

# **Molson Coors Brewing Company**

## **Political Contributions Principles**

### **Introduction**

*Molson Coors Brewing Company (MCBC) strives to be a top performing global brewer recognized for world class corporate responsibility. We intend to conduct our business consistent with our values: Excelling, Passion, Integrity & Respect, Creativity and Quality.*

*These Principles apply to Molson Coors Brewing Company (Company), all of our business units and other entities in which we hold a majority or controlling interest.*

### **Principles**

The Company engages in the political environment in order to inform public policy makers on company and industry issues and practices and to promote corporate responsibility, including the responsible promotion and consumption of our products. Only designated Company employees may engage in public policy influence on behalf of the Company, and these employees must adhere to registration, ethics and disclosure requirements in their jurisdiction.

A record of company contributions to candidates or political parties are publicly available through government and/or political party databases. Where they are not available the Company will publicly disclose them. The following principles apply to Company political contributions:

- Contributions must be consistent with applicable laws, regulations and business practices, including the US Foreign Corrupt Practices Act and the UK Bribery Act.
- Only designated Company employees may make such contributions, and they must comply with the Company's Code of Conduct, 'Living Our Values' and get approval through the process established by the business unit Chief Public Affairs or Government Affairs Officer.
- Where political action committees (PAC) or equivalents are allowed under local election rules all applicable local laws, regulations and business practices apply.

Involvement in a political campaign or making a donation to a candidate is a personal decision. When such contributions are made the following principles apply:

- Employee contributions are strictly voluntary, with no requirement or coercion to participate; no reimbursement will be provided by the Company;
- Any and all employee contributions must be solicited and made in a manner fully consistent with applicable laws, regulations, and business practices.