



BEAVERTOWN

CODE OF CONDUCT

INTRODUCTION

What's the Code All About Then?

Our Code is here to help us do the right thing—even when no one's watching. It's the foundation of a respectful, ethical workplace where people trust each other and feel proud of the company they're part of. It's not just about rules—it's about values, integrity, and making good choices.

What's Covered?

Inside the Code, you'll find the principles we live by and what we expect from each other. It covers important topics like discrimination, harassment, fraud, and corruption. It's about how we behave—towards colleagues, customers, partners, and everyone else we interact with.

It won't have an answer for every situation (we're not fortune tellers), but it will help you navigate tricky moments and point you to the right people or resources when you need a hand.

And just so we're clear: if local laws or regulations are stricter than what's in the Code, those take priority.

Who's It For?

Everyone. Whether you've just joined or you've been around for years, whether you're in the office, on the road, or at a work event—this Code applies to you. We also expect our business partners to uphold the same high standards, as outlined in our Supplier Code.

How Does It Help?

The Code is here to support you in:

- *Acting with honesty and integrity*
- *Living our Values and protecting our reputation (and your own)*
- *Knowing what's expected of you in your day-to-day work*
- *Following the laws and regulations that apply to us*
- *Finding guidance when you're unsure*
- *Speaking up when something doesn't feel right*



Got a Dilemma? Let's Talk

Not every situation is clear. If something feels off, or you're not sure what to do, talk it through with someone. A colleague, a manager, a trusted advisor—whoever you feel comfortable with. And if you think something's wrong, please speak up. It's how we keep our culture strong and deal with issues before they grow. You can raise concerns through several channels, including via our Speak Up partner, **Protect** – confidentially or anonymously, if you prefer.

What If the Code Is Breached?

Breaching the Code can damage our company, our people, and the trust others place in us. That's why we take it seriously. If someone doesn't follow the Code, there may be consequences—including disciplinary action.

So let's all do our part. Read the Code. Live by it. And if in doubt, ask.

Key Principles of Our Code

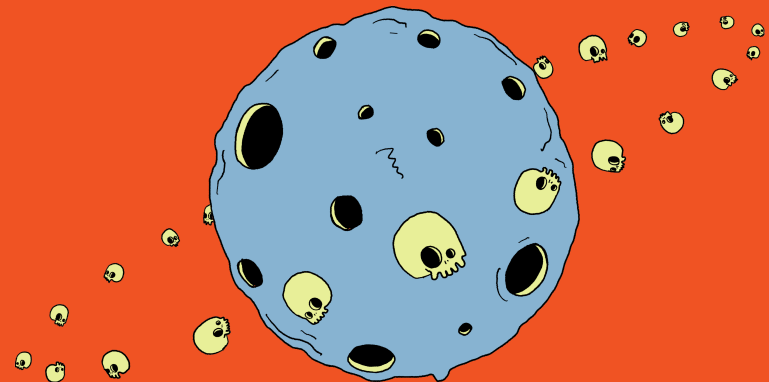
We believe in doing the right thing – not just when the spotlight's on us, but when no one's watching. It's how we work, it's who we are. Kindness, respect and fairness aren't just buzzwords around here – they're the basics.

We're on a mission to build a fairer, more inclusive world – one where everyone has a seat at the table and feels free to be exactly who they are.

We play by the rules, always. Wherever we go, whatever we do – we follow the law, and we expect the same from everyone we work with.

We care about people, the planet and doing things properly. We're all about brewing a better future – responsibly, sustainably, and with purpose.

And when something's not right? We speak up. We ask questions, share ideas, and have the tough conversations. No fluff, just honest talk. Because being real is how we move forward – together. To learn more about what's expected of you, check out the **HEINEKEN Code of Business Conduct**.



CARING FOR PEOPLE AND PLANET

Responsible alcohol consumption

We brew for good times – not over-the-top ones – we're big on balance. That means enjoying our drinks in moderation and making smart choices. Always.

We take responsibility seriously – in how we sell, how we market, and who we work with. We're all in on cutting down harmful drinking – whether it's underage drinking, drinking and driving, drinking during pregnancy, or going overboard.

We're all reps for drinking responsibly. So, if you choose to drink, do it with care – in the right place, at the right time, for the right reasons. Know the legal drinking age, stick to the limits, and most importantly – if you're driving, don't drink. Ever. Simple as that.

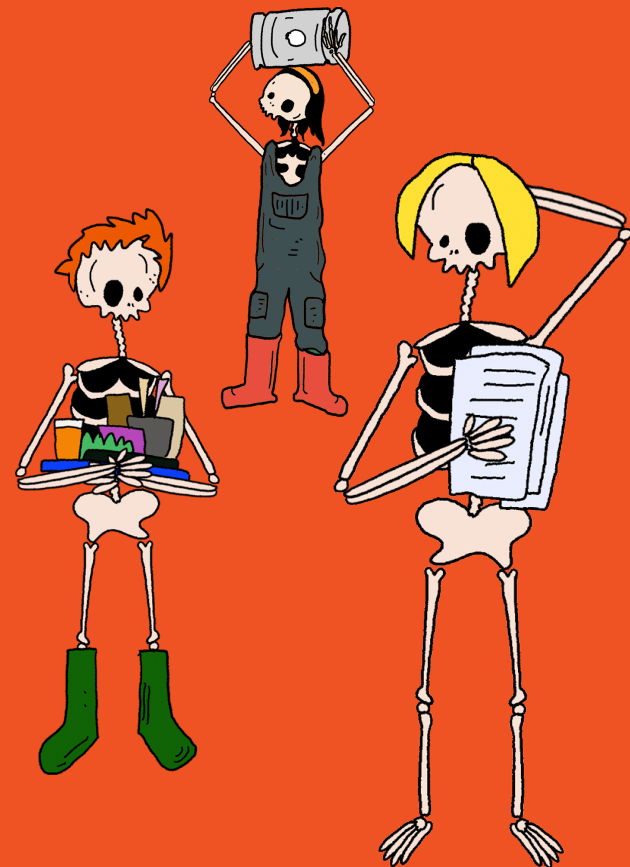
For more info and clear guidelines on responsible consumption? Check out the **HEINEKEN Code of Business Conduct**.

Human rights

People matter – plain and simple. That's why everything we do is rooted in respect for human rights and basic dignity. It's not just something we say – it's built into our values.

We expect everyone we work with to get on board too – whether you're part of the team, a supplier, a customer, or just someone impacted by what we do. If something doesn't feel right or you spot a red flag, say something. Speak up. We're here to listen, and we're all in on making sure everyone's treated fairly, always.

For an overview of our minimum human rights standards, check out the **HEINEKEN Code of Business Conduct**.

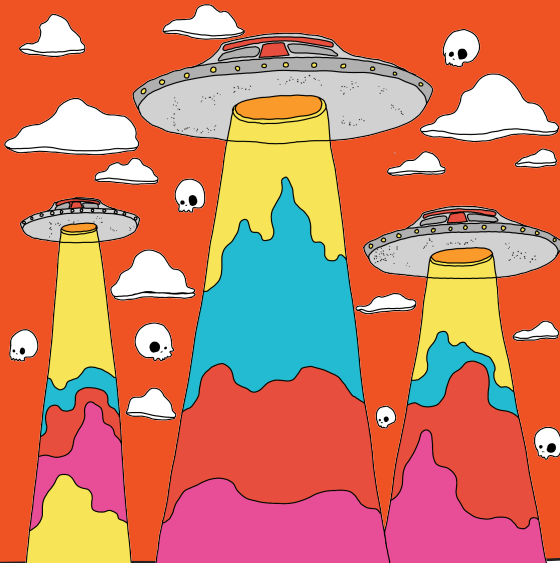


Health & Safety

People are at the heart of everything we do – and that means keeping each other safe, always. Whether you're at your desk, out on-site, catching up with a customer, or halfway to somewhere new, safety comes first. No exceptions.

Know the rules, follow them, and don't wing it in an emergency – make sure you're clued up on what to do, wherever you are. And if something feels off? Speak up. Report it. A near miss today could be a real problem tomorrow, so let's look out for each other. Safety isn't just a box to tick – it's how we keep the good times rolling.

To read more about how we maintain a safe and healthy workplace, and our life saving commitments, access the **HEINEKEN Code of Business Conduct**.



Discrimination and Harassment

Everyone deserves a fair shot – no matter who they are or where they're from.

We're all about treating people equally, with respect and kindness, full stop. That means no discrimination, no favouritism – just equal opportunities for everyone, based on what they bring to the table.

We celebrate differences – whether it's race, gender, age, background, or anything else that makes you, you.

And let's be clear: there's zero room for bullying, harassment or any kind of abuse here. Respect is non-negotiable. So, treat your teammates right, steer clear of dodgy behaviour, and if you see or hear something that's not okay – speak up. We've all got a part to play in making this a safe, supportive space for everyone.

For more information on how we celebrate our diversity and say no to discrimination and harassment, please refer to the **HEINEKEN Code of Business Conduct**.

CONDUCTING BUSINESS WITH INTEGRITY AND FAIRNESS

Fair competition

We love to win – but only by playing fair. That means sticking to competition laws, wherever we do business. When we're working with customers, suppliers, or even crossing paths with competitors, we've got to keep things above board.

Chatting with a competitor? Part of an industry group? Posting something in the press? These are moments to stay sharp – because sharing the wrong info, even accidentally, can land us in hot water. Same goes for exclusive deals or price recommendations – we can suggest, but never force a price.

If you're ever unsure, don't guess – reach out to Legal. And if something doesn't sit right or seems off? Say something. We're all responsible for keeping the game fair and square.

To gain a better understanding of how we play fair win the right way, please refer to the **HEINEKEN Code of Business Conduct**.

Anti-bribery and Anti-corruption

We win with brains, not bribes. We're all about smart moves, not shady ones – zero tolerance for corruption, full stop.

We're all for good vibes, great company, and the

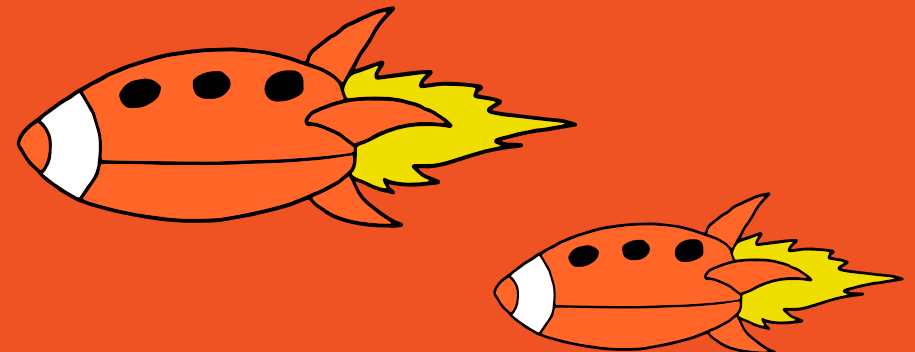
occasional clink of glasses – but when it comes to gifts, entertainment, and hospitality, we keep it classy, transparent and above all, fair.

Whether it's a thank-you pint, a team dinner, or sponsoring a local cause, it should always feel right – never like a bribe or a shady favour. We're here to build real relationships with our partners, not win them over with fancy perks.

So, if you're giving or getting something – make sure it's proportionate, professional, and no strings attached. Use your judgment, stay open about it, and never put someone in a tight spot.

We're cool with doing good – supporting charities, celebrating wins, and showing appreciation – but we don't do politics, and we never mess with the integrity of our decisions. Keep it honest, keep it respectful, and keep it all above board.

Please access the **HEINEKEN Code of Business Conduct** for further guidance on how to be responsible with Gifts, Entertainment & Hospitality.





Conflict of interest

We keep business and personal stuff in separate lanes – no blurry lines, no awkward overlaps. When we make decisions, it's all about what's best for the company, not what's best for our mates, our side gigs, or our cousin's new startup.

Even if something looks like a conflict of interest, it's worth flagging. Transparency is the name of the game – if something feels a bit off, talk it through with your manager, a legal buddy, or someone you trust.

We'd much rather have an honest chat upfront than clean up a mess later. Keep it open, keep it clear, and we're all good.

To learn how to avoid and disclose conflicts of interest, please access the **HEINEKEN Code of Business Conduct**.

Business partners

We like to work with good people – the kind who share our values and do business the right way. Our success isn't just about what we do – it's also about the company we keep.

That's why we team up with partners, suppliers, and customers who act with integrity, follow the rules, and treat others fairly. Their actions reflect on us, so we hold them to the same high standards we set for ourselves. Our **Supplier Code** is your go-to guide on the responsibilities our suppliers must commit to.

And if something doesn't sit right? Say something. Whether you're one of us or one of our partners, we're all in this together – and speaking up helps us keep things clean, fair, and honest.

For more guidance on how we work with responsible business partners, please access the **HEINEKEN Code of Business Conduct**.



Marketing

Everyone has a part to play in how we talk about our brands – and we want to do it right. Right message, right moment, right place.

So, if you're involved in spreading the word – whether it's a slick new campaign or a cheeky post on social – here's what to keep in mind:

- Market responsibly. Always follow our Responsible Marketing Code – that goes for all our products, from full strength to alcohol-free. We're here to celebrate good times, not promote overdoing it. Keep it honest, keep it mindful, and always keep minors out of the mix.
- Keep it green – and accurate. Got something to say about sustainability? Great! Just make sure it's backed up, crystal clear, and not greenwashing. Our Green Claims Policy is your go-to for getting it right.
- Be upfront with info. People deserve to know what they're drinking – and when not to. Our Global Labelling Policy helps you give them the facts in a way that's easy to understand.
- Don't forget digital. TikTok, Instagram, metaverse madness – wherever we show up online, the Responsible Marketing Code applies. Same rules, just a different screen.

Let's keep our messaging bold, fun, and above all, responsible. Access the **HEINEKEN Code of Business Conduct** for the **Responsible Marketing Code**, the **Global Green Claims Policy**, and the **Global Labelling Policy**.

Sponsorships

Sponsorships come in all shapes and sizes – from handing out branded goodies at festivals to backing events with some cash or product support. It's a great way to show up, connect, and spread the good vibes. But as always, we've got to do it responsibly.

Stick to the Responsible Marketing Code. If an event is likely to attract a crowd where more than 30% are minors – it's a no-go. When in doubt, skip the sponsorship. And when we do show up, we bring options – including our no- and low-alcohol brands – because responsible drinking starts with real choice.

Keep it squeaky clean with public bodies. Sponsoring government-linked organisations (like embassies or public institutions) can get tricky. It needs to be totally above board. So, register it in the HeiDisclosure tool and get Legal's thumbs up before moving ahead. Cash sponsorships? Super rare – and only okay under tight conditions. Usually, it's in-kind support or nothing at all. Bottom line: sponsorships should never feel dodgy or look like bribery. If it's not 100% clear, take a step back and check in first.

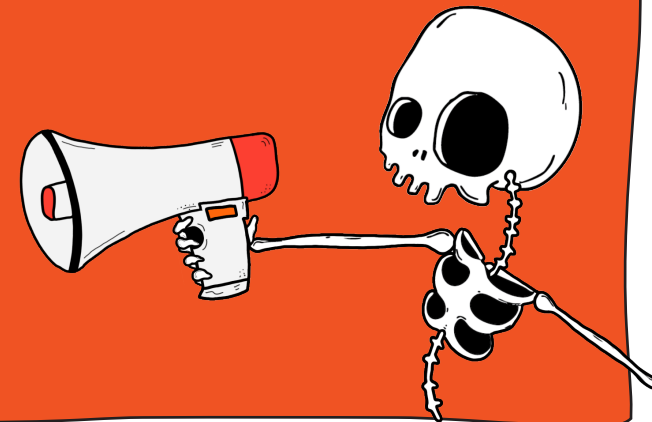
Communication

We're big fans of a good chat – but when it comes to talking about the company, we keep it smart, sharp and above all, responsible. Right message, right place, right time, right crowd – that's the golden rule.

If you're speaking on behalf of the company – whether it's at a big event or on social media – you're repping all of us. So stick to the guidelines, follow our policies, and channel your inner BEAVERTOWN ambassador (no branded cape required).

And social media? It's powerful stuff. A single post can do a lot – for better or worse. So whether you're online in work mode or just scrolling after hours, use your common sense. Think before you post, keep it respectful, and protect the rep – yours and ours.

Check out the **HEINEKEN Code of Business Conduct** for the Corporate Affairs Media Policy and the Social Media Guidelines.



PROTECTING OUR ASSETS

Financial integrity and fraud

Fraud? Yeah, that's a hard no from us. It doesn't just mess with the numbers – it can seriously damage our reputation and trust with everyone we work with. So, we've all got a part to play in keeping things clean, honest, and transparent.

Fraud can show up in all sorts of sneaky ways – faking documents, swiping company stuff, bending the rules for personal gain, or even cooking the books. And yep, that includes fiddling with sales records or making things look better (or worse) than they really are. It might seem small in the moment, but the fallout can be massive.

Bottom line: everything we report – whether it's financial or not – needs to be the real deal. No shortcuts, no cover-ups.

If something doesn't feel right, say something. Chat to your manager, a Trusted Rep, Legal, or share it with our Speak Up partner, **Protect**. We're all in this together – and honesty is how we keep things running smoothly.

For more guidance – and examples – on how to ensure financial and non-financial integrity and prevent fraud, please refer to the **HEINEKEN Code of Business Conduct**.



Use of company resources

We've all got a bit of company kit in our hands – whether it's a laptop, a phone, a company credit card, or even just a login to one of our systems. And with that comes responsibility.

Wherever you work and whatever your role, if it's company property, treat it right. Use it with care, use it professionally, and most importantly – use it for work, not for winning at online poker or binge-watching boxsets (unless you've got the OK to do so).

Look after what you've been trusted with. It's all part of keeping things running smoothly – and showing a bit of respect for the tools that help us do our best work.

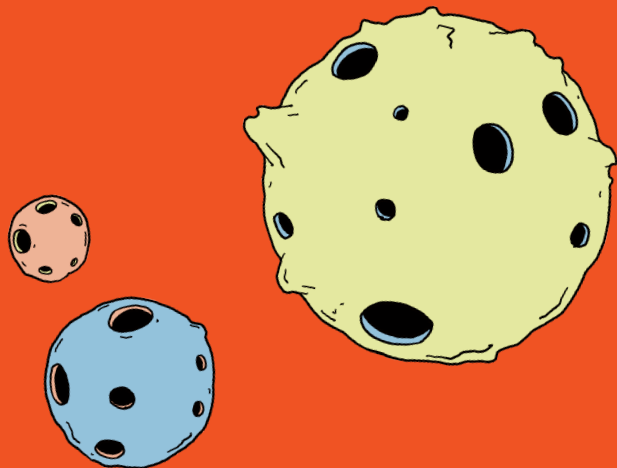
The **HEINEKEN Code of Business Conduct** includes further guidance and additional policies on how we can safeguard our company assets and resources. Information security and confidentiality

Our ideas, brands, and secret recipes? Yep, they're a big deal – and they need protecting. From our boldest brews to our cleverest campaigns, intellectual property is what sets us apart. So whether you're creating, selling, or shouting about our products, make sure you're keeping that IP safe – and giving others' the same respect too. Not sure about trademarks, patents or domain names? Legal's your go-to.

And while we're at it, let's talk secrets – the work kind. Think budget plans, product formulas, designs, strategies... the stuff you don't want landing in the wrong inbox. Confidential info should stay exactly that: confidential. Only share it if you're allowed to, and only with the right people.

Treat it like you would your favourite beer recipe – don't let it spill.

Read the **HEINEKEN Code of Business Conduct** on protecting the confidentiality and security of information.



Data privacy

We take privacy seriously – it's one of those things you just don't mess with. Whether it's personal data from our employees, customers, or business partners, we're all about keeping it safe and sound. Wherever we're working, we make sure we're following the local rules for data protection – because everyone deserves their privacy. That means handling personal info with care, using it only for legit business purposes, and sticking to the law (and our privacy guidelines).

So, whether you're dealing with emails, customer info, or anything in between, make sure it's being handled the right way. After all, trust is everything.

To report a personal data breach, click here:

protectingyourdata@beavertownbrewery.co.uk

The **HEINEKEN Code of Business Conduct** includes a detailed section on protecting personal data, including links to our Company's Privacy Principles, and the Global Data Privacy Portal.

SPEAKING UP

What does Speaking Up mean?

Speaking up is basically raising your hand and saying, “Hey, something’s not right here.” Ideally, we’d all feel comfy chatting things out directly with the person involved. But let’s be real—that’s not always doable. That’s why we’ve got a bunch of other ways for you to raise your concern without the awkward face-to-face.

What can you Speak Up about?

If something’s going on that doesn’t sit right with our Code—or, the law—it’s time to speak up. We’re talking things like discrimination, harassment, fraud, corruption, conflicts of interest, or even environmental harm. If it feels off, it probably is.

When should you Speak Up?

The sooner, the better. If something’s giving you that “hmm, this doesn’t feel right” vibe, don’t wait. You don’t need to have all the facts—just a gut feeling is enough to get the ball rolling. We’d rather check out a false alarm than miss something serious. And no, you won’t get in trouble for raising a concern in good faith (unless you’re making stuff up—don’t do that).



How to Speak Up?

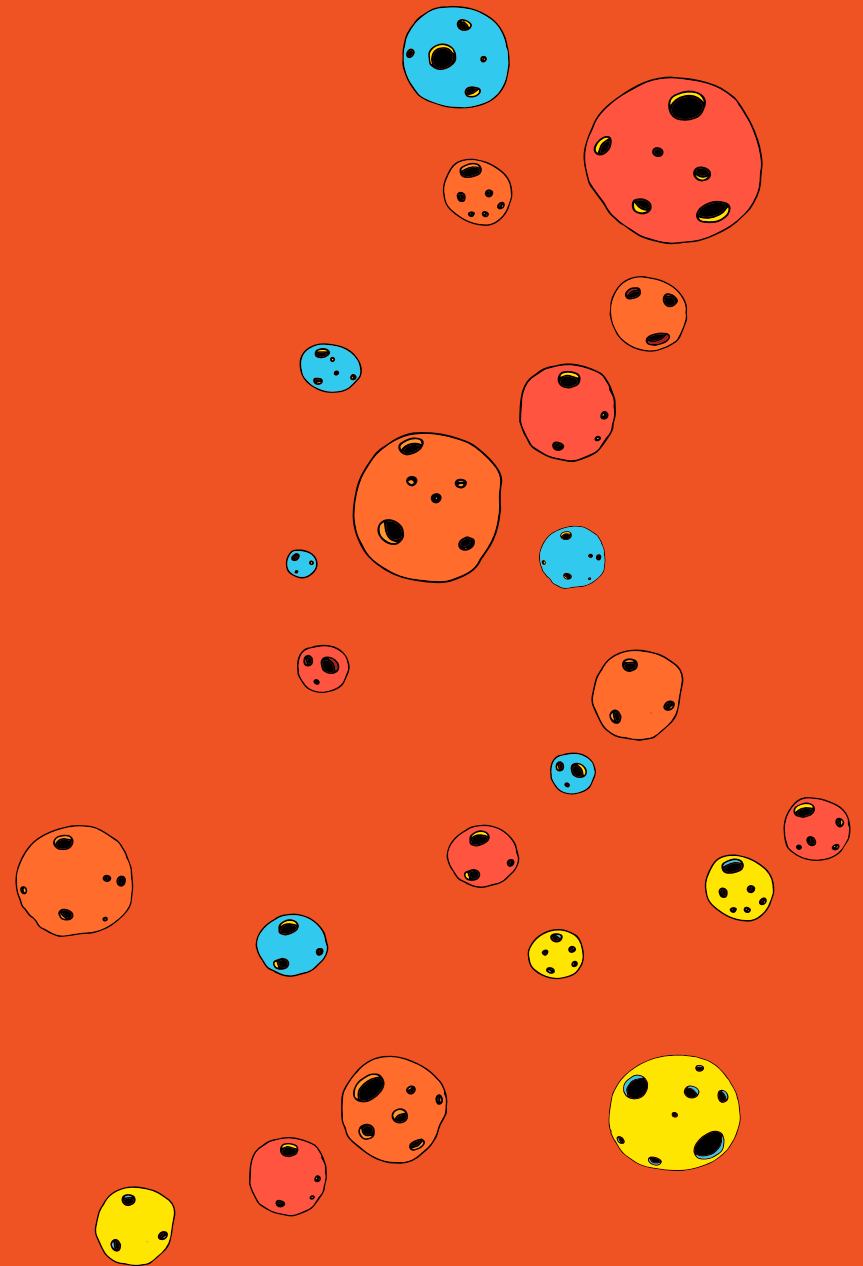
Pick your path—whatever feels right for you:

Your manager: Sometimes a quick chat with your manager can sort things out. If not, they'll know what to do next.

A trusted colleague: Not vibing with the manager route? No worries. The leadership team and managers across the business are all ears. They can give advice or help you file a report.

The People Team: Where our **Whistleblowing Policy** can be used to address any concerns
peopleteam@beavertownbrewery.co.uk

Speak Up via Protect: Advice line is available Mondays, Tuesdays, Thursdays: 9:30am – 1pm, 2pm – 5:30pm; Wednesdays and Fridays: 9:30am – 1pm. Anyone in need of advice outside of those times can reach Protect via their **contact form** and make arrangements for a call back. Confidential and anonymous? Absolutely.



What happens after you Speak Up?

Once you've raised your concern, it goes to an independent team that handles it with care and confidentiality. They'll dig into the facts and figure out what's what. You'll get a "we got this" message within five days, and a heads-up when the investigation wraps up. We won't spill all the details (privacy matters), but if something's wrong, we'll fix it—whether that's training, process tweaks, or real disciplinary action.

And yes, your identity stays under wraps unless you say otherwise. Anonymous means anonymous. If someone tries to play detective and guess who you are? Not okay. Let us know.

Retaliation? Big no-no

We've got zero tolerance for any kind of payback against someone who speaks up. If you're brave enough to raise a concern, we've got your back. And if you feel like someone's giving you grief for it—tell us. We'll step in.

But hey—don't use Protect to Speak Up, throw shade or settle scores. False accusations are not ok.

What's expected of you?

Know how and when to speak up. If you see something shady, say something.

Don't retaliate. Be kind. Be fair.

Cooperate if there's an investigation. That means showing up, sharing info, and not deleting stuff. Keep it confidential. No gossiping about ongoing investigations, okay?

If you're a manager or leader...

Make it safe to speak up. Your team should feel like they can talk to you.

Support your people. Listen, don't brush things off.

Take action. If it's serious, escalate it. Some things can't be solved with a coffee chat.

Learn from it. If something went wrong, figure out how to stop it from happening again.

The Heineken Speak Up policy is included in the **HEINEKEN Code of Business Conduct**.

