews, documentary reviews, etc.

### *(2) The Asahi Group Responsible Procurement Policy*

The [Asahi Group Procurement Policy](#) (**Procurement Policy**) is complementary to the Supplier Code. It applies to the same wide range of Asahi Group's suppliers and their associated parties as the Supplier Code, and further formalizes the responsible, values-driven and capacity-building procurement program for the Asahi Group. It emphasizes the creation of partnerships with suppliers who share our sustainable commitments and highlights Asahi's wish and capabilities to work collaboratively with our business partners towards supply chains that protect the human rights of workers and communities and safeguard the environment.

In this sense, the Procurement Policy provides that in case of a supplier's non-conformance with any requirement, Asahi will work with the supplier to ensure the issue is appropriately remediated. Asahi will work collaboratively with the supplier to develop and implement a Supplier Management Plan (SMP) to close out any identified non-conformances, which will then be monitored by Asahi as part of an ongoing verification and monitoring activities. Asahi expects suppliers to demonstrate genuine progress in the implementation of the SMP within the required timeframes. However, in the rare cases where a supplier is both unwilling and unable to close out their SMP, the contracting relationship may be terminated by Asahi.

The responsible procurement program adopts a risk-based approach and aims to support continuous improvement and multistakeholder collaboration to tackle systemic issues, including modern slavery.

### *(3) The Asahi Group Responsible Procurement Guidelines*

The details of the responsible procurement program, from supplier onboarding, pre-screening due diligence, through the monitoring and compliance verification processes, to performance management and stakeholder feedback, are further set out in the [Asahi Group Responsible Procurement Guidelines](#).

In order to ensure vast accessibility and better understanding of the policies and guidelines, these are translated and made available in 16 languages.

### ***The Asahi Speak-Up Policy***

To ensure more efficient identification of breaches and non-compliances, the Asahi Group has also implemented the Asahi Speak Up Policy (**Speak-Up Policy**). Pursuant to the Speak-Up Policy, our employees can easily report potential and actual issues related to modern slavery. The existence of a dedicated whistleblowing hotline and relevant policies is subject to regular internal promotion. The hotline is available 24/7, free of charge and in the main languages used in the countries where we operate. Concerns can be reported through a web intake site or through a phone hotline channel.

These reporting tools are fully confidential and anonymous, operated by an independent company. Phone calls are not recorded, and the operators do not require any personal identification. The online tool does not place cookies on users' computers.

The current whistleblowing hotline and general setup across the Asahi Group was fully reviewed in 2023 and 2024. As a result of this review, an updated global Speak Up hotline was introduced across all entities of the Asahi Group, including the AEI Group, in May 2024. Extensive communication was issued to refresh employee information about the Speak Up hotline channels and introduce the updated global hotline system.

## Responsibility for Implementation

To safeguard the effective implementation of and adherence to these commitments and policies, we have established clear cross-functional responsibilities within the AEI Group and Asahi Group globally:

- The **senior management** team is responsible for ensuring that we and our associates comply with all legal and ethical obligations, including those related to combating modern slavery.
- The **Human Resources** and **Corporate Affairs** departments are responsible for building awareness of our obligations amongst all staff that include modern slavery and human trafficking.
- **Internal Audit** monitors the effectiveness of internal control systems.
- **Management** at all levels is responsible for ensuring that those reporting to them receive adequate and regular training, understand and fully comply with our commitments.
- Our **Procurement** team, both locally and globally based, aims to work with and support all suppliers to implement improvements in their operations, in line with the responsible procurement program.

## Legacy 2030 and our Purpose

Legacy 2030 is the AEI Group's action plan setting out ambitious sustainability goals for 2030 putting an emphasis on our impacts on the planet and people. Through our actions, we aim to contribute to the UN Sustainable Development Goals, focusing on areas where we can make an impact, utilizing our scale, supply chains and partnerships. We work closely with AGH to identify, implement and share best practices and enhance our shared commitment to conducting our business in a sustainable manner, upholding human rights and championing ethical behaviour while being the enablers of meaningful human connections in line with our corporate purpose of **Creating Meaningful Connections**.

This purpose was formally defined and launched in 2021 and guides everything we do. Recognising the shared challenges of the world, such as health, inequality and climate change we must lead the change that we want to see for nature and for humanity. Being clear on our purpose helps us to do this and achieve the following goals:

1. Be a force for planet positivity
2. Serve up a positive and inclusive experience for people and society

Through regular employee trainings, workshops and company communications, we continue to ensure that all our employees are well educated in ethics and compliance and are well-equipped to implement our purpose in their day-to-day business. We made sure that they are comfortable with our policies, work with our suppliers, and identify possible threats to our values.

Across the Asahi Group, we have taken the necessary steps to ensure that the commitment to human rights, including labour rights and the fight against modern slavery and human trafficking, are adequately known, understood and implemented in practice, as per the Asahi Group standards.

This statement has been approved by the Board of directors of:

**Asahi Europe & International Ltd.** on 15<sup>th</sup> May, 2025

**Asahi UK Ltd.** on 4<sup>th</sup> June, 2025

**Asahi Premium Brands Ltd.** on 27<sup>th</sup> June, 2025