



Asahi Europe & International

Modern Slavery and Human Trafficking Statement

for the financial year ended on 31 December 2021

2021

Introduction

Asahi Europe & International Limited (AEIL) and its group of companies (AEI Group or we) are fully committed to a transparent and abuse-free supply chain. We acknowledge the utmost importance of properly identifying and mitigating any potential risks of modern slavery and human trafficking in our business and among our suppliers. Accordingly, the purpose of this Modern Slavery and Human Trafficking statement, prepared in accordance with section 54(1) of the UK Modern Slavery Act 2015, is to describe the steps taken within the AEI Group to ensure that slavery and human trafficking are not taking place in our supply chains and in any part of our business.

What is Modern Slavery?

Modern slavery is a fundamental human rights abuse encompassing any exploitation of other people for personal or commercial gain, depriving people of their liberty and treating them as property. Modern slavery is a global issue and no country can be considered immune. Modern slavery includes slavery, servitude, child labour, and any forced, compulsory or bonded labour, as well as human trafficking.

Our Corporate Structure

AEIL and its Group are part of Asahi Group Holdings (AGH), a global beer, spirits, soft drinks, and food group with leading positions in European and Asia-Pacific markets listed on the Tokyo Stock Exchange, Japan.

AGH established its European business after a series of acquisitions in 2016 and 2017. Since then, some necessary internal restructuring took place to assure the most effective set-up of the business. The last restructuring took place over the course of financial year 2021 and consisted in consolidating the UK-based businesses held by Asahi International Ltd. (AIL). With effect as of January 1, 2022, the entire business, including all assets, liabilities, rights and obligations of AIL, was thereafter transferred to AEIL. AIL, as well as certain other companies, such as Asahi Brands UK Ltd., have since ceased their activities and are currently dormant, in preparation for their deregistration. In addition, in September 2021, Asahi Breweries Europe Limited (ABEG) changed its name to Asahi Europe & International Ltd. (AEIL).

Currently, AEIL runs, through its subsidiaries, 19 production facilities in 8 countries across Europe. The company is the custodian of some of the best beer brands in the world, such as Asahi Super Dry, Pilsner Urquell, Peroni Nastro Azzurro, Grolsch, and Kozeł. Its full-portfolio markets in Europe include Plzeňský Prazdroj in the Czech Republic and Slovakia, Dreher in Hungary, Kompania Piwowarska in Poland and Ursus Breweries in Romania, Koninklijke Grolsch in the Netherlands, Birra Peroni in Italy and Asahi UK in the United Kingdom and Ireland.

The remit of AEI Group is also to develop and manage all export markets globally, outside of Japan and Oceania. Our business covers 90 markets, and it has over 10,000 passionate colleagues on board. The AEI Group has a clear ambition to accelerate its growth trajectory sustainably and solidify its global footprint. We are therefore well-positioned to deliver on our great taste promise and create meaningful connections.

This Modern Slavery and Human Trafficking Statement is made on behalf of the entire AEI Group and in particular the following AEI Group companies that meet the criteria for publishing under the UK Modern Slavery Act 2015:

- **Asahi Europe & International Ltd.**
- **Asahi International Ltd.**
- **Asahi UK Ltd.**
- **Asahi Brands UK Ltd.**
- **Asahi Premium Brands Ltd.**

Please note that **Asahi International Ltd.** and **Asahi Brands UK Ltd.** ceased their activities as of **January 1, 2022** with a view to being struck off the Company register later in the year and this Modern Slavery and Human Trafficking Statement shall in no event be interpreted as implying any trading or other commercial activity on their part for the year 2022.



Our Commitment and Policies

Our engagement to responsible sourcing and transparent supply chains is shared across all Asahi companies globally and concrete commitments and risk mitigation and identification tools are provided both at the AEI Group level and at the ultimate parent (AHG) level.

The AEI Group has adopted the [AEI Group Supplier Code of Conduct \(Code\)](#) applicable to AEIL, its subsidiaries as well as other companies it directly and indirectly owns or manages. The Code provides a set of non-negotiable minimum norms of conduct that the AEI Group's suppliers must comply with, and which they are encouraged to exceed.

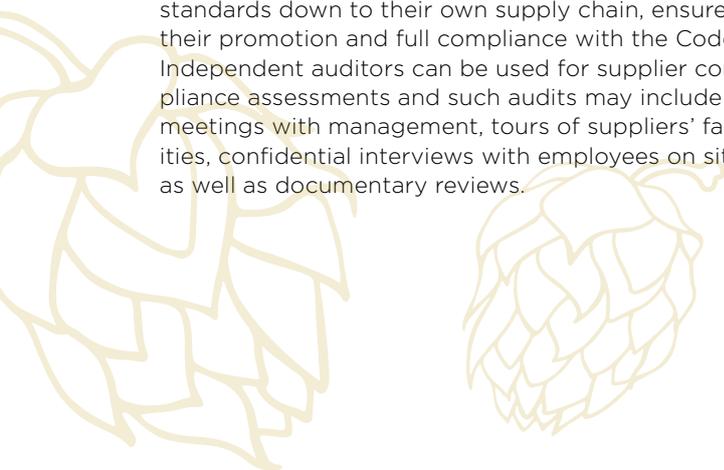
Among other things, the Code specifically prohibits all forms of modern slavery and child labour. Such norms of conduct form an integral part of our supplier contracts and supplier assessment processes, and all our suppliers must agree to comply with the Code. Suppliers are expected to flow the standards down to their own supply chain, ensure their promotion and full compliance with the Code. Independent auditors can be used for supplier compliance assessments and such audits may include meetings with management, tours of suppliers' facilities, confidential interviews with employees on site as well as documentary reviews.

For instance, in 2021, four on-site supplier audits were conducted with our Brewing and Packaging suppliers. Other direct materials suppliers operated on the basis of permits to supply granted by the AEI Group. If on-site audits identify non-compliance, we establish a corrective plan, and a monitoring system is put in place to measure progress. For any issues identified through the audit programme, we are committed to addressing these through supplier workshops.

AIL and its subsidiaries applied, prior to January 2022, their own Supplier Code of Conduct, the terms of which were consistent with the AEI Group Code.

In addition, pursuant to AEI Group's Whistleblowing Policy, our employees can easily report potential and actual issues related to modern slavery. The existence of a dedicated hotline and relevant policies is subject to regular internal promotion. The hotline is available 24/7, free of charge and in the main languages used in the countries where we operate. Apart from the hotline, concerns can also be reported online. These reporting tools are fully confidential and anonymous, operated by an independent company. Phone calls are not recorded and the operators do not require any personal identification. The online tool does not place cookies on users' computers.

We are also part of a global group of companies with a well-established and long-standing commitment to protecting human rights, including labour rights and the fight against modern slavery and human trafficking. AGH and its companies' approach to human rights are set out in the [Asahi Group Code of Conduct](#) and the [Asahi Group Human Rights Principles](#). In particular, these policies formalize our commitment to act and conduct our business with integrity, in an ethical manner and in compliance with our internal policies and external regulations.



Responsibility for Implementation

To safeguard the effective implementation of and adherence to these commitments and policies, we have established clear cross-functional responsibilities within AEI Group:

- The **senior management** team is responsible for ensuring that we and our associates comply with all legal and ethical obligations, including those related to combating modern slavery.
- The **Human Resources** and **Corporate Affairs** departments are responsible for building awareness of our obligations amongst all staff that include modern slavery and human trafficking.
- **Internal Audit** monitors the effectiveness of internal control systems.
- **Management** at all levels is responsible for ensuring that those reporting to them receive adequate and regular training, understand and fully comply with our commitments.
- Our **Procurement** team aims to work with and support all suppliers to implement improvements in their operations, in line with our Supplier Code of Conduct.



Progress

We continue to work closely with AGH to identify the best ways to share best practices and enhance our shared commitment to upholding human rights and ethical behaviour. At the core of this is embedding our new purpose of **Creating Meaningful Connections** which was defined and launched in 2021 and will guide everything we do. Recognising the shared challenges of the world, such as health, inequality and climate change we must lead the change that we want to see for nature and for humanity. Being clear on our purpose helps us to do this and achieve the following goals:

1. **Be a force for planet positivity**
2. **Serve up a positive and inclusive experience for people and society**

Over 2021 we continued to ensure that all our employees are well educated in ethics and compliance through regular communications and online trainings. We made sure that they are comfortable with our policies in day-to-day business, work with our suppliers, and identify possible threats to our values.

Across the AEI Group, we have taken the necessary steps to ensure that the commitment to human rights, including labour rights and the fight against modern slavery and human trafficking, are adequately known, understood and implemented in practice, as per the AEI Group standards.

Our Response to COVID-19

The global pandemic of COVID-19 continued to impact the world in 2021 and develop further with the onset of new variants. Against this backdrop, we continued to prioritize the health and well-being of our people – which today remains our priority, ensuring that we took internal measures to keep our people safe and protected. AEI Group maintains the highest hygienic standards and over the course of 2021, we continued to ensure that strict guidelines concerning social distancing and hygiene were practiced and observed in line with government regulations in the countries where we operate.

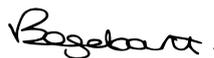
Starting in October 2021 we gradually began welcoming employees back to the office in a flexible way and in line with local regulations. We continue to closely monitor office working arrangements, updating our guidance accordingly.



Paolo Lanzarotti
AEI Group CEO
Director, Asahi Europe & International Ltd.



Tim Clay
Director, Asahi International Ltd.,
Asahi UK Ltd., Asahi Brands UK Ltd.



Victoria Segebarth
Director, Asahi Premium Brands Ltd.

This statement has been approved by the Board of Directors of:

Asahi Europe & International Ltd. on May 23, 2022
Asahi International Ltd. on May 27, 2022
Asahi UK Ltd, on May 20, 2022
Asahi Brands UK Ltd, on May 20, 2022
Asahi Premium Brands Ltd, on May 27, 2022