

## Asahi Beverages Whistleblowing Procedure – For disclosures by External Persons

This procedure applies to individuals including:

- former officers, employees and associates;
- relatives of our current and former officers, employees and associates;
- our former contractors, suppliers, and their employees; or
- relatives of current and former contractors, suppliers and their employees, including a spouse (including de facto), parent, child or dependant.

If you have a concern about Improper Conduct occurring in relation to our business, you may use our “Ethics & Compliance Hotline” to raise your concern, which is a confidential hotline that is independently operated by SMG Health 24 hours a day, 7 days a week. The “Ethics & Compliance Hotline” phone number is 1800 314 793 (Australia) or 0800 377 990 (New Zealand).

You can raise your concern anonymously. A disclosure made to our whistleblowing hotline will be treated with discretion. The identity of a discloser (or information likely to lead to a discloser being identified as a discloser) will be kept confidential, except to the limited extent advised otherwise. You may be required to sign a confidentiality agreement in relation to information we provide to you about the investigation.

Your concern must be based on reasonable grounds **and** relate to Improper Conduct outlined below:

Improper Conduct	Example/s
<p>Misconduct in relation to the Asahi Beverages Group.</p> <p><b>Misconduct</b> includes fraud, negligence, default, breach of trust, or breach of duty in relation to Asahi Beverages Group.</p>	<p>Deliberately or negligently breaching laws in the conduct of our business or the person’s duties.</p> <p>Deliberately overcharging customers or charging customers for services they did not receive.</p>
<p>An improper state of affairs or circumstances, in relation to the Asahi Beverages Group.</p>	<p>Unethical conduct, such as systemic or serious breaches of our Code of Conduct, Bribery and Anti-Corruption Policy.</p> <p>Conduct which may cause financial or non-financial loss to the Asahi Beverages Group or be otherwise detrimental to the interests of Asahi Beverages Group, such as financial mismanagement.</p>
<p>Information that indicates that the Asahi Beverages Group or any of our officers or employees have engaged in conduct that constitutes a breach of the Corporations Act or other laws administered by ASIC and APRA, such as: <i>Corporations Act</i>; <i>ASIC Act 2001</i>; <i>Banking Act 1959</i>; <i>Financial Sector (Collection of Data) Act 2001</i>; <i>Insurance Act 1973</i>; <i>Life Insurance Act 1995</i>; <i>National Consumer Credit Protection Act 2009</i>; <i>Superannuation Industry (Supervision) Act 1993</i>; or any instrument made under those Acts.</p>	<p>Insider trading.</p> <p>Trading while insolvent.</p> <p>Breach of continuous disclosure rules.</p> <p>Engaging in detrimental conduct towards a person who is, or is thought to be, a discloser.</p> <p>Revealing the identity (or information likely to lead to identification) of a discloser (except in permitted circumstances).</p>

Information that indicates that Asahi Beverages Group or any of our officers or employees have engaged in conduct that breaches any other Commonwealth laws, that is punishable by 12 months or more imprisonment	Bribing a government official. Breach of work, health and safety laws.
Information that indicates that the Asahi Beverages Group or any of our officers or employees have engaged in conduct that represents a danger to the public or the financial system.	Deliberately or negligently misleading the public about the safety of a product.
Information that indicates misconduct or an improper state of affairs or circumstances, in relation to the tax affairs of the Asahi Beverages Group or associated entity.	Information about a tax evasion scheme within the business.
Concerns about the actions of a third party.	A supplier asking you for a kickback arrangement.
Any attempt to conceal or delay disclosure of any of the above conduct.	