



Asahi Breweries Europe Group

Anti-Slavery and Anti-Human Trafficking Statement

for the financial year ending 31 December 2019

2019

[This anti-slavery and anti-human trafficking statement is made by Asahi Breweries Europe Ltd pursuant to Section 54(1) of the UK Modern Slavery Act 2015.]

“ We prohibit all forms of slavery and human trafficking within our organisation and in our supply chains.

Paolo Lanzarotti, Director, Asahi Breweries Europe Ltd.

Background

Following the acquisition of the SABMiller beer businesses in Europe from AB InBev, two distinct sub-groups were acquired by the Asahi Group, with a significant business overlap. The sub-groups were:

- **Asahi Europe Ltd.**, holding the Birra Peroni, Asahi UK and Grolsch businesses; and
- **Asahi Breweries Europe Ltd.**, holding Kompania Piwowarska, Dreher, Ursus, Plzensky Prazdroj and AE Brands Korea businesses (“Asahi Breweries Europe Group”).

In 2019, the Asahi Group restructured its two above mentioned sub-groups in order to deliver on strategic priorities, create top-line growth, and achieve cost synergies, and enhance talent mobility within the Asahi Group. As a result of the restructuring, the Asahi Breweries Europe Ltd. acquired from Asahi Europe Ltd. the Peroni and Grolsch businesses and amongst other things handed over the territories outside of its operating markets to Asahi Europe Ltd.

The restructuring was completed by the end of 2019 with the process of integration of new businesses into the structure of the Asahi Breweries Europe Group to follow. The role of Asahi Breweries Europe Ltd. within the Asahi Group did not change.



Commitment and Policies

We are a part of a group of companies that has a long-standing commitment to human rights, including labour rights and the fight against modern slavery and human trafficking.



Responsibility

To ensure the effective implementation of and adherence to these commitments and policies, we have established clear responsibilities within the Asahi Breweries Europe Group.

Further details of the Asahi Group approach to human rights are set out in:

Asahi Group Code of Conduct ([link](#))
Asahi Group Human Rights Principles ([link](#))

In this statement, we use the term modern slavery to encapsulate slavery, servitude, child labour (as defined by the International Labour Organization), and forced or compulsory labour, as well as human trafficking.

The Asahi Group prohibits all forms of modern slavery in its organisation and supply chain. Our commitment to prohibiting modern slavery is set out in a number of codes and policies that are an integral part of our contracts with suppliers, including our:

Supplier Code of Conduct ([link](#))
Code of Business Conduct and Ethics

Potential and actual issues relating to modern slavery can be reported in line with our Whistleblowing Policy.

The senior management team is responsible for ensuring that our behaviour, and that of our associates, complies with our legal and ethical obligations, including those related to eradicating modern slavery.

The Human Resources and Corporate Affairs departments are responsible for ensuring awareness of our obligations amongst all staff. 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 and understand and fully comply with our commitments.

Our position is communicated to all suppliers, contractors and business partners through the Supplier Code of Conduct. Our procurement team aims to work with, and support, all suppliers as they implement improvements in their operations.

Progress

We have worked closely with Asahi Group Holdings to identify the best ways in which the organisations can share best practices, enhance our collective commitment to human rights and ethical behaviour.

All suppliers must be compliant with the Supplier Code of Conduct. Where on-site audits have identified non-compliance, a corrective plan is established and a monitoring system is in place to measure progress against non-compliance action plans. Common issues identified through audit programme are being addressed through supplier workshops.

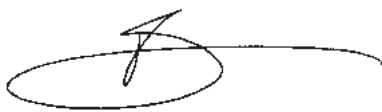
During the year 2019, we were consistently ensuring that all our employees are well educated in the area of ethics and compliance and are comfortable with our policies in day-to-day business, in cooperation with suppliers, and are able to identify possible threats to our values. To better understand the needs of our employees in this area and the needs of their daily work, we have launched the Ethics and Compliance survey, results of which will be closely studied and any requirements resulting from it will be implemented this year.

The procurement department has been making sure all corporate policies are clearly communicated to our suppliers and followed by them.


As Italy and the Netherlands joined the Asahi Breweries Europe Group, we had to take all steps necessary to ensure that the commitment to human rights, including labour rights and the fight against modern slavery and human trafficking is properly followed as to the Group standards under Asahi Breweries Europe Ltd.

As unprecedented pandemic hit the world in early 2020, we are dedicated to continue following our values and making sure that even when the circumstances are not ideal and we have to deal with difficulties across the whole group due to worldwide governments' restrictions, we always follow our policies and values to ensure the human rights are protected and ethical behaviour is the only acceptable way of business.

This statement has been approved by the board of directors of Asahi Breweries Europe Ltd.



Paolo Lanzarotti
Director, Asahi Breweries Europe Ltd.
May 2020



“ We are dedicated to continue following our values and making sure that even when the circumstances are not ideal and we have to deal with difficulties, we always follow our policies and values to ensure the human rights are protected and ethical behaviour is the only acceptable way of business.