



Our Standards for Business and Supply Partners

June 3, 2019

Introduction

Molson Coors Brewing Company wants to build winning relationships with our suppliers, vendors, distributors, and business partners (here in referred to as “You”). We are committed to doing business the right way by acting ethically, responsibly, and in compliance with the law. We achieve this by respecting human rights, demanding quality, and embracing diversity and inclusion. We have a responsibility to ourselves, the communities we live in, people we work with, customers we serve, and beer drinkers we seek to delight to always operate with integrity, honesty, and respect.

We strive to adopt the best practice standards and techniques possible to achieve ethical and sustainable procurement by balancing economic development, social development, and environmental protection with our commercial needs for quality, reliability, innovation, and value. As one of our business partners, we expect You to adopt best practice standards and strategies as well.

Our Commitment

Good corporate citizenship is a key priority at our company. We are committed to using an ethical and sustainable supply chain and managing the supply of goods and services in a responsible way by adopting a risk and opportunities-based approach to identify our priorities.

We are committed to working with business partners who:

- Comply with all applicable international, national, regional, state, and local laws, rules, regulations and legislation.
- Work with us to meet our quality, reliability, innovation, and value for money needs.
- Assess sustainability risks and identifying opportunities for improvement and innovation.
- Collaborate with us to continually improve business practices.

We emphasize that this document sets out our minimum compliance standards. They do not alter or eliminate any contractual requirements or other specifications provided by Molson Coors or its affiliates and subsidiaries. As a business partner, You are required to meet or exceed all threshold requirements. Many of these standards are grounded in applicable laws, rules, and regulations that are routinely updated and changed. You are always required to comply with the most current version of these laws, rules, regulations as they evolve. Further, we consistently strive to improve our standards and achieve excellence. We may modify and update these standards from time to time in order to achieve these goals. You are expected to comply with the most recent version of these standards. However, some requirements may not apply to You, depending on the nature of the relationship You have with Molson Coors.

Our Business Partners’ Responsibilities

Each business partner of Molson Coors Brewing company and/or its subsidiaries and affiliates, is required to understand and meet these requirements. We encourage all our business partners to have an open dialogue with us if you have questions or concerns regarding compliance with our standards.

Where the use of sub-contractors or other third-party organizations has been permitted, we expect You to hold such sub-contractors or third-party organizations to the same standards.

Furthermore, we expect You to have appropriate processes in place to verify and demonstrate applicable compliance with our standards. We also expect You to have a business continuity plan in place in the event of an unforeseen, partial or complete interruption of their goods or services.

Modifications to these Policies

These Standards were last updated and adopted on June 3, 2019. Molson Coors reserves the right to modify these policies from time to time. You are expected to comply with these policies as revised.

Employment Standards and Human Rights

We are committed to preventing human rights violations. We strive to ensure our workplaces implement the highest level of safety and employment standards consistent with the United Nation's Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights to Work, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. We expect You to act in accordance with these standards as well. We take a strong stance against modern slavery and forced labor in all its forms, such as human trafficking, child labor, workplace abuse, and domestic and indentured servitude. You must meet basic ethical and employment standards. We evaluate Your ability to adhere to basic ethical and employment standards in determining whether to have and maintain a business relationship with You. We are committed to sourcing from, and do business with, business partners who engage in ethical labor practices that allow their workplace to be a diverse, safe, and healthy environment for all employees.

You shall:

- Ensure that there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, sex, color, national or social origin, religion, age, disability, sexual orientation or any other status protected by applicable laws in the jurisdictions in which You operate. A fundamental aim is to ensure a diverse and representative workforce profile through promotion of employment equality.
- Comply with all anti-slavery laws and all other applicable laws relating to human trafficking and its prevention, including but not limited to the UK Modern Slavery Act 2015.
- Prohibit physical disciplinary abuse and forced labor, including human trafficking.
- Respect our employee's right to join, form, or not to join a labor union.
- Fully document grievance procedures and communicate their existence and availability to staff.
- Compensate all employees fairly with wages, overtime premiums, and benefits relative to industry and country laws. Hours of work must comply with benchmark industry standards and must not be excessive.
- Not require staff and workers to lodge 'deposits' or their identity papers with their employer, and ensure staff are free to leave their employer after reasonable notice.
- Publicly disclose the locations of all manufacturing and processing sites globally and ensure that all sites are maintained appropriately to prevent hazardous working conditions.
- Ensure that no child labor is recruited and that children or young persons outside of legal working age will not be employed. These policies and procedures will conform to the provisions of the relevant International Labor Organization ("ILO") standards.
- Remove any harassment, bullying, and actions or attitudes that promote or allow such practices in the workplace.
- Have, and comply with, internal health and safety policies and procedures and applicable foreign, national, regional and local laws, rules and regulations to ensure a safe working environment, including the effective application of environmental, health and safety management and monitoring systems and maximizing the physical security of their employees wherever they are employed.
- Provide training to employees and ensure that all employees understand the health, safety, and security issues and requirements concerning their job/position.
- Observe all applicable international, national, regional, state, and local laws, rules, and regulations.

Ethical Business Practices

Our policies on gifts, entertainment, bribery and corruption, and conflicts of interest are clear: no gift, favor or entertainment is required to conduct business with Molson Coors, and You may be ineligible to do business with Molson Coors if a conflict of interest exists where any of our employees own a substantial interest in Your organization or have a close personal relationship with a key person in Your organization. Further, we expect You to adhere to strict standards surrounding confidentiality, business expenses, securities, software, tangible and intangible assets, and compliance with the law.

You shall:

- Refrain from providing any payments, loan, service, gratuity, gift, personal travel or other favors of more than nominal value to any Molson Coors representative.
- Follow applicable anti-bribery and corruption laws in all areas of the world, including, for example, the United States Foreign Corrupt Practices Act and the UK Bribery Act. These laws generally prohibit promising, offering, receiving or making, whether directly or indirectly, any payment of money, products or services to anyone in exchange for favorable treatment. You are not allowed to make any such payments for, or on behalf of Molson Coors Brewing Company or any of its affiliates, including the so called “facilitating” payments to government/public officials to perform routine functions they are already obligated to perform.
- Provide prompt disclosure of any relationship where any of our employees own a substantial interest in Your organization or have a close personal relationship with a key person in Your organization.
- Safeguard both our tangible (i.e. money, physical assets) and intangible assets (i.e. intellectual property, information).
- Keep our confidential information secure and avoid discussions of confidential information in public places.
- Retain and preserve the confidentiality of sensitive information. This obligation may be ongoing and extend beyond the term of a contractual arrangement. You may be asked to sign a Non-Disclosure Agreement.
- Follow any guidelines provided in relation to the submission of business-related expenses. All expenses must be reasonable and supported by valid receipts where required.
- Never purchase, sell, or otherwise trade Molson Coors Brewing Company securities while in possession of material, non-public information. You may not provide material, non-public information directly or indirectly to anyone. Any such disclosure is a breach of Your confidentiality obligations and may subject the You to liability under certain U.S. securities laws.
- Refrain from engaging in unauthorized duplication of any software owned or licensed by Molson Coors.
- Communicate these standards to employees, contractors and business partners in writing and ensure that they are followed.
- Comply fully with all laws that promote full and fair competition (sometimes referred to as antitrust or competition laws). These laws regulate dealings with competitors, customers, distributors and other third parties and we require You to familiarize yourself with these laws to ensure Your conduct is accordance with them.
- Comply with all applicable sanctions, export control, and anti-boycott laws regulations, orders, directives, designations, licenses, and decisions of the United Nations, the European Union, the United Kingdom, and the United States, and anti-money laundering laws and regulations in all applicable jurisdictions, and refrain from directing proceeds of doing business with us to benefit persons, entities or countries that are targeted by such laws.
- Observe all applicable international, national, regional, state, and local laws, rules, regulations.

We strongly encourage You to contact the Molson Coors Ethics and Compliance Helpline at **1-866-294-9302** or www.molsoncoorshelpline.ethicspoint.com if You have a question, concern, or feel pressured to violate these standards. The Helpline is run by a third-party service provider and can be completely anonymous, if requested. Every caller is provided a code number and can call back to receive an answer to their question or find out how the matter was resolved.

Community Responsibilities

We strive to engage in the highest standard of conduct and will always strive to treat our business partners ethically, honestly, and fairly. We expect You to conduct activity following the same standards of ethics, honesty, and fairness. Further, we are committed to alcohol responsibility in all our business practices and encourage You to promote principles of alcohol responsibility.

You shall:

- Deploy a consistent and ethical standard by which contracts are awarded with respect to products and services for Molson Coors, taking into consideration a wide array of social, environmental, and economic impacts on the communities in which they operate or source from.
- Have plans in place to minimize any disruption to local communities caused by their activities and to demonstrate compliance with those plans.
- Encourage employee education on responsible drinking principles.
- Only promote the highest principles of responsible drinking in the creation of marketing and sales collateral.

Environmental Impact

We continually strive to improve the environmental quality of our systems and our products. We endeavor to do business with business partners who share our philosophies and commitments to the environment. We are committed to sourcing from business partners who grow, convert, produce, and deliver packaging materials, goods, services, and support in a manner that embraces our sustainability and quality standards while meeting or exceeding expectations for performance, product and consumer safety, and environmental sustainability.

You shall:

- Efficiently use available resources to minimize or mitigate environmental impacts by fully exploiting opportunities for energy optimization, utilizing clean and low energy sources, and using whole life cycle costing for energy.
- Seek to reduce carbon emissions, discharges, waste and use of water, and energy.
- Provide information on carbon emissions and embedded carbon associated with the manufacture and supply of products and services, including those associated with production, storage, transportation, use, and ultimate disposal or recycling.
- Secure legally and sustainably sourced timber and timber products, and comply with appropriate national, regional, local, and international laws and standards.
- Comply with our Packaging Policy, available at <http://www.molsoncoors.com/-/media/molson-coors-corporate/policies/packaging-policy.ashx?la=en>, and our Agricultural Brewing Ingredients Policies, available at <http://www.molsoncoors.com/-/media/molson-coors-corporate/policies/agricultural-brewing-ingredients-policy.ashx?la=en>, where applicable.
- Give priority to and provide information on secondary materials (reused or recycled) where they offer equal or greater value and do not compromise quality or food safety standards. Provide information on recycled content and recyclability. Exploit opportunities to increase such levels where appropriate.
- Produce biodiversity action plans for high-risk first-tier categories and demonstrate compliance with good practice in habitat management for those business partners whose activities significantly impact species or habits, and support and comply with our Packaging or Agricultural Brewing Ingredients policies where applicable.
- Quantify the water consumption of products or services provided and demonstrate how You will exploit opportunities to reduce water consumption in operations over time.
- Have water risk assessments and be able to demonstrate compliance with any risk mitigation activities specified for categories of supply that are sourced from areas of water stress.
- Work with us to reduce waste at our sites, and where waste cannot be eliminated, work to ensure we have alternatives to land fill for disposal. Where practicable, all products and packaging will be reused, recycled, or recovered by local, commonly available methods.
- Comply with local and national environmental laws, rules, and regulations, and show sensitivity to environmental issues that may impact local communities.

Data Security

Data security and the protection of information is an ever-growing concern worldwide. We are committed to doing our part to protect data and individual privacy. We expect our Supply Partners to maintain adequate data security protocols using appropriate technical and organizational security measures.

Supply Partners shall:

- Comply with all directives, laws, rules, and regulations relating to the privacy, confidentiality, security, and protection of protected data.
- Use appropriate technical, physical, and administrative security measures, and safeguards designed to protect the storage and transmission of protected data.
- Comply with security breach notification laws, rules, and regulations and have appropriate organizational procedures in place in order to react to a security breach.
- Comply with all requirements of the ePrivacy Directive (2002/58/EC) and any successor regulation or similar and applicable legislation enacted outside of the European Economic Area.
- Maintain a list of all locations where personal data is processed.
- Ensure that any transfer of personal data is performed by an entity that maintains active certification under the EU-US Privacy Shield Program or any similar or successor program.
- Ensure that any transfer of personal data is transferred pursuant to standard contractual clauses or binding corporate rules approved by the European Commission, as applicable, and deemed to ensure “adequate” data protection under applicable local and international data protection law.

How We Work With You

As a global company, we recognize that we have a diverse range of business partners and that achieving these standards presents unique challenges in different parts of the world. In order to know our business partners, we use a variety of tools and services to perform initial screenings of potential business partners and may perform additional due diligence screenings for various purposes, including anti-bribery and anti-corruption.

For suppliers and vendors, we have developed a comprehensive but flexible multi-stage process for identifying, assessing, and managing risk as it relates to sustainable procurement. We utilize the Sedex Risk Assessment Tool with many of our suppliers and vendors and we are working towards utilizing Sedex more in the future.

Management systems

Where deemed necessary by Molson Coors, suppliers and vendors shall use management systems to facilitate continual improvement and compliance with the expectations of these standards. This is determined by the size and activities of such suppliers and vendors, along with the sustainability-related risks derived from our analysis and audit process. The management systems shall include:

- Allocating appropriate resources and defining appropriate policies and standards.
- Performing all contracted services in a reasonably safe and professional manner.
- Identifying and complying with applicable laws, regulations, industry standards, and relevant customer requirements, as such laws, regulations, industry standards, or requirements are amended from time to time.
- Having mechanisms to determine and manage risks in all areas addressed by this document.
- Maintaining documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.
- Implementing training programs that achieve appropriate levels of knowledge, skills, and abilities in management and workers to address these expectations.
- Striving to continually improve by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies.