

Company Name Heineken NV
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 47.3 out of 100

Theme Score	Out of	For Theme
4.6	10	A. Governance and Policies
19.4	25	B. Embedding Respect and Human Rights Due Diligence
7.1	15	C. Remedies and Grievance Mechanisms
1.0	20	D. Performance: Company Human Rights Practices
9.5	20	E. Performance: Responses to Serious Allegations
5.8	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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: In its Human Rights Policy, the Company states: 'We respect the dignity and human rights of all people. [...] We expect our employees, our management, individuals working for HEINEKEN through a third party contract, our suppliers and business partners, to respect human rights in line with this policy and to ensure that our work complies with our Company's commitments to human rights. Our Human rights Policy is the foundation to help us to understand, avoid and address human rights related risks.' [Human Rights Policy, 2018: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: Human rights policy states: 'Our policy is aligned with the following international standards [...] The Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD), The United Nations (UN) Guiding Principles on Business and Human Rights.' In addition, on its website, 'Respecting Human Rights', the Company states: [Our Human Rights Policy] It is based on our endorsement of international standards including the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD) of 2010, and the United Nations (UN) Guiding Principles on Business and Human Rights.' However the wording 'is aligned with ...' or 'is based on...' are not consider a clear commitment following CHRB criteria. [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Not met: OECD: See above [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com]
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 Human Rights Policy includes 10 standards including respect for ILO core: non discrimination, prohibition of child or forced labor, freedom of association and collective bargaining. [Human Rights Policy, 2018: theheinekencompany.com] • Met: Explicitly list All four ILO for AG suppliers: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks: Health & safety, Non-discrimination, No harassment and violence, Child protection, Freedom of association and the right to collective bargaining, No forced labour, Rest and leisure, Fair wages and income, Access to water, Respect for human rights in high risk contexts. We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy include provision covering all ILO Core. With respect freedom of association and collective bargaining, the policy indicates: 'We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognised labour union, we will establish a constructive dialogue with this labour union. Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.' [Human Rights Policy, 2018: theheinekencompany.com] • Met: Respect H&S of workers: The Human Rights Policy has an explicit statement on health and safety: 'Nothing matters more than the safety of our people. Our Life Saving Rules cover our highest safety risks and these need to be strictly followed. The company undertakes to provide a safe and healthy working environment.' [Human Rights Policy, 2018: theheinekencompany.com & Global occupational health and safety policy, 01/2012: theheinekencompany.com] • Met: H&S applies to AG suppliers: The supplier code states that 'We are committed to provide a safe and healthy work place and prevent harm to our employees, individuals working for us through a third party contract and other visitors. We also expect our Suppliers to meet the following minimum expectations...'. [Supplier Code, 02/2019]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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: Respecting the right to water: The Company is a signatory to the CEO water mandate. In addition, it has specific commitments for 'significant water balancing by our production units in water-scarce and water-distressed areas'. Moreover, the Company indicates in its Human Rights Policy: ' We acknowledge the right to water as a basic human right. Our employees and others working on our sites need to have access to safe drinking water and sanitary facilities.' [Water policy, 10/1999: theheinekencompany.com & Human Rights Policy, 2018: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expecting suppliers to respect these rights: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks'. Standards include access to water. In relation to its coverage, the Company indicates that 'we expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Protecting water resources on website: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights: It is not clear to CHRB how Land Rights has not been identified as a salient human rights issue. • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: See above. [Protecting water resources on website: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • 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)	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"> • Not met: Women's rights • Met: Children's rights: In its Human Rights Policy, the Company states: ' We respect the rights of the child as stated in the United Nations (UN) Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. We will not engage in, or allow, child labour within our facilities or in those of our suppliers. We are also committed to supporting the elimination of child labour in our value chain'. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: Migrant worker's rights • Met: Expects suppliers to respect these rights: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks: Health & safety, Non-discrimination, No harassment and violence, Child protection, [...]. We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Met: Child Rights Convention/Business Principles: See above [Human Rights Policy, 2018: theheinekencompany.com] • Not met: Convention on migrant workers • Met: Expecting suppliers to respect these rights: See above [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com]
A.1.4	Commitment to engage with stakeholders	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: Regular stakeholder engagement: On its website section 'Engaging with our stakeholders', the Company describes its work to engage with its different stakeholders including: employees, suppliers, NGO, employee representatives. [Engaging with our stakeholders, 31/08/2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: In its Human Rights Policy, the Company indicates: 'We recognise that effective dialogue with relevant external stakeholders is an integral element of assessing our own human rights performance. We value the perspectives of affected stakeholders, in particular local communities. Their input helps to inform our approach to human rights on a global and local level.' [Human Rights Policy, 2018: theheinekencompany.com]
A.1.5	Commitment to remedy	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 remedy: In its Human Rights Policy, the Company states: 'Respect for human rights includes preventing human rights issues or addressing them at an early stage or to seek adequate remedy in case human rights are violated.' [Human Rights Policy, 2018: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Collaborating with other remedy initiatives: In December 2015, former employees of Bralima, HEINEKEN's subsidiary in the DRC, filed a complaint with the NCP (Dutch National Contact Point) with regard to an alleged violation of the OECD Guidelines. After extensive reviews and constructive discussions, the parties found a satisfactory outcome. [Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: oecdguidelines.nl] • Not met: Work with AG suppliers to remedy impacts: The Company includes in its Supplier Code the following provision: 'In the event of non-compliance with the minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe.' However, it is not clear whether it will work to remedy any adverse impacts either through the business relationships own mechanisms or through collaborating with them on the development of third party non-judicial remedies. [Supplier Code, 02/2019]
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its website: 'We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy. Furthermore, we do not accept threats or intimidation against human rights defenders, and recognise the role of human rights defenders in supporting our efforts to embed human rights in our global operations.' [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <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 Code of Business Conduct, which includes human rights policy, has been signed by the CEO and CFO. [Code of Business Conduct, 09/2018: theheinekencompany.com & Human Rights Policy, 2018: theheinekencompany.com] • Met: Board level responsibility for HRs: On its website section 'Brewing a Better World governance' (the name of its sustainability programme), the Company indicates that: 'Brewing a Better World progress is one of the priority topics of HEINEKEN Executive Team discussions. Chaired by our CEO, the Executive Team is responsible for ensuring delivery, ownership and alignment across all our businesses, supported by input from our subject specialists. Sustainability is embedded throughout our business, for example driven by Supply Chain (Water and CO2), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption).' In addition, in its Annual Report 2017, it states: 'The Executive Team consists of the two members of the Executive Board, the four regional presidents and four Chief Officers.' [Brewing a better world governance: theheinekencompany.com & Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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: Board/Committee review of salient HRs: On its website, the Company indicates the following: 'Respect for human rights is embedded throughout our business. The HEINEKEN Risk Committee, chaired by the CFO, will maintain oversight of the identified (potential) human rights risks and the programme to mitigate these risks.' The Chief Financial Officer (CFO) is part of the Company's Executive Board, however the Risk Committee is not a Board of Directors Committee nor the CFO is not part of the Board of Directors. No evidence found, therefore, on how the Board of Directors or Board of Directors Committee has a process in place to discuss human rights issues or how these are regularly reviewed. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com & Board of Directors, 08/2019: theheinekencompany.com] • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process

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A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources, and didn't contain evidence that could be used to award. • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions • Met: Senior responsibility for HR: On its website the Company indicates: 'Respect for human rights is embedded throughout our business. The HEINEKEN Risk Committee, chaired by the CFO, will maintain oversight of the identified (potential) human rights risks and the programme to mitigate these risks. All our Management Teams in operating companies have the assignment to assess and address human rights related risks, with support of global guidance and training, coordinated by the Director Social Sustainability.' And on its website section 'Brewing a better World governance', it indicates: 'Sustainability is embedded throughout our business, for example driven by Supply Chain (Water and CO2), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption). 'On a day-to-day basis, Brewing a Better World is coordinated by the Global Sustainable Development team which is supported by many functional experts'. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com & Brewing a better world governance: theheinekencompany.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: See above. In addition, it states: 'We form alliances (tribes) throughout the entire organisation and with our suppliers to develop new solutions. [...] Around the world, each operating company has its own sustainability coordinator and team for delivering global Brewing a Better World commitments at the country level.' [Brewing a better world governance: theheinekencompany.com] • Met: Day-to-day responsibility for AG in supply chain: See above [Brewing a better world governance: theheinekencompany.com]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights: On its website section 'Brewing a better world governance', the Company indicates: 'Selected senior managers at global, regional and local levels have sustainability objectives linked to their function to support the delivery of our sustainability agenda. Bonus targets are set for relevant managers in the areas of energy, water and procurement. For specific markets, sustainability objectives are also set in relevant areas such as Supply Chain, Procurement and Corporate Affairs.' However, there is no further information about the specific incentives and if any of these incentives is related to human rights issues. [Brewing a better world governance: theheinekencompany.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2017, the Company reports its main risks, one of them is 'Non compliance': 'Across many geographies, law enforcement has become more systematic than in the past, in particular with regard to anti-bribery and corruption, competition and data privacy laws, and human rights. This leads to an increased risk of being subject to allegations of violations of laws and regulations. Over the years, HEINEKEN has constantly been looking to enhance its internal compliance system and resilience to the changes of the legal environment.' In addition, in its website, the Company states: 'Risk Committee, chaired by the CFO, will maintain oversight of the identified (potential) human rights risks and the programme to mitigate these

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>risks.' [Annual Report 2018, 02/2019: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Audit Committee focuses on supervising the activities of the Executive Board with respect to, among others, 'the operation of the internal risk management and control system, including the enforcement of the relevant primary and secondary legislation and supervising the operation of codes of conduct', however, no evidence found in relation to an assessment of the adequacy of the enterprise risk management system itself in managing human rights. [Audit Committee Regulations: theheinekencompany.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own 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: Commits to ILO core conventions: See indicator A1.2 • Met: Communicates its policy to all workers in own operations: In its Annual Report 2018, the Company indicates: ' The updated Code and policies were launched in September 2018 in our operating companies, in 38 languages. We provide ongoing communication and training to employees worldwide to raise awareness of the Code and its underlying policies. Mandatory e-learning exposes employees to practical business conduct dilemmas. By the end of 2018, more than 78,546 employees (92%) had completed the training, either online or in the classroom (2017: 75,000).' [Annual Report 2018, 02/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A1.2 • Not met: Communication of policy commitments to stakeholder: The Policy indicates that 'It is important to integrate and implement the HEINEKEN Human rights Policy and practices throughout all our OpCos in line with the United Nations Guiding Principles on Business and Human Rights. The implementation is supported with communication materials, translation of the policy in the relevant languages, online training, guidelines on how to implement this policy and human rights workshops in selected markets.' In addition, on its website section 'Respecting Human Rights, it indicates: 'The new policy will be communicated as part of the Code of Business Conduct refresh, supported by training and a practical guidance document.' All relevant policies, like the Human Rights Policy, Brand Promoters Policy, Business Code of Conduct and Supplier Code are publicly available on our website. However, publishing the documents in the website is not considered a proactive communication action. No evidence found on how the policies are communicated to affected stakeholders including local communities. [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • 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 • Not met: Communicating policy down the whole AG supply chain • Met: Requiring AG suppliers to communicate policy down the chain: In its Supplier Code, the Company indicates: 'Respecting and abiding by the Supplier Code is just the starting point for many Suppliers. By signing it, they agree to live up to our expectations in the field of responsible business conduct; on business conduct, human rights, health and safety, and protecting the environment.' In addition, in its Annual Report 2018, the Company states: 'Every supplier is asked to abide by our Supplier Code, which sets out clear guidelines for how we expect them to act in the areas of Integrity and Business Conduct, Human Rights, and the Environment. The Supplier Code procedure is implemented among all our suppliers, and we expect our suppliers to ensure that their suppliers adhere to the same standards'. In addition, with respect Brand Promoters which are engaged through Third Party Suppliers, the Company asks them to commit to the key principles of its Brand Promoters Policy, adding to the signed Supplier Code an Addendum with these key principles. [Annual Report 2018, 02/2019: theheinekencompany.com & Supplier Code, 02/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, suppliers are asked to sign the Supplier Code: 'By signing the HEINEKEN Supplier Code, suppliers agree to comply with our principles of integrity, environmental care and human rights.' [Annual Report 2018, 02/2019: theheinekencompany.com & Supplier Code, 02/2019]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Including on AG suppliers: In its Supplier Code, the Company indicates: 'HEINEKEN also expects Suppliers to take appropriate steps to ensure that their own suppliers comply with the minimum standards of the Supplier Code.' However, it is not clear whether this steps include contractual or other binding arrangements. [Supplier Code, 02/2019]
B.1.5	Training on 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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: In its Annual Report 2018, the Company indicates: 'We provide ongoing communication and training to employees worldwide to raise awareness of the Code and its underlying policies. Mandatory e-learning exposes employees to practical business conduct dilemmas. By the end of 2018, more than 78,546 employees (92%) had completed the training, either online or in the classroom (2017: 75,000)'. In addition, in its Annual Report 2017, it indicates: 'The Code of Business Conduct training has to be completed by all HEINEKEN employees'. [Annual Report 2018, 02/2019: theheinekencompany.com & Annual report, 2017: theheinekencompany.com] • Met: Trains relevant AG managers including procurement: In its 'Brand Promoters Policy', the Company indicates: 'All Commerce, Procurement and HR Teams, who are involved with Brand Promoters, must complete a mandatory baseline e-learning. This e-learning includes all key aspects of this Policy.' This policy makes reference to the new Human Rights Policy, which covers all ILO core areas. [Brand Promoters Policy: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • 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: In its Annual Report 2018, the Company indicates: 'Management is supported by second line of defence functions (e.g. internal control, business conduct and other functional risk management teams). These functions oversee compliance with HEINEKEN's policies, process and controls, facilitate the implementation of effective risk management practices and drive continuous improvements of internal controls. Global Audit provides independent and objective assurance and consultancy services. It employs a systematic and disciplined approach to evaluate and improve the organisation's governance and risk management processes including reliability of information, compliance with laws, regulations and procedures, and efficient and effective use of resources. [...] Compliance with company policies is periodically assessed. Deviations from the defined standards are included in the global monitoring and follow-up processes, supporting management in addressing these deviations'. [Annual Report 2018, 02/2019: theheinekencompany.com] • Met: Monitoring AG suppliers: In addition, the Company indicates in its Annual Report 2018: 'We safeguard compliance through a risk-based step-by-step process: [...] 2. The intensity with which we monitor compliance against our Supplier Code depends on the risk profile of a supplier. Our supplier risk analysis (SRA) tool assesses suppliers based on their type of business and level of supplier-specific risk. All potentially high-risk suppliers are required to go through step three of the programme. 3. We use the EcoVadis26 sustainability monitoring and scorecard to assess the strength of potentially high-risk suppliers' management systems for ensuring compliance with our Code. [...] Suppliers that are still considered high-risk go on to Step 4 and undergo a site audit. 4. The final step is a site audit by a third party using our Supplier Code as the basic assessment criteria. We use the SMETA27 four-pillar protocol. It enables us to contribute to and use the global database of audits held by AIM-Progress, the responsible-sourcing platform used by over 40 of the world's leading fast-moving consumer goods companies.' [Annual Report 2018, 02/2019: theheinekencompany.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: In its Supplier Code, the Company states: 'In the event of non-compliance with the minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe'. In addition, in its Annual Report 2018, the Company indicates: 'We strive for continuous improvement to ensure ongoing compliance with our Supplier Code. If a case of non-compliance is found, we discuss corrective actions with the supplier and allow for commitment to correct the non-compliance within a given timeline. If commitment and action is not forthcoming, HEINEKEN will cease to do

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business with the supplier. [...] We stopped working with 13 suppliers because they were unwilling to sign our supplier code (11), or refused to subscribe to EcoVadis (2).' However, it is not clear how many cases of non-compliances were found. [Annual Report 2018, 02/2019: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Not met: Example of corrective action: As indicated above, the Company 'stopped working with 13 suppliers because they were unwilling to sign our supplier code (11), or refused to subscribe to EcoVadis (2).' However, no evidence found on examples of corrective actions'. [Annual Report 2018, 02/2019: theheinekencompany.com] • 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: The Company has stated that 'All new suppliers receive our Supplier Code containing environmental criteria. Refusing to sign or failure to comply with our Supplier Code can lead to a termination of commercial relationship'. Human rights is part of the Supplier Code. [GRI Reference table 2018, 04/2019: https://theheinekencompany.com] • Met: HR affects on-going AG supplier relationships: In its Supplier Code, the Company states: 'In the event of non-compliance with the minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe. If a Supplier is not able or fails to correct the noncompliance, HEINEKEN may end the relationship'. [Supplier Code, 02/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Not met: Working with AG suppliers to improve performance: In its Annual Report 2018, the Company indicates: 'We strive for continuous improvement to ensure ongoing compliance with our Supplier Code. If a case of non-compliance is found, we discuss corrective actions with the supplier and allow for commitment to correct the non-compliance within a given timeline.' However, this does not refer to proactive work. In addition, the Company provide information on how it engaged with 3rd party agencies which hire brand promoters and about the concrete steps it is taken to improve Brand Promoters working conditions, which include the development of the Brand Promoters Policy and the actions to implement it in the Third party agencies. However, this indicator looks for evidence of work carried out with agricultural suppliers to improve their performance on human rights, including an example. [Annual Report 2018, 02/2019: theheinekencompany.com & Brand Promoters Policy: theheinekencompany.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company indicates that 'We will continue to identify salient human rights issues through 11 in-depth workshops across the globe and engage with potentially affected stakeholders where possible'. In addition, it says 'Water has been identified as a human right risk, we are regularly conducting extensive stakeholder workshops in water-stressed areas, in partnership with UN organisation UNIDO, and gather representatives from stakeholder groups using the same watershed as our brewery operations, including communities. Furthermore, in its website, the Company discloses information about the human rights assessment workshops conducted with support of Shift: 'We will continue to identify salient human rights issues through 11 in-depth workshops across the globe and engage with potentially affected stakeholders where possible.' [Engaging with our stakeholders, 31/08/2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Not met: Frequency and triggers for engagement • Met: Communities in the AG SC engaged: The Company indicates that it engaged with Multi Bintang breweries local communities to address water issues facing Indonesia. Multi Bintang host two major stakeholder workshops in collaboration with the United Nations Industrial Development Organization (UNIDO). [Tackling the water stewardship challenge, 08/2019: theheinekencompany.com] <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: Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: On its website, 'Respecting Human Rights' section, the Company states: 'The renewed policy incorporates work conducted with Shift, a leading centre of expertise on the UN Guiding Principles on Business and Human Rights, which enabled us to identify seven salient human rights risks: health & safety, discrimination, child labour, freedom of association, excessive working hours, fair wages and access to water. [...] We have been developing our Human Rights due diligence process since 2016 to better understand and address the human rights risks in our own operations and across our value chains. So far, we have done this working with Shift in Mexico, Myanmar, Nigeria, Haiti and South Africa. We will continue to expand the approach into other markets. Engaging with experts, NGOs, communities and employees in the countries where we operate is vital to better understand and address our risks. We also further test our salient risks with the support of NGOs, employees and partners to ensure we do not lose sight of other relevant human rights issues.' In addition, in its 2018 Annual Report, the Company indicates: 'In 2019, we will hold human rights workshops in five more markets: Brazil, Jamaica, Indonesia, East Timor and DRC.' [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com & Annual Report 2018, 02/2019: theheinekencompany.com] • Met: Identifying risks in AG suppliers: On its website, the Company indicates: 'We have been developing our Human Rights due diligence process since 2016 to better understand and address the human rights risks in our own operations and across our value chains. So far, we have done this working with Shift in Mexico, Myanmar, Nigeria, Haiti and South Africa. We will continue to expand the approach into other markets.' [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: In consultation with stakeholders: 'Engaging with experts, NGOs, communities and employees in the countries where we operate is vital to better understand and address our risks. We also further test our salient risks with the support of NGOs, employees and partners to ensure we do not lose sight of other relevant human rights issues.' [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: In consultation with HR experts: As indicated above, NGOs and academic experts. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Not met: Triggered by new circumstances: 'We have been developing our Human Rights due diligence process since 2016 to better understand and address the human rights risks in our own operations and across our value chains. So far, we have done this working with Shift in Mexico, Myanmar, Nigeria, Haiti and South Africa. We will continue to expand the approach into other markets. [...] We assessed the potential impacts of our business activities and relationships with the expert support of Shift.' However, no details found on how changes in circumstances can trigger the due diligence process. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Not met: Explains use of HRIAs or ESIA (inc HR) [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In its Annual Report 2018, the Company indicates: 'Since 2016, we have been conducting human rights risks assessments and action planning workshops in nine of the countries in which we operate across all regions[...]. We conducted these assessments with the centre of expertise Shift, the global leading expert on the UN Guiding Principles on Business and Human Rights. As a result, we have a better understanding of the salient human rights risks we face as a company. [...] In 2019, we will hold human rights workshops in five more markets: Brazil, Jamaica, Indonesia, East Timor and DRC.' In its 2017 Annual Report, the Company gave further information about the workshops: 'These workshops will focus on practical and impactful action planning to address identified Human Rights risks. Based on input from stakeholder roundtables with NGOs and academic experts, we set up an internal cross-functional platform gathering HEINEKEN experts for the Africa and Middle East Region addressing Human Rights related issues relevant for the region. We also started to develop operational guidance, with support from Shift, on how to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conduct business and operate in challenging social, political, and economic contexts.' In addition, the Company indicates: 'Based on our work with Shift, we have identified seven salient Human Rights risks for our business in our own operations and/or our value chains: discrimination; trade union rights; fair wages and income; child labour in our supply chain; working hours; access to water; and health and safety. Most of the issues identified are especially a risk for our operating companies in emerging economies.' [Annual Report 2018, 02/2019: theheinekencompany.com & Annual report, 2017: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of salient risks: As indicated above, the Company identified 'seven salient Human Rights risks for our business in our own operations and/or our value chains: discrimination; trade union rights; fair wages and income; child labour in our supply chain; working hours; access to water; and health and safety.' No new relevant information in latest year report. [Annual report, 2017: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: The Company indicates that it has been developing its due diligence process since 2016 and, following the assessment step, in integrating and acting, it states that has 'revised and sharpened our human rights policy based on the identified salient issues', that has strengthened the human rights section of the supplier code, and that it is continuously working 'with regions and OpCos to address specific issues, such as operational guidance for challenging contexts and on principles and guidelines for the deployment of Brand Promoters, and we developed practical and impactful human rights action plans in Mexico, Myanmar, and Nigeria. [...] All Operating Companies that have had a human rights workshop will, next to ensuring implementation of Human Rights Policy, put action-plans in place to address their human rights issues identified in the workshops'. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Including in AG supply chain: See above. [Working with Brand Promoters, 05/2018: theheinekencompany.com & Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Example of Actions decided: The Company explains the assessment carried out in Africa in relation to working conditions of brand promoters. It concluded that that the single biggest issues was that policies and management systems were lacking in many of the agencies, that improvements should be made in procurement and contracting agency services, including background checks, ensuring commitment of and adherence to the supplier code. As a consequence, the Company has defined a set of seven guiding principles and created a new Brand Promoters Policy with guidelines on the contracts and working conditions of brand promoters. To ensure policy implementation, the 'monitoring of compliance with the Brand promoters Policy is now fully embedded into the existing Heineken governance framework'. In addition, 'internal and external compliance audits will be conducted on a periodic basis'. [Working with Brand Promoters, 05/2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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	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: System to check if Actions are effective: The Company indicates that 'through the HEINEKEN risk control framework we will support and monitor implementation of Human Rights Policy in all our Operating Companies. All Operating Companies that have had a human rights workshop will, next to ensuring implementation of Human Rights Policy, put action-plans in place to address their human rights issues identified in the workshops. Performance against target level of compliance is continuously monitored'. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Lessons learnt from checking effectiveness: The Company provides an example related to safety-risk: 'Given its growing presence in emerging markets, safety is an ongoing challenge and a permanent focus area. Rolled up throughout all operations, the HEINEKEN Life Saving Rules target all the activities that carry the greatest safety threats to employees and contractors. Despite these efforts, several significant fatal accidents have occurred, underlining the importance of realising further improvements in the area of safety. In particular, a specific programme to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			improve road safety, being one of the highest risk areas, has been set up and is being rolled out'. [Annual Report 2018, 02/2019: theheinekencompany.com] Score 2 • Met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: The Company has explained how it is implementing a due diligence process, including human rights risks and impacts identification in both own operations and supply chain (see B.2.1). [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Comms plan re assessing risks: The Company has demonstrated through its publicly available documents how it assesses its human rights risks and impacts and discloses salient issues (see B.2.2). [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Comms plan re action plans for risks: The Company has demonstrated through communications on its website how the due diligence process includes a system to take action against salient human rights issues, and provides an example of action taken. (See B.2.3) [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com & Working with Brand Promoters, 05/2018: theheinekencompany.com] • Met: Comms plan re reviewing action plans: See indicator B.2.4 [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] • Met: Including AG suppliers: The description cover human rights impacts involving its supply chain. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com] Score 2 • Met: Responding to affected stakeholders concerns: 'On 14th December 2015, former employees of Bralima Heineken in Bukavu, DRC (period 1999-2003) notified a specific instance with the Dutch National Contact Point with regard to an alleged violation of the OECD Guidelines for Multinational Enterprises by Bralima in Bukavu, Democratic Republic of Congo, and Heineken N.V., based in Amsterdam, The Netherlands. The NCP concluded that on the basis of the criteria for further examination of the Commentary on the implementation procedure of the OECD Guidelines for multinational enterprises (2000) the notification merited further consideration and offered its good offices to resolve the issue by facilitating a dialogue between the parties. Both parties accepted this offer and an expert mediator was appointed by the NCP. The dialogue was conducted under the chairmanship of the NCP and resulted in a satisfactory outcome for both parties. Final statement describing the process and outcomes of the dialogue.' [NCP - Bralima vs Heineken: oecdguidelines.nl & Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: oecdguidelines.nl] • Not met: Ensuring affected stakeholders can access communications: To response to the allegation made with respect the working conditions of Brand Promoters, the Company published a response in its website to inform its stakeholders. However, CHRB could not find further information about proactive actions made by the Company to ensure affected stakeholder have access to this communication. [Working with Brand Promoters, 05/2018: theheinekencompany.com & Working with Brand Promoters, 02/2019: theheinekencompany.com]

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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The 'speak up' system is available to all employees and allows reporting violations of the code of conduct or any other policy of the Company. The Speak up policy describes the different channels available. This covers a general commitment to Human Rights. [Code of Business Conduct, 09/2018: theheinekencompany.com & Speak up policy, 09/2018: secure.ethicspoint.com] Score 2 • Met: Number grievances filed, addressed or resolved: The Company discloses the number of reports received through Speak up (1.293) and also indicates that 49% of the reports were substantiated and corrective and preventative actions were taken where relevant and possible. In addition, it reports that 24% of the reports were related with discrimination and harassment. [Annual Report 2018, 02/2019: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages: The speak up policy states that 'you can use the external Speak Up Service. This gives you the opportunity to raise concerns confidentially and in your own language'. The EthicsPoint website is available in more than 30 languages. [Heineken Ethics point: secure.ethicspoint.com] • Met: Opens own system to AG supplier workers: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. [Speak up policy, 09/2018: secure.ethicspoint.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: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. The online form on its Ethics point website has a specific section to report human rights issues and it allows anyone, employee or not, not make a report. [Speak up policy, 09/2018: secure.ethicspoint.com & Heineken Ethics point: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The mechanisms are available on the website and in more than 30 languages. In addition on its website section 'Code of Business Conduct', the Company indicates: 'Speak Up is available to anyone, either inside or outside our Company. [...] People outside our Company can follow this link to access our externally operated Speak Up Service. Through this online platform, you have the possibility to directly file a report and to call our independently run confidential hotline.' [Code of Business Conduct website, Ap 2019: theheinekencompany.com & Heineken Ethics point: secure.ethicspoint.com] • Met: AG supplier communities use global system: The Company indicates in its Brand Promoters Policy, that 'they will also all have access to both HEINEKEN Speak-up and Local Support Line'. In addition, as indicated above, the SpeakUp channel is available to anyone, either inside or outside the Company. [Code of Business Conduct website, Ap 2019: theheinekencompany.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	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: Response timescales: The Speak up policy states that 'all concerns that are received by our company are logged into a case management system. Depending on the nature, urgency and potential impact of your concern, the case will be handled by an OpCo or Global Case Manager who works under the supervision and instruction of the Integrity Committee. <p>The Company states that 'if you submit a report, you will receive a confirmation of receipt within 5 to 7 working days, with an estimate of how long it will take to handle and assess your concern. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average closure of the matter can be expected within 1 to 3 months.' [Speak up policy, 09/2018: secure.ethicspoint.com]</p> <ul style="list-style-type: none"> • Met: How complainants will be informed: The speak up policy states that 'after you complete your report (online or by phone), you will receive a unique code called a 'report key'. You can use this key to call back or access the website to check progress on your report. You can see whether the person dealing with your report has feedback for you or further questions'. It also indicates that 'you will be informed of the overall findings, i.e. whether or not our Company has established that misconduct has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned'. [Speak up policy, 09/2018: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Integrity Committee has the objective 'to investigate reports of serious wrongdoing or malpractice on corporate level, or joint ventures, on reports that cannot be handled on local level or are according to the whistleblower not properly handled on that level.' [Terms of Reference of Integrity Committee: heinekenusa.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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 statement prohibiting retaliation: The speak up policy states that 'you will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for Speaking Up'. The Speak up website also contains references to protection against retaliation: 'Our Company does not tolerate any form of threat or retaliation against a person for raising a concern in good faith. This protection also extends to anyone giving information or cooperating in a follow-up investigation'. Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers)'. [Speak up policy, 09/2018: secure.ethicspoint.com & Heineken Ethics point FAQ: secure.ethicspoint.com] • Met: Practical measures to prevent retaliation: It is possible to report anonymously. In addition, reporting channels are managed by an external company. [Speak up policy, 09/2018: secure.ethicspoint.com & Heineken Ethics point: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice: The Company provided evidences to CHRB. However, these were not found in a public domain document. • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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"> • 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 • Met: Example of issue resolved (if applicable): The Company point out the case of the Former employees of Bralima resolved through the National Contact Point for the OECD Guidelines for Multinational Enterprises: 'The dialogue meetings in January 2017 ended with an agreement between the parties on next steps. [...] the parties wished to maintain confidentiality on the agreement/outcome. [...] Heineken has indicated that it will draw up a policy, including guidelines, on how to conduct business and operate in volatile and conflict-affected countries.' [Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: oecdguidelines.nl]
C.7	Remedying adverse impacts and incorporating lessons learned	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"> • 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"> • Met: Changes introduced to stop repetition: As part of the agreement with Bralima former employees, the Company committed to improve its policy and practices on doing business in a volatile and conflict-affected countries, which it is doing with the updated version of its Human Rights Policy and with the updating of other related policies and Codes (Supplier Code). In addition, the Company took different measures to respond to the allegations with respect to the working conditions of Brand Promoters employed in Africa, specifically related to harassment. The Company responded with an investigation, policy creation, its implementation and monitoring actions. [Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: oecdguidelines.nl & Annual Report 2018, 02/2019: theheinekencompany.com] • 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.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 new Human Rights Policy indicates: 'All of our employees should be paid sufficiently for a decent standard of living, enough to satisfy basic needs for the employee and his/her family. Where the local statutory minimum wage is non-existent or not sufficient to ensure a decent standard of living, we will pay our employees enough to meet this standard.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. In the Supplier Code, the Company indicates: 'The Supplier pays its employees fair wages for work performed. The Supplier observes the statutory minimum wage set in the country in which it operates. Where the statutory minimum wage is non-existent or not sufficient to meet basic needs, the Supplier strives to pay employees enough to ensure a decent standard of living enough to satisfy basic needs for the employee and their families.' Its latest Brand Promoters Policy also includes a Fair wage provision. However, the living wage have to cover basic need and some discretionary income and, although the company feedback state that their definition of basic needs include discretionary income, that could not be supported with a public reference. [Human Rights Policy, 2018: theheinekencompany.com & Supplier Code, 02/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers <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.1.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing 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: Identifies suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (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: Child Labour rules in codes or contracts: The new Human Rights Policy indicates: ' We respect the rights of the child as stated in the United Nations (UN) Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. We will not engage in, or allow, child labour within our facilities or in those of our suppliers. We are also committed to supporting the elimination of child labour in our value chain. We follow the ILO definition of the minimum age for admission to employment or work. This age shall not be lower than the age of completion of compulsory schooling and in any case not be under 15 years of age, except in some countries, where it is 14. We comply with local law if it sets a higher age to define child labour.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code.' In its Supplier Code, the Company indicates: 'The Supplier will not engage in, or allow, child labour within their facilities or in those of their suppliers. The Supplier follows the ILO definition of the minimum age for admission to employment or work. This age shall not be lower than the age of completion of compulsory schooling and in any case not be under 15 years of age, except in some countries, where it is 14. The Supplier complies with local law if it sets a higher age to define child labour.' The Brand Promoters Policy also includes a provision related with child labour. Also, the Company carries out SMETA audits on suppliers, which is a proxy for age verification. However, no reference found to remediation programmes. [Human Rights Policy, 2018: theheinekencompany.com & Supplier Code, 02/2019]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on child labour: The Company indicates that it is 'working with the Fair Labour Association to assess the risk of child labour in the agricultural value chain in the Korhogo area of Ivory Coast. The assessment report and recommendations are expected in 2019'. In addition, the Company indicates in its '2018 Message in a Bottle' document: 'We finalised our three-year Human Rights Action Plan following workshops with Shift, an expert in human rights, and internal and external stakeholders. Our focus areas apply across the whole value chain and include health safety, diversity and inclusion, workplace rights and child labour. However, no details found on specific work carried out with suppliers to improve their practices in relation to this issue. [Annual Report 2018, 02/2019: theheinekencompany.com & 2018 Message in a Bottle, N/A] <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.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 new Human Rights Policy indicates: 'We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. This means that none of our employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by HEINEKEN. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code.' In its Supplier Code, the Company indicates: 'The Supplier respects the freedom of movement of employees. None of their employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by the Supplier. All employees, including contract workers, should work freely. They should be aware of the terms and conditions of their work and be paid regularly as agreed.' [Human Rights Policy, 2018: theheinekencompany.com & Supplier Code, 02/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on debt & fees • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Prohibition on forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The new Human Rights Policy indicates: 'We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. This means that none of our employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by HEINEKEN. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code.' In its Supplier Code, the Company indicates: 'The Supplier respects the freedom of movement of employees. [...] All employees, including contract workers, should work freely. They should be aware of the terms and conditions of their work and be paid regularly as agreed.' However, there is no mention to specific requirements to refraining from restricting workers' movement through the retention of passports or other personal identification travel documents or bank payment card or similar arrangements for accessing wages or other measures to physically restrict movement. [Human Rights Policy, 2018: theheinekencompany.com & Supplier Code, 02/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on free movement • 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.1.6.b	Freedom of association and collective bargaining (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: FoA & CB rules in codes or contracts: The new Human Rights Policy indicates: 'We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognised labour union, we will establish a constructive dialogue with this labour union. Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code.' In its Supplier Code, the Company indicates: 'The Supplier respects the right of employees' to freedom of association and collective bargaining. Where local laws and practices restrict the right to freedom of association and collective bargaining, the Supplier endeavours to develop other ways to have a meaningful social dialogue with worker representatives, without breaking local law.' On the other hand, the Company indicates in its website 'Respecting Human Rights', that it does not 'not accept threats or intimidation against human rights defenders, and recognise the role of human rights defenders in supporting our efforts to embed human rights in our global operations' and that it expects its 'suppliers and business partners to respect human rights in line with our policy.' However, there is no specific provision to prohibit intimidation, harassment, retaliation and violence against union members or union representatives in the Supplier Code or a contractual arrangement with its suppliers. [Respecting Human Rihgts, 15/08/2019: theheinekencompany.com & Supplier Code, 02/2019] • 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.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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: Sets out clear Health and Safety requirements: The Company indicates in its Supplier Code: 'The Supplier provides a safe and healthy working environment for its employees. The Supplier will provide safe tools, equipment and vehicles that are suitable for the work that is undertaken. The Supplier's employees are competent for the work and are trained in the safe use of the tools, equipment and the vehicles they operate. The Supplier's employees are empowered to stop unsafe work and report incidents and unsafe work practices. When working for us at our facilities or remotely, Supplier and Supplier's employees must adhere to applicable Safety and Health procedures and work instructions, including the HEINEKEN Life-Saving Rules. The Supplier maintains emergency procedures to respond to health emergencies and accidents, including access to adequate medical care. Employees of the Supplier should be fit for their work in the working conditions in which they will be operating.' [Supplier Code, 02/2019] • Not met: Injury Rate disclosures: In its Annual Report 2018, the Company reports its accidents frequency and the number of accidents of Company's personnel and contractor. However, figures need to include agricultural supply chain. [Annual Report 2018, 02/2019: theheinekencompany.com] • Not met: Lost days or near miss disclosures: In its Annual Report 2018 and in its website, the Company reports the lost calendar days per 100 FTE of Company's personnel. However, figures need to include agricultural supply chain. [Annual Report 2018, 02/2019: theheinekencompany.com & Promoting Health and Safety, 15/08/2019: theheinekencompany.com] • Met: Fatalities disclosure: In its Annual Report 2018 and in its website, the Company indicates: 'In 2018, 17 people lost their lives while working for HEINEKEN (2017: 14)21. This is unacceptable and it clearly does not reflect our Company values. Three people were HEINEKEN employees and 14 were employed by contractors or suppliers. Nine fatalities were the result of crime-related security incidents and eight were road accidents. An increase of crime-related events in Mexico contributed to the number of fatal accidents. All fatal accidents are fully investigated and lead to actions to prevent re-occurrence.' [Annual Report 2018, 02/2019: theheinekencompany.com & Promoting Health and Safety, 15/08/2019: theheinekencompany.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: On its website, the Company indicates: 'Launched in 2016, the HEINEKEN Life Saving Rules target the activities that carry the greatest safety threats to employees and contractors. They set out clear and simple 'do's and don'ts' for our highest-risk activities. All our operating companies are required to assess their safety performance and develop action plans close any gaps.' In addition, in its '2018 Message in a Bottle' document, the Company reports: 'In 2018, we launched an internal awareness campaign and training to promote road safety, a high priority for our company. The campaign included safety awareness and alert driver training for employees who drive, along with a reward and recognition programme to celebrate best practice. From 2018, we're also including road safety clauses in our contracts with third party transporters and distributors.' [Promoting Health and Safety, 15/08/2019: theheinekencompany.com & 2018 Message in a Bottle, N/A] Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (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 land & owners in codes or contracts 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
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: In its Supplier Code, the Company indicates: 'We expect our Suppliers to adhere to local applicable laws concerning energy usage, water stewardship and waste management.' In addition, it includes some tips for continuous improvement such as: 'We encourage our suppliers to have their own environmental policy statement including ambitions to reduce the environmental impact of their operations with regard to: [...] Responsible water and wastewater management' or 'The Supplier is encouraged to ensure employees have access to safe drinking water and sanitary facilities in the work place.' However, these are not requirements, only suggestions. [Supplier Code, 02/2019] Not met: How working with suppliers on water stewardship issues: In its Annual Report 2018, the Company indicates: 'In Mexico, we started a pilot project in the Guanajuato watershed, an important agricultural area under risk of decreasing water availability. We set up a strong cooperation between our specialists, farmers, the malting plant, breweries, and strategic suppliers. The team is working on improvement of yield, water use, CO2 emissions and farming practices.[...] Projects include drip irrigation, aerial monitoring of crops using drones and use of biological agrochemicals. [...]This pilot delivered water savings and increased the yield.' However, there is no specific reference to actions made in order to improve its suppliers' practices in relation to access to water and sanitation of its vicinity. [Annual Report 2018, 02/2019: theheinekencompany.com] <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.1.10.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: Although the Company is working in a 'Inclusion and diversity' program which includes actions to promote gender diversity, the program is focus in its own operations. CHRB could not find information describing how the Company is 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		No allegations meeting the CHRB severity threshold were found, and so the score of 37.86 out of 80 points scored in themes A-D & F has been applied to produce a score of 9.46 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.76 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Heineken NV made data public that met one or more elements of the methodology in 29 cases, leading to a disclosure score of 2.76 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company indicates in its Annual Report 2018: 'We gather data in accordance with guidelines and definitions based on the Global Reporting Initiative (GRI Standards) Guidelines, unless stated otherwise'. It also discloses a GRI table. [Annual Report 2018, 02/2019: theheinekencompany.com & GRI Reference table 2018, 04/2019: tps://theheinekencompany.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	1 out of 4	Heineken NV met 2 of the 8 thresholds listed below and therefore gets 1 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • 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) Discussing challenges openly <ul style="list-style-type: none"> • 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 Demonstrating a forward focus <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

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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and Wales.

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.