

Modern Slavery and Human Trafficking Statement

for the financial year ended on 31 December, 2025

Asahi Europe & International Limited (**AEIL**) and its group of companies (**AEI Group** or **we**) are fully committed to are committed to conducting business ethically and with integrity, including maintaining transparent and responsible supply chains free from modern slavery and human trafficking.

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, Ltd. (**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. 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 expanded its activities in the United States. In December 2025, AGH announced its decision to indirectly acquire a majority stake in East African Breweries PLC (EABL) from Diageo. EABL is a listed Kenya-based company which markets beer, spirits and RTD beverages in Kenya, Uganda and Tanzania. The transaction is subject to various regulatory approvals, and its closing is anticipated in the second half of 2026.

Currently, AEIL operates, through its subsidiaries, 19 production facilities in 9 countries. 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 Kozeľ. 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 80+ 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 further strengthen 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.**

Given the global nature of our operations and supply chains, including sourcing of agricultural raw materials, packaging materials and indirect services across multiple jurisdictions, we recognize that certain regions and sectors present a heightened risk of modern slavery. We therefore adopt a risk-based approach to identifying, assessing and mitigating such risks, with particular focus on higher-risk geographies and supplier categories.

Our Commitment and Policies

The Asahi Responsible Procurement Program

In 2025, we entered the second year of collaboration with our Global Procurement Office, Asahi Global Procurement Pte. Ltd. (**AGPRO**), established in 2024 in Singapore to rationalize global procurement activities. The aim of AGPRO is to increase efficiency and enable a coherent approach to addressing sustainable supply chain topics while allowing different regions to implement best practices.

AGPRO oversees Asahi Group's strategic procurement initiatives, including integrating global, regional, and local functions to manage human rights impacts in supply chains. Sustainability under AGPRO is split into four key pillars: Human Rights, Climate Change, Nature and Circularity.

The risks of modern slavery and other adverse human rights impacts in our supply chains are identified, assessed and managed under the global Asahi Responsible Procurement Program (**Program**)¹. The Program applies to the Asahi Group and defines actions and mechanisms to carry out risk-based due diligence on suppliers regarding Modern Slavery in our supply chain.

With the launch of this new Program, AGPRO, together with AGH, launched new global responsible procurement policies that are informed by leading standards and unify our supplier requirements relating to responsible procurement and human rights.

¹ Click [here](#) for more information

In 2025, AGPRO built on preliminary risk assessments conducted in the previous year which were applied on suppliers to ascertain the baseline risks of adverse impacts on workers, communities and nature occurring in our most critical global supply chains. Inherent risks for each supplier were determined based on their industry and country of operations and suppliers' risk profiles were validated using EcoVadis' IQ+ inherent risk assessment solution.

After a successful pilot on high-risk categories in 2024, we continued to focus on expanding the Program to additional areas of risk. Through the risks assessments, we prioritized our efforts to expand the Program to include the following direct categories:

- Flavours
- Sugar sweeteners
- Hops
- Brewing Adjuncts
- Malt
- Cans
- Glass
- Metal closures
- Corrugates
- Labels
- Kegs

Risks present in our indirect procurement are also taken into consideration. The Program therefore also includes the following indirect categories:

- HR Services
- Facility management
- Consulting
- Freight
- Utilities
- Pallets
- Spare Parts
- Maintenance, repair and operations (MRO)
- CAPEX
- Media Print Production
- Infrastructure IT

Other activities carried out together with AGPRO included:

- Further training sessions for our internal procurement team members on the Program, including how to identify risks and ensure these are mitigated effectively
- Streamlining the use of third-party tools such as Sedex and EcoVadis to improve clarity and consolidate due diligence activities.
- Piloting the expansion of our Program to the second tier of our supply chain for selected categories
- Reaffirmation of the availability and accessibility of our grievance mechanisms to our suppliers

During the reporting period, we focused on moving from pilot to implementation. Together with this shift, we transitioned from theory to practice, through substantiated KPIs and measurable progress.

	Status
Total number of direct suppliers onboarded to HRDD program	35

	Status
Total number of in-direct suppliers onboarded to HRDD program	32

During 2026, we plan to capitalise on our existing momentum to expand our program while reducing risk and supporting the remediation of findings.

Policies

(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 standards expected of all 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.

(4) 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, but we also allow other reporting forms (e.g. walk-in, physical letter, direct email, etc.). 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. Regular communication is issued, at a minimum on a yearly basis, to refresh employee information about the Speak Up 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.

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.

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 May 26, 2026

Asahi UK Ltd. on June 26, 2026

Asahi Premium Brands Ltd. on May 28, 2026