

Anti-Slavery and Anti-Human Trafficking Statement for the financial year ended 31 December 2018

This anti-slavery and anti-human trafficking statement is made by Asahi Europe Ltd and Asahi UK Ltd pursuant to section 54(1) of the UK Modern Slavery Act 2015. Unless specifically indicated, references to "we", "us" or "our" are references to each and both companies.

Background

Asahi Europe Ltd and Asahi UK Ltd are beer businesses, selling and distributing beer brands. Asahi Europe Ltd is the holding company of the Asahi Europe group which was created on 11 October 2016, as a result of the acquisition, by Asahi Group Holdings, Ltd of the Italian, Dutch, British and French businesses of SABMiller. Asahi Europe Ltd only performs intra-group support functions, but has subsidiary operations in The Netherlands, Italy, the United Kingdom, France, Switzerland and Canada.

Asahi UK Ltd is one of the key subsidiaries within the Asahi Europe group. Its business is the sale and distribution of beer products in the United Kingdom and Ireland. All beer distributed by Asahi UK Ltd is brewed by other Asahi Group Holdings companies.

Commitment and Policies

We are part of a group of companies that has had a long-standing commitment to human rights, including labour rights and the fight against modern slavery and human trafficking. Further details of the Asahi Group Holdings approach to human rights are set out in the Asahi Group Human Rights Principles, a copy of which is set out in Appendix 1.

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 its supply chain.

Our commitment to prohibiting modern slavery is set out in a number of codes and policies, including:

- Our Supplier Code of Conduct (www.asahibeer.eu/suppliers)
- Asahi Group Human Rights Principles (Appendix 1)

These documents are publicly available on our and Asahi Group's websites.

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

Responsibility

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

- The senior management team has overall responsibility for ensuring that our behaviour, and that of our associates, complies with our legal and ethical obligations, including in relation to modern slavery.
- The Human Resources and Corporate Affairs departments have responsibility for ensuring awareness of our obligations amongst all staff. Internal Audit monitors the effectiveness of internal control systems.

- Management at all levels are responsible for ensuring 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 works with and supports all suppliers as they implement improvements in their operations.

Progress

During 2018 we worked closely with Asahi Group Holdings to define and adopt Human Rights Principles. These were adopted by the Asahi Group board of directors on 8 May 2019.

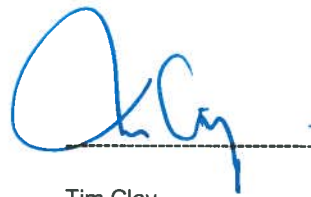
This statement has been approved by the board of directors of each of Asahi Europe Ltd and Asahi UK Ltd.



Hector Gorosabel

CEO, Asahi Europe Ltd

June 2019



Tim Clay

Managing Director, Asahi UK Ltd

July 2019



Asahi Europe Ltd

Asahi UK Ltd

A subsidiary of Asahi Europe Ltd

Appendix 1

Asahi Group Human Rights Principles

The Asahi Group Human Rights Principles

The Asahi Group Human Rights Principles (hereinafter referred to as “these Principles”) are a foundational element of all our business operations. These Principles are based on the Asahi Group Code of Conduct and Asahi Group Philosophy, and govern all other human rights-related policies within Asahi Group.

These Principles apply to all officers and employees of each Asahi Group company¹. We also expect our business partners, including our suppliers, to understand and uphold these Principles and to work with us to ensure that our business complies with these Principles.

The Board of Directors of Asahi Group Holdings, Ltd. is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments.

Commitment to Respect Human Rights

We recognize that the activities of our business may have potential and actual human rights impacts, from research and development, and procurement through to our products and services.

We are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights² and these principles concerning fundamental rights in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work³. We are also committed to the United Nations Guiding Principles on Business and Human Rights⁴, and Asahi Group Holdings, Ltd. is a signatory to the United Nations Global Compact, whose ten principles we are committed to upholding.

¹ “all officers and employees of each Asahi Group company” means Asahi Group board members, executive officers, those involved in the execution of business related to its management or their supervisors, and others who carry out their duties based on employment contracts with each Asahi Group company.

² The International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. They are considered as internationally-agreed common standards for all people and all nations, and sets out fundamental human rights to be universally protected.

³ The ILO Declaration on Fundamental Principles and Rights at Work sets out principles concerning fundamental rights as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation.

⁴ The United Nations Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council in 2011, provide the authoritative global standard for action related to human rights in a business context, clarifying what is expected by governments and companies to address adverse impacts on human rights arising from business activity.

We will comply with laws and regulations applicable to our business in all countries and regions where we do business. Where national/regional laws differ from or conflict with international human rights standards, we will seek ways to honor the principles of internationally recognized human rights to the extent possible, without violating local laws and regulations.

Commitment to Human Rights Due Diligence

We will conduct due diligence to identify, prevent and mitigate adverse human rights impacts that may relate to our business operations to fulfill our commitment to the United Nations Guiding Principles on Business and Human Rights.

We will strive to avoid infringing human rights or contributing to human rights infringements by stakeholders, including our suppliers and other business partners. If we identify that we have caused or contributed to such infringement, we will endeavor to remediate such impacts.

We believe that the perspective of affected stakeholders is critical for us to recognize actual or potential stakeholders affected by our business activities, and to develop appropriate responses to address such impacts. We will strive to engage with relevant stakeholders in a timely manner to understand the human rights issues relevant to our business and consider from their views as we conduct our business.

Human Rights Issues Relevant to our Business

We recognize that addressing the following human rights issues linked to our business operations constitutes an essential component of our human rights responsibility.

- **Discrimination:** We will respect diversity and the human rights of individuals. We will not discriminate against or commit any act that damages the dignity of any individual based on nationality, race, ethnicity, religion, ideology, gender, age, disability, gender identity, sexual orientation, or employment status, or any other protected characteristics as defined by national/regional laws and regulations.
- **Harassment:** We will not tolerate harassment of any type, neither through words nor actions.
- **Forced Labor and Child Labor:** We will not engage in forced labor, child labor, nor any form of modern slavery including human trafficking.

- **Freedom of Association and the Right to Collective Bargaining:** We will respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where we do business. Where the right to freedom of association and collective bargaining is restricted under national/regional laws and regulations in contravention of international human rights standards, we will seek ways to honor these rights by establishing alternative means of dialogue with employees.
- **Occupational Health and Safety:** We will keep updated on laws and regulations concerning health and safety in our workplace and the status of their implementation, and always strive to maintain a safe and healthy work environment.
- **Working Hours and Wages:** We will comply with all applicable laws and regulations related to working hours and wages of the countries and regions where we do business. We will work towards ensuring wages that enable our employees to meet their basic needs of living.
- **Impacts within the Supply Chain:** We will endeavor to understand our supply chain including our business partners and their subcontractors. We will share these Principles with suppliers and verify and assess their compliance. We will also endeavor to engage with other relevant stakeholders to promote respect for human rights in our entire supply chain.
- **Impacts within the Community:** We acknowledge that our business can have impacts on human rights within the community, such as land rights, access to water, health, and the rights of indigenous peoples. We are committed to upholding our human rights responsibility in the communities in which we do business, and aim to contribute to a sustainable society.

Grievance Mechanisms

Employees who observe or suspect a possible violation of applicable laws and regulations of the countries and regions where we do business or of our internal policies, are encouraged to report their concerns with their supervisors, and/or through our internal hotline/whistleblowing systems. We also have inquiry systems through which interested external stakeholders of Asahi Group can notify about violations or actions that may be in violation of these Principles.

Employees or interested stakeholders who report or notify possible breaches will not be disadvantaged in any way. On the contrary, their reports and notifications will be well received as

an opportunity for us to increase the transparency of Asahi Group's business activities, and help strengthen the mutual trust we have with our stakeholders.

We are committed to continue enhancing our capacity to identify and respond to human rights impacts resulting from our business operations.

Awareness Raising and Training

In order to implement and comply with these Principles throughout Asahi Group, we will seek to translate these Principles into relevant languages for the countries and regions where we do business and provide training and education to all officers and employees.

Monitoring and Reporting

We will continually track the implementation of these Principles, and make improvements as necessary. We will regularly disclose our progress towards implementing these Principles through our website, Integrated Report and other relevant communication channels.

These Principles have been approved by the Board of Directors of Asahi Group Holdings, Ltd. on 8 May 2019.

8 May 2019



Akiyoshi Koji
President and Representative Director, CEO
Asahi Group Holdings, Ltd.