

# **AB InBev**

---

## **Anheuser-Busch InBev Supplier Anti-Corruption Policy**

---

**October 2017**

## Contents

- 1. Introduction ..... 3
- 2. Preventing Bribery..... 3
- 3. Accurate Books and Records ..... 3
- 4. Third Parties..... 3
- 5. Transparency and Disclosure ..... 4
- 6. Cooperation with Investigations ..... 4
- 7. Training ..... 4
- 8. Compliance Certifications ..... 4
- 9. Consequences for Violations ..... 4



## 1. Introduction

Anheuser-Busch InBev has a zero tolerance policy toward bribery and corrupt conduct in any form. Bribes, kickbacks, and other improper inducements involving public officials, customers, suppliers, and all other counterparties are strictly prohibited. This prohibition includes “facilitation” payments (*i.e.*, small payments made to ensure that a government official performs official duties).

This policy applies to all parties who supply goods or services to Anheuser-Busch InBev, including third parties that you might engage in connection with your work for us (collectively, “Suppliers”).

## 2. Preventing Bribery

In agreeing to work with Anheuser-Busch InBev, Suppliers agree that their directors, officers, employees, and third parties **will not give or accept bribes or kickbacks in any form.**

Suppliers must:

- Comply with anti-corruption laws in all jurisdictions in which they operate
- Not offer, promise, or authorize the giving of any money, advantage, or other thing of value to any third party in order to secure an improper advantage for Anheuser-Busch InBev or Supplier
- Not solicit, accept, or agree to accept any money, advantage, or other thing of value from an Anheuser-Busch InBev employee, director, officer, or any third party in exchange for an improper advantage to Anheuser-Busch InBev or any of its employees, directors, officers, or third parties
- Not pay or provide anything of value to a third party where there is reason to suspect that all or part of the payment or thing of value may be provided to a public official or other third party for an improper purpose
- Not do anything to induce, assist, or permit someone else to violate these rules

## 3. Accurate Books and Records

Suppliers must keep accurate and complete books and records, including supporting documentation, relating to their work with Anheuser-Busch InBev. Suppliers must maintain accurate, detailed, and itemized invoices, with receipts and other adequate supporting documentation for any fees or disbursements paid on Anheuser-Busch InBev’s behalf.

## 4. Third Parties

Suppliers must conduct risk-based integrity due diligence on individuals or entities they engage who may interact with government officials in connection with their work for Anheuser-Busch InBev. Suppliers must also require such third parties to comply with the principles contained in this policy.

## 5. Transparency and Disclosure

Suppliers **must** promptly disclose to Anheuser-Busch InBev the details of any allegations, reports, or evidence of bribery or corruption (including demands for improper payments, regardless of whether any payment was made in response) that relates to their work with Anheuser-Busch InBev. This includes the details of any notice, subpoena, legal demand, investigation, enforcement action, court proceeding, or other communication from any government authority concerning bribery or corruption.

Suppliers **must** also promptly disclose to Anheuser-Busch InBev if any of its owners, partners, officers, directors, employees, or agents is or will become an official or employee of any government, government instrumentality, political party, or public international organization.

**Anheuser-Busch InBev may terminate or restrict relationships with Suppliers where we unilaterally identify corruption issues or government relationships that have not been transparently disclosed to us. Anheuser-Busch InBev reserves the right to withhold making or reimbursing any payments that violate applicable anti-corruption laws.**

If you believe that you may have identified a reportable issue, you should immediately submit a confidential report electronically (which may be made anonymously) at <http://talkopenly.ab-inbev.com>.

## 6. Cooperation with Investigations

Supplier **must** cooperate fully with Anheuser-Busch InBev in connection with any investigation into bribery or corruption relating to its work for Anheuser-Busch InBev, including by appointing a representative with sufficient seniority and authority to respond to requests.

## 7. Training

Suppliers must provide appropriate training to their employees and business partners, and conduct sufficient monitoring of their activities to secure their compliance with this policy. If you require assistance with such training, Anheuser-Busch InBev may be able to assist. Suppliers must distribute this policy to all employees or business partners who work on Anheuser-Busch InBev matters.

## 8. Compliance Certifications

Anheuser-Busch InBev, at its discretion, may periodically require Suppliers to execute and deliver certifications attesting to Suppliers' continued compliance with the provisions of this policy.

## 9. Consequences for Violations

If you violate the terms of this policy, Anheuser-Busch InBev may terminate or restrict its business relationship with You. Anheuser-Busch InBev also may report any unlawful activities to government enforcement authorities.