

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Heineken NV
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 37.2 out of 100

Theme Score	Out of	For Theme
5.1	10	A. Governance and Policies
13.9	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
0.5	20	D. Performance: Company Human Rights Practices
7.5	20	E. Performance: Responses to Serious Allegations
4.8	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: In its Human Rights Policy, the Company states: 'We respect the dignity and human rights of all people. [...] We expect our employees, our management, individuals working for HEINEKEN through a third party contract, our suppliers and business partners, to respect human rights in line with this policy and to ensure that our work complies with our Company's commitments to human rights. Our Human rights Policy is the foundation to help us to understand, avoid and address human rights related risks.' [Human Rights Policy, 2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: Human rights policy states: 'Our policy is aligned with the following international standards [...] The Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD), The United Nations (UN) Guiding Principles on Business and Human Rights.' However the wording 'is aligned with ...' is not consider a clear commitment following CHRB criteria. [Human Rights Policy, 2018: theheinekencompany.com] Not met: OECD: See above [Human Rights Policy, 2018: theheinekencompany.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: ILO Core: The Human Rights Policy includes 10 standards including respect for ILO core: non discrimination, prohibition of child or forced labor, freedom of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>association and collective bargaining. [Human Rights Policy, 2018: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Met: All four ILO for AG suppliers: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks: Health & safety, Non-discrimination, No harassment and violence, Child protection, Freedom of association and the right to collective bargaining, No forced labour, Rest and leisure, Fair wages and income, Access to water, Respect for human rights in high risk contexts. We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: See above [Human Rights Policy, 2018: theheinekencompany.com] • Met: Respect H&S of workers: The Human Rights Policy has an explicit statement on health and safety: 'Nothing matters more than the safety of our people. Our Life Saving Rules cover our highest safety risks and these need to be strictly followed. The company undertakes to provide a safe and healthy working environment.' [Human Rights Policy, 2018: theheinekencompany.com & Global occupational health and safety policy, 01/2012: theheinekencompany.com] • Met: H&S applies to AG suppliers: The supplier code states that 'working conditions should allow for safe working practices and support the occupational health of employees'. [Heineken Supplier code, 07/2010: theheinekencompany.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: The Company is a signatory to the CEO water mandate. In addition, it has specific commitments for 'significant water balancing by our production units in water-scarce and water-distressed areas'. Moreover, the Company indicates in its Human Rights Policy: ' We acknowledge the right to water as a basic human right. Our employees and others working on our sites need to have access to safe drinking water and sanitary facilities.' [Water policy, 10/1999: theheinekencompany.com & Human Rights Policy, 2018: theheinekencompany.com] • Met: Expecting suppliers to respect these rights: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks. Standards include access to water. In relation to its coverage, the Company indicates that 'we expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Protecting water resources on website: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: See above [Protecting water resources on website: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] • Not met: Expecting suppliers to respect these rights
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights • Met: Children's rights: In its Human Rights Policy, the Company states: ' We respect the rights of the child as stated in the United Nations (UN) Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. We will not engage in, or allow, child labour within our facilities or in those of our suppliers. We are also committed to supporting the elimination of child labour in our value chain'. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: Migrant worker's rights • Met: Expects suppliers to respect these rights: On its website section 'Respecting human rights' the Company indicates: 'The updated policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>address human rights-related risks: Health & safety, Non-discrimination, No harassment and violence, Child protection, [...]. We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy.' [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Met: Child Rights Convention/Business Principles: See above [Human Rights Policy, 2018: theheinekencompany.com] • Not met: Convention on migrant workers • Met: Expecting suppliers to respect these rights: See above [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: On its website section 'Engaging with our stakeholders', the Company describes its work to engage with its different stakeholders including: employees, suppliers, NGO, employee representatives. [Engaging with our stakeholders: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: In its Human Rights Policy, the Company indicates: 'We recognise that effective dialogue with relevant external stakeholders is an integral element of assessing our own human rights performance. We value the perspectives of affected stakeholders, in particular local communities. Their input helps to inform our approach to human rights on a global and local level.' [Human Rights Policy, 2018: theheinekencompany.com]
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: In its Human Rights Policy, the Company states: 'Respect for human rights includes preventing human rights issues or addressing them at an early stage or to seek adequate remedy in case human rights are violated.' [Human Rights Policy, 2018: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Collaborating with other remedy initiatives: On its website section 'Respecting Human Rights', the Company includes an example of how it collaborates with access initiatives such as NCP: 'In December 2015, former employees of Bralima, HEINEKEN's subsidiary in the DRC, filed a complaint with the NCP (Dutch National Contact Point) with regard to an alleged violation of the OECD Guidelines. After extensive reviews and constructive discussions, the parties found a satisfactory outcome. More information on the case, including the NCP's final statement, can be found on the NCP website.' [Respecting Human Rights: theheinekencompany.com] • Not met: Work with AG suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Code of Business Conduct, which includes human rights policy, has been signed by the CEO and CFO. [Code of business conduct, 03/2016: theheinekencompany.com] • Met: Board level responsibility for HRs: On its website section 'Brewing a Better World governance' (the name of its sustainability programme), the Company indicates that: 'Brewing a Better World progress is one of the priority topics of HEINEKEN Executive Team discussions. Chaired by our CEO, the Executive Team is responsible for ensuring delivery, ownership and alignment across all our businesses, supported by input from our subject specialists. Sustainability is embedded throughout our business, for example driven by Supply Chain (Water and CO2), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption).' In addition, in its Annual Report 2017, it states: 'The Executive Team consists of the two members of the Executive

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Board, the four regional presidents and four Chief Officers.' [Brewing a better world governance: theheinekencompany.com & Annual report, 2017: theheinekencompany.com] Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board/Committee review of salient HRs: Human Rights policy is overseen by the Chief HR Office who is a board director. [BHRC Submission, Updated in 2016: business-humanrights.org] • Not met: Examples or trends re HR discussion Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Senior responsibility fo HR (inc ILO): On its website the Company indicates: 'The HEINEKEN Integrity Committee (IC), chaired by the Chief HR Officer, will maintain oversight of the human rights programme and advises on key decisions related to external engagement, resources and reporting. All our Operating Companies Management Teams have the assignment to assess and address human rights related risks, with support of global guidance and training, coordinated by the Manager International Labour Relations.' And on its website section 'Brewing a better World governance', it indicates: 'Sustainability is embedded throughout our business, for example driven by Supply Chain (Water and CO2), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption). 'On a day-to-day basis, Brewing a Better World is coordinated by the Global Sustainable Development team which is supported by many functional experts'. [Respecting Human Rights: theheinekencompany.com & Brewing a better world governance: theheinekencompany.com] Score 2 • Met: Day-to-day responsibility: See above. In addition, it states: 'We form alliances (tribes) throughout the entire organisation and with our suppliers to develop new solutions. [...] Around the world, each operating company has its own sustainability coordinator and team for delivering global Brewing a Better World commitments at the country level.' [Brewing a better world governance: theheinekencompany.com] • Met: Day-to-day responsibility in supply chain: See above [Brewing a better world governance: theheinekencompany.com]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights: On its website section 'Brewing a better world governance', the Company indicates: 'Selected senior managers at global, regional and local levels have sustainability objectives linked to their function to support the delivery of our sustainability agenda. Bonus targets are set for relevant managers in the areas of energy, water and procurement. For specific markets, sustainability objectives are also set in relevant areas such as Supply Chain, Procurement and Corporate Affairs.' However, there is no further information about the specific incentives and if any of these incentives is related with human rights issues. [Brewing a better world governance: theheinekencompany.com] • Not met: At least one key AG HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

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B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR part of enterprise risk system: In its Annual Report 2017, the Company reports its main risks, one of them is 'Non compliance': 'Across many geographies, law enforcement has become more systematic than in the past, in particular with regard to anti-bribery and corruption, competition and data privacy laws, and human rights. This leads to an increased risk of being subject to allegations of violations of laws and regulations. Over the years, HEINEKEN has constantly been looking to enhance its internal compliance system and resilience to the changes of the legal environment.' [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Audit Committee focuses on supervising the activities of the Executive Board with respect to, among others, 'the operation of the internal risk management and control system, including the enforcement of the relevant primary and secondary legislation and supervising the operation of codes of conduct', however, no evidence found in relation to an assessment of the adequacy of the enterprise risk management system itself in managing human rights. [Audit Committee Regulations: theheinekencompany.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Communicates its policy to all workers in own operations: In its Annual Report 2017, the Company indicates: ' The Code and its policies are available in more than 40 languages both online and as a printed booklet. Communication and training is provided to employees worldwide to raise awareness about the Code and its policies. A mandatory e-learning exposes all employees to practical business conduct dilemmas. By the end of 2017, more than 75,000 employees had completed this training, either online or in the classroom (2016: 50,000). We implemented our Business Conduct framework in four new operating companies.' [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder: The Policy indicates that 'It is important to integrate and implement the HEINEKEN Human rights Policy and practices throughout all our OpCos in line with the United Nations Guiding Principles on Business and Human Rights. The implementation is supported with communication materials, translation of the policy in the relevant languages, online training, guidelines on how to implement this policy and human rights workshops in selected markets.' In addition, on its website section 'Respecting Human Rights, it indicates: 'The new policy will be communicated as part of the Code of Business Conduct refresh, supported by training and a practical guidance document.' However, no evidence found on how it is communicated to affected stakeholders including local communities. [Human Rights Policy, 2018: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Steps to communicate policy commitments to BRs: In its Annual Report 2017, the Company indicates: 'Every supplier is asked to abide by our Supplier Code, which sets out clear guidelines for how we expect them to act in the areas of Integrity and Business Conduct, Human Rights, and the Environment. The Supplier Code procedure is implemented among first tier suppliers, and we expect our suppliers to ensure that their suppliers adhere to the same standards'. However this Code does not include all ILO core. [Annual report, 2017: theheinekencompany.com] • Not met: Including to AG suppliers: See above [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: The report also states that the Company safeguard's compliance through a risk-based step-by-step process that includes suppliers signing of the code: 'By signing the HEINEKEN Supplier Code, suppliers agree to comply with our principles of integrity, environmental care and human rights. [...]'. However, this Code does not include all ILO core. [Annual report, 2017: theheinekencompany.com] • Not met: Including on AG suppliers: See above [Annual report, 2017: theheinekencompany.com]

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B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments: In its Annual Report 2017, the Company indicates: 'Communication and training is provided to employees worldwide to raise awareness about the Code and its policies. A mandatory e-learning exposes all employees to practical business conduct dilemmas. By the end of 2017, more than 75,000 employees had completed this training, either online or in the classroom (2016: 50,000). We implemented our Business Conduct framework in four new operating companies'. In addition, it indicates: 'The Code of Business Conduct training has to be completed by all HEINEKEN employees', however this Code does not include all ILO core. [Annual report, 2017: theheinekencompany.com] • Met: Trains relevant managers including procurement: In its 'Brand Promoters Policy', the Company indicates: 'All Commerce, Procurement and HR Teams, who are involved with Brand Promoters, must complete a mandatory baseline e-learning. This e-learning includes all key aspects of this Policy.' This policy makes reference to the new Human Rights Policy, which covers all ILO core areas. [Brand Promoters Policy: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Monitoring implementation of HR policy commitments: In its Annual Report 2017, the Company indicates: 'Management is supported by second line of defence functions (e.g. internal control, business conduct and other functional risk management teams). These functions oversee compliance with HEINEKEN's policies, process and controls, facilitate the implementation of effective risk management practices and drive continuous improvements of internal controls. Global Audit provides independent and objective assurance and consultancy services. It employs a systematic and disciplined approach to evaluate and improve the organisation's governance and risk management processes including reliability of information, compliance with laws, regulations and procedures, and efficient and effective use of resources. [...] Compliance with company policies is periodically assessed both in OpCos and in Global Functions. Deviations from the defined standards are included in a global monitoring and follow-up tool, which supports management in addressing these deviations.' [Annual report, 2017: theheinekencompany.com] • Not met: Monitoring AG suppliers: In addition, the Company indicates: 'We safeguard compliance through a risk-based step-by-step process: <ol style="list-style-type: none"> 1. By signing the HEINEKEN Supplier Code, suppliers agree to comply with our principles of integrity, environmental care and human rights. 2. The intensity with which we monitor compliance against our Supplier Code depends on the risk profile of a supplier. Our supplier risk analysis (SRA) tool assesses suppliers based on their type of business and level of supplier-specific risk. All potentially high-risk suppliers are required to go through step three of the programme. 3. We use the EcoVadis34 sustainability monitoring and scorecard to assess the strength of potentially high-risk suppliers' management systems for ensuring compliance with our Code. Suppliers complete an online questionnaire and provide supporting evidence, which EcoVadis analyses alongside a 360° scan which looks at whether a supplier has been mentioned positively or negatively in the media, by NGOs or trade unions. They then create a supplier scorecard. Suppliers that are still considered high-risk go on to Step 4 and undergo a site audit. 4. The final step is a site audit by a third party using our Supplier Code as the basic assessment criteria. We use the SMETA35 four-pillar protocol. It enables us to contribute to and use the global database of audits held by AIM-Progress, the responsible-sourcing platform used by over 40 of the world's leading fast-moving consumer goods companies'. However, its current Supplier Code does not cover all ILO core. [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process: The Company indicates that 'if a case of non-compliance is found, we discuss corrective actions with the supplier and allow for a commitment to correct the non-compliance within a given timeline. If commitment and actions is not forthcoming, HEINEKEN will cease to do business with the supplier'. It also states that 'We stopped working with 85 suppliers in 2017 because they were unwilling to sign our Supplier Code (47), refused to subscribe to EcoVadis (37) or refused to undergo a site audit (1). It also indicates that compliance remained at 78%. However, it is not clear how many cases of non-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliances were found (times the corrective action process was necessary). [Annual report, 2017: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Not met: Example of corrective action [Sourcing sustainably: theheinekencompany.com] • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company has stated that 'All new suppliers receive our Supplier Code containing environmental criteria. Refusing to sign or failure to comply with our Supplier Code can lead to a termination of commercial relationship'. Human rights is part of the Supplier Code, although it does not cover all ILO core. [GRI Table, 2017: theheinekencompany.com] • Met: HR affects on-going supplier relationships: In its Annual Report 2017, the Company states: ' If a case of non-compliance is found, we discuss corrective actions with the supplier and allow for commitment to correct the non-compliance within a given timeline. If commitment and action is not forthcoming, HEINEKEN will cease to do business with the supplier'. [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Not met: Working with suppliers to improve performance: In its Annual Report 2017, the Company indicates: 'We strive for continuous improvements to ensure ongoing compliance with our Supplier Code. If a case on non-compliance is found, we discuss corrective actions with the supplier and allow for commitment to correct the non-compliance within a given timeline' However, there is no further information on how it is working with suppliers to improve performance.
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: Although the Company discloses its work to engage with different stakeholders, there is no information about how it has identified this stakeholders and if human rights issues is part of the identification process. [Engaging with our stakeholders: theheinekencompany.com] • Not met: Frequency and triggers for engagement • Not met: Workers in SC engaged • Not met: Communities in the SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates: 'Based on input from stakeholder roundtables with NGOs and academic experts, we set up an internal cross-functional platform gathering HEINEKEN experts for the Africa and Middle East Region addressing Human Rights related issues relevant for the region. We also started to develop operational guidance, with support from Shift, on how to conduct business and operate in challenging social, political, and economic contexts.' In addition, on its website section 'Respecting Human Rights', the Company states: 'The renewed policy incorporates work conducted with Shift, a leading centre of expertise on the UN Guiding Principles on Business and Human Rights, which enabled us to identify seven salient human rights risks: health & safety, discrimination, child labour, freedom of association, excessive working hours, fair wages and access to water.' [Annual report, 2017: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] • Met: Identifying risks in AG suppliers: On its website, the Company indicates: 'We have been developing our Human Rights due diligence process since 2016 to better understand and address the human rights risks in our own operations and across our value chains. So far, we have done this working with Shift in Mexico, Myanmar, Nigeria, Haiti and South Africa. We will continue to expand the approach into other markets.' [Annual report, 2017: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above [Annual report, 2017: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with stakeholders: 'Engaging with experts, NGOs, communities and employees in the countries where we operate is vital to better understand and address our risks. We also further test our salient risks with the support of NGOs, employees and partners to ensure we do not lose sight of other relevant human rights issues.' [Respecting Human Rights: theheinekencompany.com] • Met: In consultation with HR experts: As indicated above, NGOs and academic experts. [Annual report, 2017: theheinekencompany.com] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In its Annual Report 2017, the Company indicates: 'We will continue our risk assessment with the expert support of Shift by organising Human Rights workshops in 10 more markets across all regions in 2018–2020. These workshops will focus on practical and impactful action planning to address identified Human Rights risks. Based on input from stakeholder roundtables with NGOs and academic experts, we set up an internal cross-functional platform gathering HEINEKEN experts for the Africa and Middle East Region addressing Human Rights related issues relevant for the region. We also started to develop operational guidance, with support from Shift, on how to conduct business and operate in challenging social, political, and economic contexts.' <p>In addition, the Company indicates: 'Based on our work with Shift, we have identified seven salient Human Rights risks for our business in our own operations and/or our value chains: discrimination; trade union rights; fair wages and income; child labour in our supply chain; working hours; access to water; and health and safety. Most of the issues identified are especially a risk for our operating companies in emerging economies.' [Annual report, 2017: theheinekencompany.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of salient risks: See above [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Company indicates that it has been developing its due diligence process since 2016 and, following the assessment step, in integrating and acting, it states that has 'revised and sharpened our human rights policy based on the identified salient issues', that has strengthened the human rights section of the supplier code, and that it is continuously working 'with regions and OpCos to address specific issues, such as operational guidance for challenging contexts and on principles and guidelines for the deployment of Brand Promoters, and we developed practical and impactful human rights action plans in Mexico, Myanmar, and Nigeria'. [Respecting Human Rights: theheinekencompany.com] • Met: Example of Actions decided: The Company explains the assessment carried out in Africa in relation to working conditions of brand promoters. It concluded that that the single biggest issues was that policies and management systems were lacking in many of the agencies, that improvements should be made in procurement and contracting agency services, including background checks, ensuring commitment of and adherence to the supplier code. As a consequence, the Company has defined a set of seven guiding principles and created a new Brand Promoters Policy with guidelines on the contracts and working conditions of brand promoters. To ensure policy implementation, the 'monitoring of compliance with the Brand promoters Policy is now fully embedded into the existing Heineken governance framework'. In addition, 'internal and external compliance audits will be conducted on a periodic basis'. [Working with Brand Promoters, 2018: theheinekencompany.com] • Met: Including in AG supply chain: See above. [Working with Brand Promoters, 2018: theheinekencompany.com & Respecting Human Rights: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness

Indicator Code	Indicator name	Score (out of 2)	Explanation
	effectiveness of actions to respond to human rights risks and impacts		Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Comms plan re identifying risks: The Company has explained in its annual report and on the website how it is implementing a due diligence process, including human rights risks and impacts identification in both own operations and supply chain (see b.2.1). [Respecting Human Rights: theheinekencompany.com & Annual report, 2017: theheinekencompany.com] Met: Comms plan re assessing risks: The Company has demonstrated through its publicly available documents how it assesses its human rights risks and impacts and discloses salient issues (see b.2.2). [Annual report, 2017: theheinekencompany.com] Met: Comms plan re action plans for risks: The Company has demonstrated through communications on its website how the due diligence process includes a system to take action against salient human rights issues, and provides an example of action taken. [Respecting Human Rights: theheinekencompany.com & Working with Brand Promoters, 2018: theheinekencompany.com] Not met: Comms plan re reviewing action plans Not met: Including AG suppliers <p>Score 2</p> <ul style="list-style-type: none"> Met: Responding to affected stakeholders concerns: 'On 14th December 2015, former employees of Bralima Heineken in Bukavu, DRC (period 1999-2003) notified a specific instance with the Dutch National Contact Point with regard to an alleged violation of the OECD Guidelines for Multinational Enterprises by Bralima in Bukavu, Democratic Republic of Congo, and Heineken N.V., based in Amsterdam, The Netherlands. <p>The NCP concluded that on the basis of the criteria for further examination of the Commentary on the implementation procedure of the OECD Guidelines for multinational enterprises (2000) the notification merited further consideration and offered its good offices to resolve the issue by facilitating a dialogue between the parties.</p> <p>Both parties accepted this offer and an expert mediator was appointed by the NCP. The dialogue was conducted under the chairmanship of the NCP and resulted in a satisfactory outcome for both parties.</p> <p>Final statement describing the process and outcomes of the dialogue.' [NCP - Bralima vs Heineken: oecdguidelines.nl]</p> <ul style="list-style-type: none"> Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: The 'speak up' system is available to all employees and allows reporting violations of the code of conduct or any other policy of the Company. The Speak up policy describes the different channels available. This covers a general commitment to Human Rights. [Code of business conduct, 03/2016: theheinekencompany.com & Speak up policy: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Number grievances filed, addressed or resolved: The Company discloses the number of reports received through Speak up (146) and also indicates that 56% of the reports were substantiated and corrective and preventative actions were taken where relevant and possible. In addition, it reports that 12% of the reports were related with discrimination and harassment. [Annual report, 2017: theheinekencompany.com] Met: Channel is available in all appropriate languages: The speak up policy states that 'you can use the external Speak Up Service. This gives you the opportunity to raise concerns confidentially and in your own language'. The EthicsPoint website is available in more than 30 languages. [Heineken Ethics point: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Opens own system to AG supplier workers: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. [Speak up policy: secure.ethicspoint.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. However, no evidence found of mechanisms being available to communities. [Speak up policy: secure.ethicspoint.com & Heineken Ethics point: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The mechanisms are available on the website and in more than 30 languages. In addition on its website section 'Code of Business Conduct', the Company indicates: 'Speak Up is available to anyone, either inside or outside our Company. [...] People outside our Company can follow this link to access our externally operated Speak Up Service. Through this online platform, you have the possibility to directly file a report and to call our independently run confidential hotline.' [Code of Business Conduct website: theheinekencompany.com & Heineken Ethics point: secure.ethicspoint.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales: The Speak up policy states that 'all concerns that are received by our company are logged into a case management system. Depending on the nature, urgency and potential impact of your concern, the case will be handled by an OpCo or Global Case Manager who works under the supervision and instruction of the Integrity Committee. <p>The Company states that 'if you submit a report, you will receive a confirmation of receipt within 5 to 7 working days, with an estimate of how long it will take to handle and assess your concern. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average closure of the matter can be expected within 1 to 3 months.' [Speak up policy: secure.ethicspoint.com]</p> <ul style="list-style-type: none"> • Met: How complainants will be informed: The speak up policy states that 'after you complete your report (online or by phone), you will receive a unique code called a 'report key'. You can use this key to call back or access the website to check progress on your report. You can see whether the person dealing with your report has feedback for you or further questions'. It also indicates that 'you will be informed of the overall findings, i.e. whether or not our Company has established that misconduct has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned'. [Speak up policy: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Integrity Committee has the objective 'to investigate reports of serious wrongdoing or malpractice on corporate level, or joint ventures, on reports that cannot be handled on local level or are according to the whistleblower not properly handled on that level.' However, it focused only in the internal affairs of the Company. [Terms of Reference of Integrity Committee: heinekenusa.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The speak up policy states that ‘you will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for Speaking Up’. The Speak up website also contains references to protection against retaliation: ‘Our Company does not tolerate any form of threat or retaliation against a person for raising a concern in good faith. This protection also extends to anyone giving information or cooperating in a follow-up investigation’. Speak up ‘is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers)’. [Speak up policy: secure.ethicspoint.com & Heineken Ethics point FAQ: secure.ethicspoint.com] • Met: Practical measures to prevent retaliation: It is possible to report anonymously. In addition, reporting channels are managed by an external company. [Speak up policy: secure.ethicspoint.com & Heineken Ethics point: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: As part of the agreement with Bralima former employees, the Company committed to improve its policy and practices on doing business in a volatile and conflict-affected countries, which it is doing with the updated version of its Human Rights Policy and with the updating of other related policies and Codes (Supplier Code). [NCP - Bralima vs Heineken: oecdguidelines.nl] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The new Human Rights Policy indicates: 'All of our employees should be paid sufficiently for a decent standard of living, enough to satisfy basic needs for the employee and his/her family. Where the local statutory minimum wage is non-existent or not sufficient to ensure a decent standard of living, we will pay our employees enough to meet this standard.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.' However, the Suppliers Code is not still available. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to manufacturing sites (factories or fields) Score 2 • Not met: Discloses significant parts of SP and why
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Child Labour rules in codes or contracts: The new Human Rights Policy indicates: 'We respect the rights of the child as stated in the United Nations (UN) Convention on the Rights of the Child, including the right to education, the right to rest and play and the right to have basic needs met. We will not engage in, or allow, child labour within our facilities or in those of our suppliers. We are also committed to supporting the elimination of child labour in our value chain. We follow the ILO definition of the minimum age for admission to employment or work. This age shall not be lower than the age of completion of compulsory schooling and in any case not be under 15 years of age, except in some countries, where it is 14. We comply with local law if it sets a higher age to define child labour.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.' However, the Suppliers Code is not still available. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Debt and fees rules in codes or contracts: The new Human Rights Policy indicates: 'We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. This means that none of our employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by HEINEKEN. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.' However, the Suppliers Code is not still available. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: How working with suppliers on debt & fees Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Free movement rules in codes or contracts: The new Human Rights Policy indicates: 'We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. This means that none of our employees should pay for their job. Fees and costs associated with recruitment and employment should be paid by HEINEKEN. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.' However, the Suppliers Code is not still available. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: How working with suppliers on free movement Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: The new Human Rights Policy indicates: 'We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognised labour union, we will establish a constructive dialogue with this labour union. Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.' In addition it indicates: 'Our human rights standards also apply to our suppliers through the HEINEKEN Supplier Code. This code helps suppliers to understand HEINEKEN's minimum standards. We expect our suppliers to familiarise themselves with its content.' However, the Suppliers Code is not still available. [Human Rights Policy, 2018: theheinekencompany.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements: The Company indicates in its Supplier Code: 'Working conditions should allow for safe working practices and support the occupational health of employees'. However it does not set out clear health and safety requirements. [Heineken Supplier code, 07/2010: theheinekencompany.com] • Met: Injury Rate disclosures: In its Annual Report 2017, the Company reports the number of accidents, and FTE of Company's personnel and contractor or suppliers. [Annual report, 2017: theheinekencompany.com] • Met: Lost days or near miss disclosures: See above [Annual report, 2017: theheinekencompany.com] • Met: Fatalities disclosure: In its Annual Report 2017, the Company indicates: 'We were deeply saddened that 14 people lost their lives while working within the HEINEKEN Company in 2017 (2016: 15). Six of these people were direct HEINEKEN employees and eight were employed by contractors or suppliers. Four people lost their lives in Mexico, three in Democratic Republic of Congo, two in Brazil, one each in Ethiopia, Nigeria, Slovakia, South Africa and United States of America. Seven fatalities involved traffic accidents, four fatalities were crime related and three were due to falls.' [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in the progress made
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues: In its Annual Report 2017, the Company indicates: 'We have committed to balance the water we consume in water-stressed areas. The water stewardship projects that enable us to do it are increasingly varied – from restoring wetlands and testing whether barley planted among olive trees in Spain can help conserve water, to researching innovative new irrigation techniques with farmers in Mexico. But this is not an easy process and takes time. One of the challenges is mobilising stakeholders, as everyone has a role to play.' In addition, it reports: 'In 2017, the HEINEKEN Africa Foundation approved 10 new projects totalling an investment of €1 million. Four of these projects will provide access to safe drinking water to communities in Burundi, DRC, Kenya, and Sierra Leone, with the aim to benefit up to 82,000 people.' However, there is no specific reference to actions made in order to improve its suppliers' practices in relation to access to water and sanitation. [Annual report, 2017: theheinekencompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Area: Right to land Headline: Oaxaca Wind Farms to supply Heineken and Femsa impact indigenous peoples in Oaxaca Sources: Jornada, 05/08/2015 - jornada.unam.mx Business and Human Rights - business-humanrights.org Equitable Origin report entitled 'Defining and Addressing Opposition to Wind Development in Oaxaca', January 2016 - d2oc0ihd6a5bt.cloudfront.net_nawindpower.com and gob.mx Allegation: Heineken has been implicated in land rights disputes linked to wind farm projects in the Mexican state of Oaxaca. As of 2015, 21 wind farms have been built in Oaxaca and the number is expected to rise with the Mexican Government's targets to increase clean energy in the country. A number of these projects have been linked to human rights concerns, primarily related to the rights of indigenous peoples, land rights, lack of adequate consultation and security concerns including intimidation and death threats. Indigenous Ikoots communities claim that their right to free, prior & informed consent has not been respected. The 396 megawatts that will be produced by the controversial Mareña Renovables project will be sent to Femsa and Heineken. <p>Community resistance has indefinitely delayed and ultimately led to the cancellation of the Mareña project. Later on, the project was moved from the common land to a private property land and renamed to Energía Eólica del Sur (EES).</p> <p>According to a report by Equitable Origin, there are similar allegations about the Eólica del Sur project and in January 2018, Mexico's Mexican Supreme Court has ruled that the indigenous people had a "right to prior, free and informed consultation" about the project on their land and, thus, ordered a halt to construction .</p>
E(1).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public response available: The Company responded via the Business and Human Rights Resource Centre in 2012 to similar issues stating: 'We have been made aware that there are some allegations by local communities stating they never granted permission to erect the wind farm in their communal lands. We are surprised by this claim, since the information we have received from Mareña Renovables is that there is strong local support for the project and that all land lease agreements were signed with inhabitants of the areas with the presence of local authorities and after extensive public assemblies. In addition, the minutes of the assemblies are registered with the Agrarian Authorities. <p>There has been extensive information regarding the project, and since August 2011 at least 63 consultation or information meetings have been carried out in San Dionisio del Mar, 33 in Santa María del Mar and 42 in Alvaro Obregón'.</p> Score 2 <ul style="list-style-type: none"> Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company policies address the general issues raised Met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> Not met: Policies address the specific rights in question: As far as CHRB was able to ascertain, the Company does not have a public policy related to land.
E(1).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Engages with affected stakeholders: Energía Eólica del Sur has engaged with stakeholders. The Mexican Ministry of Energy announced that as a result of the consultation process, the Zapotec community has approved and accepted the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>construction of the wind farm project. However, other groups have continue to resist the project</p> <ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders: Though the project reached an agreement with some of the groups on remedy, it is not clear whether all groups were party to this agreement. • Not met: Has improved systems and engaged affected stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.29 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Heineken NV made data public that met one or more elements of the methodology in 24 cases, leading to a disclosure score of 2.29 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows: Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company indicates in its Annual Report 2017: 'We gather data in accordance with guidelines and definitions based on the Global Reporting Initiative (GRI Standards) Guidelines, unless stated otherwise'. It also discloses a GRI table. [Annual report, 2017: theheinekencompany.com & GRI Table, 2017: theheinekencompany.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0.5 out of 4	<p>Heineken NV met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.