



MODERN SLAVERY STATEMENT 2021

This statement is published in accordance with section 54(1) of the UK Modern Slavery Act 2015 (“MSA”).

It sets out the actions that Molson Coors Brewing Company (UK) Limited and its UK subsidiaries (collectively, “**Molson Coors**”) have taken during the financial year ended 31 December 2021 to identify and prevent modern slavery risks in our business and supply chains.

At the time of publication of this statement the following subsidiary companies meet the reporting threshold contained in the Modern Slavery Act 2015:

1. Molson Coors Brewing Company (UK) Limited
2. The Cobra Beer Partnership
3. Sharp’s Brewery Limited

This statement was approved by the Board of Molson Coors on 13th June 2022.

Every time a beverage is picked up there is an imprint left behind. At Molson Coors we’re making sure it is a positive one.

MODERN SLAVERY
STATEMENT 2021
(UK OPERATIONS)



Organisation Structure

Molson Coors Brewing Company (UK) Limited is part of the Molson Coors Group, one of the world's largest global brewers. Our ultimate parent company is the Molson Coors Beverage Company, a US company with dual principal executive offices in Golden, Colorado and Montreal, Quebec.

Molson Coors markets, promotes and supplies alcoholic and non-alcoholic drinks in the UK and beyond. We champion our popular global and national brands including Carling, Coors, Cobra, Staropramen and many more.

Position Statement

Molson Coors is opposed to all forms of unethical business behaviour. We recognise the harmful impact that modern slavery has on individuals and society and we are fully committed to preventing these illegal practices.

Molson Coors respects the dignity and rights of all people, and we work every day to create the right conditions for our employees and others with whom we engage to flourish and achieve their full potential.

We believe that our workforce and wider supply chain should reflect and protect the communities where we operate, the consumers who enjoy our beverages and beyond.

Molson Coors is a signatory to the United Nations Global Compact. This means that we endeavour to align our global values and our approach to doing business with the ten principles of the UN Global Compact, which are derived from the Universal Declaration of Human Rights, the international Labour Organization's Declaration on Fundamental Principles and Rights at Work and other initiatives.

Policies

Molson Coors supports the goals of the Modern Slavery Act and takes seriously its responsibility to act with due diligence to avoid infringing on the human rights of others and address any impact on human rights if they occur.

To that end:

- [Our Standards for Business and Supply Partners](#) (the “**Standards**”) help us to manage this risk by providing guidance to our suppliers and partners about the minimum standards that we expect.
- [Molson Coors Employment Principles](#) underpin a number of our people policies and are guided by international human rights standards. They outline our commitment to supporting an open and inclusive workplace where all employees are valued, engaged and inspired to be the best that they can be and refer specifically to modern slavery issues such as forced labour, child labour, work hours and wages. Molson Coors encourages its business partners to uphold these principles and to adopt similar approaches within their business.
- Our [Code of Business Conduct](#), (the “**Code**”) is the compass that guides the way that we work. The Code is an internal guide for employees which sets out to influence who we are, what we do and how we do it (both culturally and strategically) by working together as a business, within our marketplace, our community and with our investors. The Code applies to all officers, directors and employees of Molson Coors and steps through our guiding principles about how we win in the right way in the marketplace. Importantly, the Code instils in our employees the value of diversity, equity and inclusion, and it condemns harassment and discrimination.

Supply Chain

At Molson Coors we work with a broad range of suppliers based in the UK and globally who deliver goods and services for our brewing and commercial operations.

We have over 1,600 suppliers for the UK business covering 12 categories such as raw materials, packaging, brewing, distribution, marketing. Some of our services, for example IT, are outsourced to third parties.

We acknowledge there is a risk in the supply chains for these operations and have the following due diligence in place to identify and mitigate those risks:

- Vendor set-up questionnaire – risks in supplier responses are reported to procurement category managers.
- [The Standards](#) – a link to our [Standards](#) is included in our standard business terms and conditions as well as our contract terms. The Standards lay out the obligations for our suppliers to comply with employment standards and human rights.
- Tender process – our tender documentation contains our Supplier Standards and Code of Conduct, both of which include the obligations which we expect our suppliers to comply with.
- Procurement Risk Register – [Molson Coors introduced a procurement risk register in 2021](#) to record risks we consider exist in our supply chain, including any related to labour standards or human rights violations.
- Supplier Ethical Data Exchange (“**SEDEX**”) – Molson Coors is a member of SEDEX and we encourage our strategic suppliers to become members of this [organisation](#) . We continue to review the suppliers which are members of SEDEX to increase the number of strategic suppliers participating in the programme.
- As an integral part of supplier’s contracts, Molson Coors includes an Anti-Slavery clause which sets out key anti-slavery requirements that suppliers need to comply with.
- We seek to include a Right-to-Audit clause in our supplier contracts. With a number of business activities carried out by third parties outside direct control of the company, the Right-to-Audit has increasing importance and represents a powerful tool for risk control and mitigation.



Management Systems

Training

Molson Coors employees complete business conduct training when they first join the business, usually within the first 30 days and then every other year thereafter. This training aligns our employees with the principles of our [Code](#), instills in our employees the value of diversity, equity and inclusion, condemns harassment and discrimination and provides guidance around a multitude of ethics and compliance issues.

For the end of the reporting period over 2021 the overall completion rate of the business conduct training at Molson Coors was recorded at being 99% of current employees throughout our global operations.

Whistleblowing

Our [Code](#) also encourages employees to 'Speak Up' when they see something that could cause damage to themselves; their co-workers; the environment; the public; the company's business or reputation and to stockholders.

Molson Coors employees can use an ethics and compliance hotline to report anything that they believe is a violation of the Code or any other company policy.

This hotline provides a third-party confidential and anonymous means for employees to voice their concerns regarding ethics and compliance issues or potential violations. The hotline is available via telephone or internet to make the resource as convenient as possible for our employees.

In addition to the ethics and compliance helpline, Molson Coors employees in the UK have a second 24-hour employee helpline, the 'Employee Assistance Program hotline' (the "**EAP hotline**"). Like the ethics and compliance helpline, the EAP hotline is confidential and run by a third party. The EAP hotline provides a support service for employees to use on a non-specific basis, regardless of whether the support they need is personal or work-related.

Management Systems

Human Rights

Employees

Our due-diligence process for all new hires includes the undertaking of checks to confirm the identity of the worker and to verify their right to work. Aside from the recruitment process, managers are expected to conduct one-to-one meetings on a monthly basis with their direct reports to foster open and honest communication, including in regard to the employee's well-being. These conversations foster a trusting environment where employees can feel comfortable sharing personal and professional concerns and enable managers to spot if things are not quite right.

All Molson Coors employees are issued with a written contract of employment that complies with all applicable labour laws, including wages; benefits; working hours; minimum wage; and no unauthorised deductions.

All UK employees at Molson Coors have their salary benchmarked against like-for-like roles within our industry on an annual basis. Our contracts of employment contain reasonable notice provisions to allow our employees to terminate their employment with us should they wish to do so.

Ongoing Development

We continue to ensure the aims of Our Imprint and Diversity, Equity and Inclusion approach are adopted throughout our business and our total supply chain. We actively identify areas where we can improve and an example of initiatives we undertook in 2021 included:

How have we developed this in 2021:

- In 2021 the procurement team completed full refresher training on how to identify risks in the supply chain and how to mitigate those risks.
- In 2021 Modern Slavery awareness supply chain training and a refresher on our Speak Up policy was delivered to our employee representatives (including union representatives).
- In 2021 we invited a number of our core suppliers to sign up to SEDEX to help reduce the risk of Modern Slavery in our supply chain.
- We continue to promote good procurement practices by supporting procurement team members who wish to study for the Chartered Institute of Purchasing & Supply qualifications.



Final Word

Molson Coors commits to raising awareness of modern slavery, human trafficking and human rights within our global organisation over its next financial year. We see this not only as a moral imperative, but as an opportunity to make a real difference in all the communities we serve.

This statement covers 1st January 2021 to 31st December 2021 and has been considered and approved by the Board of Molson Coors.

Phil Whitehead	Lord Karan Bilimoria
Western Europe Managing Director	Director
On behalf of Molson Coors Brewing Company (UK) Limited & Sharp's Brewery Limited	On behalf of: the Cobra Beer Partnership Limited