



TITLE: Employee Alcohol Policy **ISSUE DATE:** 07/01/2008
APPROVAL: Chief Responsibility and Ethics Officer

<p>Purpose:</p>	<p>This Policy sets forth guidelines and established uniform procedures for MillerCoors and its subsidiaries and affiliates. MillerCoors produces award winning, quality beers that are responsibly enjoyed by millions of consumers. Drinking beer in moderation can be a pleasurable part of a balanced lifestyle. MillerCoors recognizes that the vast majority of its employees and consumers drink responsibly and are proud of our products and our company. MillerCoors takes pride in its leading efforts to promote the responsible use and consumption of its products.</p> <p>In continuing these efforts and to ensure the safety of our employees, the following policy is designed to establish uniform standards for responsible alcohol consumption during work events, while at company facilities and outside the workplace that uphold the company's reputation, provide a safe workplace for employees and comply with applicable laws.</p> <p>The image and reputation of a company is determined in large part by the way its employees are seen to behave. This is particularly true for a company in the beer business. Our employees are our ambassadors and can enhance our reputation by their responsible attitude toward drinking. Irresponsible use or abuse of our products, however, can jeopardize MillerCoors reputation and reflect negatively on our products.</p> <p>MillerCoors also recognizes that our employees and consumers expect us to continue our efforts and be seen as doing our part in marketing our products responsibly. MillerCoors is committed to protecting our right to market and sell beer to legal drinking age consumers by upholding responsible marketing and advertising practices directed only to legal drinking age consumers.</p> <p>MillerCoors has separately instituted an advertising and marketing compliance program, which is a comprehensive and systematic approach that ensures our advertising and marketing practices adhere with the letter and spirit of the laws regulating the alcohol industry. This includes adherence to the Beer Institute Advertising and Marketing Code and the MillerCoors Marketing Compliance Manual.</p>
<p>Scope:</p>	<p>This Policy is applicable for MillerCoors, its subsidiaries and affiliates. This Policy is applicable to all MillerCoors employees and contract employees working on behalf of the Company, during and in work environments and occasions, whether at company facilities or in company-related settings.</p>
<p>Accountability:</p>	<p>All employees are expected to read, be familiar with and acknowledge their understanding of this Policy on a yearly basis. The Corporate Responsibility and Ethics Division, in consultation with Legal and Human Resources, is responsible for issuing and updating this policy as necessary to comply with current regulations and applicable company policies. It is the responsibility of all MillerCoors employees to ensure that their performance at work and their judgment are not impaired by alcohol.</p>
<p>Policy/ Procedure:</p>	<p>I. Personal Conduct</p>

Whether or not to drink alcohol beverages is entirely a personal decision. No employee is expected to drink because MillerCoors is in the beer business, nor is employment conditional upon your decision to drink alcohol beverages. In all situations, an employee's conduct when consuming alcohol beverages is solely his/her responsibility. The company is not in a position to alter the consequences, legal or otherwise, of irresponsible alcohol consumption.

All employees must ensure that their performance at work and their judgment are not impaired by alcohol. It is unacceptable for employees to report to work or perform their job impaired or intoxicated by alcohol.

If an employee chooses to drink alcohol on approved occasions while conducting company business, he or she is expected to do so responsibly. Of course, under no circumstances will the company reimburse for any alcohol beverages purchased other than MillerCoors products without pre-approval by a Vice President or other officer of the Company. As ambassadors of our company, employees are expected to set a positive example. An employee's decision to drink alcohol beverages at a company related function includes an obligation to get home safely. It is every employee's responsibility to be sure he or she is able to drive safely. If there are any doubts, arrange alternative transportation.

A. Alcohol and the Workplace

MillerCoors recognizes that employees perform a vast scope of work on behalf of the company including brewing, packaging, marketing, selling and supporting our ability to produce and market our products. Because of these diverse responsibilities, policies have been established for our employees surrounding alcohol consumption specific to the job responsibilities they perform.

B. Corporate Facilities

The consumption of beer or any alcoholic beverage on company property is only permitted in officially designated pubs, hospitality areas, special event designated areas, official taste rooms, new product development areas and lunch areas.

Bartender service is not required at employee events on MillerCoors property but may be used. Employees that choose to drink alcohol on these approved occasions are expected to do responsibly as outlined in the Personal Conduct section of this policy.

C. Manufacturing Facilities

For safety reasons and in compliance with established law and negotiated bargaining agreements, no alcohol may be consumed by brewery employees during working hours. It is unacceptable for employees to report to work or perform their jobs while impaired or intoxicated by alcohol. In the event this policy shall conflict with a collective bargaining agreement that the company has entered into, the terms of the collective bargaining agreement shall apply.

With the plant manager's approval, specific occasions and designated areas may be recognized when plant employees may consume beer while on company property or while conducting business on behalf of the company.

D. Taste Testing Areas and New Product Development Areas

Officially appointed testers or members of taste panels are excluded from the consumption restriction but must continue to uphold the Personal Conduct Code.

E. Frederick J. Miller Pub (Milwaukee)

Beer is to be served by bartenders only. These bartenders are TIPS trained and have authority to politely refuse service to any guest. All employees are responsible for upholding high standards of behavior and courtesy in line with the company's image and the Personal Conduct section of this policy. A Safe Ride Home program is established to ensure that any guest deemed unable to drive safely receives a paid taxi ride to his/her home. All employees will be required to show company ID and all guests must be prepared to show proof of age.

II. Off-Site Employee and Non-Employee Events and Receptions

Company-sponsored receptions or promotional events should not be held solely or expressly for the purpose of drinking. Rather, the serving of alcohol beverages should be incidental to the business purpose.

One individual (preferably a MillerCoors employee) must be designated as the person in charge of the function. The designated individual must be in attendance at all times and will assume responsibility for guideline compliance.

Alternative, non-alcohol beverages should always be available and their availability prominently evidenced. Appropriate food or snacks should be provided.

It is preferred that only professional and experienced bartenders who have completed a server training course such as TIPS® should be used as regulated by state law. A MillerCoors employee should not serve as a bartender.

All functions must have an official, preset ending time, in no case later than 1:00 a.m. local time. Alcohol beverage service should be discontinued at least one hour before the event is scheduled to end. In no event should service continue after midnight.

Should an occasion arise where a person appears impaired or intoxicated by alcohol, he/she must be politely but firmly refused additional alcohol beverages and offered a non-alcohol beverage instead. If the individual becomes belligerent, the person in charge of the event should be notified.

If, despite all efforts to prevent over consumption, someone does have too much to drink, he or she is to be dissuaded from driving. Alternative transportation (taxis, etc.) should always be arranged for anyone whose driving ability is in question. If he/she refuses alternative transportation, the local authorities should immediately be notified and the employee so informed.

For events involving non-employees, trained personnel must be provided to ensure that all participants are appropriately identified. Under no circumstances is anyone under the legal drinking age of 21 to be served alcohol.

From time to time, MillerCoors may host charitable or community events on its premises where attendees have purchased tickets that include, among other things, complimentary alcohol beverages. Where those events are three hours or less in duration, legal aged attendees should be permitted no more than three 12 ounce beers during the course of the event and, in all instances, alcohol beverage service shall cease 15 minutes before the event ending time.

A. Meetings & Entertainment

Job responsibilities frequently require employees to entertain guests, distributors and customers. If an employee chooses to drink alcohol on these approved occasions while conducting company business, he or she is expected to do so responsibly and adhere to the Personal Conduct Code. As ambassadors of our company, employees should only purchase and support the products produced by MillerCoors and its subsidiaries.

B. Hospitality Areas

Employees and guests must adhere to the personal code of conduct section of this policy as well as adhere to any rules in place while enjoying company hospitality areas.

Requests to use a meeting facility at corporate or at a brewery must be approved in advance by the appropriate manager. Emphasis should be placed on the use of such facilities during regular business hours by groups such as key retailers or civic and community organizations.

If evening use of such facilities is approved and alcohol beverages are to be served, all of the general guidelines must be followed. The function should be limited to three hours with 10:00 p.m. being the latest any group should be authorized to use the company's facility. With plant manager approval, shift variations may be accommodated. Requesting groups must be advised of these restrictions in advance.

III. Offenses Committed Outside the Work Place

MillerCoors has a reasonable and legitimate interest in protecting its business from harm caused by the actions of its employees both at work and outside work. At the same time, the company recognizes and respects the right of all employees to engage in activities outside employment that are private in nature and that do not in any way conflict with the company's business interests. As a major employer and industry leader, offenses committed by any MillerCoors employee outside work may also affect its reputation. As ambassadors for the company, employees can enhance our reputation by demonstrating a responsible attitude towards drinking. In contrast, if employees drink irresponsibly or commit offenses related to or resulting from the consumption of alcohol, they place the company's reputation at risk. MillerCoors employees are therefore expected to recognize this and to act accordingly.

A. Drunk Driving Offenses

Drunk driving is a criminal offense and is not condoned by MillerCoors under any circumstances. While each case will be reviewed on an individual basis, employees involved in drunk driving incidents can be subject to disciplinary action, including termination. The consequences of the actual drunk driving offense in terms of actual harm (e.g. whether or not the employee was involved in an accident resulting in damage to property, injury or death) may also be taken into account but are not necessarily relevant to an assessment of the seriousness of the case.

Any employee convicted of a criminal offense involving the consumption of alcohol, or any criminal offense committed while under the influence of alcohol will be the subject of disciplinary proceedings.

Subject to the finding in the disciplinary proceedings, the appropriate sanction will depend on all the circumstances of the case. The following should be noted in this regard:

- The effect of the employee's actions on the company's reputation will be a key consideration;
- The more senior an employee, the more likely their actions will adversely affect the company's reputation;
- While each case will be considered on its facts, dismissal is likely to be the appropriate sanction in the case of an executive or manager whose conduct either risks damaging or has damaged the company's reputation;
- Although the outcome of the court proceedings may be one factor to take into account, it will not be determinative. If damage to the company's reputation has already occurred, disciplinary action may be appropriate regardless of the eventual outcome.

B. Drunk Driving Offense Involving Company Leased Vehicle

All employees with company lease vehicle privileges are required to obey all of the traffic laws and company vehicle policies. Drunk driving is a criminal offense and is not condoned by MillerCoors under any circumstances. The company will review any violations on an individual basis but employees can be subject to disciplinary action, including termination. Employees driving company vehicles have the responsibility to be sure he or she is able to drive safely. If there are any doubts, arrange alternative transportation.

IV. General Matters

A. Employee Assistance Program

MillerCoors has available to all employees, through the Employee Assistance Program (EAP), information and counseling to assist with problems such as alcohol dependency. The cost of any rehabilitation or treatment will be covered by the health insurance plan in effect at the time, to the extent that the plan provides such benefit and the employee participates in one of MillerCoors health plans. Information is available by contacting the Employee Assistance Program.

B. Disciplinary Actions

MillerCoors reserves the right to test employees where there is reasonable suspicion surrounding their ability to perform their job responsibilities due to being impaired by alcohol. In all cases, the company will bear all costs associated with testing, including travel expenses. Employees must submit to testing when scheduled by the company. All information received regarding an alcohol testing will be maintained on a confidential basis. Employees shall have the right to require that a confirmed positive sample be re-tested.

Except as otherwise provided in the policy, any employee who violates this policy or the spirit of this policy shall be subject to disciplinary action including discharge. No employee shall be discharged or disciplined solely as a result of a first positive alcohol test, as long as he or she agrees to participate in the EAP and any treatment or rehabilitation program recommended by EAP, and authorizes the EAP and provider of any such treatment or rehabilitation program to inform the company about the employee's compliance with directives of the program. A refusal to participate in, or comply with the directives of the EAP and

	<p>any EAP recommended treatment or rehabilitation program shall result in immediate discharge. Nothing herein shall preclude discipline or discharge because of conduct that would otherwise warrant discipline, regardless of whether such conduct arises out of, or is related to, alcohol use.</p> <p>C. Collective Bargaining Agreements</p> <p>In the event this policy shall conflict with a collective bargaining agreement that the company has entered into, the terms of the collective bargaining agreement shall apply.</p> <p>D. Laws and Regulations</p> <p>In the event that this policy shall conflict with any state or federal laws or regulations, only the provision in conflict shall be modified to comply with the law or regulations.</p>
Contact:	<p>Cornell Boggs, Chief Responsibility and Ethics Officer Karen Ripley, Chief Legal Officer</p>