

CODE OF CONDUCT



Supplier Code of Conduct / Responsible Sourcing Policy

Asahi Beverages, as part of Asahi Group, is committed to a principled approach to doing business. We operate in a way that promotes responsibility in the areas of labour, land and human rights, environment and sustainability, compliance and ethical conduct, anti-corruption and corporate fraud, and we expect the same from our Suppliers. At Asahi Beverages, our Suppliers are an integral part of our business, and therefore our success. We hold ourselves to the highest ethical standards when it comes to our supply chain.

Purpose:

The minimum compliance requirements and standards we require from our Suppliers, both of goods and services, form the basis of this Supplier Code of Conduct / Responsible Sourcing Policy, "**Supplier Code of Conduct**". These are the minimum expectations, and we require our Suppliers and our own employees to embrace, support, and enact a set of values to support these principles and continue to monitor their own compliance to this document where applicable. As such, our approach is not just about monitoring compliance but also about working to understand challenges, encourage improvements, and empower Suppliers to take ownership throughout the value chain. Equally, we are considerate of local factors and challenges faced by our Suppliers in the different parts of the world where we operate and procure from. If these local factors and challenges prevent potential suppliers meeting our standards, Asahi will try to work with them on a case-by-case basis to improve their practices.

This Supplier Code of Conduct applies to all employees of Asahi Beverages, including all of its Business Divisions which together constitute "**Asahi Beverages**". This Supplier Code of Conduct also applies to all Suppliers, their officers, employees, representatives, subsidiaries, agents, or upstream Suppliers ("**Associated Parties**") providing goods or services to Asahi Beverages. A copy of this Supplier Code of Conduct will be made available to all Suppliers. The Supplier must ensure that its Associated Parties and sub-contractors also comply with the principles set out in the Supplier Code of Conduct.

It also applies to any individual or corporate entity associated with Asahi Beverages, or who performs functions in relation to, or on behalf of, Asahi Beverages.

Note: This document does not form part of an employee's employment contract, and Asahi Beverages may vary, revoke, or replace this document from time to time at its discretion.

Scope:

- This Supplier Code of Conduct defines the minimum standards that we abide by and expect our Suppliers to adhere to at all times whilst supplying goods or services to Asahi Beverages or its subsidiaries. It does not prevent us or our Suppliers from exceeding these standards.
- In addition to the Supplier Code of Conduct, Suppliers are expected to comply with national, international, and other applicable law and, where the provision of law and this Supplier Code of Conduct address the same subject, to apply the provision that affords the greater protection; the same applies to Asahi Beverages.

Suppliers' Management of their Own Suppliers

- Suppliers engaging with Asahi Beverages or its subsidiaries must take steps to promote these principles in their own supply chain and ensure they are respected.
- Suppliers such as traders and agents must ensure that their own Suppliers (including manufacturers, farmers and other sub-contracted parties) become fully aware of the principles; the provisions stated therein, their meaning and implications for their manufacturing or farming practice.

Supplier Compliance

- Acceptance of this Supplier Code of Conduct is a pre-requisite in every Asahi Beverages or its subsidiaries' contract for supply of goods and/or services. Through the signing of the contract and/or acceptance of the purchase order, the Supplier commits that its operations are subject to the provisions contained in this Supplier Code of Conduct.
- All Suppliers and employees will comply with legislation, regulations, and other relevant obligations that apply to them, in the various capacities that we operate as individual entities and as partners.
- Suppliers must be able to demonstrate compliance with the code at the request and to the satisfaction of Asahi Beverages.
- Asahi Beverages may utilise independent auditors to assess Supplier compliance with this Supplier Code. These assessments may include confidential interviews with workers on site. When contracting with agents or traders, Asahi Beverages may elect to have their manufacturing or farming Suppliers of these agents or traders assessed for compliance as well.
- Should a Supplier at any time become aware that they are unable to comply with the Supplier Code of Conduct, the Supplier must promptly raise a non-compliance with its relevant Asahi Beverages contact. If you are ever in doubt about your obligations and responsibilities under this Supplier Code of Conduct, please seek advice from your primary contact at Asahi Beverages Regional Hub and/or its Business Divisions, or your supervisor.
- If Asahi Beverages becomes aware that a supplier is not in compliance with this Supplier Code of Conduct, Asahi Beverages may require corrective measures to be implemented, within reasonable timeframes determined by Asahi Beverages (having regard to the nature and circumstances of the non-compliance).
- Non-compliance with this Supplier Code of Conduct may result in termination or suspension of Asahi Beverages' arrangements with the supplier.

Behaviours Required of Suppliers and Employees:

Comply with all relevant laws and regulations in Australia and/or the country in which Supplier's company is incorporated in, in relation to employment practices, human rights and modern slavery, rights of land and natural resources, indigenous people, and anti-discrimination and harassment.

Employment Practices

- Ensure that working environments are safe, healthy, and secure, and comply with all health and safety legislation and other relevant obligations while providing employees, contractors and visitors with information, training, and supervision to understand and uphold health and safety responsibilities. Identify and assess health and safety hazards and take action to eliminate or minimise risks. Establish, measure and review objectives and targets to continually improve health and safety performance and eliminate the potential for harm.
- Identify hazardous materials and chemicals, and ensure their safe handling, movement, storage, recycling, reuse, and disposal in compliance with applicable laws and regulations.
- Ensure policies and procedures to deal with emergency situations are in place.
- Ensure no inappropriate alcohol consumption by consuming alcohol in a responsible manner at company functions and other work-related events.
- If alcohol is consumed at a company function or work-related event, each employee is responsible for ensuring that they observe the relevant laws, in Australia and/or the country in which Supplier's company is incorporated in, in relation to driving within safe and legal blood or breath alcohol levels (dependent upon the type of driver licence held). Under no circumstances should an employee drive any vehicle if they are over the legal BAC or BrAC limit. Employees must ensure that they have a safe means of transport home from such events or functions. Employees who do not have a means of transport should advise their Supervisor or Manager for assistance in arranging transport.
- Allow freedom of association and the effective recognition of the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions of operations. 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, seek ways to honour these rights by establishing alternative means of dialogue with employees.

Human Rights and Modern Slavery

- Commit to respecting all internationally recognised human rights as relevant to operations. In doing so, strive to act in a manner consistent with the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work in all areas of business.
- Comply with all applicable laws and regulations related to working hours and wages of the countries and regions of business.
- Work towards ensuring wages that enable employees to meet their basic needs of living.
- Commit to taking human rights considerations into account when selecting suppliers and expect all Suppliers to comply with these views on Human Rights and actively seek to work with third parties who support this approach and these standards in this area.

- Undertake ongoing due diligence within operations and supply chain to identify and address any actual or potential adverse impacts with which Suppliers may be involved (whether directly or indirectly).
- Conduct due diligence to identify, prevent and mitigate adverse human rights impacts that may relate to business operations.
- Strive to avoid infringing human rights or contributing to human rights infringements by stakeholders, including suppliers and other business partners. Any identification of such infringement will be remediated as soon as possible.
- Work with employees and suppliers to assist in understanding of human rights and adoption of best practices to ensure respect for human rights.
- Do not engage in forced labour, child labour, nor any form of modern slavery including human trafficking.
- Ensure compliance with all Modern Slavery laws including, but not limited to, the Modern Slavery Act 2018 (Cth); the Modern Slavery Act 2018 (NSW) and Divisions 270 and 271 of the Commonwealth Criminal Code. As such, have in place adequate procedures to identify, prevent, mitigate and account for modern slavery in operations and supply chains. Additionally, provide all necessary and requested information for evaluation and assessment of potential Modern Slavery risk, and comply with any request to verify compliance to Code of Conduct with Supplier audits as part of ongoing compliance monitoring at any point during the contractual relationship.
- If advised by Asahi Beverages, register with the Supplier Ethical Data Exchange (SEDEX), and complete an online questionnaire using the SEDEX platform. Existing Suppliers are required to review and submit any updates to their questionnaire on a regular basis. Asahi Beverages may also request Suppliers to have an ethical audit performed by an independent approved third party.

Anti-discrimination and Harassment

- Promote diversity, inclusion, and equal opportunity.
- Do not tolerate unlawful discrimination, harassment, sexual harassment, bullying, vilification, or victimisation, in the workplace, either through words or actions.
- Respect diversity and the human rights of individuals.
- Do 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.

Rights of Land and Natural Resources

- Commit to upholding human rights responsibility in the communities in which business is done and aim to contribute to a sustainable society.
- Ensure that land acquisitions and changes of use are made with respect to the rights of individuals and communities impacted. This includes but is not limited to conducting due diligence around land rights and titles particularly during development of new business opportunities, while also seeking free, prior, and informed consent and having a grievance mechanism to resolve any disputes over land titles such as our ethics and compliance hotline referred to below.
- Conduct business activities with consideration to local communities.

Indigenous People

- Respectfully acknowledge the past, present and emerging traditional owners and custodians of the land of the indigenous people and respect their culture and identity.

Food Safety and Quality, Environment and Sustainability

- Conduct all due diligence necessary to ensure product quality and safety. Place priority on food safety and quality and respond to requirements for information disclosure and notification of relevant authorities in case of product recall, safety measures for supply destination and/or in case of damaged products.
- Comply with all relevant environmental legislation and other relevant obligations in relation to environmental performance, management, and reporting.
- Ensure policies, procedures, and relevant environmental management systems are in place to identify, control, and mitigate significant environmental impact, including ensuring all environmental permits and registrations must be legally compliant at any time.
- Report any inspection from local government bodies, along with details of any official complaint, legal action, or recommendation.
- Optimise consumption of natural resources, implement, and demonstrate sound measures to prevent/reduce and track where possible pollution and other toxic emissions, water/energy/carbon footprint, reuse and recycle packaging and reduce waste to landfill and post-consumer waste.
- Respect biodiversity and conduct business activities with consideration to biodiversity impacts.
- Implement necessary steps and processes to mitigate environmental risks.
- Ensure all actions are taken to minimise environmental impact of transportation vehicle were possible, including but not limited to the following:
 - Vehicles transporting product must be suitable for food transportation and never transport garbage, refuse, toxic materials, scrap materials, medical waste, radioactive materials, sludge, asbestos, or hazardous waste. Brake linings should be asbestos free where practical. Vehicles should also be in compliance with local air pollution, noise and emission control legislation including emission-testing requirements. Vehicles should also be inspected annually for proper maintenance to maintain fuel efficiency, low emissions, and overall road safety as appropriate.
 - If an Asahi Beverages product that is transported falls within the definition of a hazardous material (e.g. flammable essences or corrosive acids such as phosphoric acid or some citrus based acids) vehicles should comply with all applicable hazardous material transport regulations including but not limited to shipping papers, bills of lading, vehicle placarding, special driver licensing and training requirements, and container labelling.
 - Refrigerants and insulation materials used in refrigerated vehicles should be non-CFC and non-HCFC (i.e., environmentally friendly, non-ozone depleting refrigerants).
- Be transparent about social, environmental, and economic sustainability practices, and actively engage in our policies and processes.
- Support us with our Sustainability goals where possible:
 - **Climate Change:** Reduce our carbon emissions across our supply chain to be ZERO CO₂ by 2050 & adopt 100% renewable sourced electricity by 2025
 - **Sustainable Packaging:** Reduce, our use of virgin plastics; increase re-use of materials (rPet); make our packaging 100% recyclable, returnable or compostable by 2025
 - **Sustainable Water Resources:** Reduce our water consumption & ensure sustainability of our water resources

- **Sustainable Supply Chain / Respect for Human Rights:** Ensure our supply chain and operations respect & upholds Human Rights
- **Sustainable Raw Material Procurement:** Ensure our sourcing considers environmental and social impacts as well as minimising climate risk
- **Circular Economy:** Expand our efforts to reduce, reuse and recycle waste in our operations

Compliance, Ethical Conduct, Corporate Fraud, and Anti-Corruption

- Always act ethically and with integrity and comply with all relevant laws and regulations, in Australia and/or the country in which Supplier's company is incorporated in, in relation to ethical conduct, corporate fraud, bribery, corruption and prohibited business practices, as well as with relevant social norms
- Comply with all applicable anti-bribery and anti-corruption legislation including, without limitation, the Crimes Act 1914 (Cth) and the Criminal Code Act 1995 (Cth) or similar laws of other countries that are applicable
- Commit to the principles of lawful and free competition based on the merits of products and services, and abide by all anti-trust, consumer and competition laws in all countries of operation including without limitation the Competition and Consumer Act 2010 (Cth) (**CCA**). Do not engage in activities that violate relevant competition, fair-trading and consumer protection laws.
- Mitigate risk of corruption with an entertainment or gifts policy. Modest gifts and reasonable hospitality may be accepted if they are transparent, culturally appropriate and incapable of influencing a person's duty and/or encouraging misuse of his or her authority and of low value of AUD 100 or less.
- Maintain full confidentiality of trade information, business processes and technology. There should be no infringement on the intellectual property rights of third parties. Business information (including but not limited to employee and technical information) should be thoroughly managed.
- Ensure no act that conflicts with the interests of the company is committed.
- Act ethically, while ensuring no improper conduct is committed, including:
 - Fraud (act of obtaining money, assets or services for yourself or for another person through dishonesty or deception).
 - Dishonesty.
 - Improper activities (acts or omissions that violate company directives, instructions, policies, regulation or rules, including but not limited to substantial mismanagement of company resources, or involving a substantial risk to employee or public health and safety or to the environment).
 - Theft or misappropriation.
 - Significant mismanagement or waste of funds or resources.
 - Serious harm to public health, safety and environment, or the health and safety of any employees.
 - Acts or omissions that may adversely affect the reputation of your or our company.
 - Acts or omissions that may be relevant to an employee's capacity to perform their job.
 - Action taken against the person making the disclosure, or harm suffered by a employee, as a result of making a report of improper conduct.
- Have no connection with organised crime elements or any individuals or groups which engage in illegal acts.
- Disclose sources of primary origin (including country of origin) associated with any materials supplied to Asahi Beverages or its subsidiaries. Asahi Beverages may request information of

Suppliers' supply chain to identify origin of goods or services to facilitate assessment of upstream supply chain compliance.

- Provide fair and just opportunities to all Suppliers.

Reporting Breaches

- If Supplier becomes aware of a breach of this Supplier Code of Conduct, either in your organization or ours, you can make an anonymous report to the Ethics and Compliance Hotline (Whistleblower Hotline).
- This hotline is managed by an independent third-party provider and confidentiality is guaranteed.

ETHICS & COMPLIANCE HOTLINE

Australia: 1800 314 793

Operated by an independent third party.
Available 24 hours a day, 7 days a week.

New Zealand: 0800 377 990

We will continue to monitor and review this Supplier Code of Conduct and adapt it as necessary. An up-to-date version of this policy can be found at all times on the Asahi Beverages website – <https://www.asahi.com.au/responsibility/corporate-social-responsibility-principles>

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