



SUPER BOCK GROUP

SUPPLIER CODE
OF CONDUCT
SUPER BOCK GROUP

MAY 2024



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Identification of Responsibilities

PREPARATION	REVIEW	APPROVAL
Procurement Department	Legal & Compliance Department	Executive Committee

Review

VERSION	DATE	MAIN CHANGES
1.0	April 2020	1st Version of the Supplier Code of Conduct
2.0	March 2024	Governance model, supervision and frequency; CCF breach/infringement reporting mechanisms; Supplier audit; Interconnection with other policies; Dissemination template

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Introduction

Introduction

OUR COMMITMENT

The Super Bock Group is committed to making a continuously positive contribution to the community in the social, environmental and governance aspects by developing and implementing commercial practices in accordance with the Code of Ethics. At the same time, we want to ensure that our business strategy and operations are conducted in a responsible manner.

The Super Bock Group prides itself on being a company that operates on the basis of the principles contained in its Code of Ethics. It expects that the suppliers and partners with which it works can share the same values, also set out in this code. We strive to continually improve and firmly believe in long-term relationship building, with supplier collaboration being crucial to the Super Bock Group business. We value frank and transparent communication, as we believe it to be vital for successful business relationships.

With this code, we seek to create value for all our stakeholders, including our employees, our business partners and the communities in which we operate.



SCOPE OF APPLICATION

This code applies to all suppliers of the Super Bock Group and the group companies. The provisions of the code also extend to suppliers' employees, including service providers and contractors.

It is the responsibility of suppliers to ensure that subcontracted companies and third parties acting on their behalf do not infringe the provisions of this code or the Sourcing Policy, and they must ensure that they are communicated and implemented accordingly.

COMPLIANCE

The Supplier Code of Conduct is a prerequisite in all relations and contracts entered into between the companies of the Super Bock Group and their business partners. This policy will be made available to suppliers before and during the sourcing process, and will always be available on the corporate website. Suppliers must adhere to this code and comply with all applicable laws and regulations. The Super Bock Group expects that its suppliers will be able to demonstrate their commitment to this code and all applicable legislation.

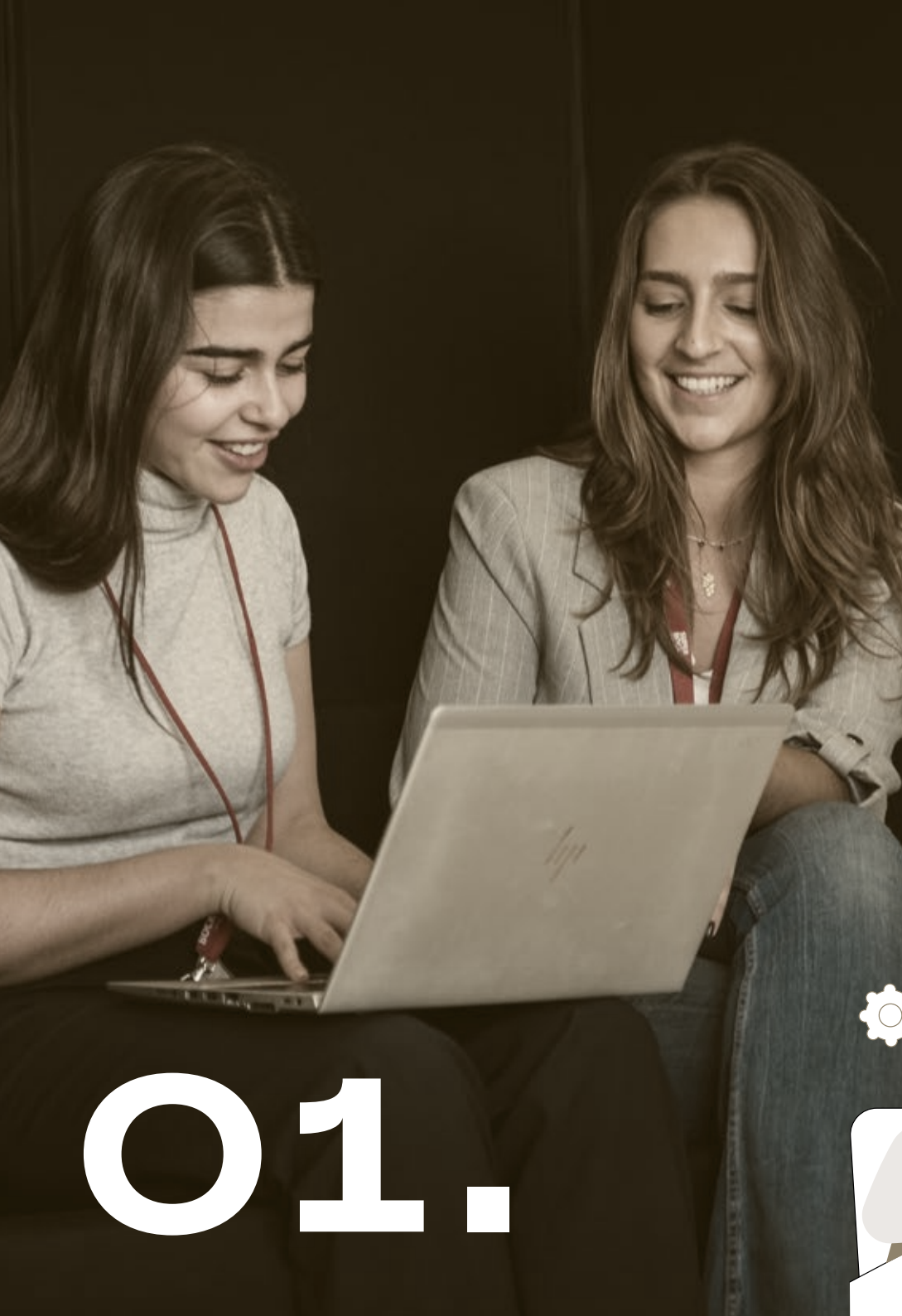
The Super Bock Group expects its suppliers to:

- a) ensure this Code of Conduct is known to all their employees so that they are familiar with the requirements of this policy;
- b) train their employees to effectively comply with this Code of Conduct;
- c) immediately communicate any potential non-compliance with this Code of Conduct.
- d) perform a self-assessment in the areas identified and defined by the Super Bock Group, where the strict confidentiality of the process will be guaranteed.

The Super Bock Group also reserves the right to audit the supplier's compliance with this code, and suppliers must grant the necessary access to their facilities and information, subject to reasonable notice, to:

- a) audit documents and records;
- b) review processes, procedures or control mechanisms underlying or involved in the fulfilment of their obligations inherent to the underlying supply;;
- c) perform a pre-assessment prior to the first supply;

The Super Bock Group also reserves the right to terminate any agreements if a supplier repeatedly fails to comply or decides that compliance with the aforementioned code cannot be achieved.



01.

01. Employment and Human Rights

Super Bock Group suppliers undertake to respect the employment legislation in force in the countries where they operate, as well as all international regulations, in particular the International Labour Organization (ILO) conventions and the United Nations Universal Declaration of Human Rights.

NON-DISCRIMINATION

Suppliers must not discriminate between their employees on the basis of criteria such as descent, age, sexual orientation, marital status, family situation, economic situation, nationality, race, religion, political or ideological beliefs and trade union membership in the context of decisions related to employment, including hiring, dismissal and retirement. They should focus exclusively on relevant, objective and non-discriminatory criteria.

FORCED LABOUR

In the case of forced labour, the supplier must: **a)** comply with all applicable laws relating to the fight against slavery and human trafficking; **b)** ensure that all their employees are allowed to move freely and can leave their workplace at the end of each working day; **c)** ensure that all their employees are free to leave the employment relationship through termination of the employment contract, observing the legal requirements applicable in each country. **d)** ensure that there is no form of forced/slave labour or human trafficking in their supply chains; **e)** maintain policies and procedures to ensure compliance with this principle; **f)** notify the Super Bock Group whenever they become aware of any situation that constitutes or may constitute a situation of forced/slave labour or human trafficking.



CHILD LABOUR

Suppliers must promote and respect the rights of children as laid down in the United Nations Convention, in particular the right to education, the right to play, the right to rest and the right to have basic needs met. As such, suppliers must not be involved in or benefit from the use of child labour at their premises or at the premises of their suppliers.

The Super Bock Group will only hire suppliers whose employees are aged 18 years or over or have finished compulsory schooling. Business partners shall take reasonable steps to verify the age of job seekers and employees in their activities.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must respect the various forms of freedom of association, in particular the right of employees to form or join trade unions or other structures representing employees to defend their interests. Suppliers must also respect the right to collective bargaining. Suppliers shall not influence and must respect the trade union choice of employees and shall not allow or promote any persecutory or discriminatory conduct by virtue of such choices.

HARASSMENT

Suppliers must provide a safe and healthy working environment and, consequently, must reproach and punish

any acts of physical, verbal, sexual or psychological harassment, as well as any abuse or threats in the workplace, whether these are carried out by their employees or by any business partners. Suppliers shall also implement internal reporting mechanisms for this type of situation, with safeguards of confidentiality, impartiality and independence in the assessments carried out.

WAGES, BENEFITS AND WORKING HOURS

Suppliers must comply with the general employment law and any collective labour regulation (Collective Bargaining

Agreement) which is applicable to them in general and, in particular, with regard to pay, other supplementary remuneration, working hours and benefits.

Their employees must comply with the limits of the normal working time which apply at any moment, in accordance with the working time organisation model, which must be implemented in strict compliance with employment legislation, as well as the principles and rules laid down in the ILO Conventions.

Overtime, where it exists, shall be paid in accordance with the applicable employment legislation.

Only disciplinary sanctions arising from the general employment law or other applicable legislation shall be allowed.

PAID TIME OFF

Suppliers undertake to respect the taking of parental leave, holidays and any other time off provided for by law. Employees exercising their rights cannot be used as grounds for dismissal or other persecutory or discriminatory measures.

EMPLOYMENT CONTRACT

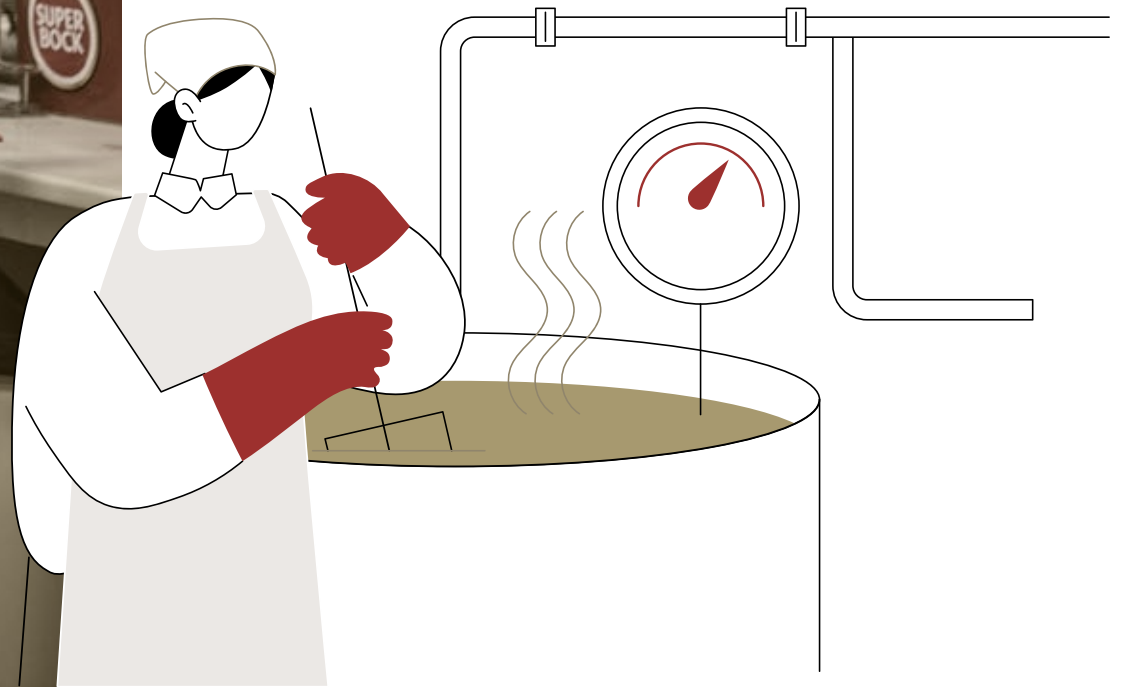
Suppliers shall provide all employees with their employment contract in accordance with the legal requirements. Inactive and seasonal workers must not benefit from conditions different from other employees because of their employment relationship, except those arising from the applicable legislation.



02. Health & safety

Suppliers must provide their employees with a safe and healthy working environment, as well as the training, work equipment and protective equipment necessary to safely perform their tasks. Suppliers must identify health and safety plans that define clear measures to safeguard employees and others who may be affected by their activities. In addition, suppliers should actively identify, eliminate and control all aspects that pose a risk to their employees and the community.

We also expect our Suppliers to meet the minimum requirements contained in all the points of this chapter.



02.

SYSTEMS, DOCUMENTATION, OCCUPATIONAL MEDICINE AND ACCIDENTS

Suppliers must, in accordance with the applicable legislation, develop and maintain effective systems for training, information and consultation of employees on important health and safety issues, and ensure that medical examinations are carried out for their employees within the scope of occupational medicine services, in accordance with the deadlines laid down in the legislation in force. Suppliers must also keep records of occupational accidents and diseases, update the risk matrix and ensure that they are disseminated and known by employees.



SANITARY INFRASTRUCTURE

Suppliers must provide adequate, clean and hygienic infrastructure that can meet the needs of their employees and is appropriate to the number of employees.



This requirement is applicable to workplaces and to any other location made available by the supplier, and must include access to drinking water, toilets and changing room facilities, where applicable.



ACCIDENTS AND HEALTH EMERGENCIES

Suppliers shall establish and maintain emergency response procedures to respond effectively to all health and safety emergencies and incidents affecting their employees, facilities or surroundings and the community.

In addition, during a visit to or performance of works on the premises of the Super Bock Group, suppliers and any subcontractors must behave safely in accordance with health and safety standards and rules, comply with the Integrated Management Policy in force, and thus prevent the occurrence of accidents. All incidents (accidents, near-accidents or unsafe conditions) that may compromise the safety of workers or facilities, occurring inside, outside or in the service of SBG, or any malfunction at the facilities or their activity, which may cause breach of legal requirements or defined rules, must be reported to us. Suppliers shall also comply with the Life-Saving Rules defined by SBG ensuring the protection and conservation of human and physical assets in accordance with SBG's Occupational Safety and Health Regulation.

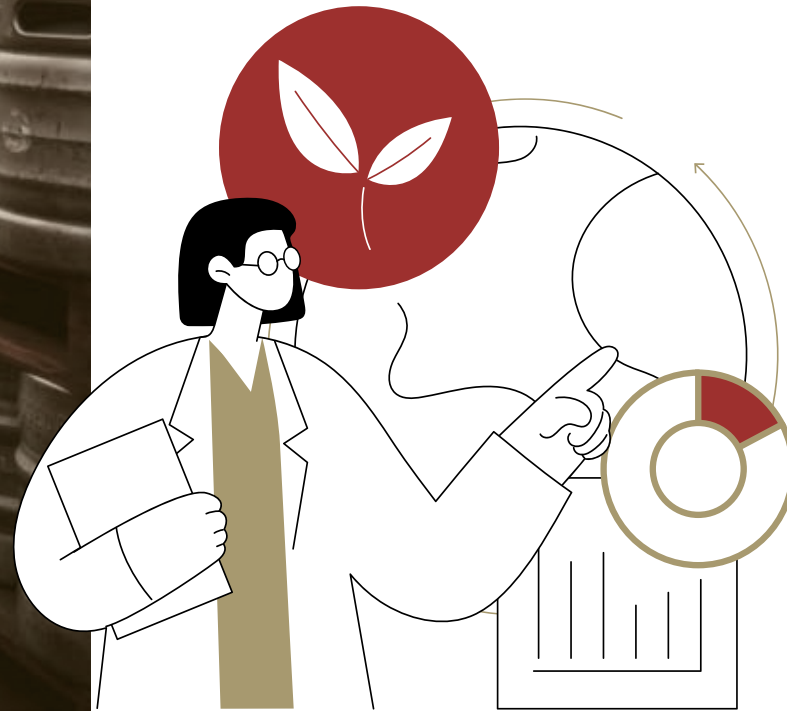
03.

03. Environment

The Super Bock Group recognises and values suppliers who implement best practices in terms of Sustainability in their processes and operations, ensuring a continuous search for resource optimisation and minimising the impact on the surrounding environment.

Suppliers must respect and be aware of the current applicable legislation and relevant procedures with regard to the environmental impact of their activities, products and services. They should also proactively ensure compliance with environmental regulations through continuous training of all staff and effective operational control and monitoring of their activities and business.

Suppliers shall promote, implement and be able to demonstrate systematic actions and practices that aim at, inter alia, the rationalisation of consumption (e.g. materials, water, energy), the reduction of their ecological footprint and the circularity of the materials they use and incorporate into their products and processes.



ENVIRONMENTAL MANAGEMENT

Suppliers shall endeavour to prevent and operate effective systems to minimise, address and report any adverse environmental impact of their activities, products and services. Suppliers should aim for continuous improvements in their overall environmental performance by maintaining a follow-up and monitoring system, as well as commit to working with their own suppliers to improve environmental performance throughout the product or service supply chain. Suppliers shall ensure that they are in compliance with applicable laws relating to air emissions, noise pollution, soil pollution, water abstraction, groundwater and surface water discharges, and waste treatment and disposal.

WATER MANAGEMENT

Suppliers shall ensure compliance with laws and regulations related to the use of water (wastewater discharges and/or water abstraction). They must ensure they have procedures to regulate specific water consumption as well as solutions for reduction, treatment and/or reuse of water. Suppliers shall pay particular attention to water management in areas where water supply is at risk. Wastewater generated by suppliers shall be properly treated at (or discharged to) an authorised external treatment facility.

CARBON EMISSION MANAGEMENT

Suppliers shall:

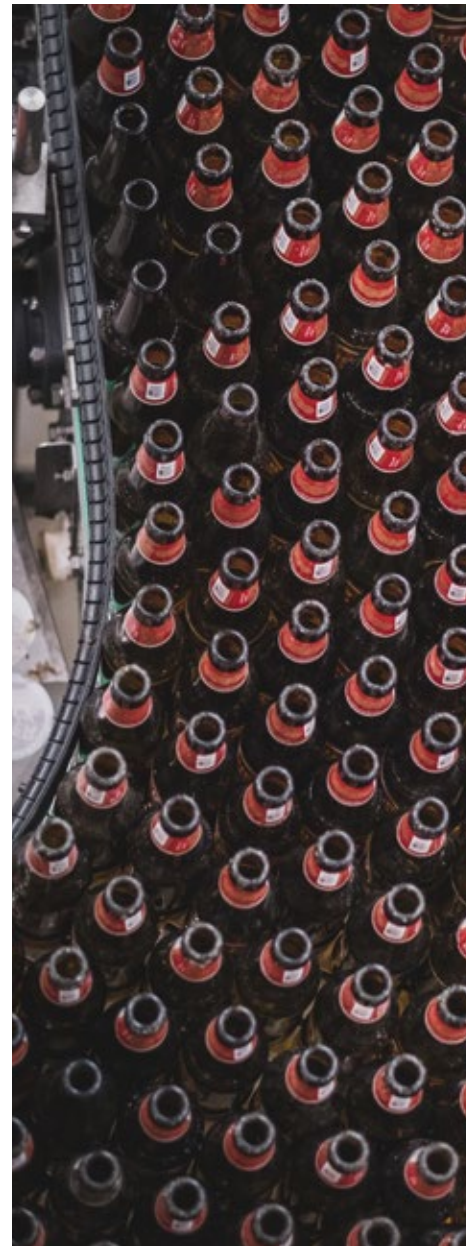
1. ensure compliance in their activity with laws and regulations relating to emissions of pollutant gases into the environment;
2. work proactively to understand and reduce their carbon footprint across the value chain by identifying and defining carbon footprint mitigation actions.

Suppliers must ensure the efficient use of energy, through responsible consumption practices, the implementation of efficient production processes and seek to minimise their consumption in a sustained manner.

WASTE, RECYCLING AND CHEMICALS

Suppliers shall establish and maintain **(i)** a list of hazardous and non-hazardous waste in order to monitor the types and quantities of waste they generate, **(ii)** separation and proper conveyance of all waste they generate, and **(iii)** procedures for the safe handling, transport and disposal of such waste.

Hazardous waste should not be landfilled or incinerated on site except when authorised by the competent authorities. If non-hazardous waste is landfilled or incinerated locally, all legal requirements must be met.



Suppliers shall maintain written procedures with clear guidance on the acquisition, storage, handling, transportation and use of chemicals, with special emphasis on hazardous materials. Suppliers shall endeavour to introduce secondary (reused or recycled) materials that offer equal or greater value and do not compromise food quality or safety standards. They must provide information on recycled content and recyclability. They should look for opportunities to increase these levels when appropriate.

BIODIVERSITY

Suppliers should produce biodiversity action plans for high-risk first-line categories which demonstrate compliance with good practices in habitat management for those business partners whose activities significantly impact species or habitats.

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04. Business Integrity and Ethics

CORRUPTION, BRIBERY AND OTHER RELATED ISSUES

Suppliers must comply with, and ensure that all their employees and partners comply at all times with, all applicable anti-corruption laws in the areas where they operate, in relation to their business activity and, in particular, they must ensure that their representatives, employees and partners **(i)** do not attempt to directly or indirectly obtain or offer an undue advantage (i.e. an advantage to which they are not entitled) from any public official, political office

holder, business partner or any other third party; **(ii)** they shall not directly or indirectly participate in or promote any other form of corruption, bribery, extortion, misappropriation or fraud which aims to obtain unfair advantages or fraudulently influence the outcome of their business relations; or **(iii)** they will not directly or indirectly participate in or facilitate any form of money laundering, terrorist financing, violations of economic or commercial sanctions, tax evasion or theft.

GIFTS AND ENTERTAINMENT

Suppliers must refrain from offering financing, gifts or similar to influence any business decisions.

The Super Bock Group and its employees must refrain from receiving gifts and other offers, of any sort, which may influence or shape the business decision. Suppliers must ensure that all gifts and entertainment offered to employees of the Super Bock Group are legal, transparent, sporadic, socially appropriate, of low economic value, and that they do not imply, or appear to imply, any form of pressure or influence on the business relations.



CONFLICTS OF INTEREST

Suppliers are obliged to recognise when they are, may be or may be perceived as being in a situation that constitutes a conflict of interest, i.e. a situation where personal activities, personal relationships or other interests conflict with the interests of the Super Bock Group. Suppliers shall not allow conflicts of interest to compromise their professional judgements and responsibilities, as well as the judgements of their representatives or employees, and they shall voluntarily report any conflicts of interest involving professionals of the Super Bock Group.

COMPETITION

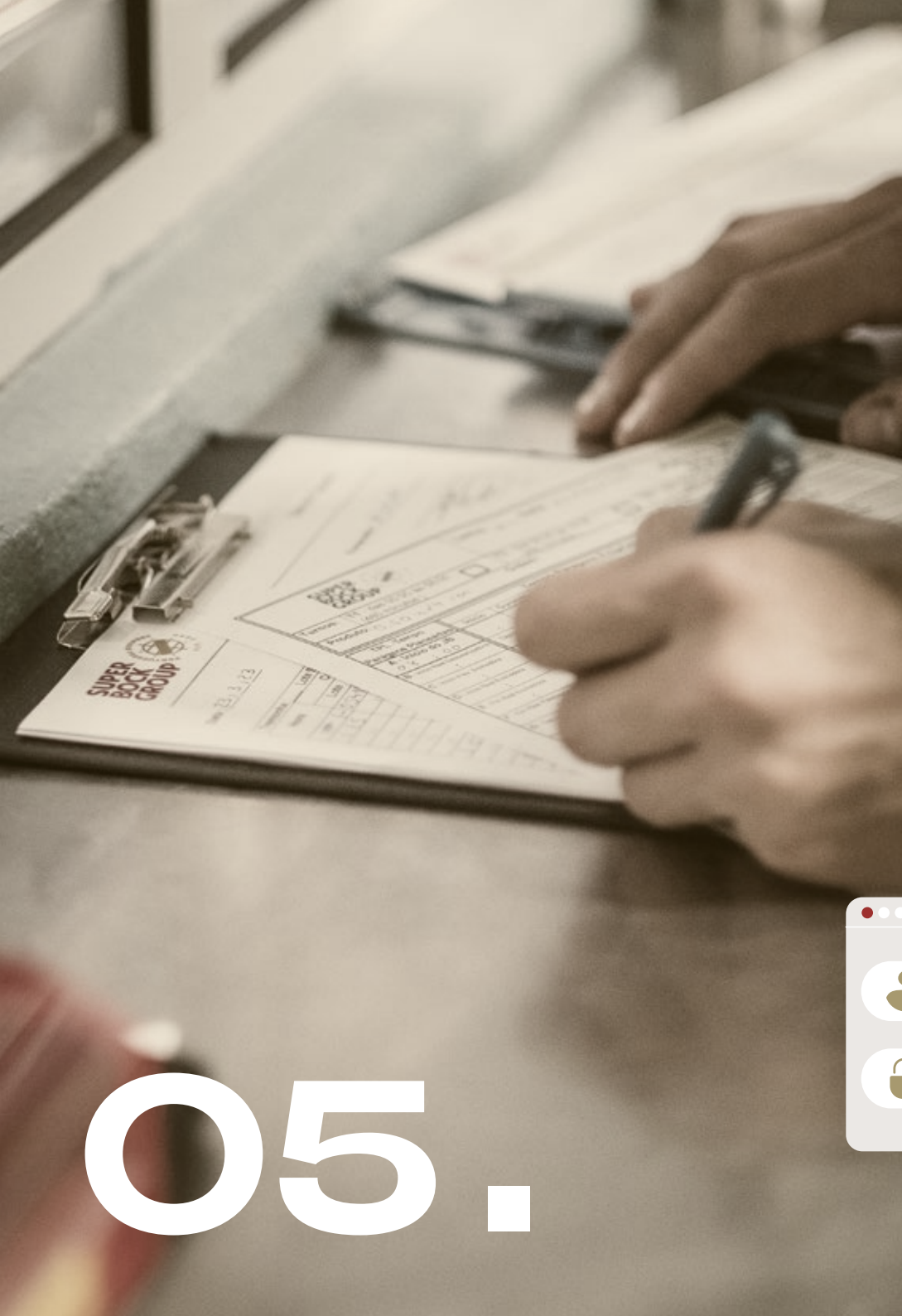
Suppliers shall not engage in or facilitate anti-competitive behaviour, anti-trust practices or anti-monopoly practices, including the exchange of inappropriate information. Suppliers should not share information they receive from or about their competitors with the Super Bock Group.

TRADE SANCTIONS/EMBARGOES

Suppliers shall comply with all applicable laws and control regulations relating to trade sanctions and/or embargoes in accordance with Portuguese and European Union law relating to import,



reimport, export and re-export (Sanctions/Embargoes), and shall not be obliged to carry out any activity in accordance with this Code that breaches any Sanctions/Embargoes. Suppliers shall promptly notify the Super Bock Group of any non-compliance or if the supplier, any of its employees, directors or executives, or any of its affiliates is, or becomes, a person or entity with whom transactions are prohibited under such Sanctions/Embargoes. The Super Bock Group may, without incurring any liability with the supplier, terminate any contract, exclude from a tender or refuse any bid with immediate effect if: **(i)** any provision of the contract, bid or other agreement in force or to be entered into with the supplier at any point breaches or is reasonably considered by the Super Bock Group to be in breach of Sanctions/Embargoes; **(ii)** the Sanctions/Embargoes render the performance of the contract, bid or any other agreement in force or to be entered into with the supplier commercially unreasonable; **(iii)** the supplier, or any of its directors, employees and shareholders, affiliates or subcontractors, is subject to Sanctions/Embargoes; or **(iv)** the supplier does not notify Super Bock Bebidas in accordance with this Clause.



05. Data Protection

Suppliers shall ensure, when processing personal data entrusted to them by their employees, service providers and customers, that applicable national and European legislation on privacy and personal data protection is respected.



05.

PRINCIPLES OF PROCESSING

Whenever suppliers collect and transfer personal data from their representatives, employees or service providers, they must ensure that:

- 1.** the personal data collected and transferred will be processed lawfully and collected for specific, explicit and legitimate purposes;
- 2.** only personal data strictly necessary for the fulfilment of the purpose for which such data were collected and transferred (e.g. compliance with the Legal Framework Promoting Occupational Health and Safety) will be processed;
- 3.** they comply with the right to information about the personal data to be processed, their purposes, legal basis and identification of the recipients of such data, vis-à-vis the data subjects (employees, service providers, etc.);
- 4.** persons authorised to process personal data undertake to be confidential or are subject to appropriate legal confidentiality obligations.

SECURITY OF PERSONAL DATA PROCESSING

Suppliers shall use appropriate technical and organisational measures to protect personal data against unauthorised destruction (accidental or unlawful), accidental loss, alteration, disclosure or access, in particular where the processing involves the transmission of the data over a network, and against any form of unlawful processing, and shall implement distinct or additional security measures to protect such data.

REPORTING OF POTENTIAL IRREGULARITIES

The Super Bock Group encourages its suppliers to report any possible irregularity or infringement of its Code of Ethics, as well as any breach of this Code of Conduct. To this end, the Super Bock Group provides on the corporate website a reporting channel - <https://eu.deloitte-halo.com/whistle-blower/website/Superbock>, where any supplier or employee of a supplier can express their concerns related to behaviours

or decisions that, performed or detected in a professional context, do not comply with this code.

The Super Bock Group recommends that its suppliers make their own mechanisms available for reporting irregularities, as required by law.





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