



MillerCoors Business Code of Conduct

In our quest to create America's best beer company, MillerCoors is committed to providing products and services of superb quality and value to its customers and our consumers. It is vital for our suppliers to understand that MillerCoors expects the highest standard of conduct. Our standards set forth fundamental principles and policies to which all of our suppliers must adhere. MillerCoors will always strive to treat our suppliers ethically, honestly and fairly. We strongly encourage any business partner who has a question, or feels pressured by a MillerCoors employee or another representative of our company to violate these Standards, to contact MillerCoors Ethics Hotline at (888) 278-1496. This site is run by a third party service provider and can be completely anonymous if you like. 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.

Communication.

MillerCoors expects its suppliers to communicate these standards to their employees and business partners to ensure they are followed.

Offer of payments, loans, entertainment and gifts by supplier.

Our business relationships are based on superior value of goods and services that we buy from our suppliers. Our policy on gifts and entertainment is clear -- no gift, favor or entertainment is needed to conduct business with MillerCoors. Suppliers must not offer or provide any payment, loan, service, gratuity, gift, personal travel or other favors of more than nominal value to any MillerCoors employee.

Commercial bribes or political donations.

Commercial bribery is illegal and subject to criminal penalties in many countries, including the United States. MillerCoors prohibits all bribes, kickbacks or other unlawful or improper methods of remuneration to be given to any of our employees. Additionally, no supplier is allowed to make any payments for or on behalf of MillerCoors, or with funds provided by MillerCoors, to any official of a government or government agency.

MillerCoors employee(s) owns substantial interest in organizations doing business with MillerCoors.

Supplier is ineligible to do business with MillerCoors and should not seek to do business with MillerCoors if any of our employees owns a substantial interest in supplier's organization. Prompt disclosure is required by our suppliers.

Use and protection of MillerCoors assets.

MillerCoors looks to our suppliers to safeguard our informational and physical assets. We expect our suppliers to keep our confidential information secure and avoid discussions of confidential information in public places. The obligation to retain and preserve confidential information may be ongoing and span beyond the years of contractual agreement with the supplier.

Our contracts provide clear guidelines related to submission of business related expenses. All business expenses must be reasonable and supported by valid receipts where required under the agreement.

Insider Trading

Our suppliers are prohibited from purchasing, selling or otherwise trading in our parents' Molson Coors Brewing Company or SABMiller plc securities while in possession of material non-public information. Additionally suppliers may not provide material non-public information, directly or indirectly to anyone.

Use of software

MillerCoors suppliers may not engage in unauthorized duplication of any software owned or licensed by MillerCoors.

MillerCoors Responsible Sourcing Principles

The impacts of our purchasing stretch around the world. We engage with our suppliers to reduce reputational risks, secure the supply of quality goods and services, provide employment and improve standards of living, especially in developing communities. MillerCoors is committed to implementing Responsible Sourcing Principles into our supplier assessment procedures to ensure that basic human rights are respected throughout our supply chain and has adopted the following Responsible Sourcing Principles:

Business Conduct: Suppliers must deal openly and fairly with MillerCoors and adhere to contract terms.

Working Conditions: Supplier policies and procedures for health and safety must, at a minimum, meet legal requirements, and where such legal requirements do not exist, the policies and procedures must be sufficient to protect the well-being of the employees.

Employment: Forced or compulsory labor is strictly prohibited.

Child Labor: In accordance with ILO conventions, children may only be employed in circumstances that fully safeguard them from potential exploitation, that protect them from moral or physical hazards and long term damage to health and that do not disrupt their education.

Wages and Hours: Wages paid must not be lower than that required by local law, or in the absence of local law, the level paid generally within that industry. Also, hours of work must conform to local law, or in the absence of local law, the norm within that industry; however the hours of work must not be excessive.

Diversity: While being respectful of cultural differences, MillerCoors expects their primary suppliers to provide development of equal opportunities without discrimination on the grounds of races, religion, gender or any other arbitrary means.

Freedom of Association: Supplier employees are to be free to join lawful associations.

Environment: MillerCoors continually strives to improve environmental quality of our systems and our products. We strive to do business with suppliers who share our philosophies and commitments to the environment. Suppliers must comply with environmental laws and show sensitivity to other environmental issues that may impact local communities and / or MillerCoors.