

SABMiller Anti-Bribery Policy



SUPPLIER VERSION

MARCH 2012

<p>Introduction</p>	<p>"SABMiller is committed to conducting its business responsibly and in accordance with the highest legal and ethical standards. Operating transparently and ethically is not only the right thing to do; it is ultimately good for business. Understanding anti-bribery laws and following the principles in the SABMiller Code of Business Conduct and Ethics and this Anti-Bribery Policy is essential to safeguard our reputation for honesty and integrity and our long term financial wellbeing. Following our policies and procedures is not optional, and failure to do so can result in severe consequences for SABMiller and the individuals concerned." Graham Mackay, Chief Executive, SABMiller plc.</p> <p>SABMiller's Code of Business Conduct and Ethics ("the Code") states that "We do not permit the direct or indirect offer, payment, solicitation or acceptance of any improper payments (for example, bribes, or illegal gratuities) in any form".</p> <p>Most countries in which SABMiller operates have laws that prohibit improper payments, such as bribes. An increasing number of countries have also adopted laws that prohibit bribery even when it is committed outside these countries' own borders (particularly in the case of payments to public officials).</p> <p>Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties.</p>
<p>To whom does this policy apply?</p>	<p>This policy applies to all suppliers of SABMiller and sets out the minimum standards to which they must adhere at all times.</p>
<p>What is bribery?</p>	<p>Bribery can be described as the giving to or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business or any other benefit.</p> <p>Bribery can take place in the public sector (e.g. bribing a public official) or private sector (e.g. bribing the employee of a customer). Bribery can also take place where an improper payment is made by or through a third party.</p> <p>Bribes and kickbacks can therefore include, but are not limited to:</p> <ul style="list-style-type: none"> • gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses; • payments, whether by employees or business partners such as agents, introducers or consultants; • other 'favours' provided to public officials or customers, such as engaging a company owned by a member of a public official's or customer's family; and • the uncompensated use of company services, facilities or property.

<p>Our policy on bribery:</p> <p>(i) General</p>	<p>No supplier is permitted to pay or offer a bribe in <u>any</u> form on behalf of SABMiller. You must never whilst involved in work for SABMiller:</p> <ul style="list-style-type: none"> • Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to SABMiller. "Public official" should be understood very widely, and broadly means anyone paid directly or indirectly by the government or performing a public function, including officials of state owned enterprises and public international organisations. • Attempt to induce a public official, whether local or foreign, to do something illegal or unethical. • Pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official. You should therefore be careful when selecting third parties, such as agents and consultants (see guidance below). • Establish an unrecorded ('slush') fund for any purpose. • Otherwise use illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or offering anything of value when you know it would be contrary to the rules of the recipient's organisation for the recipient to accept it. • Do anything to induce, assist or permit someone else to violate these rules. • Ignore, or fail to report, any suggestion of a bribe. <p>As well as complying with the specific prohibitions in this Policy, suppliers must exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.</p>
<p>(ii) Facilitation payments</p>	<p>SABMiller Policy is that so-called "facilitation" or "grease" payments are prohibited. Such payments should not be made to public officials, even if they are nominal in amount and/or common in a particular country.</p>
<p>(iii) Agents and Sub-contractors</p>	<p>Suppliers should not sub-contract their work for SABMiller to any party who they have reason to suspect will pay bribes on SABMiller's behalf.</p> <p>Suppliers should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of SABMiller. All fees and expenses paid to third parties should represent appropriate and justifiable remuneration for legitimate services to be provided. Accurate financial records of all payments in relation to SABMiller's business must be kept.</p>
<p>Reporting of bribery and suspicious activity</p>	<p>If suppliers become aware of any actual or suspected breach of this Policy, they should report this to their usual SABMiller contact or, if that is not appropriate, to the SABMiller legal department, the whistleblowing helpline or the Group General Counsel. Processes are in place to ensure that such complaints are investigated and appropriate action is taken.</p>