

 Molson Coors Brewing Company Policy	Policy Title:	Global Anti-Bribery and Corruption Policy
	Effective/Revision Date:	11 October 2016
	Policy Owner/Contact: (Position title only):	VP, Global Ethics and Compliance
	Policy Approver: (Position title only):	MCBC Board of Director Audit Committee on the recommendation of the MCBC Chief Ethics and Compliance Officer

<p><i>Policy Overview/Description</i></p> <p><u>PURPOSE:</u> Molson Coors Brewing Company (“MCBC” or “Company”) prohibits bribery and corruption. Employees are expected to do business ethically, fairly, honestly and openly.</p> <p><u>SCOPE:</u> This policy applies to directors, officers, and all employees of MCBC, its worldwide operations, and subsidiaries. This policy also applies to businesses, business partners, distributors, other third parties, and any person doing business on behalf of MCBC or representing the company such as agents, contract employees, temporary employees, consultants, and contractors.</p> <p><u>POLICY:</u> MCBC prohibits bribery. Bribery includes:</p> <ul style="list-style-type: none"> • giving any sort of payment or anything of value to (1) a Foreign Official (defined below), or (2) anyone else, where the intent is to improperly influence the Official or other person to obtain or retain business or some other commercial advantage for MCBC, or • accepting any sort of payment or anything of value from anyone, where the intent is to be influenced to act improperly (e.g., a breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust). <p>This Policy prohibits direct action by employees and indirect action through others (e.g., third parties) who are performing services on behalf of MCBC, such as consultants, suppliers, distributors or agents.</p> <p>Bribes can include money, gifts, hospitality, expenses, favors, political or charitable contributions, or any direct or indirect benefit or consideration. This is not an exhaustive list. There is no set monetary threshold that defines a payment as a bribe, and the bribery does not have to result in the advantage being received to be improper. It is the intent that matters.</p>
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If you wish to provide promotional, entertainment, or travel expenses for any Foreign Official, you must first get approval from your local legal department. If you believe that a local written law permits certain payments that are not allowed by our company policy, please consult with your local legal department.

The U.K. Bribery Act prohibits the giving or receiving of bribes to commercial organizations and private individuals in addition to Foreign Officials. Bona fide corporate hospitality is permitted (see below), but care must be taken to ensure this is done in compliance with local gift and entertainment policies, and accurate records are maintained in accordance with relevant guidelines.

Payments for Routine Government Action

Facilitation payments are payments to induce officials to perform routine functions they are already obligated to perform. Such facilitation payments are considered bribery and not allowed; however, businesses may pay for legally required, “official” administrative fees or fast-track services that are clearly identifiable as being official fees. Some examples of official fees include but are not limited to:

- Processing licenses, permits, or other official documents;
- Processing government paperwork such as visas and work orders;
- Providing services such as police protection, mail pick-up and delivery, loading and unloading of cargo or providing utilities such as phone service, power, water supply; and
- Scheduling inspections associated with contract performance or transit of goods and services.

Any transaction must be appropriately categorized and accurately recorded.

Gifts, Entertainment, Hospitality and Travel Expense Funding

All business gifts, hospitality and business entertainment provided to employees or third parties or received from others working on behalf of MCBC must comply with MCBC’s Code of Business Conduct, local Gift and Entertainment policies and the Global Travel and Entertainment policy.

Bona fide business hospitality and expenses are acceptable provided they are proportionate and reasonable. For example: a CEO who is entertaining someone of an equivalent level may have a higher threshold for what is a reasonable expense as opposed to a sales person at a manager level. Local policies already provide guidance on what is considered an acceptable expenditure for a gift, entertainment or hospitality activities, so please refer to these, your line manager or your legal representative for further clarification.

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Charitable Donations

Making charitable donations is permissible as long as the donation complies with the business unit policy on Charitable Contributions and is not made for the personal, financial, or political benefit of any Foreign Official, or any MCBC customer/supplier (or their families), or to obtain favorable business treatment or commercial advantage.

Third Party Payments and Use of Agents

It is unlawful to make a payment to a third party or agent if you know or suspect that the person may use or offer all, or a portion, of the payment directly or indirectly as a bribe.

Conscious disregard or ignorance of this responsibility is not an acceptable defense. Never make a payment of any kind to any person you suspect will use or offer the funds as a bribe.

It is your responsibility to ensure that consultants, agents, or any third party working on behalf of MCBC are legitimate service providers. Appropriate bribery/corruption due diligence must be completed and retained before engaging such parties.

Books, Records, and Internal Control Requirements

Expenses incurred as a result of illegal payments must never be hidden or purposefully misclassified and must always be accurately recorded and accounted for. International anti-bribery laws require detailed and accurate accounting records for all transactions, including cash and bank accounts. Violation of this requirement may result in prosecution of individuals and/or the company.

Consequences of Violating Anti-bribery Laws

As an employee you will be held accountable whether you pay or receive a bribe yourself or whether you authorize, assist, or conspire with someone else to violate anti-bribery law. There is never an excuse for making unethical payments to any person or for directing or permitting someone else to do so.

Consequences for Individuals: Consequences of violating anti-bribery laws may include imprisonment, probation, mandated community service, and significant monetary fines against you as an individual (which may not be paid by MCBC). Violators are also subject to disciplinary action, up to and including termination from the company.

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Consequences for Molson Coors Brewing Company: Consequences of violating anti-bribery laws may include fines, fees, damage to corporate valuation, brand, reputation, loss of import/export privileges, loss of business, legal action by competitors, and litigation expenses. In addition, under some anti-bribery laws, senior officers of MCBC can be held personally liable for violations, facing fines and/or imprisonment.

Training

Relevant MCBC employees and other individuals performing duties on behalf of MCBC are required to complete training on a regular basis to ensure that they are familiar with MCBC’s anti-bribery and corruption policy and what to do if they suspect a bribery or corruption issue. We each have a responsibility for holding each other accountable to assure we follow our company anti-bribery and corruption policy. Supporting or ignoring an act of bribery is not acceptable. All leaders should ensure their team members understand and comply with this Policy.

Questions or Reports

If you want to ask a question about this policy or the training, contact either your local legal department or the Ethics & Compliance Helpline: www.ethicspoint.com or hotlink from your business unit intranet site.

In certain circumstances, proposed payments may appear to violate anti bribery and corruption law, but there may be other factors which mean that they are, in fact, allowed within the law. If you think this could be the case, you should seek advice from your local legal department.

If you are concerned that an anti-bribery violation could occur, is occurring, or has occurred, report the matter immediately to the following:

Ethics & Compliance Helpline:

www.ethicspoint.com or hotlink from your business unit intranet site.

-or-

Call the VP Global Ethics and Compliance, Molson Coors Brewing Company, Telephone: 303-927-2383

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DEFINITIONS:

A **Foreign Official** is defined as officials of any government department or agency or their family members; officials of any public international organization (such as the United Nations); political parties and party leaders; candidates for public office; executives and employees of government-owned or government-run companies (such as an employee at a state-controlled media outlet or a doctor in a state-controlled hospital); anyone acting on behalf of any of these officials; an individual holding a legislative, administrative or judicial position of any kind, whether appointed or elected, who exercises a public function on behalf of any country or territory or any public agency or public enterprise of that country, or is an official or agent of any public international organization.

REFERENCE INFORMATION:

- [Global Travel & Expense Policy](#)
- [MillerCoors Travel & Expense Policy](#)
- Molson Coors [Code of Business Conduct](#)
- MillerCoors [Code of Business Conduct](#)
- [U.S. Charitable Contributions Policy](#)

This policy is also available in the following languages (please check all that apply):

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|---------------|------------|-------------|------------|
| ✓ Bulgarian | ✓ Chinese | ✓ Croatian | ✓ Czech |
| ✓ French | ✓ Hindi | ✓ Hungarian | ✓ Japanese |
| ✓ Montenegrin | ✓ Romanian | ✓ Serbian | ✓ Spanish |
| ✓ Russian | | | |

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