

The California Transparency in Supply Chains Act of 2010 (SB 657) (“Act”) went into effect in the State of California on January 1, 2012. The Act seeks the elimination of slavery and human trafficking from product supply chains and requires that large companies who do business in California disclose their efforts toward the elimination of slavery and human trafficking by answering the questions below.

MillerCoors was formed in July 2008 as a joint venture of SABMiller and Molson Coors, and continues to evolve and implement best policies and practices. As a company, we have adopted and utilized our Responsible Sourcing Principles since 2008, to ensure that basic human rights are acknowledged and respected by both our own procurement initiatives and the initiatives of our suppliers. The principles provide guidance regarding business conduct, working conditions, forced employment, child labor, wages, diversity, freedom of association and environmental issues. A copy of our Responsible Sourcing Principles can be found in our Supplier Code of Conduct [here](#). In addition, in 2011 MillerCoors joined the Supplier Ethical Data Exchange (SEDEX) program. This program provides MillerCoors the ability to evaluate select suppliers’ policies relative to human trafficking and slavery via its self-assessment questionnaire and risk reporting features.

The sustainable development of our company is a key priority in building our business the right way. Our sustainable development practices include efforts around ethics and transparency, alcohol responsibility, environmental sustainability, sustainable supply chain and people & community investment. More information regarding our sustainable development efforts can be found in our Sustainable Development Report [here](#).

Specific responses to the questions in the Act are listed below.

**Does your company**

**(1) Engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery?**

MillerCoors assesses its Top 100 Suppliers (by spend) relative to sustainability risk, including human trafficking and slavery. Select suppliers are engaged in using the Supplier Ethical Data Exchange (SEDEX) to self-assess and disclose their policies, enabling MillerCoors to evaluate the risk potential they present. Additionally, MillerCoors regularly reviews various categories of spend and initiates projects to source new suppliers. During these events, we evaluate potential suppliers on a variety of qualifications, including our Responsible Sourcing Principles which include prohibitions on forced or compulsory labor. The evaluations are not conducted by a third party.

**(2) Audit suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains?**

MillerCoors does not audit its suppliers to evaluate compliance with the Responsible Sourcing Principles. It does evaluate risk of non-compliance with those suppliers engaged in the SEDEX program. We are actively expanding supplier engagement in this program.

**(3) Require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business?**

MillerCoors does not currently require suppliers to certify that all materials incorporated into their product comply with slavery and human trafficking laws where they do business, but we do require all suppliers to comply with all applicable federal, state and local laws. Additionally, utilization of the SEDEX tool provides us with visibility to supplier practices and policies.

**(4) Maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking?**

MillerCoors has a robust Code of Business Conduct to educate and hold employees responsible for engaging in legal, ethical and responsible business practices. Employees must affirm their review of and compliance with the Code of Conduct annually. Our Code of Business Conduct does not currently address slavery and human trafficking and can be found [here](#).

**(5) Provide company employees and management who have direct responsibility for supply chain management training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products?**

MillerCoors does not train its employees on issues relating to human trafficking and slavery.