

Myanmar Foreign Investment Tracking Project

Response from Heineken

Sector: Food and beverage
Region of HQ: Netherlands

1. *Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.*

We are building a greenfield brewery in Hmawbi township, close to Yangon. Total investment is around 60 million USD CAPEX. Through our operations we will create around 200 direct jobs and many more indirect jobs in the field of agriculture, distribution, HORECA and retail.

2. *Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.*

We have a global Employees and Human Rights Policy in place. We will formally launch this policy in Myanmar in 2015. Business conduct procedures and training is conducted as part of our employee induction programme (available in Burmese) and is included in our Employee Handbook given to all incoming staff. Our Employees and Human Rights Policy can be found here: <http://www.theheinekencompany.com/sustainability/governance/our-policies>. All information about our Code of Business Conduct is published here: <http://www.theheinekencompany.com/about-us/business-conduct>. Locally, we also work with the ILO Liaison Office in Myanmar and the Myanmar Centre for Responsible Business (an NGO funded by an international consortium led by the UK's Department for International Development).

3. *Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?*

Our local Managing Director is responsible for compliance. This is managed via a regular Control Self-Assessment audits and an annual Internal Audit, both of which are managed from the regional office, and the findings reported back to the Global team.

4. *If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?*

N/A

5. *How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?*

We organise stakeholder engagement and visit the communities that surround our brewery to understand and address their needs when and where appropriate.

6. *Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.* Contact person for Myanmar is Government Affairs and Sustainable Development Manager Zita Schellekens; zita.schellekens@heineken.com

We also have a Speak Up policy and - service which is not only open to our employees but to anyone of the general public that wants to share a concern with us. The link to our externally operated Speak Up Service is: <http://speakup.heineken.com>

This online platform offers the possibility to directly file a report, to call our independently run confidential hotline and to find all related information on our Speak Up Policy.

7. We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:

All policies mentioned below can be found on our Company website:

<http://www.theheinekencompany.com/sustainability/governance/our-policies>

- a. *Freedom of association and collective bargaining*
 - Employees and Human Rights Policy: paragraph 'Freedom of association and the right to collective bargaining'
 - Supplier Code
- b. *Living wages*
 - Employees and Human Rights Policy: paragraph 'Remuneration'
- c. *Workplace health and safety*
 - Employees and Human Rights Policy: paragraph 'Health and safety'
 - Global Occupational Health and Safety Policy
 - Supplier Code
- d. *Child labour*
 - Employees and Human Rights Policy: paragraph 'Child labour'
 - Supplier Code
- e. *Forced labour*
 - Employees and Human Rights Policy: paragraph 'Forced labour'
 - Supplier Code
- f. *Anti-discrimination (whether based on race, gender, religion, nationality, etc.)*
 - Employees and Human Rights Policy: paragraph 'Non-discrimination'
 - Supplier Code
- g. *Environment*
 - Environmental Policy
 - Energy Policy
 - Water Policy
 - Global Distribution Policy
 - Global Packaging Policy
 - Supplier Code
- h. *Land rights*

Extensive work was undertaken by international and local lawyers to establish the land rights for the site of our brewery
- i. *Relocation*