

The Heineken Code of Whistle Blowing

Executive summary

The whistle blowing procedure is developed in order to promote transparency, to underpin the risk management systems and to help protect the reputation of the organisation. It defines the procedure for employees and others, to report (suspicion of) serious contravention of the Heineken Code of Business Conduct.

It is based on advice from KPMG and discussed with the CSR Advisory Board and specifically with MMO Africa.

By this Code Heineken is in compliance with the Corporate Governance regulation in the Netherlands. Local adaptation of this policy is only permissible in order to comply with local mandatory law and regulations.

Principles

The procedure is based on the following principles:

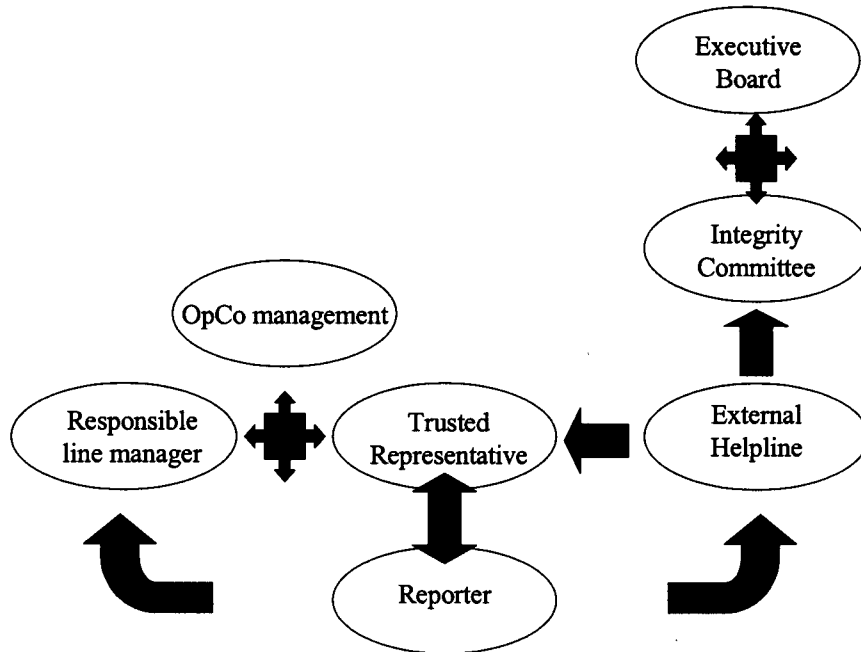
- Heineken will act on any serious wrongdoing or malpractice within the company.
- A toll free number (external agency) offers employees the possibility to report serious wrongdoing 24/7 in their own language and, if the whistle blower chooses so, guarantees anonymity
- Local management is responsible for managing an issue locally. The Executive Board decides on international issues, in case of appeal and if local management is involved in alleged serious wrongdoing or malpractice.
- The whistle blower will be offered protection, confidentiality and on request anonymity.
- Heineken will not tolerate false and malicious allegations and will take disciplinary action where this occurs.
- Implementation and communication of the procedure is GM/ MD's responsibility.
- An Integrity Committee will prepare decisions and monitor execution on corporate level on behalf of the Executive Board.
- The Code does not replace existing procedures for handling (individual) grievances.

Procedure

We propose a whistle blowing procedure that has the following features in headlines:

- An infringement of Code of Business Conduct or any other serious misconduct or malpractice is primarily reported to the responsible line manager.
- If – for whatever reason – this is not possible or desirable, the reporter can get in touch with the local trusted representative or call a helpline (toll free international number) that will establish contact between the reporter and the local trusted representative (coach) or the Integrity Committee.
- If the whistle blower chooses to remain anonymous, (s)he will receive a 'call log number', which allows him/her to call back for checking the status of the investigation.
- The Trusted Representative / Integrity Committee will investigate the issue. Local management / the Executive Board will decide.

In graphics, the procedure can be represented as follows:



Implementation

Local implementation of the procedure and communication is GM/MD's responsibility and will be done together with the implementation of the Code of Business Conduct. It implies:

- a. Information to employees about the procedure in headlines (toll free number, protection, issues, false allegations etc.) This will also be posted on the company/corporate website.
- b. Appointing one or more local Trusted Representative(s)
- c. Providing proper instructions regarding the procedure to those involved and monitors correct execution.
- d. Installing proper administrative procedures.

Implementation of the Corporate procedure, the helpline and monitoring of the procedure will be done by Corporate Affairs.