

# Anadolu Efes Code of Conduct for Suppliers

## Contents

1. INTRODUCTION.....	3
2. HUMAN RIGHTS PRINCIPLES.....	3
2.1. Discrimination and Harassment.....	3
2.2. Child Labor.....	3
2.3. Forced or Compulsory Labor.....	4
2.4. Working Hours and Wages.....	4
2.5. Freedom of Association and Collective Bargaining.....	4
3. HEALTH AND SAFETY.....	4
4. ENVIRONMENTAL STANDARDS.....	4
4.1. Waste, Resource Consumption and Pollution Reduction.....	4
4.2. Environmental Management System.....	4
5. BUSINESS INTEGRITY.....	5
5.1. Ethical and Compliant Business Conduct.....	5
5.2. Conflicts of Interest, Gifts, Entertainment and Hospitality.....	5
5.3. Anti-Bribery and Anti-Corruption.....	5
5.4. Business and Financial Records.....	5
5.5. Confidentiality.....	5
6. DEMONSTRATION OF COMPLIANCE.....	6
7. RAISING CONCERNS.....	6
8. CONTACT and FURTHER INFORMATION.....	6
9. VERSION and REVISION DETAILS.....	6
9.1 Version 3.....	6

## 1. INTRODUCTION

Anadolu Efes is committed to making a positive contribution to the society and the environment by developing and implementing responsible business practices within its supply chain. We value our business relations with our suppliers and other business partners. We treat our business partners in the same way we expect to be treated.

We expect all our suppliers to help us to fulfill this commitment by supporting and respecting our values and principles in their business relations with us as well as with their own business partners.

This Code of Conduct for Suppliers (the "Supplier Code") defines the minimum requirements that Anadolu Efes suppliers are required to adhere to. This Supplier Code is an extension of Anadolu Efes Code of Business Conduct and Ethics which is accessible at

[https://www.anadoluefes.com/Upload/Docs/AEFES\\_CodeOfBizConductEthicsAnnex-1.pdf](https://www.anadoluefes.com/Upload/Docs/AEFES_CodeOfBizConductEthicsAnnex-1.pdf)

This Supplier Code applies to all suppliers of Anadolu Efes who produce materials or provide services for Anadolu Efes. All Anadolu Efes suppliers are required to adhere to the principles and standards set in this Supplier Code and comply with national laws and regulations.

## 2. HUMAN RIGHTS PRINCIPLES

Anadolu Efes respects internationally proclaimed human rights, related International Labour Organisation standards and United Nations Universal Declaration of Human Rights. Anadolu Efes is a participant in United Nations Global Compact.

We encourage our suppliers to embrace these international standards and we expect them to respect the human rights of their employees in the workplace, and to promote human rights within their value chain. Those principles designed to cover employees also apply to contract workers and any workers without a formal employment contract.

### 2.1. Discrimination and Harassment

Suppliers must create an inclusive work environment free of discrimination with respect to gender, marital status, age, religion, race, political opinion, social or economic status, language, ethnical origin, nationality, sexual orientation or disability. All forms of abuse conduct and physical, verbal and written harassment should be prohibited by the suppliers.

### 2.2. Child Labor

Child labor refers to work that is mentally, physically, socially or morally harmful to children; or work that interferes with their schooling. Suppliers must not engage in or benefit from the use of child labor. They must comply with local laws and regulations and standards of International Labor Organization.

**2.3. Forced or Compulsory Labor**

Suppliers must not use or participate in any form of forced or compulsory labor; all work must be conducted on a voluntary basis.

**2.4. Working Hours and Wages**

Suppliers must provide employees with fair wages and benefits that comply at least with minimum wage legislation and other applicable laws on wage and working time.

**2.5. Freedom of Association and Collective Bargaining**

Suppliers must recognize the rights of freedom of association and collective bargaining under applicable law.

**3. HEALTH AND SAFETY**

Suppliers are expected to provide a safe and healthy work environment for their employees. At a minimum, suppliers' policies and procedures for health and safety must meet legal requirements. Wherever these do not exist, the supplier must ensure that risks of accidents, injury, and exposure to health risks are minimised, adopting the prevailing knowledge of the industry.

**4. ENVIRONMENTAL STANDARDS**

We expect our suppliers to comply with all relevant local environmental legislation and conduct business in a way which protects and preserves the environment. Anadolu Efes requires suppliers to focus on the following areas:

**4.1. Waste, Resource Consumption and Pollution Reduction**

Suppliers must ensure that they optimise the consumption of natural resources, and implement and demonstrate sound measures to prevent pollution; reduce the use of water; reduce the energy and carbon footprint; re-use and recycle packaging and reduce waste to landfill and post-consumer waste.

**4.2. Environmental Management System**

Suppliers should have policies, procedures and relevant environmental management systems to identify, control and mitigate significant environmental impact.

**5. BUSINESS INTEGRITY**

High standards of ethical behaviour is fundamental to Anadolu Efes. We have our own Code of Business Conduct and Ethics, which applies to all employees across the group as well as to third parties acting on behalf of Anadolu Efes. Anadolu Efes Code of Business Conduct and Ethics set the minimum standards of behaviour and conduct expected. We want to extend these standards throughout our supply chain by including business ethics in this Supplier Code.

**5.1. Ethical and Compliant Business Conduct**

Suppliers must act ethically and with integrity at all times and comply with applicable laws and regulations. Supplier must commit to the principles of lawful and free competition and abide by relevant applicable anti-trust, consumer protection and competition laws.

**5.2. Conflicts of Interest, Gifts, Entertainment and Hospitality**

Suppliers must not engage in any improper payments, make or receive direct or indirect offers, or solicitations to our employees. Suppliers should avoid situations where a conflict of interest may occur, and must immediately disclose to Anadolu Efes any conflict of interest that do arise. Anadolu Efes does not accept gifts or offers of hospitality and entertainment from current or prospective suppliers.

**5.3. Anti-Bribery and Anti-Corruption**

Anadolu Efes is fully committed to eradicate corruption from all business transactions. Our suppliers must not engage in corruption such as bribery or any form of improper or unlawful payment under any circumstances including bribery, extortion or and money laundering.

**5.4. Business and Financial Records**

Suppliers are expected to maintain an honest and transparent attitude in presenting their business and financial capabilities and should never provide false or altered business and financial reports or statements. Suppliers must keep accurate and complete books and records of all matters related to the business with Anadolu Efes.

**5.5. Confidentiality**

We expect our suppliers to safeguard Anadolu Efes confidential and personal information, to use it only for intended purpose and not to share this information without our authorization. We also expect them to meet the requirements of applicable data privacy laws and regulations.

**6. DEMONSTRATION OF COMPLIANCE**

Acknowledgement of this Supplier Code is a pre-requisite in every Anadolu Efes contract for supply. Through the signature of the contract, the supplier commits that its operations are subject to the provisions contained in this Supplier Code.

Suppliers must be able to demonstrate compliance with the Supplier Code at the request and to the satisfaction of Anadolu Efes. If Anadolu Efes receives a reasonable suspicion that the supplier has not complied the provisions of this Supplier Code, Anadolu Efes has the right to terminate or restrict business relation with that supplier.

**7. RAISING CONCERNS**

We expect our suppliers to raise their concerns, report any gaps or potential violation of this Supplier Code (i) to their contact in Anadolu Efes or (ii) to Group Ethics Officer (at +90 216 578 80 54 or e-mail to [Groupethics@anadoluefes.com](mailto:Groupethics@anadoluefes.com)).

Alternatively, suppliers may use communication channels listed on <https://www.anadoluefes.com/Upload/Docs/CommunicationChannelsENG.pdf>. Those communication channels are managed by an independent third party and they are available for Anadolu Efes employees and third parties (including our suppliers). Our suppliers can confidentially, and if desired, anonymously, raise a concern, or report any violation via telephone, email or internet, 24 hours a day, 7 days a week.

**8. CONTACT and FURTHER INFORMATION**

We look forward to working with you. Please contact your Anadolu Efes procurement contact person, should you have any questions with regard to the principles and standards set out in this Supplier Code.

**9. VERSION and REVISION DETAILS****9.1 Version 3**

- This is Version 3 and it replaces Version 2.