

Company Name Anheuser-Busch InBev
Industry Agricultural Products (Supply Chain and Own Operations)
Overall Score (*) 35.7 out of 100

Theme Score	Out of	For Theme
5.0	10	A. Governance and Policies
7.4	25	B. Embedding Respect and Human Rights Due Diligence
4.6	15	C. Remedies and Grievance Mechanisms
6.0	20	D. Performance: Company Human Rights Practices
7.5	20	E. Performance: Responses to Serious Allegations
5.2	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company describes the following: 'This Global Human Rights Policy ("Policy") outlines AB InBev's approach and commitment to respecting human rights across our global operations and our value chain.' [Global Human Rights Policy, 6/2019: ab-inbev.com] Met: UNGC principles 1 & 2: The Global Human Rights Policy states that as 'a signatory to the United Nations ("UN") Global Compact, we are committed to business practices that respect human rights and that align with international standards of responsible business conduct.' [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: Under the "Our Commitment" section of the Company's Global Human Rights Policy the Company commits to the UN Guiding Principles on Business and Human Rights. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: ILO Core: The Company's Code of Business Conduct and Global HR policy cover each of discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Global Human Rights Policy, 6/2019: ab-inbev.com & Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Explicitly list All four ILO for AG suppliers: The Company states in its Global Responsible Sourcing Policy, 'we expect our Business Partners to respect the human rights of employees within their operations, and to promote human rights of all workers – whether directly engaged by the Business Partner or through third-party companies or agencies, and whether engaged formally or as casual or temporary workers – within their operations. We seek to work with our Business Partners to understand the challenges within our supply chain and work together to support improvements.' The Human rights principles are those which Anheuser-Busch InBev considers to be the most salient within its global value chain, and this includes Child Labour and Young People; Forced Labour and Freedom of Movement; Freedom of Association and the right to collective bargaining; and Discrimination and Harassment. With respect freedom of association and collective bargaining, the Policy says: 'Business Partners must support the right of all workers to choose whether to form or join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. Business Partners must not discriminate in any way against workers that choose to form or join trade unions, or against those workers that choose not to form or join trade unions. In those countries and/or situations in which the legal system prohibits or severely restricts the right of freedom of association, Business Partners must support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers' interests and communication between workers and management.' [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Human rights policy contains explicit commitment to each labour area of child labour, forced labour, discrimination, freedom of association and collective bargaining. In relation to these last two, it says: 'AB InBev respects the right of all its workers to form and join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. [...] In those countries and/or situations in which the legal system prohibits or severely restricts the right of freedom of association, AB InBev will support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers interests and communication between workers and management' [Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: Respect H&S of workers: The Human Rights policy states that 'AB InBev strives to ensure high standards of occupational health and safety throughout the organization, as articulated in our Health and Safety Policy'. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: H&S applies to AG suppliers: The Global Responsible sourcing policy contains a commitment to health and safety and a list of specific requirements. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respect land ownership and natural resources: The Company states in its Human Rights Policy that it 'follows all applicable national laws relating to the rights of land and national resources ensuring land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. We conduct due diligence around land rights and title during the development of new business opportunities.' However, in order to award this indicator the company must commit to respecting ownership/use of land and natural resources. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Respecting the right to water: The Company is 'committed to working in partnership with communities where we operate to understand and take reasonable approaches to managing natural resources, including water, and to helping provide access to natural resources such as water to communities in need.' However, no explicit commitment to respecting the right to water could be found. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all: The Company states in its Global Human Rights Policy 'Ab InBev follows all applicable laws relating to the rights of land and national resources [...] We seek to secure free, prior, and informed consent and have a grievance mechanism in place to resolve any dispute over land titles'. In its Responsible Sourcing Policy, it says that 'business partners must seek free, informed, prior consent'. However, 'seek' free prior, informed consent, is not

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>considered a formal commitment to obtain FPIC. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com & Global Human Rights Policy, 6/2019: ab-inbev.com]</p> <ul style="list-style-type: none"> • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people’s rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles: The Company states that its commitment is based on the UN Women's Empowerment Principles, as well as the Children's Rights and Business Principles. However, the use of the wording 'based on' is not considered a formal statement of commitment following CHRB wording criteria. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Child Rights Convention/Business Principles: See above. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company identifies stakeholder engagement in its Materiality Assessment. Furthermore, the Company states in its Global Human Rights Policy, that the Company is 'committed to engaging in meaningful dialogue with stakeholders to assess potential or actual human rights impacts, or their legitimate representatives.' It also states it 'believes that engaging with affected and potentially affected stakeholders is critical for building and maintaining a robust human rights approach.' [Materiality Assessment, 12/2017 & Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company 'believes that stakeholder engagement is important when this [Human Rights] Policy is periodically updated, and when the Company undertakes periodic human rights risk assessments.' However, this is not strong enough to be considered a formal commitment to engage stakeholders in the design, and no further evidence was found. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Regular stakeholder design engagement: In developing its Human Rights policy, the Company 'consulted with both internal and external stakeholders.' However, it is unclear whether this includes affected stakeholders, and no evidence could be found of regular engagement in the design of the policy. [Global Human Rights Policy, 6/2019: ab-inbev.com]
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company is 'committed to the provision of effective remedy where AB InBev has not met the standards set out in' its human rights policy. This policy covers workers (including full time, part time, independent contractors and temporary), communities, and other stakeholders. The policy includes commitments to respect Human rights, UN Global Compact, UN Guiding principles and ILO Core areas, among others. [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Global Human Rights Policy was approved by the Global Audit Committee in December 2016. [Human Rights Disclosure, 03/2018] • Met: Board level responsibility for HRs: The Human Rights Disclosure states that the 'Global Compliance Committee and Regional-level Compliance Committees, which both include members of the Executive Board of Management, oversee implementation of the Policy.' [Human Rights Disclosure, 03/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board/Committee review of salient HRs: The Company states in its Human Rights Disclosure that it has established a Global Sustainability Council and Global Reputation Council, both of which include members of the Executive Board. In the first eight months of 2018, reports relating to compliance with human rights policy were twice presented to each of the Audit Committee and Global Ethics and Compliance Committee. [Human Rights Disclosure, 03/2018 & Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Met: Examples or trends re HR discussion: 'By way of example, in the first eight months of 2018, reports relating to compliance with the human rights policy were twice presented to each of the Audit Committee and Global Ethics & Compliance Committee. As part of that process, the Company approved the introduction of a Global Anti-Harassment and Anti-Discrimination Policy this year.' [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The Company states that 'the final individual bonus pay-out percentage also depends on each executive's personal achievement of their individual performance targets. Individual performance targets of the CEO and the EBM may consist of financial and non-financial targets such as sustainability and other elements of corporate social responsibility as well as compliance/ethics related targets.' However, it is unclear if these targets include human rights or a key industry risk. [Annual Report 2018, 22/3/2019: ab-inbev.com] • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions • Met: Senior responsibility for HR: All employees are required to act in accordance with the principles of the Company's Global Human Rights Policy, and it is the responsibility of the Ethics & Compliance and People teams to ensure all employees comply with this policy. The Global Ethics & Compliance Team oversees this, under the stewardship of the VP Ethics & Compliance. Also, 'every Zone-level Compliance team in our business has regional accountability for the application of our Global Human Rights Policy and completion of human rights assessments and actions plans.' [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: See above.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Day-to-day responsibility for AG in supply chain: The Company has disclosed the following to CHRB: 'Responsible Sourcing is led by the Global Procurement function due to its relationship with suppliers and their role in supplier selection and management. Our Chief Procurement and Sustainability Officer, and related Procurement function are accountable for the implementation of our Responsible Sourcing Policy into our supplier selection and management processes. Within our Procurement function, the Vice President of Supplier Value Creation and Sustainability leads the Responsible Sourcing Program, with the Global Sustainability Director and Global Sustainability Manager responsible for oversight on a day-to-day basis.' [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org]
B.1.2	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Senior manager incentives for human rights: The Company describes performance measures to which compensation is linked for Global Compliance Directors (and zone-level compliance directors), Global Sustainability Director and Global Sustainability Manager among others. Incentives are linked to undertaking human rights risk assessments, ensuring remediation plans are implemented and integrating lessons learned, implementing responsible sourcing program and remedial actions, assessment of issues in agriculture supply chain, etc. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] Met: At least one key AG HR risk, beyond employee H&S: As indicated above, human right related issues included go beyond health and safety and include a range of human right issues that necessarily include key risks. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: HR risks is integrated as part of enterprise risk system: The Company has disclosed that governance of the Human Rights Policy is integrated into its risk management system and overseen by the Audit Committee, but does not describe how human rights risks are included in a broader system. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Not met: Communicates its policy to all workers in own operations: The Company's Human Rights Policy states 'The Global and Zone Corporate Affairs teams will take steps to ensure the Policy is communicated effectively and an appropriate training program is put in place.' However, no description of the steps they are actually taking nor use of local languages where appropriate could be found. [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions: See indicator A.1.2 Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 Met: Requiring AG suppliers to communicate policy down the chain: The Company has a Responsible Sourcing Policy that applies to all business partners. The Policy is made available to business partners during the sourcing process and is accessible on the company website. The Company states in its Global Responsible sourcing policy, 'We expect our Business Partners to communicate the Policy to their employees and, cascade throughout their supply chain.' [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: The Responsible Sourcing Policy is a prerequisite in every Anheuser-Busch InBev contract for supply. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] Not met: Including on AG suppliers: The Company states that its business partners are to 'Communicate the [Responsible Sourcing] Policy to their employees and, cascade throughout their supply chain'. However it is not clear if contractual or binding arrangements are cascading down the supply chain. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The Company indicates in its GRI standard guide 2018 that 'A human rights policy is included in our Code of business conduct, on which we train our employees'. However, is not clear whether all employees are trained. [GRI Standard Index (2018): ab-inbev.com & GRI Standards Index, 12/2017] • Met: Trains relevant AG managers including procurement: The Company states in its Human Rights Disclosure, 'in 2017, the changes to our Responsible Sourcing Policy were communicated to our procurement team along with key information on how to embed responsible sourcing into our procurement processes. This was supplemented by in-person training to over 140 procurement colleagues. The training covered key topics including: the importance of human rights and the need to embed this into our procurement decision making processes, an overview of our Responsible Sourcing Policy, and the process to ensure our supplier selections take into account human rights practices.' [Human Rights Disclosure, 03/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company indicates that 'for each assessment, compliance teams conducted inquiries with relevant management personnel, site inspections, and interviews with employees of varying seniority and employment tenure. The Human Rights Legal Review Protocol provides guidance to Compliance teams on how to identify and undertake site-level assessments within our direct operations...'. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: Monitoring AG suppliers: The Company has disclosed the following to CHRB: 'If a supplier is identified as potentially higher risk in terms of responsible sourcing and human rights, they are required to undergo a 4-pillar Sedex Members Ethical Trade Audit (SMETA). The audit is conducted by a third-party company. The audit companies we work with engage directly with our suppliers to visit supplier premises to identify any gaps against our Responsible Sourcing Policy.' This policy includes the ILO core. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org & Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company states the auditors described above 'create the audit reports and agree with each supplier the corrective action plan which is shared with AB InBev.' However, no further details found, including the number of incidences. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AG selection of suppliers: In 2017 the Company implemented its "Global Responsible Sourcing Policy" which sets out the requirements for companies working with Anheuser-Busch InBev in relation to its human rights commitments. It states that "Acknowledgement of this Policy, and an agreement to abide by the standards set forth herein, is a pre-requisite in every Anheuser-Busch InBev contract for supply'. During 2017, the Company established 'a supplier prequalification process that assesses suppliers' performance against this policy and triggers third-party audits if a supplier is identified as high risk. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com & 2017 Annual Report, 12/2017] • Met: HR affects on-going AG supplier relationships: According to the Company's CHRB August 2018 Disclosure, refusal to accept the principle of three Responsible Sourcing Policy and the Supplier Anti-Corruption Policy, or to undergo an ethical audit and address identified issues can result in suppliers not being selected for business. In the case of non-compliance with these requirements the Company states that suppliers may de-authorised. Since 2015, six suppliers have been de-authorised. [Human Rights Disclosure - August 2018, 08/2018:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>humanrights.org & Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance: The Company states in its CHRB August 2018 Disclosure, that Anheuser-Busch InBev works in partnership with suppliers to support them in effectively implementing responsible sourcing practises. However, no evidence found of the specific work carried out with suppliers to improve their human rights performance, including examples. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org]
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company states in its Human Rights Disclosure, it recognises that 'identifying and addressing human rights risks is not the sole responsibility of a particular individual or function within our business. We require input and responsibility of multiple functions, including People, Procurement and Legal and Corporate Affairs. To facilitate effective cross-functional working, in 2018 we are establishing a working-level Human Rights Committee chaired by the Global Legal and Compliance Function.' It is not clear whether external stakeholders are included or how this is implemented in the Company's processes and systems. [Human Rights Disclosure, 03/2018] • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company describes a process that seems to include both identification and assessment. 'Compliance teams conduct comprehensive risk-based human rights assessments annually [...] During 2017, we conducted assessments in sixteen countries representing eight zones'. Assessments are conducted by Zone Ethics & Compliance teams and consider they human rights policy, the issues identified during the assessment and information from broader external engagement with stakeholders. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Met: Identifying risks in AG suppliers: The company has 'developed a supplier pre-qualification process that comprises of three pillars - financial stability, business integrity, and responsible sourcing and human rights', and is continuing to expand on this process. The Company describes the following: 'The supplier pre-qualification process (which includes Responsible Sourcing) is applied to both new suppliers and existing suppliers. All new suppliers are assessed as they enter supplier engagements. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: 'Compliance teams conduct comprehensive risk-based human rights assessments annually across our operations to evaluate compliance with policy. During 2017, we conducted assessments in sixteen countries'. Although the Company refers to 'assessments' the process seem to include identification as it not only assessed against policy, as it also indicates that teams consider too 'issues identified during the assessment and information from broader external engagement with stakeholders'. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Met: In consultation with stakeholders: The Company states that the Zone Ethics & Compliance teams take into consideration 'information from broader external engagement with stakeholders', for instance, 'Africa Zone is working collaboratively with Partner Africa'. For each assessment, teams 'conducted inquiries with relevant management personnel, site inspections, and interviews with employees of varying seniority and employment tenure'. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with HR experts: 'The Human Rights Legal Review Protocol provides guidance to Compliance teams on how to identify and undertake site-level assessments within our direct operations, ensuring consideration of the type of operation, stakeholders to engage, geographic location, potential for human rights issues amongst other criteria'. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Met: Triggered by new circumstances: However, new suppliers go through a pre-qualification process. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company states in its Materiality Assessment that human rights is one of the material aspects considered, however it does not provide details on what aspects of human rights are critical, nor is human rights one of the eight material aspects prioritised in its assessment. The Annual Report states that in 2017 it conducted a risk-based global analysis to assess enforcement of its human rights policy, but it does not disclose which issues are considered and addressed. [Materiality Assessment, 12/2017 & 2017 Annual Report, 12/2017] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in AG supply chain • Met: Example of Actions decided: The company provides the following example: 'in 2017, our Latin America North Zone identified security as a potential human rights issue as a result of their risk assessment process and reported it through the appropriate channels. This led to a number of changes such as recruiting a Security Manager for the region to improve security processes and resources at several at-risk operations.' [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states 'Our Helpline is available 24/7 and is toll-free. It is available to all colleagues, where you can CONFIDENTIALLY and, if you choose, ANONYMOUSLY report any concern in relation to potential breaches of our Code of Business Conduct. It is a secure means of reporting, provided by an independent company. It is available anywhere in the world and you can file your report in your language: By phone using a toll-free telephone number based on the country from which you are calling.' This covers human rights grievances. [Global CoBC, 02/2017: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: As above, different languages are available. [Global CoBC, 02/2017: ab-inbev.com] • Met: Opens own system to AG supplier workers: The Company states in its Responsible Sourcing Policy that grievances mechanisms are available for suppliers to report any gaps or breaches of the policy. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: In the Company's Global Human Rights Document, under the heading "Grievance Mechanisms and Non-Retaliation" the Company states that 'Any and all violations of this Policy must be reported through AB InBev's Compliance Helpline, online at talkopenly.ab-inbev.com, or by phone at 1-844-780-9959 or a local number available on the website. The Compliance Helpline is available 24 hours and is toll-free. It is available to anyone, and reports can be made confidentially and anonymously.' [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The online compliance helpline is available in 12 languages. [Compliance helpline, N/A: ab-inbev.gan-compliance.com] • Met: Expects AG supplier to have community grievance systems: The Company's Responsible Sourcing Policy states that 'Business Partners must have systems in place to enable anonymous grievance reporting by workers and external individuals.' In addition, the policy states that expects business partners to undertake, among others, the following step: 'Communicate the Policy to their employees and, cascade throughout their supply chain'. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales: The Company indicates that 'grievances must be resolved within 60 days of submission, unless the case requires an extended timeline to resolve and is granted an exception by the Global Ethics & Compliance team'. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] • Not met: How complainants will be informed: Although the Company reports multiple ways to submit grievances, no evidence found in relation to how the complainants are informed on the progress of their complaints. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company indicates that 'senior leadership are immediately notified of any grievance filed, specifically the VP of Ethics & Compliance and the VP of Risk. Should an affected stakeholder have concerns regarding their grievance, they have the right to anonymously file another case to appeal and a new investigator will be assigned to their case'. However, no evidence found on whether complaints can be escalated to more senior levels or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			independent parties if necessary. [Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org]
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Code of Conduct states that 'AB InBev prohibits and will not tolerate any retaliation or threatened retaliatory action against any employee who reports of a possible violation of law, regulation or AB InBev policy.' In addition, it is possible to report anonymously. The Global Human Rights Policy states 'AB InBev has a zero-tolerance policy toward any threatened or actual retaliation against any and all persons, or their legitimate representatives, who, in good faith, (i) raises concerns, (ii) formally or informally reports to AB InBev, (iii) assists another colleague to report to AB InBev, or (iv) participates in an investigation or litigation regarding a possible violation of this Policy.' [Global CoBC, 02/2017: ab-inbev.com & Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: Practical measures to prevent retaliation: As stated above, reports can be made anonymously. [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects AG suppliers to prohibit retaliation: The Responsible sourcing policy states the following: 'Business Partners must have systems in place to enable anonymous grievance reporting by workers and external individuals [...] The business partner also should have in place a policy prohibiting retaliation against workers and other stakeholders who lodge good faith grievances or concerns'. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Pays living wage or sets target date: The Company describes the following: 'AB InBev strives to provide workers with a pay and benefits package that supports an adequate standard of living. Wages and benefits shall be equal or superior to the applicable minimum legal and regulatory requirements.' However, the Company does not include a timeframe for paying workers an adequate standard of living, nor defines what that is. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Paying living wage • Not met: Definition of living wage reviewed with unions
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The Company includes the following in its Responsible Sourcing Policy: 'Business Partners should strive to provide workers with a pay and benefits package that supports an adequate standard of living. Wages and benefits shall be equal or superior to the applicable minimum legal and regulatory requirements.' However, it is not clear if this includes family and discretionary income. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: Improving living wage practices of suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Company requires the following from its suppliers: 'When contracting with agents or traders, Business Partners must be able to disclose the primary source of origin for materials supplied to Anheuser-Busch InBev. For selected supply chains Anheuser-Busch InBev may request the mapping of the upstream supply chain back to origin to facilitate compliance assessments.' The Company provides support to its suppliers in regards to mapping. For example, 'In 2018, we are working with first tier sugar suppliers in Brazil to map the supply chain to determine the mills and plantations that our sugar is primarily sourced from. As part of the mapping exercise with suppliers, we are gathering information on workers such as how workers are recruited, the employment of migrant employees and workforce gender diversity.' However, no further information in relation to name and address of suppliers were provided. Also, it is unclear if the Company actively and systematically maps all direct and indirect suppliers. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com & Human Rights Disclosure - August 2018, 08/2018: business-humanrights.org] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why
D.1.4.a	Prohibition on child labour: Age verification and corrective actions (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company 'prohibits the employment and exploitation of children within its facilities and will not engage in or support the use of child labor as defined by the ILO, which is work that is mentally, physically, socially or morally harmful to children, or work that interferes with their schooling.' [Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: Age verification of job applicants and workers: The Company 'will take reasonable steps to verify the age of job applicants and workers in its own operations.' [Global Human Rights Policy, 6/2019: ab-inbev.com] Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company states in its Responsible Sourcing Policy that 'Business Partners must prohibit the employment and exploitation of children and must not engage in or support the use of child labor as defined by the ILO.' Business partners are required to adhere with the policy in supply contracts. The Company uses Sedex Members Ethical Trade Audit, which includes age verification. No evidence found, however, in relation to remediation programmes. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Pays workers in full and on time: The Company describes the following: 'Workers should receive payment for work regularly, in full and on time and should have access to a pay slip, explaining their wage and any deductions.' In addition, 'workers also must not be required to lodge deposits or pay recruitment fees to AB InBev or any recruitment agent working on behalf of AB InBev'. [Global Human Rights Policy, 6/2019: ab-inbev.com] • Met: Payslips show any legitimate deductions: See above. [Global Human Rights Policy, 6/2019: ab-inbev.com] Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company's Responsible Sourcing Policy states that "Business Partners must prohibit, and must not benefit from any forms of forced or compulsory labour" and that "the use of bonded labour is strictly forbidden." Further, the sourcing policy states "Workers must not be required to lodge recruitment fees (deposits) and are free to withdraw from the employment relationship with reasonable notice. Workers must be allowed to leave the work premises off-shift. Business Partners must also prohibit the trafficking of persons, including arranging or facilitating the travel of another person with a view to that person being exploited". [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.c	Prohibition on forced labour: Restrictions on workers (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Company's Global Human Rights Policy states that the Company 'prohibits all forms of forced or compulsory labour and thus all employment relationship must be voluntary in nature. The use of prison labour or indentured or bonded labour is strictly forbidden, and workers must not be required to relinquish identity papers, passports, or work permits as a condition of employment. Workers must not be required to lodge deposits or pay recruitment fees to AB InBev or any recruitment agent working on behalf of AB InBev. Workers are free to withdraw from the employment relationship with reasonable notice and are allowed to leave the work premises off working hours.' [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company's Responsible Sourcing Policy states that "workers must not be required to relinquish identity papers, passports or work permits as a condition of employment. Workers must not be required to lodge recruitment fees (deposits) and are free to withdraw from the employment relationship with reasonable notice. Workers must be allowed to leave the work premises off shift". [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Global Human Rights Policy discloses it 'respects the right of all its workers to form and join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. AB InBev does not discriminate in any way against workers that choose to form or join trade unions, or against those workers that choose not to form or join trade unions. In those countries or situations in which the legal system prohibits or severely restricts the right of freedom of association, AB InBev will support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers' interests and communication between workers and management.' [Global Human Rights Policy, 6/2019: ab-inbev.com] • Not met: Discloses % covered by collective bargaining agreements <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Company states in its Responsible Sourcing Policy that 'Business Partners must support the right of all workers to choose whether to form or join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. Business Partners must not discriminate in any way against workers that choose to form or join trade unions, or against those workers that choose not to form or join trade unions. In those countries and/or situations in which the legal system prohibits or severely restricts the right of freedom of association, Business Partners must support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers' interests and communication between workers and management.' [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The total recordable injuries in 2018 were 415 for supply employees and 1116 for second tier/sales employees. [Annual Report 2018, 22/3/2019: ab-inbev.com] • Met: Lost days or near miss disclosures: Lost time injuries in 2018 were 135 for supply employees, 318 for second tier/sales employees, and 492 for contractors. [Annual Report 2018, 22/3/2019: ab-inbev.com] • Met: Fatalities disclosures: The number of fatalities in 2018 were 1 for supply employees; 4 for second tier/sales employees; and 9 for contractors. [Annual Report 2018, 22/3/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company states that it aims to "continually improve safety performance, which includes setting stretching targets. In 2017 [the Company] succeeded in reducing lost time injuries for both.. people and.. contract workers in breweries and vertical operations by 38% from 2016, which exceeded our targets by 21%. In distribution we divide the area into two distinct categories, Logistics and Sales. Logistics includes Tier II warehousing operations and Distribution drivers that deliver product. Tier II Logistics experienced an 11% improvement in safety performance compared to 2016 and the sales department finished the year with a 43% improvement compared to 2016. With a target of 17% year-on-year improvement the combined departments achieved an overall improvement of 29% over the prior year. Further analysis reveals a 30% improvement for employees and 22% improvement with contractor workers". [Human Rights Disclosure - Final3, 03/2018: business-humanrights.org] • Met: Met targets or explains why not: According to the Human Rights Disclosure Document that Company has met and surpassed all set targets. [Human Rights Disclosure - Final3, 03/2018: business-humanrights.org]
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company sets out clear minimum requirements for suppliers in its Global Responsible Sourcing Policy. [Human Rights Disclosure, 03/2018] • Not met: Injury Rate disclosures: The total recordable injuries in 2018 were 1116 for second tier/sales employees, but no information could be found on injury rates for contractors. [Annual Report 2018, 22/3/2019: ab-inbev.com] • Met: Lost days or near miss disclosures: Lost time injuries in 2018 were 318 for second tier/sales employees, and 192 for contractors. [Annual Report 2018, 22/3/2019: ab-inbev.com] • Met: Fatalities disclosure: The number of fatalities in 2018 were 9 for contractors. [Annual Report 2018, 22/3/2019: ab-inbev.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: The Company states in its Human Rights Disclosure, 'Health and Safety is the most significant risk, with 47% of SMETA Audits identifying it an issue. We recognise this is a common challenge in global supply chains. In 2017, we implemented a supplier health and safety training program in key markets in our Africa Region - South Africa, Tanzania, Nigeria, Uganda and Zambia - reaching 246 suppliers. In 2018, we are expanding the program to include farmers in our agricultural supply chain to support them with the information and guidance they need to protect themselves and their employees. We recognise there are limitations to the supplier pre-qualification process and audits alone. To better understand how systemic human rights risks relate to our supply chains, in 2017 we partnered with the World Wide Fund for Nature to carry out a supply risk analysis covering key social, environmental and economic risks, including human rights risks, for our priority agricultural crops globally. This highlighted potential risk of child and forced labour in Latin American supply chains, and we are undertaking deeper analysis to better understand the risk and any action required. We also recognise that our suppliers value support to implement responsible sourcing principles in their businesses. In 2017, we collaborated with AIM-PROGRESS, Partner Africa, The Coca-Cola Company and Diageo to create a Business Toolkit that includes training on productivity and efficiency, quality, safety, time management, workforce cooperation and communication, workforce management, environmental management, business integrity and land rights. In 2018, the toolkit will be available as online learning and in-person workshop materials to enable scale. [Human Rights Disclosure, 03/2018] • Not met: Provides analysis of trends demonstrating progress
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Approach to doing so if no recent land deals: In regards to land rights, the Company describes the following: 'AB InBev follows all applicable national laws relating to the rights of land and national resources ensuring land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. We conduct due diligence around land rights and title during the development of new business opportunities. We seek to secure free, prior, and informed consent and have a grievance mechanism in place to resolve any disputes over land titles (see Section 9 below).' However, no clear information about the identification of these individuals or communities could be found. [Global Human Rights Policy, 6/2019: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Follows IFC5 in any state land deals • Not met: Describes approach if no recent land deals
D.1.8.b	Land rights: Land acquisition (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Rules on land & owners in codes or contracts: The Company states 'Business Partners must follow all applicable national laws relating to the rights of land and national resources ensuring land acquisitions and changes of use are made respecting the rights of individuals and communities impacted. Business Partners must conduct due diligence around land rights and titles during the development of new business opportunities. Business Partners must seek free, informed, prior consent and have a grievance mechanism in place to resolve any disputes over land titles.' [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.a	Water and sanitation (in own agricultural operations)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: The Company website describes that 'AB InBev annually updates water risk assessments at our breweries and other manufacturing facilities throughout the world using the WRI Aqueduct tool and its own global management system called Voyager Plan Optimization (VPO) and our Supply Excellence Program. We regularly engage our experts throughout the company through technical meetings, quarterly conference calls and an annual water-risk workshop at our global environment and safety conference. We also engage with local water stakeholders to verify the risk and seek ways to partner on solutions. The Company also implements watershed protection project in Brazil.' [Company website: Better World, 06/2018: annualreport.ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Water targets considering local factors: The Company's 2025 Water Stewardship Targets states that commits to '100% of our communities in high stress areas will have measurably improved water availability and quality'. The Company also discloses 'Our ultimate goal is to ensure water access and quality for both our communities and our breweries.' [Company website: Better World, 06/2018: annualreport.ab-inbev.com] • Not met: Reports progress and shows trends in progress made: The Company provides data on water use, showing that in 2018, it used less than in 2017. However, these trends do not relate to the Company's 2025 Water Stewardship Targets of measurably improved water availability and quality in high stress areas. [Annual Report 2018, 22/3/2019: ab-inbev.com]
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts: The Company describes the following: 'Business Partners must observe all applicable laws and regulations concerning the environment and ensure the protection of the natural environment. Business Partners should do this through integrating environmental management practices into operational and training systems. Anheuser-Busch InBev requires Business Partners to have a focus on the following areas: [...] Water: Measure and commit to reduce water usage and discharge'. However, no evidence of refraining from negatively affecting access to safe water could be found. [Global Responsible Sourcing Policy (Updated March 2019), 3/2019: ab-inbev.com] • Not met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.a	Women's rights (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to stop harassment and violence against women: The Company has an Anti-Harassment and Anti-Discrimination Policy. It applies to 'all AB InBev colleagues (full-time, part-time and temporary), including colleagues of any subsidiaries or joint ventures where AB InBev has a majority interest or management control.' It defines harassment as 'all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. [...] Harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering colleagues or subordinates or refusing to talk to them.' The Company describes the following with regards to sexual harassment: 'To make it easier for colleagues to understand their rights and obligations under the Policy, AB InBev has put in place the Zone Ambassador program. The role of the Zone Ambassador is to ensure that sexual harassment complaints are identified in a timely manner and directed through the proper channels. [...] The Ethics & Compliance Committee shall also ensure that the Zone Ambassadors receive special training with respect to identifying behavior indicative of sexual harassment, interacting with potential victims of sexual harassment, confidentiality, sensitivity and handling the initial phases of sexual harassment complaints.' Also, 'Supervisors and managers who receive harassment complaints must within 5 business days report the complaint through the Compliance Helpline (or to a Zone Ambassador in cases of sexual harassment). [...] If supervisors and managers do not timely report potential violations of this Policy as set forth in Section 3.2, they will be subject to disciplinary action.' 'AB InBev will investigate any complaint under this Policy promptly, thoroughly and impartially, in accordance with the Global Investigation Guidelines. The relevant Zone or the Global Compliance Committee will determine any remedial or disciplinary actions.' [Global Anti-Harassment & Anti-Discrimination Policy, 21/06/2018: business-humanrights.org] • Not met: Working conditions take account of gender • Not met: Equality of opportunity at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meet all requirements under score 1
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: AB InBev accused of anti-union activity in Sonapat, India • Area: FoA & CB • Story: Since February 2018, AB InBev Sonapat workers and their families continue their protest at the factory gate in support of their right to union recognition and collective bargaining, free from harassment and victimization. They are insisting on the Company to act to remedy alleged human rights abuses by reinstating with full rights of all dismissed and suspended Haryana Breweries Limited Mazdoor Union (HBLM) union leaders and members and withdrawing the police charges against union leaders. The strike was apparently prompted by the firing of Union President Anil Kumar Saini from the factory, after he took earned time off after working for 16 hours on a public holiday. Since 2016 the workers allege that local managers have refused to negotiate a collective bargaining agreement with the HBLM. The managers of AB InBev India have allegedly coordinated physical assaults on union members and sought to undermine the rights of workers at the Sonapat factory to impede workers ability to freely associate and bargain collectively. The IUF urges AB InBev to exert whatever pressure is necessary on local management at Sonapat factory to ensure they reinstate the suspended and terminated union committee members, "Local managements at AB InBev India facilities must be instructed to stop harassing union members for engaging in legitimate union activities and must enter into good faith negotiations with the unions to reach collective bargaining agreements." In comments to 'Good Beer Hunting' Ingvild van Lysebetten, global external communication director for AB InBev, said that a "couple" of people have been protesting as they await legal proceedings in a labor court. Ms van Lysebetten said that the root of the issue comes from three employees whose jobs were terminated, but couldn't provide details on why they lost their jobs. She said that operations at the factory haven't been impacted and that "the welfare of our people is our top priority." Van Lysebetten adds that there are no plans for restructuring at the plant or for mass layoffs. • Sources: [IUF - 05/06/2018: iuf.org][Beerworkers.org - 08/03/2018: beerworkers.org][Goodbeerhunting.com - 19/04/2018: goodbeerhunting.com]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The website Goodbeerhunting.com quoted Ingvild van Lysebetten, global communications director for AB InBev, saying a "couple" of people had been protesting as they await legal proceedings in labor court, and that the root cause of the issue comes from 3 employees whose jobs were terminated - however she failed to give any further details. [Goodbeerhunting.com, 19/04/2018: goodbeerhunting.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The response from Ingvild van Lysebetten does not provide sufficient detail. [Goodbeerhunting.com, 19/04/2018: goodbeerhunting.com]
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Human Rights Policy states that AB InBev supports the right of all workers to join lawful trade unions and other organizations of their choice and to bargain collectively. It also states that "In those countries and/or situations in which the legal system prohibits or severely restricts the right of freedom of association, AB InBev will support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers interests and communication between workers and management." [Global Human Rights Policy, 12/2016: ab-inbev.com] • Met: Policies apply to the type of business relationships involved: The company's Human Rights Policy states that commitment to human rights applies to all AB InBev operations and to full, part time, temporary AB InBev employees and independent contractors. It also applies to any subsidiaries or joint ventures where AB InBev has a majority interest or management control. [Global Human Rights Policy, 12/2016: ab-inbev.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Human Rights Policy says "AB InBev prohibits all forms of physical, verbal, and written harassment, and will not engage in corporal punishment or take disciplinary-related deductions from workers' pay". [Global Human Rights Policy, 12/2016: ab-inbev.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: No evidence that AB InBev has meaningfully engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: No publicly available evidence that AB InBev has encouraged linked businesses to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: No publicly available evidence that AB InBev has provided remedy to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: No publicly available evidence that AB InBev has improved systems. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: No publicly available evidence that AB InBev has provided remedy to the victims, nor that the remedy provided is satisfactory. • Not met: Has improved systems and engaged affected stakeholders: No publicly available evidence that AB InBev has improved its systems or engaged with affect stakeholders.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.35 out of 4	Out of a total of 51 indicators assessed under sections A-D of the benchmark, Anheuser-Busch InBev made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 2.35 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports a GRI standard index for its 2018 Annual report [GRI Standard Index (2018): ab-inbev.com]
F.3	Key, High Quality Disclosures	0.8 out of 4	<p>Anheuser-Busch InBev met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.1.1.a: Living wage (in own agricultural operations) • Met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.