

	Title:	Speaking Up Policy
Molson Coors Brewing Company Policy	Owner:	Chief Ethics and Compliance Officer
	Scope:	MCBC Enterprise-wide
	Effective Date:	August 23, 2013

Purpose

At Molson Coors, we believe that ***speaking up is the right way*** to demonstrate our values, build a culture of integrity and protect ourselves and the company from risks associated with non-compliance that could harm our reputation and continued success. This policy outlines when and how we should speak up to report conduct we believe does not comply with the law, regulations or company policies.

Policy

As Molson Coors employees, we are all responsible for speaking up about anything we believe in good faith is, or may be, a violation of the law, regulations, the Code of Business Conduct or company policies so that it can be properly addressed. This includes potential violations by ourselves, other employees, business partners, suppliers or anyone who is working on behalf of Molson Coors. Some examples of the types of issues you should report are:

- Intentional misstatement of accounting records, time cards, expense reports or other critical business records
- Product tampering
- Bribery or attempted bribery
- Conflicts of Interest
- Misuse of Company assets, theft or fraud
- Discrimination or harassment
- Irresponsible alcohol use or behavior while representing the company
- Inappropriate agreements with competitors
- Inappropriate gifts or entertainment
- Misuse of confidential information or intellectual property
- Unsafe work practices
- Workplace violence

Molson Coors cannot live up to its commitment to act with integrity if we, as employees, do not speak up when we should. That is why, in addition to understanding and following the Code and any laws or policies that apply to your job responsibilities, you should speak up and ask questions if you are not sure what the right thing to do is in any situation; or, if you believe someone acting on behalf of the company has done, is doing or may be about to do something that violates the law or our policies.

Any person who seeks advice or raises a concern in good faith is doing the right thing. Retaliation by anyone against a person for speaking up about a potential violation is against the law and company policy. If you suspect retaliation against yourself or any other Molson Coors employee for speaking up, you should report your concern.

Confidential information of Molson Coors Brewing Company for use by its employees for internal purposes only. The current Policy and/or procedure is available on the company intranet website.	Revision Date: 23Aug2013	Page: 1 of 4
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Who should I contact?

The most important thing is that you ask the question or raise the concern. Your immediate supervisor or manager is usually a good place to start, but you can also report ethics and compliance issues, ask questions or get advice from any of the following:

- Someone higher in your chain of command
- The head of your department, location or business unit
- Your local Human Resources or Legal departments
- Internal Audit
- Someone in the global Ethics and Compliance department

If someone comes to you to raise a concern, you are responsible to report it to an appropriate person in your local Human Resources or Legal department, your local Business Conduct Director or to the global Ethics and Compliance department. They will determine the appropriate course of action.

Direct conversations are often best, but there may be times when you may not feel comfortable talking to someone in person or you may want to remain anonymous. In those situations, we encourage you to use the Ethics and Compliance Helpline where it is acceptable under local law. Our helpline is a convenient and confidential way for you to ask a question or raise a concern at any time using the telephone or internet. It is hosted by a third party provider, EthicsPoint, to maintain confidentiality and anonymity when requested. Instructions on how to access the Helpline are listed below.

If you desire to have your concern regarding accounting, internal accounting controls or auditing matters sent only to the audit committee of the MCBC Board of Directors, you may specify that when using the Helpline or send a written communication to Audit Committee, Molson Coors Brewing Company, c/o Corporate Secretary Suite 3220, 1225 17th Street, Denver CO 80202, USA.

No one should discourage you from speaking up or making a report about possible misconduct. If that happens, you should notify your local Business Conduct Director, the Chief Ethics and Compliance Officer or raise your concern using the Ethics and Compliance Helpline.

What happens when I raise a concern?

We take all reports of potential violations seriously and will investigate the facts to determine what happened and decide what to do based on those facts. In order to do that, certain individuals will have to know of the concern and the specifics of the allegation of misconduct. Results of the investigation will be shared with individuals on a "need to know" basis while respecting the confidentiality of those involved.

Each case is unique. Depending on the outcome of the investigation, management may decide they do not need to take any action or there may be discipline and/or corrective action required. To the extent possible, we will notify the person who first raised the concern when we have completed the investigation.

Resources

For more information about this policy or your responsibilities, please contact the Chief Ethics and Compliance Officer at 303-927-2478 or access the Ethics and Compliance Helpline at <https://secure.ethicspoint.com/domain/media/en/gui/31/index.html> or by telephone as follows:

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In the U.S, Puerto Rico. and Canada, dial toll free #866-294-9302

Outside of the U.S. and Canada, first dial the AT&T access code for your location from the following list, then at the prompt, dial 866-294-9302

Bulgaria	Contact local legal dept.
China - Southern (Mandarin Operator)	108-10
China - Southern	108-11
China - Northern (Mandarin Operator)	108-710
China - Northern	108-888
Croatia	0800-220-111
Czech Republic	Contact local legal dept.
Hong Kong	800-93-2266
Hong Kong	800-96-1111
Hungary	Contact local legal dept.
India	000-117
Ireland (UIFN)	00-800-222-55288
Ireland (Northern)	0-800-89-0011
Ireland	1-800-550-000
Japan (NTT)	0034-811-001
Japan (KDDI)	00-539-111
Japan (Softbank Telecom)	00-663-5111
Mexico	001-800-462-4240
Mexico (Spanish Operator)	001-800-658-5454
Mexico	01-800-288-2872
Mexico (Por Cabrar)	01-800-112-2020
Romania	Contact local legal dept.
Russia (St. Petersburg)	363-2400
Russia (Moscow)	363-2400
Russia	8^10-800-110-1011
Russia	8^495-363-2400
Russia	8^812-363-2400
Scotland (C&W)	0-500-89-0011
Scotland (British Telecom)	0-800-89-0011
Serbia	Contact local legal dept.
Spain	900-99-0011
Ukraine	0^00-11
United Kingdom (BT)	0-800-89-0011
United Kingdon (C&W)	0-500-89-0011

The call will be answered in English. To continue your call in another language, please state your language to request an intrepeter. It may take 1-3 minutes to arrange for an interpreter. During this time, please do not hang up.

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Approvals

Date	Position	Name	Signature
January 1, 2012	Chief Ethics and Compliance Officer	Sherri Heckel Kuhlmann	On File
August 23, 2013	Chief Ethics and Compliance Officer	Caroline McMichen	On File

Revision History

Date Revised	Description of Change
January 1, 2012	Original
August 23, 2013	Revised language regarding anonymous reporting and Helpline contact numbers.