

Human Rights Policy

ANADOLU EFES HUMAN RIGHTS POLICY

RESPECT FOR HUMANS RIGHTS

Respect for human rights is a fundamental value of Anadolu Efes.

We strive to operate in accordance with the United Nations Universal Declaration of Human Rights in our relations with our employees, suppliers, business partners and the society we are in, and to encourage them to be sensitive in this regard. This Policy is guided by international human rights principles, including the International Bill of Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights.

Anadolu Efes is one of the first Turkish organizations to sign the United Nations Global Compact (UNGC), a strategic policy initiative for companies that promise to align their activities and strategies with universally accepted principles in the fields of human rights, labor, environment and anti-corruption. In addition, Anadolu Efes supports the OECD Guiding Principles for Multinational Enterprises and the ILO's Trilateral Declaration of Principles on Multinational Companies and Social Policy.

This policy; As Anadolu Efes, it applies to the businesses we own and the facilities we manage. Anadolu Efes also expects its suppliers and business partners to implement these principles and encourages them to adopt similar policies in their own business.

We take due care to identify and prevent human rights risks to those in our business and those around us as part of business risks. In the event that we identify adverse human rights impacts resulting from our business activities, we are committed to providing or cooperating for improvement in a fair and reasonable manner. If we are connected to or are involved in these negative effects due to our relationships with third parties, we try to improve this situation.

Anadolu Efes undertakes to contact government officials when it sees that human rights are at risk in countries where it operates, and aims to work with specific independent local stakeholders to eliminate violations of rights.

CEO of Anadolu Efes is primarily responsible for the implementation of the Human Rights Policy, as well as General Managers of the companies that Anadolu Efes operates. Anadolu Efes Human Rights Policy, is overseen by the Executive Board of Anadolu Efes.

DISCRIMINATION

We do not tolerate discrimination.

We strive to be a workplace free from discrimination, harassment and disrespect for reasons such as race, gender, national origin, ethnic origin, religion, age, disability, sexual orientation, definitions expressing gender, political opinion or any other status

protected by applicable laws.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind, regardless of personal characteristics, position or situation. Harassment is unacceptable to us in the workplace or outside of the workplace when there is a job-related situation.

DIVERSITY AND INCLUSION

We value the differences of the people we work with and try to make them feel included.

Anadolu Efes undertakes equal opportunities and makes its recruitment, placement, development, training, remuneration and promotion decisions; Based on employee qualifications, performance, skills and experience. Diversity in our workforce is essential to achieving our goals. For this reason, we strive to attract, develop and retain employees with diverse backgrounds and experiences.

CHILD LABOR

We prohibit to employ child as a labor.

We prohibit the recruitment of persons under the age of 18 in positions that require working in heavy and dangerous jobs. We expect the same from our business partners.

FORCED LABOR AND HUMAN TRADE

We prohibit all forms of forced labor, including prison labor, debt servicing, modern forms of slavery, and any kinds of all human trafficking.

WORKPLACE SECURITY

We are committed to providing a workplace free of violence, harassment and intimidation.

We provide security services when necessary to employees and in a way that respects employee dignity, confidentiality and reputation.

COMMUNITY AND STAKEHOLDER ENGAGEMENT

We recognize that we are a part of the community where we operate.

While doing our job, we establish a relationship with all our stakeholders, including vulnerable and disadvantaged groups, where their views are heard and taken into account on human rights issues that matter to them. We believe that local problems can be optimally resolved at the local level.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

It is free to unionise within legal boundaries.

We respect the right of our employees to join, form or not join a trade union without fear of retaliation or threat.

We are committed to establishing a constructive dialogue with our freely chosen representatives of our employees, who are represented by a legally recognized trade union.

SAFE AND HEALTHY WORKPLACE

The safety and health of our employees is of paramount importance.

Our policy is to provide a safe and healthy workplace and to comply with applicable occupational health and safety laws, regulations and internal requirements. We work to provide and maintain a healthy and productive workplace environment by identifying and solving risks that may cause accidents, injuries and health problems.

WORK HOURS, WAGES AND BENEFITS

We establish our wage policy and benefits competitively according to the industry, local labor market and in accordance with the terms of applicable collective bargaining agreements. We conduct our operations in compliance with applicable laws on wages and working hours. We provide opportunities for our employees to develop their talents and potential and make progress.

ENVIRONMENTAL RESPONSIBILITY AND WATER RESOURCES

We are aware of the possible effects of our land and water use on human rights within our value chain and we address this issue with special practices. In line with our Environmental Policy, we respect the human need for water resources and safe drinking water and the protection of both ecosystems and communities with proper sanitation.

As a company that signed the United Nations Global Compact and CEO Water Directive, Anadolu Efes has committed to abide by the six (6) basic rules of this directive. These basic rules are; Minimization of Water Use in Direct Activities, Supply Chain and Watershed Management, Joint Action, Public Order, Community Participation and Transparency.

GUIDANCE AND REPORTING FOR EMPLOYEES

We strive to create workplaces where open and honest communication among all employees is valued and respected.

Anadolu Efes undertakes to comply with applicable labor and employment laws wherever we operate. Anadolu Efes also ensures that employees are familiar with the Human Rights Policy through training. Any employee who believes there is a conflict between the language of the policy and the laws, customs, and practices of the place where they work, has questions about this policy, or wishes to report a potential violation of this policy confidentially should raise these questions or concerns to their company management, Human Resources department, the Local Ethics Officer or the Group Ethics Officer. Employees can also report suspected policy violations by sending an email to Groupethics@anadoluefes.com or by calling (+90 216 578 80 54). No retaliation or counter action will be taken against any employee who reports concerns under this policy. The company will investigate and respond to employee concerns and take appropriate corrective action in response to any breach.

The Human Rights Policy is in line with Anadolu Efes' Code of Ethics. This policy, including its translations and related information, can be found on Anadolu Efes's website.

<https://anadoluefes.com.tr/>

PUBLIC REPORTING

As part of our Annual Sustainability Report, we are committed to regularly reviewing and reporting to the public our human rights commitments, efforts and statements in accordance with this Human Rights Policy. This reporting refers to the UN Guidelines Reporting Framework.

Anadolu Efes reserves the right to change this policy at any time. Anything in this policy does not replace the employment contract between Anadolu Efes and its employees.