



ASAHI EUROPE & INTERNATIONAL

Modern Slavery and Human Trafficking Statement

for the financial year ended on 31 December, 2023

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. In September 2021, Asahi Breweries Europe Limited, the main Europe-based holding company, changed its name to Asahi Europe & International Ltd. (AEIL) to reflect its increased international scope in anticipation of the acquisition of the entire business of Asahi International Ltd., effective as of January 1, 2022. In 2024 AEI Group announced the acquisition of Octopi Brewing, a leading contract beverage production and co-packing facility located in USA.

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 Koziel. 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.

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 UK Ltd.**
- **Asahi Premium Brands Ltd.**
- **Nectar Imports Ltd.**



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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. 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.

In addition, pursuant to The Asahi Speak Up Policy, our employees can easily report potential and actual issues related to modern slavery. The existence of a dedicated whistleblowing 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. Concerns can be reported through web intake site or through phone hotline channel. 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 reviewed the current whistleblowing hotline and setup across the Asahi Group in 2023 and 2024. As a result of this review, an updated global Speak Up hotline was introduced across all entities of the Asahi Group, AEI included, in May 2024. Extensive communication was issued to refresh employee information about the Speak Up hotline channels and introduce the updated global hotline system.

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 is set out in the [Asahi Group Code of Conduct \(Code or Code of Conduct\)](#) 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. They put an emphasis on respect for human rights, including specifically on our commitment not to engage in acts that violate human rights, such as forced labour or child labour, or any form of modern slavery including human trafficking. These policies also underscore that we expect the same commitment and conduct of our business partners.

In order to ensure that our Code of Conduct remains a central reference for our workforce and our business partners, it is subject to a regular review. A rigorous review process engaging multiple stakeholders across our group of companies has been conducted through 2022 and 2023. As a result of such review, in order to ensure that all executives and employees of the Asahi Group understand the values of the Asahi Group's Code of Conduct in an easy-to-understand manner and truly put it into practice, the Code of Conduct has been updated and unified across the members of the Asahi Group in 2023.

The Code has been rephrased in a non-legalistic manner so as to ensure its accessibility and ease of understanding for all stakeholders. Moreover, real-life examples and a "most frequently asked

questions” section have been added to illustrate the situations that the Code aims to address and to ensure it remains a relevant tool in our efforts to prevent any improper conduct both internally and externally. Employee training is in place introducing the Code across our group.

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.

Legacy 2030 and our Purpose

Legacy 2030 is the AEI Group’s action plan setting out ambitious sustainability goals for 2030 putting an emphasis on our impacts on the planet and people. Through our actions, we aim to contribute to the UN Sustainable Development Goals, focusing on areas where we can make an impact, utilizing our scale, supply chains or partnerships. We also continue to work closely with AGH to identify, implement and share best practices and enhance our shared commitment to conducting our business in a sustainable manner, upholding human rights and championing ethical behaviour while being the enablers of meaningful human connections in line with our corporate purpose of **Creating Meaningful Connections**.

This purpose was formally defined and launched in 2021 and guides 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

During 2023, through regular employee trainings, workshops and company communications, we continued to ensure that all our employees are well educated in ethics and compliance and are well-equipped to implement our purpose in their day-to-day business. We made sure that they are comfortable with our policies, 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.



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

Asahi Europe & International Ltd. on June, 14 2024

Asahi UK Ltd. on June, 26, 2024

Asahi Premium Brands Ltd. on June, 26, 2024

Nectar Imports Ltd. on June, 26, 2024

Paolo Lanzarotti

AEI Group CEO

Director, Asahi Europe & International Ltd.

Tim Clay

Director,
Asahi UK Ltd., Nectar Imports Ltd.

Victoria Segebarth

Director, Asahi Premium Brands Ltd.