

PROCUREMENT POLICY



Applies from: 1 October 2022

1. Purpose

Lion manages its procurement of goods and services to ensure we maximize value, quality, and prevent risk whilst maintaining high standards of corporate responsibility.

At all times Lion will:

- Develop strong and productive relationships with suppliers to deliver value for money, quality goods and services and sustainable benefits;
- Act fairly and ethically in its relationships with both potential and established suppliers;
- Encourage innovation and continuous improvement with its suppliers;
- Support economic development, social outcomes, inclusion and diversity and sustainability through our purchasing choices.

This Policy and associated annexures provide key principles and guidance for anyone buying goods and services on behalf of Lion.

It is the responsibility of any person purchasing on behalf of Lion, including contractors to Lion, to be familiar with the requirements set out in this Policy and the associated annexures. These documents are to be read in conjunction with one another.

2. Scope

This Policy applies to all employees of all Lion Business Units, regardless of gender identity, gender expression, sexual orientation, intersex status, relationship status, ethnicity, cultural background, age or ability.

As laws, regulations and practices can vary between geographic locations, the policy has been set out as follows:

- Global Policy – this sets out the elements of the policy that apply to everyone irrespective of your location
- Regional specific annexure – this calls out specific requirements relevant to your location (Australia, New Zealand or US)

You must comply with the global policy and relevant regional specific annexure.

This policy may be updated over time, as such you are required regularly refamiliarise yourself with this policy to ensure you remain compliant.

3. Consequences of Breach of Policy

Lion team members must comply with this Policy (both the Global Policy and relevant regional specific annexure) at all times.

If a team member is found to have breached this Policy, they may be subjected to disciplinary action (up to and including termination of employment). The type and severity of the disciplinary action will depend upon the circumstances of the case and the seriousness of the breach.

Agents or contractors (including temporary contractors and third party labour hire) of Lion who are found to have breached this Policy may have their contracts with Lion terminated, or not renewed.

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In circumstances where a team member's behaviour or conduct may involve a breach of any local law, Lion may notify the police or other relevant government authority.

4. Who Do I Contact if I Have Questions on This Policy?

Please contact the Global Procurement & Environment Director (currently Irene Bell, irene.bell@lionco.com).

5. Global Policy (to be read in conjunction with the regional specific annexures below)

The Global Policy applies to all employees irrespective of their geographic location and is set out on the following pages.

Lion is committed to doing the right thing for the long term. To deliver sustainable commercial outcomes and corporate responsibility in the procuring of goods and services, we will promote our practices across the organization and build long-term productive relationships with our suppliers.

Implementing this policy will help us to reduce our environmental impact, improve the efficiency of our business, reduce costs, assist the development of new products and markets, foster stronger working relationships with our suppliers, and provide leadership in the community.

It is the responsibility of any person purchasing on behalf of Lion, including contractors to Lion, to be familiar with this Policy and the requirements set out in relevant annexures.

Lion's Procurement Policy captures our commitment through 3 core principles:

1. Building strong commercial outcomes & productive partnerships
2. Promoting Human Rights and Ethical Sourcing
3. Promoting sustainable (environmental, social and inclusive) sourcing practices

5.1 Build strong commercial outcomes and productive partnerships through:

- Ensuring we conduct our procurement processes in a manner that is ethical, fair and open, whilst respecting the confidential information of suppliers;
- Working with our suppliers in accordance with our core values to improve our working relationships;
- Seeking feedback from suppliers on Lions' own performance and procurement practices;
- Providing constructive feedback to our own suppliers to build capability;
- Evaluating purchases with consideration for total lifetime cost and impact of ownership;

- Ensuring our suppliers have in place accredited food safety and quality management systems, ensuring its products meet or exceed customer expectations and regulatory requirement of the markets in which products are sold;
- Ensuring our suppliers have robust and transparent systems in place to manage business continuity and compliance requirements;
- Encouraging our suppliers to bring innovation to Lion and to continuously improve all aspects of the supply relationship.

5.2 Promoting Human Rights and Ethical Sourcing

Outlined in our Lion Supplier Responsible Sourcing Code, Lion is committed to sustainable sourcing practices spanning human rights, the environment and business ethics. We will work with our suppliers to promote decent working conditions for employees and ensure there are no instances of forced and child labour and modern slavery in the supply chain within and beyond our first-tier suppliers.

Suppliers and their suppliers must observe the rights of workers in accordance with relevant national laws, International Labour Organisation (ILO) conventions and be aligned with the Ethical Trading Initiative (ETI) base code.

In the promotion of human rights and ethical sourcing practices, Lion will seek to:

- Purchase goods and services that are made in such a way to ensure human rights are respected, social and sustainability responsible guidelines are fulfilled;
- Consult with our suppliers and other stakeholders to raise their awareness and understanding of social responsibility issues;
- Through tools such as SEDEX, understand how our goods and services are being supplied;
- Ensure our suppliers have a formal safety management system that demonstrates commitment to the health, safety and wellbeing of their people, contractors and visitors, as a minimum meeting all relevant legal requirements and industry standards.

5.3 Promote sustainable (environmental & social) sourcing through:

- Evaluating purchases with consideration for their total lifetime cost of ownership, environmental, inclusive & social impact;
- Our suppliers having in place a robust environmental management system;
- Giving preference to suppliers who:
 - Have in place and follow sustainable farming & agricultural practices;
 - Support greenhouse and energy consumption reduction programs across their business;
 - Have in place systems and programs to continuously reduce consumption of 'finite' resources such as water;
 - Have a commitment to stewardship programs that minimize impact on the environment & promote better social outcomes for traditionally underrepresented sectors of our economy. For example, Indigenous business, Women-owned business and Social Enterprise;
 - Provide appropriate documentation to support any claims made e.g. recycled content, low emissions, energy efficient, quality, sourcing origins, minority certification etc;
 - Are committed to increasing the recycled content of products and materials we purchase;
 - Are compliant with the Workplace Gender Equality Act 2012 (Australia only);
 - Have an Inclusion and Diversity Policy including gender, cultural/ethnic, sexual orientation and minority communities.

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Annexure A – Australia Specific Requirements

This annexure applies to all Lion employees and businesses operating in Australia. This should be read in conjunction with the Global policy above.

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Annexure B – New Zealand Specific Requirements

This annexure applies to all Lion employees and businesses operating in New Zealand. This should be read in conjunction with the Global policy above.

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Annexure C – US Specific Requirements

For any questions on US specific requirements in complying with the Global Policy, please contact:

- New Belgium Brewing - Chief Operating Officer
- DWVP – VP Operations