

Company Name Heineken
Industry Agricultural Products (Supply Chain only)
Overall Score 28.5 out of 100

Theme Score	Out of	For Theme
3.6	10	A. Governance and Policies
12.4	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
2.5	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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: 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'. [Human Rights Policy, 2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to the 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'. [Human Rights Policy, 2018: theheinekencompany.com] Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above [Human Rights Policy, 2018: theheinekencompany.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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 has a commitment to the 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: Company has a 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:

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			<p>'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]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: See below. • Met: Company explicitly list All four ILO for suppliers: The Company's Human Rights Policy include provisions covering all ILO Core. With respect freedom of association and collective bargaining, it states: '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. [...] 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 Rights updated 2020, N/A: theheinekencompany.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to 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] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company states in its Human Rights Policy: 'Our policy is based on our commitment to respecting international standards including [...], the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), [...] We recognise the right to rest and leisure and will therefore always comply with local laws, regulations and local customs with regard to working hours, overtime and rest. We support a healthy balance between the working and private lives of our employees'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: 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: theheinekencompany.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its supplier code: 'The Supplier will always comply with local laws, regulations and local customs with regard to working hours and overtime. The Supplier recognizes the right to sufficient rest and leisure, and therefore aims to prevent their employees from working excessive hours'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week, and consensual overtime paid at a premium rate. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Supplier Code, 02/2019: theheinekencompany.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous	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 as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
	peoples' rights (AG)		<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water: The Company states 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. As part of our Brew a Better World sustainability programme, we work to reduce our consumption of water. This involves increasing water efficiency and treating waste water in our own facilities, as well as encouraging responsible water usage in our value chain. We focus our efforts on water-stressed areas, where we invest in water stewardship projects and engage with stakeholders for collective action'. However, 'to acknowledge the right' is not considered a formal statement of commitment according to CHRB wording criteria. The Environmental policy states that the Company 'aims to protect water resources, which are vital to Human rights and biodiversity and central to our sustainable growth'. However, no direct, formal commitment found in policy statements to respect the right to water. [Human Rights Policy, 2018: theheinekencompany.com] & [Environmental policy, 2020: theheinekencompany.com] • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (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"> • 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] • Met: Expects suppliers to respect at least one of these rights: In its Supplier Code, the Company indicates: 'The Supplier respects the rights of the child as stated in the 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. The Supplier will not engage in, or allow, child labour within their facilities or in those of their suppliers.' [Supplier Code, 02/2019: theheinekencompany.com] & [Respecting Human Rights updated 2020, N/A: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Child Rights Convention/Business Principles: See above [Human Rights Policy, 2018: theheinekencompany.com] • Met: Expecting suppliers to respect these rights: In its Supplier Code, the Company indicates: 'The Supplier respects the rights of the child as stated in the 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. The Supplier will not engage in, or allow, child labour within their facilities or in those of their suppliers'. [Supplier Code, 02/2019: theheinekencompany.com]
A.1.4	Commitment to remedy	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: The Company 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'. However, 'seek' remedy is not considered a formal commitment to remedy according to CHRB wording criteria. No further evidence found in policy statements. [Human Rights Policy, 2018: theheinekencompany.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not 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. In addition, the Company indicates on its website section 'Respecting Human Rights': 'In line with our Human Rights Policy commitment to seek adequate remedy in cases of human rights violations, we remain committed to collaborating with judicial or non-judicial mechanisms.' However, this document is not considered a suitable source for policy statements under CHRB's revised approach. No statement committing to collaborate with remedy initiatives (judicial and non-judicial mechanisms) was found in a suitable source for policy statement. [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: Work with suppliers to remedy impact: The Company includes in its Supplier Code the following provision: 'In the event of non-compliance with the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe'. However, no statement committing to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services was found. [Supplier Code, 02/2019: theheinekencompany.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states on 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'. However, this source is no longer considered a suitable source for policy statements under CHRB's revised approach. No further evidence found in policy documents. [Respecting Human Rights updated 2020, N/A: theheinekencompany.com] • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company indicates on its website: 'In 2021, HEINEKEN established a Sustainability and Responsibility Committee at Supervisory Board level. The committee reviewed our human rights framework and Brew a Better World commitments for a Safe and Fair Workplace, including how these priorities were chosen.' In addition, the Terms of Reference of the Sustainability and Responsibility Committee indicates: 'The Committee's task is to prepare, and if necessary, to execute, resolutions to be adopted by and acts to be performed by the Supervisory Board on the domain entrusted to the Committee'. [Respecting Human Rights, N/A: theheinekencompany.com] & [Sustainability & Responsibility Committee of the Supervisory Board - Terms of Reference, 12/2020: theheinekencompany.com] • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: The Company's CEO discusses ESG and the need to mobilize and scale innovation and technology in the future, stressing in environmental and social sustainability and its ambition to become a "more fair, more inclusive, and more equitable company'. On the other hand, on its website, the Company discloses information about its '2030 Brew a Better World ambitions', with an introduction message from its CEO: 'For over 150 years, we've been passionate about making a positive impact on the world around us. We know that we can only thrive if our people, the planet and the communities around us thrive. We are moving into a decade with even more complex challenges. Our Brew a Better World vision for 2030 raises the bar and enables faster progress towards a net zero, fairer and healthier world. Our new commitments are woven into the fabric of our balanced growth strategy, EverGreen, putting sustainability and responsibility front and centre as we write our next chapter.' According this publication its 2030 Brew a Better World ambitions includes commitments related to: 'Embrace inclusion and diversity'; 'Fair and safe workplace'; 'Impact on communities'. No specific speech/communication found, however, where the CEO or a Board member discusses why human rights matter to business or any challenges to respecting human rights encountered by the business. [Heineken CEO: On a path to become a 'more fair, more inclusive and more equitable' company, 04/2021: cnbc.com] & [HEINEKEN launches 2030 Brew a Better World ambitions, 04/2021: theheinekencompany.com]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review HRs strategy: The Company indicates on its website: 'In 2021, HEINEKEN established a Sustainability and Responsibility Committee at Supervisory Board level. The committee reviewed our human rights framework and Brew a Better World commitments for a Safe and Fair Workplace, including how these priorities were chosen'. In addition, the Terms of Reference of the Sustainability and Responsibility Committee indicates: 'The Committee's task is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to prepare, and if necessary, to execute, resolutions to be adopted by and acts to be performed by the Supervisory Board on the domain entrusted to the Committee. [...] The domain entrusted to the Committee comprises matters relating to the overall Sustainability & Responsibility strategy of the Company, including: a. the environment, including (i) water scarcity, [...] b. social sustainability, including (i) human rights, (ii) fair wages and (iii) community engagement'. [Respecting Human Rights, N/A: theheinekencompany.com] & [Sustainability & Responsibility Committee of the Supervisory Board - Terms of Reference, 12/2020: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Met: Examples/trends re HR discussion in the last reporting period: As indicated above, in 2021 the Committee 'reviewed our human rights framework and Brew a Better World commitments for a Safe and Fair Workplace, including how these priority were chosen' <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
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 has provided comments to CHRB regarding this indicator. However, evidence was not material. No evidence indicating that at least one board member has an incentive or performance management scheme linked to the company's human rights policy commitment(s) or strategy. • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and 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: Board process to review business model and strategy: Although the Company indicates in its Sustainability & Responsibility Committee Terms of Reference that it is responsible for all 'matters relating to the overall Sustainability & Responsibility strategy of the Company, including:[...] social sustainability, including (i) human rights, (ii) fair wages and (iii) community engagement;', and that this Committee 'meets three times a year or more if requested by one of its members or the Chairman of the Executive Board', no description of the actual the process(es) it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee was found. [Sustainability & Responsibility Committee of the Supervisory Board - Terms of Reference, 12/2020: theheinekencompany.com] • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company indicates on its website: 'In 2019, we appointed a Global Director Social Sustainability who reports to the Chief People Officer and is responsible for implementation and oversight of our Human Rights Policy and social commitments.' [Respecting Human Rights, N/A: theheinekencompany.com] & [2019 Annual Report, 21/2/2020: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Annual Report 2019 states that 'Focus on sustainability is embedded throughout the business, for example driven by Supply Chain (Every Drop and Drop the C), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption). As a part of Brewing a Better World governance, accountability for driving our ambition lies with the HEINEKEN Executive Team globally, and with the general manager of each HEINEKEN operating company locally. Functions (at Global and operating company level) are responsible for defining ambitions and targets, and for implementing, delivering, monitoring and reporting progress on their respective indicators. Corporate Affairs and the Global Sustainable Development team at operating company level oversee Brewing a Better World strategy and drive collaboration and coordination of activities between involved functions. See above. In addition, it states: 'Each operating company has a responsibility for sustainability reporting and a team engaged in delivering Brewing a Better World. [...] Further, we form alliances (tribes) throughout the organisation and with our suppliers to develop new solutions in the focus areas.' [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: Day-to-day resources and expertise allocation in own ops: In addition, it indicates: 'We have established regional cross-functional Good Governance platforms to address human rights issues and focus operating companies' time and resources on the common risks for their region.[...] The risk control framework embeds respect for human rights in our internal controls. The Risk Committee maintains oversight of programmes and actions to strengthen respect for human rights. Each operating company must check their own policies and practices against the Human Rights Policy and implementation guidelines'. It is not clear, however, if these resources with a human rights focus are allocated for day-to-day management or review purposes only. [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: Resources and expertise allocation in the supply chain
B.1.2	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: Senior manager incentives for human rights: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Evidence of an incentive or performance management scheme linked to its human rights policy commitment(s) for at least one senior manager is needed. • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk 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: HR risks is integrated as part of enterprise risk system: The Company states on its website section 'Risk management': 'Continuous Risk Management supports the achievement of business objectives, based on our Risk Assessment Cycle, the HEINEKEN Code of Business Conduct and the HEINEKEN Rules. As part of the Risk Assessment Cycle, operating companies and their Management Teams review and update their risks on a continuous basis throughout the year. The Code of Business Conduct and its underlying policies set out HEINEKEN's commitment to conduct business with integrity and fairness, and respect for the law and our values. ' In addition, in its Annual Report 2021, the Company reports its main risks, one of them is 'Non-compliance': 'Across many geographies, law enforcement has increased over the past years, in particular with regard to [...] human rights. [Annual Report 2021, 2021: theheinekencompany.com] & [Risk management - web, N/A: theheinekencompany.com] • Met: Provides an example: This [non-compliance with human rights laws enforcement] leads to increased risk of allegations of violations of laws and regulations by law enforcers as well as by private parties. What we are doing to manage this risk: HEINEKEN is constantly looking to enhance its internal compliance system and resilience to adapt to changes in the legal environment. HEINEKEN has embedded legal compliance in its risk and controls system, and has established processes and governance to drive implementation and compliance with the Company Rules and the HEINEKEN Code of Business Conduct.' In addition, on its website, the Company states: 'The HEINEKEN Risk Committee, chaired by the CFO who is a member of the Executive Board, maintains oversight of human rights risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and efforts to mitigate them.' [Annual Report 2021, 2021: 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, 43009: theheinekencompany.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates in its Annual Report 2021: 'We provide annual Code of Business Conduct training to all employees worldwide.' In addition, 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 2021, 2021: theheinekencompany.com] & [Annual Report 2018, 02/2019: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: According its Annual Report 2020, suppliers have to sign the Company's Supplier Code 'Understanding and accepting our requirements', as part of 'The four step Supplier Code Compliance procedure'. However, no further information describing how the Company proactively communicates its policies to other stakeholders (i.e. local communities) was found. Communication to suppliers is assessed in indicator B.1.4.b [Annual Report 2020, 2021: theheinekencompany.com] • Not Met: How policy commitments are made accessible to audience: 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, in its Annual Report 2021 it indicates: 'Our Code of Business Conduct, Human Rights Policy and Supplier Code are available in all relevant languages (around 40 languages) to ensure information is accessible to intended audiences.' However, no evidence found on how the policies are communicated to affected stakeholders including local communities [Human Rights Policy, 2018: theheinekencompany.com] & [Annual Report 2021, 2021: theheinekencompany.com]
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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: 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 2019, 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. [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] <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

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			<p>and human rights.' [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their 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 between the supplier and its own supply chain and how are expected to ensure compliance. [Supplier Code, 02/2019: theheinekencompany.com]
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.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: In its Annual Report 2021, the Company indicates: 'We provide annual Code of Business Conduct training to all employees worldwide. The training uses practical dilemmas to encourage participants to explore a range of responsible business conduct topics. In 2021, almost 73,000 employees completed the training.' [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Trains relevant managers including procurement: The Company indicates in its Annual Report 2021: 'We provide annual Code of Business Conduct training to all employees worldwide. The training uses practical dilemmas to encourage participants to explore a range of responsible business conduct topics. In 2021, almost 73,000 employees completed the training'. No specific evidence found however, in relation to training to relevant managers and workers, including those working in procurement, in human rights topics relevant to their role. [Annual Report 2021, 2021: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: In its Annual Report 2021, the Company indicates: 'We launched new trainings for security staff in line with the Voluntary Principles on Security and Human Rights, focusing on operations in volatile environments. This training is designed to ensure they have the knowledge and understanding to conduct daily tasks in compliance with international standards on security and human rights and with our policies regarding human rights and ethical conduct'. However, this action is focused on security staff only. This subindicator looks for evidence of how they Company trains its suppliers in relation to its human rights commitments/requirements. [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Annual Report 2019, the Company indicates: 'Operational management is supported by the second line of defence functions that oversee compliance with HEINEKEN's policies, processes and controls, facilitate the implementation of risk management practices and drive continuous improvements of internal controls. As third line of defence, the internal audit function ('Global Audit') is mandated to perform Group-wide reviews of key processes, projects and systems, based on HEINEKEN's strategic priorities and most significant risk areas.' Additionally, '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.' In addition, the Company indicates in its Annual Report 2021: 'The current four step Supplier Code Compliance Procedure allows us to identify and evaluate potential risks with our suppliers and execute mitigating actions to address the following issues: [...], negative media coverage related to issues such as labour and human rights, health and safety, [...].' The four steps are: Signing of the Supplier Code, Supplier Risk Analysis, Automated Screening, Corrective Action. [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Proportion of supply chain monitored: The Company indicates in its Annual Report 2020: 'We have continued to exceed our target, reaching 97% compliance with our Supplier Code Procedure across our global operating companies.' However, it is not clear the proportion of suppliers audited/monitored, as evidence seems to refer to the degree of compliance. The Company provided

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>feedback to CHRB regarding this indicator, but part of the information was not found in a publicly available source. [Annual Report 2020, 2021: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Not Met: Describe how workers are involved in monitoring: The Company indicates on its website: 'We actively encourage everyone to Speak Up about any concerns they may have about HEINEKEN'S operations, particularly in relation to suspected human rights violations and misconduct.' However, no evidence was found of workers are actively involved during monitoring/audit process. [Respecting Human Rights, N/A: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • 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.' However, it is not clear how many cases of non-compliances were found. [Supplier Code, 02/2019: theheinekencompany.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	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: HR affects 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 Standards Reference Table 2019, 01/04/2020: theheinekencompany.com] • Met: HR affects on-going 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: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements: The Company indicates on its website: 'We continue working together with our suppliers to ensure high ethical standards and respect for human rights and the environment. [...] In 2020, compliance among our suppliers with our four-step Supplier Code Procedure was 97% and 58% of our main agricultural raw materials came from sustainable sources. Our intention is to expand the Supplier Engagement Programme to advanced labour and human rights due diligence as well as bringing the collection and monitoring of our supplier environmental data into scope to improve consistency and oversight.' However, no further information describing how it proactively work with suppliers to improve their human rights performance (i.e. training) was found. [Working with stakeholders and partners, N/A: theheinekencompany.com]
B.1.8	Approach to engagement with 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"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates: 'We engage with NGOs, scientists, academic experts, investors, government representatives and industry peers to learn and gain feedback on our strategy, commitments and progress. This is an opportunity to share opportunities and dilemmas and discuss industry trends and opportunities for innovation and collaboration. Discussions cover our sustainability performance, overall agenda and future plans. We zoom in on key issues like carbon, water, responsible consumption, human rights, local sourcing and the opportunities and challenges of doing business in Africa.' However, no further information describing the process to identify and engage with workers/communities in the last two years was found. [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Discloses stakeholders that HRs may be affected • Met: Provides two examples of engagement with stakeholders: The Company reports on its website: 'At BRANA, our brewery in Haiti, we started conversations with relevant stakeholders on how to improve and strengthen labour relations. With support of CNV International, a training seminar on social dialogue was organised in March 2017 for both the executive board of the local trade union and the management of the brewery.' In addition, on its 'Respecting human rights' website section, it indicates: 'Multistakeholder engagement can influence our local decision-making. For example, in Brazil we had plans to build a new brewery in the city of Pedro Leopoldo. Although it received huge support by the local community, and obtained all relevant environmental permits, there was disagreement among

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>stakeholders on the potential impact it could have on a nearby archaeological site. Our team in Brazil held a series of conversations with groups involved, to listen and learn. Based on the outcomes, we concluded that construction would only make sense if it had the support of all stakeholders. As a result, we have stopped the construction and will search for an alternative location in the same state.' [Working with stakeholders and partners, N/A: theheinekencompany.com] & [Respecting Human Rights, N/A: theheinekencompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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: On its website, 'Respecting Human Rights' section, the Company states: 'We started conducting human rights risk assessments and action planning workshops in 2016. Following these workshops, operating companies develop practical action plans to address the potential human rights risks identified. We have now completed risk assessments and workshops in 16 operating companies: Brazil, Cambodia, Democratic Republic of Congo, Ethiopia, Haiti, Hungary, Indonesia, Jamaica, Mexico, Myanmar, New Zealand, Nigeria, Serbia, South Africa, Timor-Leste and the UK.[...] Managing human rights risks across the entire value chain is an ongoing priority. We have enhanced our supplier screening and due diligence process. An automated supplier risk management tool allows us to identify elevated risks in our value chain and focus on actions to mitigate them. Following research by the African Studies Centre Leiden (ASCL) into the socio-economic and agronomic dynamics of the Sorghum value chain in Nigeria, we identified potential human and labour rights risks in this market. We are carrying out Human and Labour Rights risk assessments of sorghum farms and aggregators in Nigeria and Nigerian Breweries will develop action plans to address any issues identified'. [Respecting Human Rights, N/A: theheinekencompany.com] • Met: Identifying risks through relevant business relationships: As stated above, the Company has an objective to address human rights risks in its value chain. [Respecting Human Rights, N/A: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: See above. The Company also indicates on its website: 'Engagement with stakeholders and industry is key. We are a founding member of the Consumer Goods Forum coalition to end forced labour, an active member in AIM-Progress and have a seat at the European Round Table for Industrialists and World Economic Forum (WEF) social initiatives. We continue to draw from the experience of NGO partners on topics such as local sourcing and respecting human rights in high-risk contexts. [...] Based on human rights risks identified through our work with Shift,[...]'. However, it is not clear whether, among the engaged stakeholders, the Company engaged with affected stakeholders. Previous website content indicated that the Company engaged with 'communities, employees and (potentially) impacted people in the countries' where it operates. No further evidence found in current sources. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Respecting Human Rights, N/A: theheinekencompany.com] • Met: Triggered by new circumstances: The Company discloses information about a case that triggered a human rights impact assessment on its website: 'In 2018 HEINEKEN commissioned the African Studies Centre Leiden (ASCL) to conduct an exploratory research into the socio-economic and agronomic dynamics of the Sorghum value chain in Nigeria. [...] The report also identifies some potential human rights risks in the Sorghum value chain. We will now undertake a thorough Human and Labour Rights risk assessment to understand these potential risks in more detail and develop an action plan to address any issues identified in collaboration with Nigerian Breweries and farm owners. As only a small player in the total Sorghum value chain, we recognize that making an impact will also require engagement with other stakeholders including local communities, local authorities, government and NGOs.' [Sorghum Value Chain in Nigeria Exploratory Study. African Studies Centre Leiden - website, 2020: theheinekencompany.com] • Not Met: Describes risks identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: in its Annual Report 2019, the Company indicates: 'We started conducting Human Rights Risk Assessments and running action planning workshops in 2016 [...] We conduct risk assessments with Shift, the global leading expert on the UN Guiding Principles on Business and Human Rights. [...]We will continue to deliver workshops in 2020 and will strengthen regional governance structures and improve human rights monitoring'. We have now completed risk assessments and workshops in 16 operating companies: Brazil, Cambodia, Democratic Republic of Congo, Ethiopia, Haiti, Hungary, Indonesia, Jamaica, Mexico, Myanmar, New Zealand, Nigeria, Serbia, South Africa, Timor-Leste and the UK.[...] Managing human rights risks across the entire value chain is an ongoing priority. [2019 Annual Report, 21/2/2020: theheinekencompany.com] & [Annual report, 2017: theheinekencompany.com] • Not Met: How process applies to supply chain: The Company indicates in its Annual Report 2021: 'The current four step Supplier Code Compliance Procedure allows us to identify and evaluate potential risks with our suppliers and execute mitigating actions to address the following issues: anti-bribery and anti-corruption, sanctions, political exposure, negative media coverage related to issues such as labour and human rights, health and safety, fraud, fair competition and money laundering. Our plan for the next year is to expand the scope of our Supplier Risk Management programme to include additional risk drivers (e.g. 'cyber security' and 'human trafficking & modern slavery') to improve consistency and oversight.' However, no further information describing the process for assessing the saliency of potential human rights risks in supply chain (including potential suppliers), including relevant factors are taken into account, such as geographical, economic, social and other. [Annual Report 2021, 2021: theheinekencompany.com] • Met: Public disclosure of the results of HR assessment: The Company indicates on its website: '[...] risks differ by country and include topics such as discrimination, excessive working hours, harassment, road safety and working conditions of third-party employees and farm workers.' On the other hand, the Company states in its Human Rights Policy: 'These ten standards are based on a global identification of our 'salient' human rights issues in our Operating Companies (OpCos) and in their local value chains.' The 10 Standards include: Health and Safety, non discrimination, no harassment, child protection, freedom of association and collective bargaining, no forced labour, access to water, fair wages and income, rest and leisure and respect for human rights in high risk contexts. [Respecting Human Rights, N/A: theheinekencompany.com] & [Human Rights Policy, 2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment: The Company indicates on its website: 'We continued working with the experts at Shift on our Human Rights due diligence process; To date, we have completed risk assessments and workshops in 16 operating companies. Brazil, Cambodia, Democratic Republic of Congo, Ethiopia, Haiti, Hungary, Indonesia, Jamaica, Mexico, Myanmar, New Zealand, Nigeria, Serbia, South Africa, Timor-Leste and the UK. ' However, no further information was found describing how affected stakeholders are involved in the assessment process of salient human rights. [Working with stakeholders and partners, N/A: theheinekencompany.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks: The Company indicates on its website: 'We started conducting human rights risk assessments and action planning workshops in 2016. Following these workshops, operating companies develop practical action plans to address the potential human rights risks identified. We have now completed risk assessments and workshops in 16 operating companies: Brazil, Cambodia, Democratic Republic of Congo, Ethiopia, Haiti, Hungary, Indonesia, Jamaica, Mexico, Myanmar, New Zealand, Nigeria, Serbia, South Africa, Timor-Leste and the UK. In 2020, we developed online workshops and we continue to strengthen regional governance structures and human rights monitoring. Due to pandemic measures, we did not conduct in-person workshops in 2021. Instead, we worked with all 16 operating companies to follow up on their salient human rights risks. These risks differ by country and include topics such as discrimination, excessive working hours, harassment, road safety and working conditions of third-party employees and farm workers. Based on stakeholder feedback, we refreshed the workshop content to allow more time for developing action plans. We will

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conduct our next in-person human rights workshops in 2022, beginning with Croatia in Q2.' [Respecting Human Rights, N/A: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Met: Description of how global system applies to supply chain: See above. In addition, it indicates: 'Managing human rights risks across the entire value chain is an ongoing priority. We have enhanced our supplier screening and due diligence process. An automated supplier risk management tool allows us to identify elevated risks in our value chain and focus on actions to mitigate them. [Respecting Human Rights, N/A: theheinekencompany.com] • Met: Example of actions decided on at least 1 salient HR issues: The Company explains the assessment carried out in Africa in relation to working conditions of brand promoters. It concluded that the single biggest issue 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'. In an update from 2020, the Company states that 'Based on feedback from NGOs and Brand Promoters themselves, we have increased gender balance in our teams of Brand Promoters in many of our markets'. [Working with brand promoters (Update 2021), 04/2021: theheinekencompany.com] & [Working with Brand Promoters (Update 2020), 12/06/2020: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions: The Company indicates in its Annual Report 2019 that it 'developed with suppliers targeted actions to mitigate identified risks.' 'Following the update of our Supplier Code in 2018, our Global Procurement and Business Conduct functions have worked together to enhance the supplier screening and due diligence process.' However, no details found on whether and how affected stakeholders are involved in decision making about action plans to take in order to face salient human rights risks and impacts. [2019 Annual Report, 21/2/2020: theheinekencompany.com]
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective: The Company indicates on its website: 'We track our human rights risks and impacts through four key channels: The HEINEKEN risk control framework, Global Audit human rights reviews, Speak Up channel and third-party assessments. The risk control framework embeds respect for human rights in our internal controls. The Risk Committee maintains oversight of programmes and actions to strengthen respect for human rights. [...] With the support of KPMG, Global Audit increased capacity to review operating companies against the key principles of our Human Rights Policy. Any gaps identified are included in the issue management system and operating companies must develop plans and take action to mitigate them.' [Respecting Human Rights, N/A: theheinekencompany.com] • Met: Lessons learnt from checking system 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 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] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Met: Involve stakeholders in evaluation of actions taken: On its website, it indicates: 'Our stakeholders are crucial to our Brew a Better World journey. They help us to stay focused and tell us when they feel we are moving off track. We engage with them and measure the progress of our relationships in three ways: reputation research, roundtables and ongoing stakeholder dialogue. The input we gain enables us to assess our material issues, identify gaps in our approach and shape our action planning.' As an example of this work, the Company highlights : 'Between April and May 2018, The HEINEKEN Company contracted Partner Africa (PA), an NGO focused on improving working conditions and responsible business

Indicator Code	Indicator name	Score (out of 2)	Explanation
			practices in Africa, to independently assess the current practices of promotion agencies in a selected number of markets in Africa, Middle East and Eastern Europe (Russia).[...] In November and December 2018, Partner Africa began the follow-up assessments of the markets and agencies which participated in the initial assessment. The purpose of these assessments was to re-assess Brand Promoter activity in the market and identify gaps which remained following the implementation of the HEINEKEN Brand Promoters Policy (June 2018) and international standards, including those outlined in the SMETA measurement criteria. [...] The following methodologies and actions were applied by Partner Africa during the assessment: Desktop assessments were performed using three inputs, namely, a self-assessment questionnaire and documentation review, management/supervisor interviews and, lastly, Brand Promoter (BP) interviews.' [Working with stakeholders and partners, N/A: theheinekencompany.com] & [Partners Africa - Brand Promoters in the HEINEKEN Africa, Middle East and Eastern Europe Region, 2019: theheinekencompany.com]
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders: First example: Communication with Brand Promoters (source: website): 'Brand Promoters were informed about our pro-active actions to improve their working conditions through a mandatory online training (accessible on mobile devices and PCs) in all relevant languages. In 2019, we delivered this online training in 32 languages to more than 23,000 Brand Promoters, agencies and our own employees, worldwide. This training helps Brand Promoters become more aware of their rights and what to do in case they encounter harassment. We also continued providing our local support lines for Brand Promoters, which they can use to report issues. As the majority of Brand Promoters are hired by agencies and work for many brands, we also continued to work extensively with the agencies that directly employ Brand Promoters in order to reinforce the principles of our Policy. Based on feedback from NGOs and Brand Promoters themselves, we have increased gender balance in our teams of Brand Promoters in many of our markets. To ensure continuous progress, we closely monitor compliance with our Brand Promoters Policy as part of our governance cycle. This includes an annual management self-assessment process. Additionally, HEINEKEN's Global Audit team carried out audits in 12 countries in 2019. Results showed how global implementation of the Brand Promoters Policy has progressed since its introduction in 2018'. However, this indicator looks for evidence of how the Company communicated and responded to affected stakeholders in relation to impacts raised by them. This seems to refer to a proactive measure taken by the Company instead of a response. In addition, the Company highlights the ASCL exploratory research into the socio-economic and agronomic dynamics of the Sorghum value chain in Nigeria, commissioned by Heineken that 'identifies some potential human rights risks in the Sorghum value chain'. Stakeholders were engaged in this research. However, it is not clear whether this engagement was to communicate regarding specific human rights impacts raised by them or on their behalf. No other example was found [Working with Brand Promoters (Update 2020), 12/06/2020: theheinekencompany.com] & [Sorghum Value Chain in Nigeria Exploratory Study. African Studies Centre Leiden - website, 2020: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	<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 '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. The Company states in its Speak Up Policy: 'This Speak Up policy is available to anyone who wishes to raise a concern about possible misconduct in relation to our Company'. [Speak up policy, 2022: theheinekencompany.com] & [Code of Business Conduct, 2018: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: 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. The Code of Business Conduct includes information about the Speak Up services. In addition, the Company indicates in its Annual Report 2021: 'We provide annual Code of Business Conduct training to all employees worldwide'. [Heineken Ethics point, N/A: secure.ethicspoint.com] & [Annual Report 2021, 2021: theheinekencompany.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: As indicated above, the Company's Speak Up Policy reads: 'This Speak Up policy is available to anyone who wishes to raise a concern about possible misconduct in relation to our Company'. In addition, the supplier code states that 'HEINEKEN encourages its Suppliers, including their employees, to speak up if they have any concerns regarding a possible violation of our Code of Business Conduct and policies, including this Supplier Code'. [Speak up policy, 2022: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] • Met: Expect Suppliers to convey expectation to their own suppliers: See above. 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.'
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: According the Company's Code of Conduct website: 'Speak Up is available to everyone, both inside and outside our company.' In addition, the Speak Up Policy reads: 'This Speak Up policy is available to anyone who wishes to raise a concern about possible misconduct in relation to 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. In addition, in an interview for IRBC with the Director Social Sustainability and the Director Global Business Conduct, they stated: 'We actively encourage everyone to speak up about any concern they might have, particularly in relation to observed or suspected violations of our Code of Business Conduct. To facilitate this, our Global Business Conduct function has developed a Speak Up system, where all grievances come in. Multiple channels are available for employees and external parties to quickly and easily raise questions and concerns, in confidence and without fear of retaliation. This can be via a Speak Up service by telephone and online directly into the system, but we also use this platform to log grievances from other sources e.g. trusted Representatives in our operations, e-mails to the company or the more unlikely channels like the OECD national contact point. The key principle is that we always need to be accessible for everyone to raise a concern or complaint.' [Code of Business Conduct website, N/A: theheinekencompany.com] & [Heineken Ethics point, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: 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. [...] Employees and 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.' In addition, in an interview for IRBC with the Director Social Sustainability and the Director Global Business Conduct, they stated: 'We actively encourage everyone to speak up about any concern they might have, particularly in relation to observed or suspected violations of our Code of Business Conduct. To facilitate this, our Global Business Conduct function has developed a Speak Up system, where all grievances come in. Multiple channels are available for employees and external parties to quickly and easily raise questions and concerns, in confidence and without fear of retaliation. This can be via a Speak Up service by telephone and online directly into the system, but we also use this platform to log grievances from other sources e.g. trusted Representatives in our operations, e-mails to the company or the more unlikely channels like the OECD national contact point. The key principle is that we always need to be accessible for everyone to raise a concern or complaint.' Finally, the Company indicates in its Annual Report 2021: 'Speak Up channels are regularly communicated to the employees and third parties.' However, no further information describing how it communicates about its Speak Up service to communities was found. [Code of Business Conduct

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>website, N/A: theheinekencompany.com] & [IRBC interview - Taking access to remedy seriously, 2021: imvoconvenanten.nl]</p> <ul style="list-style-type: none"> • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers: In its Supplier Code, the Company 'encourages its Suppliers to implement its own grievance mechanism', however it is not a requirement and it does not clarify that suppliers' external stakeholders, including communities, should have access to these grievance mechanisms. [Supplier Code, 02/2019: theheinekencompany.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system: The Company has provided comments to CHRB regarding this indicator. However, this information has not been found in publicly available sources. • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with potential or actual users on the improvement of the mechanism: The Company indicates on its website: 'Based on stakeholder feedback over the past two years, we have updated and improved our Speak Up Framework. This includes changes to the Speak Up Policy, Speak Up Investigation Manual, new guidance documents aimed at those involved in Speak Up and improvements to the case management system. We also made improvements in the area of Speak Up reporting. We will continue to review our Speak Up framework and improve where we can.' [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, 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 and how complainants will be informed: The Company indicates on its Ethics Point FAQ website: 'If you submit a formal report, you will receive confirmation of receipt within 5 to 7 business days with an estimate of how long it will take to handle and investigate your concern. On average, closure of the matter can be expected within 2 to 3 months. [...] After you complete your report (online or by phone), you will receive a unique code called a report key. You will also be asked to choose a password. You can use this key and password to call back or access the website (call.heiway.com) to check on your report. You can see whether people dealing with your report have feedback for you or further questions. You can also provide further information'. [Heineken Ethics point FAQ: secure.ethicspoint.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants: In its Speak up policy, the Company indicates: 'If you have any other question, if you wish to exercise any of the above rights or if you have a complaint about our handling of your Personal Data with regard to the Speak Up procedure, please send an e-mail to businessconduct@heineken.com, or contact Global Business Conduct at +31 20 5239 968.' However, no details found on the actual support available to complainants. Current evidence refers to addresses for asking for support. This indicator looks for a description of the actual support provided by the Company to enable complainants' participation and equal access to mechanisms. [Speak up policy, 2022: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: In addition, its Speak up policy indicates: 'If your concern is well-founded (i.e. misconduct has indeed taken place), appropriate measures will be taken where necessary in accordance with the law and our Policy on Disciplinary Measures.[...] If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the Integrity Committee [...]'. However, no further information with respect other type of outcomes was found. [Speak up policy, 2022: theheinekencompany.com] • 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, 10/2006: heinekenusa.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: 'In our Company we encourage people to speak up about (suspected) misconduct. This means that you are protected against retaliation when you address a concern. Please feel confident that you will not face any negative consequences because of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>raising concerns in good faith about suspected misconduct. Any attempt, threat or actual retaliation against you or persons or entities connected to you will not be tolerated. Retaliation is treated as a violation of our Code of Business Conduct and consequently may lead to disciplinary measures.' And according its website: 'Speak Up is available to everyone, both inside and outside our company.' [Speak up policy, 2022: theheinekencompany.com] & [Code of Business Conduct website, N/A: theheinekencompany.com]</p> <ul style="list-style-type: none"> • 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, 2022: theheinekencompany.com] & [Heineken Ethics point, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: As indicated above, the Company states: 'Please feel confident that you will not face any negative consequences because of raising concerns in good faith about suspected misconduct.' However, this statement is not explicit indicating that the Company will not retaliate against workers and stakeholders through any direct or indirect channel, including: legal action; firing or engaging in economic forms of retaliation against any workers or their representatives; or engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [Speak up policy, 2022: theheinekencompany.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • 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. National Contact Point final statement in the case Former employees of Bralima vs. Bralima and Heineken indicates: '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. The NCP encourages Heineken to do so and believes that this will facilitate decision-making and have a positive impact.' [NCP: Former employees of Bralima vs. Bralima and Heineken, 08/2017: oecdwatch.org]
C.7	Remedying adverse impacts	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 provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: According its Annual Report 2018, 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. In addition, on its website 'Working with Brand Promoters', it discloses information about all the actions taken to improve working conditions, such as: 'Brand Promoters were informed about our pro-active actions to improve their working conditions through a mandatory online training (accessible on mobile devices and PCs) in all relevant languages. In 2019 and 2020, we delivered this online training in 32 languages to more than 25,000 Brand Promoters, agencies and our own employees, worldwide. This training helps Brand Promoters become more aware of their rights and what to do in case they encounter harassment. We also continued providing our local support lines for Brand Promoters, which they can use to report issues.' Another example, is related to the Bralima case and the changes made based on lessons learnt. On the one hand, National Contact Point final statement in the case Former employees of Bralima vs. Bralima and Heineken indicates: '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. The NCP encourages Heineken to do so and believes that this will facilitate decision-making and have a positive impact.' In addition, the Company indicates in its Annual Report 2021: 'We recognise that we may face human rights dilemmas in countries that are politically less stable or where human rights are compromised. We constantly review whether we can continue to operate in such contexts and, if so, how. To guide our operating companies, we have included respecting human rights in high-risk contexts in our global Human Rights Policy and designed a set of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>'Golden Principles' and corresponding actions. In 2020 and 2021, we conducted workshops with our operating companies in high-risk contexts. These will continue in 2022.' [Annual Report 2018, 02/2019: theheinekencompany.com] & [Working with brand promoters (Update 2021), 04/2021: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts [Annual Report 2021, 2021: theheinekencompany.com]
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Number grievances filed, addressed or resolved and outcome achieved: The Company reports: 'In 2021, we received over 1,700 reports of suspected misconduct through Speak Up (2020:1,469). These reports concerned allegations of fraud (27%), discrimination and harassment (28%), conflicts of interest (8%) and other issues (37%). 45% of Speak Up reports were substantiated and corrective and preventative actions were taken where relevant, including process and control improvements and disciplinary measures'. However, it is not clear how many reports related to human rights were filed, addressed or resolved for its own workers and for external individuals and communities. [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Met: Evaluation of the channel/mechanism and changes made as result: The Company's whistleblowing mechanism was evaluated by Transparency International NL, and awarded a score of 82.7%. Additionally, it states 'We regularly evaluate and improve the Speak Up procedure, including communication and awareness of Speak Up within the organisation and our trusted representatives framework'. In addition, the Company indicates on its website: 'Based on stakeholder feedback over the past two years, we have updated and improved our Speak Up Framework. This includes changes to the Speak Up Policy, Speak Up Investigation Manual, new guidance documents aimed at those involved in Speak Up and improvements to the case management system. We also made improvements in the area of Speak Up reporting. We will continue to review our Speak Up framework and improve where we can.' [Whistleblowing Frameworks 2019, 2020: transparency.nl] & [Respecting Human Rights, N/A: theheinekencompany.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The HR 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 fair wage definition is missing to check if it covers discretionary income. On the other hand, the Company indicates in its Human Rights Policy implementation Guide: 'Fair wages that support a decent standard of living are wages that are reasonable for the type of work done and sufficient to meet employees' basic needs for food, shelter, education for their children and some discretionary income. This can be calculated by identifying the cost of basic needs such as food, transport, and accommodation while also taking into consideration factors such as family size, number of individuals employed per family, hours worked and requirement for discretionary income. [...] Although this guidelines document is aimed at OpCos and their employees, we also expect our suppliers and business partners to respect human rights in line with the standards in our Human Rights policy'. [Human Rights Policy, 2018: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • 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): The Company indicates in its Annual Report 2021: 'During the COVID-19 pandemic, we put a clear strategy in place with suppliers to support them where possible and to avoid adding additional pressures on their businesses. We reduced payment terms for small and medium suppliers and for some larger suppliers who needed our support. The majority of suppliers already had access to our Supplier Finance schemes which allow them to access early payments. When requested, we allowed early payments, prefunded orders and gave long term commitments through orders and shared access to our personal protective equipment.' However, it is not clear whether this purchasing practice remains further than COVID-19 pandemic. [Annual Report 2021, 2021: theheinekencompany.com] Score 2 <ul style="list-style-type: none"> • Not Met: Practices adopted to pay suppliers in line with agreed timeframes: The Company indicates in its Annual Report 2021: 'During the COVID-19 pandemic, we put a clear strategy in place with suppliers to support them where possible and to avoid adding additional pressures on their businesses. We reduced payment terms for small and medium suppliers and for some larger suppliers who needed our support. The majority of suppliers already had access to our Supplier Finance schemes which allow them to access early payments. When requested, we allowed early payments, prefunded orders and gave long term commitments through orders and shared access to our personal protective equipment.' However, it is not clear whether this purchasing practice remains further than COVID-19 pandemic. [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
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 direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No evidence indicating that the Company itself maps/identifies its suppliers, including direct and indirect suppliers, so it know their Names and location. Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of 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 HR policy indicates: '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 to remediation programs was found in the Supplier Code. On the other hand, the Company indicates in its Human Rights Policy implementation guidelines: 'Work together on remediation – If child labour is found within your value chain, work together with value chain partners to implement remediation plans and corrective actions to ensure that it does not re-occur. [...] Although this guidelines document is aimed at OpCos and their employees, we also expect our suppliers and business partners to respect human rights in line with the standards in our Human Rights policy.' However, it is not clear whether the Human Rights Policy implementation guidelines is part of the Supplier Code documentation or contract with Suppliers. Provisions of age verification and remediation programs are needed in Supplier Code or any other contract agreement document. [Human Rights Policy, 2018: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] • Not Met: How working with suppliers on child labour: The Company indicates in its Annual Report 2020: 'The four step Supplier Code Compliance procedure allows us to identify and evaluate potential risks with our suppliers and execute mitigating actions to address the following issues: Anti-bribery and anti-corruption; Sanctions; Political exposure; Negative media coverage related to issues such as labour and human rights, health and safety, fraud, fair competition and money laundering. [...] we have already begun evolving our Supplier Code procedure into a Supplier Engagement Programme. We have enhanced our financial assessments, particularly with our global suppliers. We have strengthened our anti-bribery and corruption programme to improve our capabilities in challenging markets [...] ' These four steps include: Understanding and accepting our requirements by suppliers; Identifying potentially high-risk suppliers; Evaluating high-risk suppliers on critical parameters; Executing appropriate corrective actions. However, no evidence of supplier capability building or similar proactive actions to show how the Company proactively work with supplier on child labour issues was found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (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: 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.' Supplier requirements apply to third party contractors and suppliers' own suppliers. [Human Rights Policy, 2018: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on debt & fees: The Company highlights its SMART Outsourcing program, that 'aims to ensure that all our contracts with third-party service providers meet our required standards.' presented on an article of the Consumer Goods Forum coalition. However, no evidence was found of how it works with suppliers proactively to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [Forum;, 2022: theconsumergoodsforum.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.d	Prohibition of forced labour: Wage practices (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: Suppliers to pay workers in full and on time in codes or contracts: The Company indicates in its Human Rights Policy implementation guidelines: 'Wages are paid directly to employees and all earned benefits and wages are paid to employees upon termination of employment. [...] Although this guidelines document is aimed at OpCos and their employees, we also expect our suppliers and business partners to respect human rights in line with the standards in our Human Rights policy.' On the other hand, its Supplier Code, a binding document, reads: '[Workers] should be aware of the terms and conditions of their work and be paid regularly as agreed'. [Implementation guidelines for the Human Rights Policy, 01/2019: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] <ul style="list-style-type: none"> • Not Met: How working with supply chain to pay workers regularly and on time: The Company highlights its SMART Outsourcing program, that 'aims to ensure that all our contracts with third-party service providers meet our required standards.' presented on an article of the Consumer Goods Forum coalition. However, no evidence was found of how it works with suppliers proactively to ensure they pay their workers in full and on time. [Forum;, 2022: theconsumergoodsforum.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The HR 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.' On the other hand, the Human Rights Policy implementation guidelines indicate: 'All work must be conducted on a voluntary basis, with no coercion of any employee through any means. Government-issued identification, passports or work permits are not withheld from employees. Copies can be taken and originals returned to the employee.[...] Every employee has the freedom of movement i.e. employees are not locked into the production facility or accommodation. [...] Although this guidelines document is aimed at OpCos and their employees, we also expect our suppliers and business partners to respect human rights in line with the standards in our Human Rights policy'. [Human Rights Policy, 2018: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] <ul style="list-style-type: none"> • Not Met: How working with suppliers on free movement: The Company highlights its SMART Outsourcing program, that 'aims to ensure that all our contracts with third-party service providers meet our required standards.' presented on an article of the Consumer Goods Forum coalition. However, no evidence was found of how it works with suppliers proactively to eliminate retention of workers' documents or other actions to physically restrict movement. [Forum;, 2022: theconsumergoodsforum.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • 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)	0.5	<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: FoA & CB rules in codes or contracts: The supplier code 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 Implementation guidelines for Human Rights Policy: 'Do not tolerate any form of harassment, discrimination or violence against employee representatives and ensure that their safety and rights are protected.' Although this guidelines document is aimed at OpCos and their employees, we also expect our suppliers and business partners to respect human rights in line with the standards in our Human Rights policy'. [Respecting Human Rights updated 2020, N/A: theheinekencompany.com] & [Supplier Code, 02/2019: theheinekencompany.com] • Not Met: How working with suppliers on FoA and CB: The Company indicates in its Annual Report 2020: 'The four step Supplier Code Compliance procedure allows us to identify and evaluate potential risks with our suppliers and execute mitigating actions to address the following issues: Anti-bribery and anti-corruption; Sanctions; Political exposure; Negative media coverage related to issues such as labour and human rights, health and safety, fraud, fair competition and money laundering. [...] we have already begun evolving our Supplier Code procedure into a Supplier Engagement Programme. We have enhanced our financial assessments, particularly with our global suppliers. We have strengthened our anti-bribery and corruption programme to improve our capabilities in challenging markets [...] ' These four steps include: Understanding and accepting our requirements by suppliers; Identifying potentially high-risk suppliers; Evaluating high-risk suppliers on critical parameters; Executing appropriate corrective actions. However, no evidence was found of supplier capability building or similar proactive actions to support the practices of its suppliers in relation to freedom of association and collective bargaining. [Annual Report 2020, 2021: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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: theheinekencompany.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: In its Annual Report 2021, the Company reports its accidents frequency and the number of accidents of Company's personnel and contractor. However, figures need to refer to quantitative information on health and safety for workers at suppliers, including agricultural workers in supply chain, related to injury rates or lost days (or near miss frequency rate) for the last reporting period. [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Fatalities rate for lasting reporting period: In its Annual Report 2021, the Company indicates: 'We deeply regret that 2 people lost their lives while working for HEINEKEN in 2021 (2020: 6). One person was our employee and one was employed by a contractor. One fatal accident was a road traffic accident and one occurred during renovation work'. However, figures need to refer to quantitative information on health and safety for workers at suppliers, including agricultural workers in supply chain, related to injury rates or lost days (or near miss frequency rate) for the last reporting period. [Annual Report 2021, 2021: theheinekencompany.com] • Not Met: Occupation disease rate for last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: On its website, the Company indicates: 'We launched a new Contractor Safety Standard to ensure the safety of contractors and subcontractors through one global standard. It focuses on high risk activities and streamlines processes for qualification and management of contractors. [...] The HEINEKEN Life Saving Rules are a set of safety rules, that apply to everyone working for our company. They are supported by risk reduction programmes and are key to preventing serious and fatal accidents. All operating companies are required to comply with the Life Saving Rules. In 2020, compliance reached: 94% in breweries (2019: 92%) , 95% in projects, commerce, distribution and logistics (2019: 95%)'. However, this datapoint looks for evidence on how it works with suppliers (agricultural supply chain) to improve performance. Evidence found seems to refer specifically to contractors [Promoting Health and Safety, N/A: theheinekencompany.com] • Not Met: Assessment of the number affected by H&S issues in the SP • 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: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • 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: theheinekencompany.com] • 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'. In addition, in its Annual Report 2021, it indicates: 'We also engaged barley, hop, maize and apple suppliers to assess potential water risks and management practices. We will use the findings to raise awareness among our suppliers on potential water risks and develop programmes to manage them in the coming years'. However, this is a work in progress, no information of current activities was found for the last three years. [Annual Report 2018, 02/2019: theheinekencompany.com] & [Annual Report 2021, 2021: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • 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"> • Area: Health & safety; working hours • Headline: Heineken, a subsidiary of Heineken Holding, and Ambev fined for alleged slave labour in Brazil • Story: On May 18, 2021, the Business and Human Rights Resource Centre reported that Heineken, a subsidiary of Heineken Holding, and Companhia de Bebidas das Americas (Ambev) were fined for the illegal employment of 22 Venezuelan and one Haitian immigrants, in a situation of slavery-like conditions in Brazil. The order came following an inspection, which freed the 23 workers, carried out by the Slave Labour Eradication Programme in the State of São Paulo, linked to the Ministry of Economy. <p>In an operation that took place in March 2021, the inspectors dismantled a system of work in conditions analogous to slavery that involved the two companies and a transport company subcontracted by both, Sider, which directly employed the workers. The companies will pay employees for moral damages and about BRL 657,270 (approximately USD 125,000) in compensation.</p> <p>Some of the main infractions that the inspectors verified and that corroborated the thesis of conditions analogous to slavery were the suppression of paid weekly rest (days off) and the pause between one delivery trip and the next, which, according to the legislation, must be 11 hours. The Slave Labour Eradication Programme report stated that "the result has been an increase in the number of accidents at work and, above all, occupational diseases, which have even caused deaths and suicides related to work".</p> <p>According to the auditor's report, the migrants lived for months (some more than a year) in the cab of the trucks parked at Sider's headquarters in Limeira and Jacareí, in São Paulo. They worked long hours and no days off. In addition, they did not have access to drinking water. The workers also had to pay for their work uniform, for nationalising their driving license, and for the unforeseen events suffered by the vehicle assigned to them.</p> <p>Under Brazilian law, Heineken and Ambev are accountable for the doings of the outsourced contractor (Sider). Both companies were found to act with deliberate blindness by ignoring the proper verification of compliance with the laws by the transport company, to obtain benefits to the detriment of labour protection regulations. The Brazilian labour inspector reported that the responsibility of the contractors "derives from the fact that the subcontracting law obliges them to guarantee the health and safety conditions of those who provide them services". Therefore, "the strenuous working day and the degrading conditions due to not having accommodation, for example, are conditions that the contractor should have controlled".</p> <p>[The Business and Human Rights Resource Centre, 18/05/2021, "Brazil: Ambev and Heineken fined for slave labour in outsourced company; victims were immigrants from Venezuela and Haiti": business-humanrights.org] [The Rio Times, 18/05/2021, "Ambev and Heineken fined for slave-like labor of Venezuelan immigrants in São Paulo": riotimesonline.com] [Click Petróleo e Gás, 18/05/2021, "Heineken and Ambev, the giant suppliers of alcoholic beverages, are fined for slave labor by Venezuelans and Haitians in São Paulo": clickpetroleoegas.com.br] [MercoPress. South Atlantic News Agency, 2</p>
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: In response to the allegation the company stated: "the company completely repudiates any form of action that does not respect the fundamental rights of workers". And reinforced: "With respect to these workers, we blocked the credits that the supplier had to receive as a result of the services provided, until the indemnities agreed between the carrier and the Public Ministry of Labor are paid in full. It is worth mentioning that all the Company's suppliers undergo a rigorous selection process and sign a Code of Conduct in which they undertake to fully comply with labor and human rights legislation". [Click Petróleo e Gás, 18/05/2021: clickpetroleoegas.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: In response to the allegation the company stated: "the company completely repudiates any form of action that does not respect the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			fundamental rights of workers". And reinforced: "With respect to these workers, we blocked the credits that the supplier had to receive as a result of the services provided, until the indemnities agreed between the carrier and the Public Ministry of Labor are paid in full. It is worth mentioning that all the Company's suppliers undergo a rigorous selection process and sign a Code of Conduct in which they undertake to fully comply with labor and human rights legislation". However, it does not address the individual aspects of the allegation, such as the living conditions and working hours of the affected workers. [Click Petróleo e Gás, 18/05/2021: clickpetroleoegas.com.br]
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Ambev stated: "Following the guidelines and with the agreement of the labour inspectors, we ensure the payment of all labour compensation and that the transport company will facilitate the return of the drivers to their place of origin or bring their families, according to the choice of each one". However, there is no evidence that Heineken or Ambev had engaged with the affected stakeholders and/or their legitimate representatives as part of understanding the causes of the impacts alleged. [MercoPress. South Atlantic News Agency, 20/05/2021: en.mercopress.com] • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy: Ambev stated: "Following the guidelines and with the agreement of the labour inspectors, we ensure the payment of all labour compensation and that the transport company will facilitate the return of the drivers to their place of origin or bring their families, according to the choice of each one". However, there is no similar statement by Heineken, therefore the CHRB cannot assume that the company provided remedy to the affected stakeholders or used its leverage to convince its linked business to do so. [MercoPress. South Atlantic News Agency, 20/05/2021: en.mercopress.com] • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: There is no evidence that the company provided remedy to the affected stakeholders. The remedy provided by Ambev cannot be attributed to Heineken. • Not Met: Remedy delivered: There is no evidence that the company provided remedy to the affected stakeholders. The remedy provided by Ambev cannot be attributed to Heineken. • Not Met: Independent remedy process used

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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