### 2022 Communication on Progress

**Efes Georgia (JSC Lomisi)** 

topics?

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Governance **Policies and Responsibilities** 1. Does the Board / highest governance body or most senior executive of the company: Issue an annual statement about the relevance of sustainable development to the company Issue an annual statement that addresses impacts on both people and the environment Issue an annual statement highlighting a zero tolerance for corruption Sign off on organizational sustainability targets Supervise Environmental, Social, and Governance reporting Regularly review potential risks related to the business model None of the above 2. Does the company have a publicly stated commitment regarding the following sustainability

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	No, this is not a current priority	No, but we plan to have a commitment within 2 years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and the value chain	Yes, and the commitment includes our own operations and the value chain along with communities and society
Human Rights			0		
Labour Rights / Decent Work			0		
Environment			0		
Anti-Corruption			0		

### 3. Does the company have in place a code of conduct regarding each of the following sustainability topics?

	No, this is not a current priority	No, but we plan to have a code of conduct within two years	Yes, focused on employee conduct	Yes, focused on employees and suppliers	Yes, focused on employees, suppliers, and other business relationships
Human Rights			0		
Labour Rights / Decent Work			0		
Environment			0		
Anti-Corruption			•		

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4. Has the company appointed an individual or group responsible for each of the following sustainability topics?

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decisionmaking authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights	Yes, with direct influence at the highest levels of the organization (e.g., has access to relevant information, includes most senior members of organization)
Human Rights				0	
Labour Rights / Decent Work				0	
Environment				0	
Anti-Corruption				0	

5. Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

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Yes, with direct Yes, with influence on some moderate outcomes (e.g., it influence on Yes, and with includes limited influence outcomes (e.g., it Yes, and with representatives of on outcomes (e.g., includes functions, direct influence at limited access to representatives of the highest level of departments, or internal some functions. business units the organization information departments, or No formal (e.g., full access to most relevant for necessary to business units structure addressing the relevant most relevant for understand risks, information, it risks concerned, poor addressing the involves members has access to representation risks concerned. relevant at highest level of from relevant has access to organization) information, it departments or relevant involves one or functions) information. more members of reports to senior senior manager) management) **Human Rights** 0 Labour Rights / Decent 0 Work 0 Environment 0 Anti-Corruption Prevention

6. Does the company have a process or processes to assess risk?

No, this is not a current priority

No, but we are planning to develop one in the

Yes, related to our own operations

Yes, related to our own operations and entire value chain and other

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	priority	to develop one in the next two years	operations	value chain and other business relationships
Human rights risks				0
Labour rights risks				0
Environmental risks				0
Corruption risks				0
5.1. During the asse	ssment of risk, whic	h business relations	ships are reviewed?	
5.1. During the asse	A few suppliers or business relationships [approximately less than 25 %]	Several suppliers / business relations  Several suppliers / business relationships (i.e., first tier or other high priority) [approx. 25 - 50 %]	ships are reviewed?  Most suppliers / relevant business relationships [approx. 51 - 99 %]	All suppliers / relevant business relationships outside the supply chain
5.1. During the asse  Human rights risks	A few suppliers or business relationships [approximately less	Several suppliers / business relationships (i.e., first tier or other high priority) [approx.	Most suppliers / relevant business relationships [approx.	All suppliers / relevant business relationships outside the supply
	A few suppliers or business relationships [approximately less	Several suppliers / business relationships (i.e., first tier or other high priority) [approx.	Most suppliers / relevant business relationships [approx.	All suppliers / relevant business relationships outside the supply chain
Human rights risks	A few suppliers or business relationships [approximately less	Several suppliers / business relationships (i.e., first tier or other high priority) [approx.	Most suppliers / relevant business relationships [approx.	All suppliers / relevant business relationships outside the supply chain

next two years

No, but we are planning

No, this is not a current

hus, persted lations bins

operations and entire

Yes, related to our own

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7. Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?

	No, this is not a current priority	No, but we are planning to develop one in the next two years	Yes, related to our own operations	Yes, related to our own operations and entire value chain and other business relationships
Human rights risks			0	
Labour rights risks			0	
Environmental risks			0	
Corruption risks			0	

Concerns and grievance mechanisms

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8. Are there any processes through which members of the company's workforce can raise concerns about the company's conduct related to human rights, labour rights, environment, or anti-corruption?

No, this is not a current priority	
No, but we plan to within two years	
Yes, we have an informal process (e.g., through supervisors, others)	
Yes, we have a formal process	0

8.1. Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

	No	Yes
Is the process communicated to all employees/workers in local languages?		•
Is the process available to non- employees (e.g., contractors, vendors, suppliers)?	•	
Is the process confidential (e.g., whistleblowing		•

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	N	lo	Ye	es
Are there processes in place to avoid retaliation?				
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)				
Other (Please provide additional information)				
9. Does the company where it has caused		access to effective i e adverse impact?	emedy to right holo	lers / stakeholders
	No process to enable remedy to stakeholders	Remedy available to some stakeholders (i.e., some geographies, employees only)	Remedy is available to all affected stakeholders	Remedy is available to all stakeholders, and suppliers are expected to have similar policies
Human Rights			0	
Labour Rights / Decent Work			0	
Environment			0	
Anti-Corruption			0	

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Lessons				
10. How does the com	npany capture les	sons regarding each	of the following su	stainability topics?
	No lessons are regularly captured	Conducts root cause analyses/investigation of major incidents	Conducts root cause analyses/investigation and changes organizational policies, processes, and practices accordingly	Systematically conducts root cause analyses/investigation and leverages learnings to influence both internal and external affairs
Human Rights		0		
Labour Rights / Decent Work		0		
Environment		0		
Anti-Corruption		0		

**Executive Pay** 

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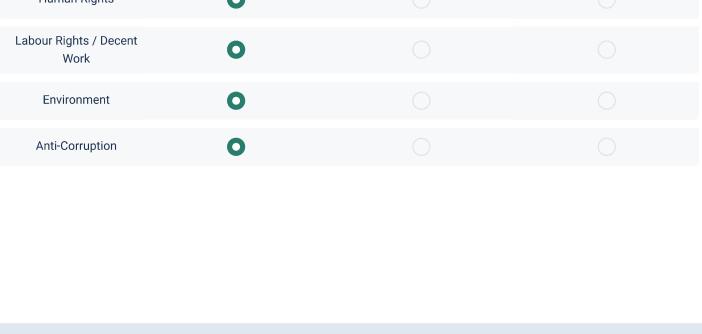
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11. Is executive pay	linked to performance on o	one or more of the followi	ing sustainability topics?
	No, and we have no intention to change	No, but we plan to within two years	Yes
Human Rights	•		
Labour Rights / Decent Work	0		



Board Composition			

#### 12. Percentage of individuals within the company's Board / highest governance body by:

	Number/Percentage	Not applicable (Please provide additional information)
Total number of board members (#)	7	
Male (%)	100	

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Female (%)	Number/Rercentage	Not applicable (Please provide additional information)
Non-binary (%)	0	
Under 30 years old (%)	0	
30-50 years old (%)	100	
Above 50 years old (%)	0	
From minority or vulnerable groups (%)	0	
Executive (%)	14.3	
Independent (%)	0	

#### 13. Do you produce sustainability reporting according to:

National/local regulation on sustainability	
Security exchange regulations	
European Union Corporate Sustainability Reporting Directive (CSRD)	

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Global Reporting Initiative (GRI)	
Sustainability Accounting Standards Board (SASB)	
International Integrated Reporting Council (IIRC)	
Climate Disclosure Standards Board (CDSB)	
Task Force on Climate-related Financial Disclosures (TCFD)	
Other voluntary frameworks (please specify in text box)	
Anadolu Efes as the owner of Efes Georgia - annually presents a sustainability report which inclu Georgia information.	ides Efes
No sustainability reporting according to any frameworks nor regulations	
We do not produce sustainability reporting outside of this Communication on Progress	

# 14. Is the information disclosed in this questionnaire assured by a third-party? No assurance for any metrics Limited assurance for minority of metrics (e.g., GHG emissions only)

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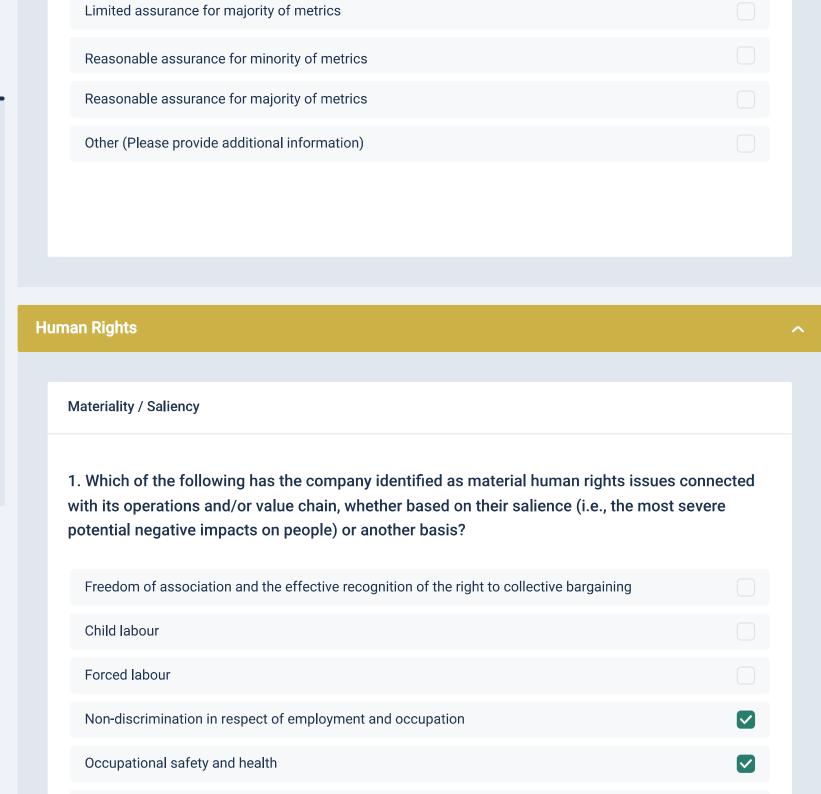
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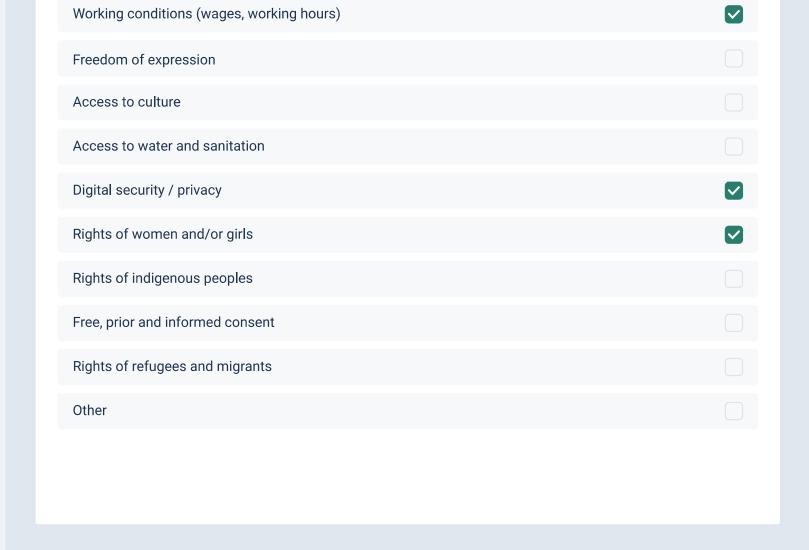
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#### Commitment

2. Does the company have a policy commitment in relation to the following human rights issues?

No, and we have no plans to develop a policy

No, but we plan to in the next two years

Yes, included within a broader policy

Yes, articulated as a stand-alone policy

Rights of women



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2019				
Freedom of expression				
Rights of refugees and migrants				
Digital security / privacy			•	
2019				
Rights of indigenous peoples				
Access to culture				
Free, prior and informed consent				
Access to water and sanitation				
onal comment				
All Those are written in An	adolu Efes Code o	of Business Conduct a	nd Ethics	

No, but we plan to in the

next two years

Yes, included within a

broader policy

Yes, articulated as a

stand-alone policy

#### 2.1. For each human rights policy, is it:

and/or giris

No, and we have no

plans to develop a

policy

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	Aligned with international human rights standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own operations?	Applied to the company's supply chain and/or other business relationships?	Developed involving human rights expertise from inside and outside the company?	Other (Please provide additional information)
Freedom of expression							
Digital security / privacy							
Rights of women and/or girls		<b>~</b>					
Access to culture							
Rights of indigenous peoples							
Free, prior and informed consent							
Rights of refugees and migrants							
Access to water and sanitation							

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#### Prevention

3. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following human rights issues?

	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing /mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
Rights of women and/or girls	0					
Freedom of expression						
Rights of refugees and migrants						
Digital security / privacy			0			
Rights of indigenous peoples						
Access to culture						
Free, prior and informed consent						
Access to water and sanitation	0	$\circ$		$\circ$		$\bigcirc$

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4. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this human rights issue?

	Provided internal training/ capacity building for the direct workforce	Building capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducting an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue	Collaboration with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Rights of women and/or girls							
Freedom of expression							
Rights of refugees and migrants							
Digital security / privacy				<b>~</b>			
Rights of indigenous peoples							
Access to culture							
Free, prior and informed consent							
Access to water and sanitation							

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#### 5. Who receives training for the following human rights issues?

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Rights of women and/or girls		<b>✓</b>					
Freedom of expression							
Rights of refugees and migrants							
Digital security / privacy							
Rights of indigenous peoples							
Access to culture							
Free, prior and informed consent							
Access to water and sanitation							

6. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights issues?

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	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Rights of women and/or girls		0			
Freedom of expression					
Rights of refugees and migrants					
Digital security / privacy			0		
Rights of indigenous peoples					
Access to culture					
Free, prior and informed consent					
Access to water and sanitation					

Response			

7. During the reporting period, has the company been involved in providing or enabling remedy

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where it has caused or contributed to adverse impact associated with the following human rights issue(s)?

	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Rights of women and/or girls		0		
Freedom of expression				
Rights of refugees and migrants				
Digital security / privacy		0		
Rights of indigenous peoples				
Access to culture				
Free, prior and informed consent				
Access to water and sanitation				

#### Optional comment

In the company we Anadolu Efes Code of Business Conduct and Ethics, in case there is any breach of the provisions company is providing respective reaction pursuant to the rules of code

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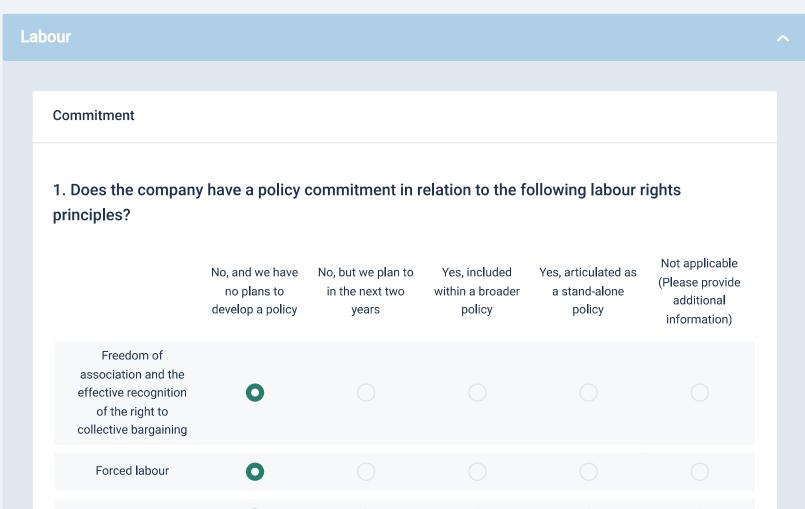
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8. Briefly describe practical actions the company has taken during the reporting period and/or plans to take to implement the human rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

Not applicable



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Child labour	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy	Not applicable (Please provide additional information)
Non-discrimination in respect of employment and occupation				0	
2019					
Occupational safety and health				0	
Working conditions (wages, working hours)	0				
otional comment					
We have no plan to d the right to collective of Georgia specifical	bargaining, Force	ed labour, Child labo	our, Working cond	litions ) because the	
<u> </u>	-		-		

#### 1.1. For each labour rights policy, is it:

company's supply chain ' provid		Publicly available?					Other (Please provide additional
---------------------------------	--	------------------------	--	--	--	--	---

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	international labour standards?	Publicly available?	most senior level of the company?	company's own operations?	supply chain and/or other business relationships?	expertise from inside and outside the company?	provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining		<b>~</b>					
Forced labour							
Child labour		<b>~</b>					
Non-discrimination in respect of employment and occupation		<b>~</b>					
Occupational safety and health							
Working conditions (wages, working hours)		<b>~</b>					

Approved at

Aligned with

operations?

Applied to

the

business

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the

company's

information)

Other

(Please

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labour rights

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Prevention

2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following labour rights issues?

		No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing/ mitigating the risks /impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question	Other (Please provide additional information)
Freedo associatio effective re of the r collective b	on and the ecognition ight to	0						
Forced	labour	0						
Child I	abour	0						
Non-discrir respe employm occup	ect of nent and	0						
Occupatio and h	-		0					
Working c (wages, hou	working		0					

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3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this labour rights issue?

	Provided internal training/ capacity building for the direct workforce	Building capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducting an audit process and/or corrective action plan	Collective Action with peers or other stakeholders, in particular workers' organizations, to address the issue	Collaboration with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Freedom of association and the effective recognition of the right to collective bargaining							<b>~</b>
Forced labour							<b>~</b>
Child labour							$\checkmark$
Non-discrimination in respect of employment and occupation	<b>~</b>						
Occupational safety and health							
Working conditions (wages, working hours)							

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4. Who receives training for the following labour rights issues?

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Freedom of association and the effective recognition of the right to collective bargaining			<b>~</b>				
Forced labour							
Child labour							
Non-discrimination in respect of employment and occupation							
Occupational safety and health			<b>~</b>				
Working conditions (wages, working hours)			<b>~</b>				

5. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights issues?

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	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining		0			
Forced labour		0			
Child labour		0			
Non-discrimination in respect of employment and occupation			0		
Occupational safety and health			0		
Working conditions (wages, working hours)		0			

#### Performance

6. What is the percentage of employees covered under collective bargaining agreements?

Percent of employees (%)

Unknown

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Employees covered under collective bargaining (%)	0		
. What is the percen	tage of employees in a trade	union or other wo	rkers' organization?
	Percent of employees (%)	Unknown	Not applicable (Please provio additional information)
Employees in a trade union or on a worker	0		
committee (%)			
committee (%)	e reporting period, what was	the percentage of	women in:
committee (%)	e reporting period, what was  Percent of women (%)	the percentage of	women in:  Unknown
committee (%)		the percentage of	
committee (%)  In the course of the	Percent of women (%)	the percentage of	
committee (%)  S. In the course of the Senior leadership level position	Percent of women (%) 56.25	the percentage of	

9. What was the average ratio of the basic salary and remuneration of women to men (comparing

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bbs of equal value) du	ring the reporting period	?	
	Salary ratio (%)	Unknown	Choose to not disclose
Women / Men (%)	0		
ptional comment			
women and the men ha	ve same rights, salary and re	muneration do not change	e according to gender.
0. In the course of the	e reporting period, how fr	equently were workers	injured (injuries per hour
orked)?	,	- <b>-</b>	<b>,</b> ( <b>,</b>
	For any of the control	Urbrasser	Oh 4 4
	Frequency of injury	Unknown	Choose to not disclose
Frequency of injury	1.29		
otional comment			
Frequency rate per 1000	0000 working hour		
4 I II 6 I			
1. In the course of the	e reporting period, what v	vas the company's incid	dent rate?
	Incident rate	Unknown	Choose to not disclose
Incident rate	0.29		
Incident rate	0.29		

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Response and Reporting	
12. In the course of the reporting period, has the company been involved in providing of	r enabling

12. In the course of the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to the adverse impact associated with the following labour rights issues?

Not applicable (Please

	Yes	No	Choose to not disclose	provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining		•		
Forced labour		0		
Child labour		0		
Non-discrimination in respect of employment and occupation		•		
Occupational safety and health		0		
Working conditions (wages, working hours)		•		

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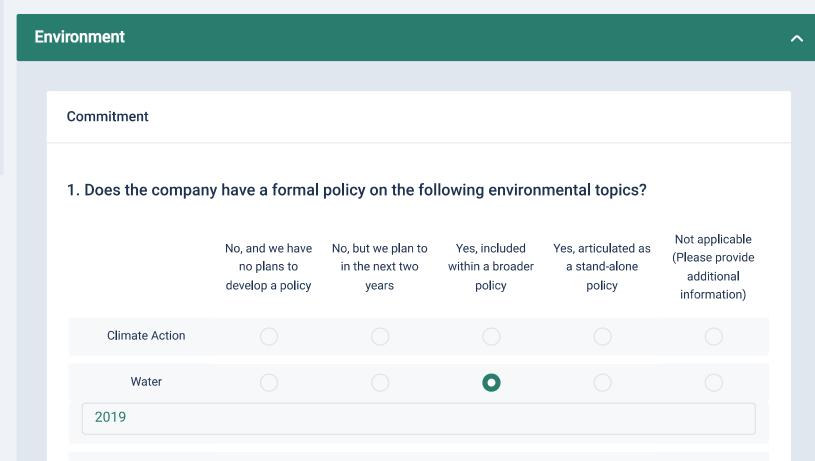
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13. Briefly describe practical actions the company has taken during the reporting period and/or plans to take to implement the labour rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

For all Employees provided trainings about Human rights



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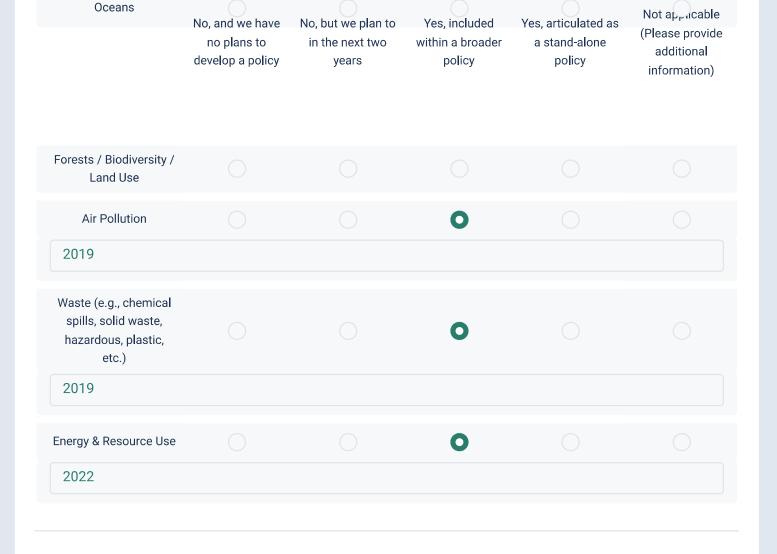
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#### 1.1. For each environmental policy, is it:

Aligned with international Publicly environmental available? standards?	Approved at most senior level of the company?	Applied to the company's own operations?	Applied to the company's supply chain and/or other business relationships?	involving environmental expertise from inside and outside the company?	Other (Please provide additional information)
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Climate Action					Applied to	Dev ped	
	Aligned with international environmental standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own operations?	the company's supply chain and/or other business relationships?	involving environmental expertise from inside and outside the company?	Other (Please provide additional information)
Water			$\checkmark$				
Oceans							
Forests / Biodiversity / Land Use							
Air Pollution						$\checkmark$	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)		•	lacksquare	lacksquare			
Energy & Resource Use		<b>☑</b>	<b>~</b>	<b>~</b>			

_			10.0	
Ρ	rev	/er	۱tı	$\mathbf{o}$
		CI		O.

2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following environmental issues?

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	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing/ mitigating the risks/ impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question	Other (Please provide additional information)
Climate Action							
Water						0	
Oceans							
Forests / Biodiversity / Land Use							
Air Pollution						0	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)						0	
Energy & Resource Use							

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preventing/mitigating the risks/impacts associated with these environmental topics?

	Provided internal training/ capacity building for the direct workforce	Building capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducting an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue	Collaboration with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Climate Action							
Water	$\overline{\mathbf{v}}$			$\checkmark$	$\checkmark$		
Oceans							
Forests / Biodiversity / Land Use							
Air Pollution				<b>~</b>			
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<b>~</b>	<b>~</b>			<b>~</b>		
Energy & Resource Use					<b>~</b>		

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4. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Climate Action					
Water		0			
Oceans					
Forests / Biodiversity / Land Use					
Air Pollution		0			
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)		0			
Energy & Resource Use				0	

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4.1. For each environmental topic in which the company sets timebound goals / targets, what kind of targets has the company set?

Description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.)

Climate Action	
Energy & Resource Use	Annually reduce the cost of energy and resources for the production of a unit of product
Water	
Forests / Biodiversity / Land Use	
Air Pollution	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	
Oceans	

4.2. For each environmental topic in which the company sets timebound goals / targets, how is progress against target / goal tracked?

Progress is reviewed against goals annually

Progress is reported internally to the most

a a a ta a la cal

Progress is reported externally

Other (Please provide additional information)

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Climate Action		
Energy & Resource Use	$\checkmark$	
Water		
Forests / Biodiversity / Land Use		
Air Pollution		
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)		
Oceans		
. In the course of the re emedy for any actual ir		

No

Progress is reported

internally to the most

senior level

Progress is reported

externally

Choose to not disclose

Other (Please provide

additional information)

Not applicable (Please

provide additional information)

Progress is reviewed

against goals annually

or more frequently

Yes

Climate Action

Water

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	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Oceans				
Forests / Biodiversity / Land Use				
Air Pollution				
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)				
Energy & Resource Use	0			
The compressor and boile	er were modernize	d		

**Climate Action** 

6. What were the company's gross global greenhouse gas emissions for the reporting period?

Scope 1 Emissions

Full

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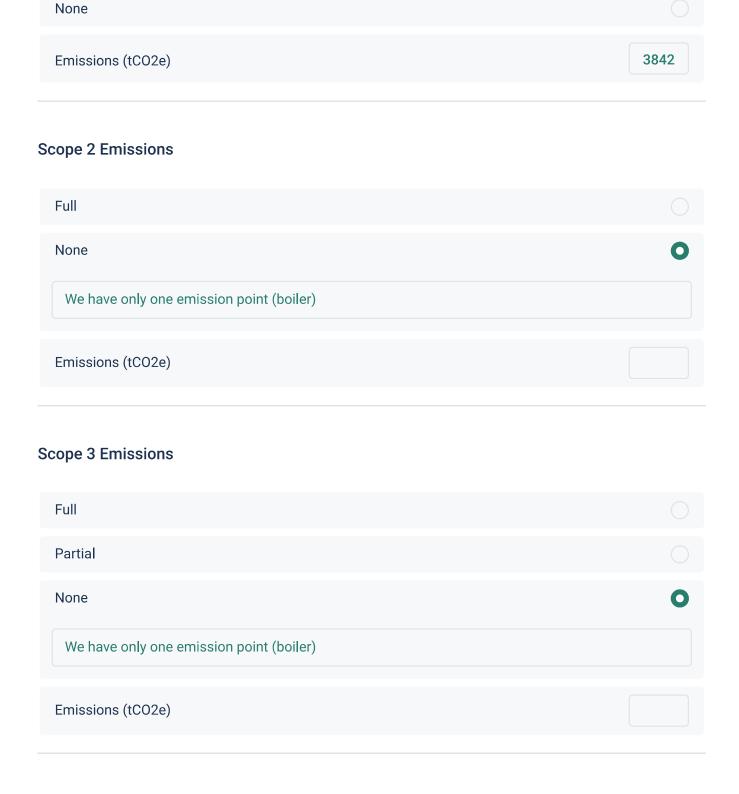
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7. What percentage of the company's revenue was invested in R&D of low-carbon products/services during this reporting period?

Percent of revenue (%)	
Unknown	0
Not applicable (Please provide additional information)	
8. Has the organization acted to support climate change adaptation and resilience?	
We have taken action to increase organization-wide resilience to climate change	lacksquare
We have taken action to increase resilience in our supply chains	$\checkmark$
We have taken action to increase resilience in the communities in which we operate	
We have provided funding for climate change adaptation and resilience initiatives and projects	
We have not taken actions to build climate change resilience in the reporting period	
Other (Please provide additional information)	
Unknown	

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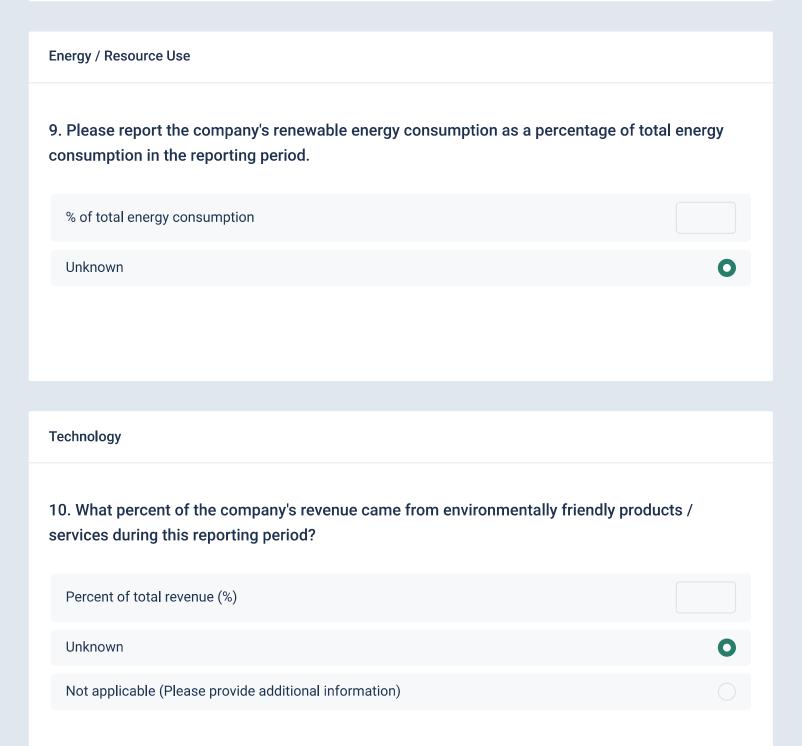
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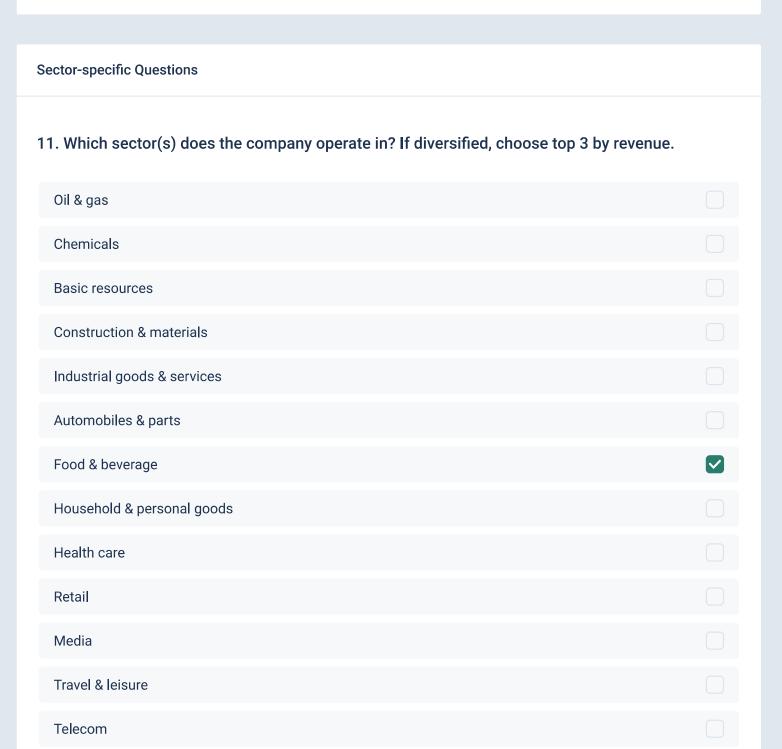
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I	Utilities			
	Banks			
	Insurance			
	Real estate			
1	Financial Services			
	Technology			
Sed	ctor-specific: Water			
op	. Please provide details rerations) during the repo	orting period.		and consumption (own
		Mega-liters	Unknown	Not applicable (Please provide additional information)
	Total			
	Groundwater:	429.05		
	Surface water:			

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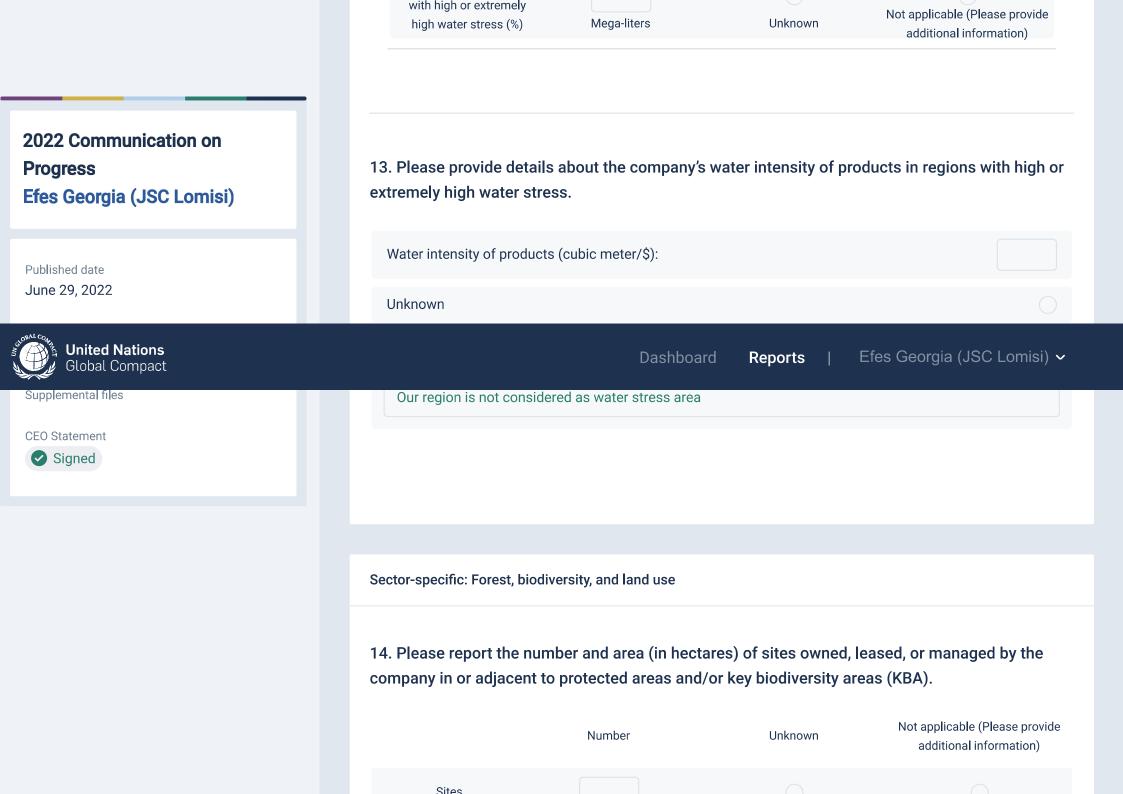
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	Mega-liters	Unknown	Not applicable (Please provide additional information)
Rainwater:			
Wastewater:			
Percentage of water withdrawn in regions with high or extremely high water stress (%)			
Water consumption (vo	lume of water in mega	aliters):	
	Mega-liters	Unknown	Not applicable (Please provide additional information)
Total	Mega-liters	Unknown	
Total Groundwater:	Mega-liters 429.05	Unknown	
			additional information)
Groundwater:			additional information)
Groundwater: Surface water:			additional information)



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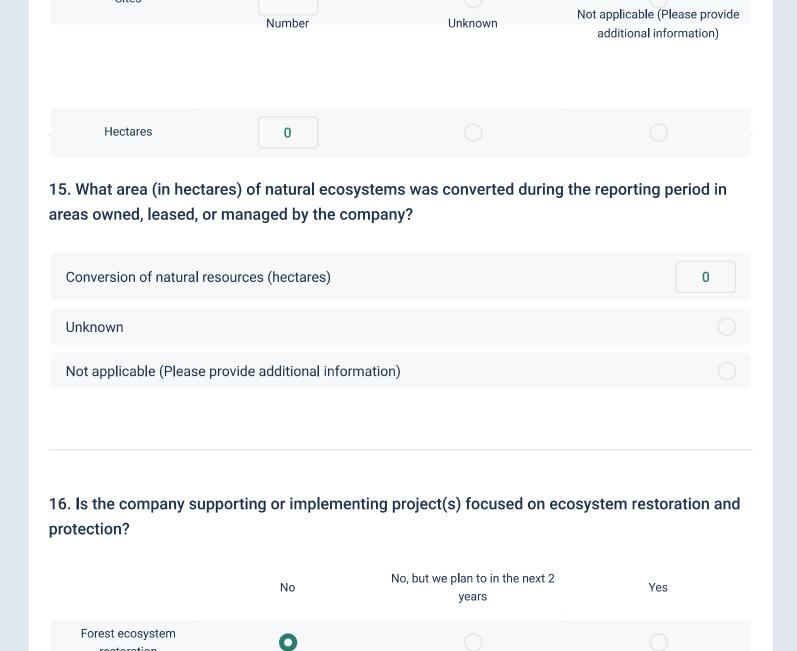
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restoration

Other ecosystem

restoration

Reforestation

Motural regeneration

0

0

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Natural regeneration	O	No, but we plan to in the next 2		
	No	years	Yes	
Agroforestry	0			
Set-aside land	0			
Biodiversity offsetting	0			
Other (please specify in text box)	•			
Overall Environment				
21. Briefly describe practical actions the company has taken during the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation.  To implement ISO 14001				

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Anti-corruption

Commitment	
1. Does the company have an anti-corruption compliance programme?	
No, it is not an immediate business priority	
No, but we plan to in the next two years	
Yes	0
2019	
Optional comment	
Anadolu Efes Code of Business Conduct and Ethics	
2. Does your company have policies and recommendations for employees on how to a doubt and/or in situations that may represent a conflict of interest, e.g. with regard to hospitality, donations, sponsorship, or interactions with public officials?	
No, and we have no plans to develop a policy	
No, but we plan to in the next two years	
Yes, included within a broader policy	

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Prevention	
3. Who receives training on anti-corruption and integrity?	
No training provided	
Select employees	
All employees	$\checkmark$
Contractors	
Direct suppliers of the organization	
Indirect suppliers of the organization	
Other – such as partners, clients, etc.	
3.1. How often is such training provided?	

Yes, articulated as a stand-alone policy

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	One time only	Every year	Every two or more years	we do not collect this data
All employees		0		
Select employees				
Contractors				
Direct suppliers of the organization				
Other – such as partners, clients, etc.				
Indirect suppliers of the organization				
4. Does the company m	nonitor its anti-co	rruption complian	ce programme?	
No, we do not monitor the	he anti-corruption co	ompliance programm	ne	
Review issues on ad-hoo	c basis			
Yes, through internal em	nployee self-evaluati	ons		
Yes, through automated	controls monitoring	)		
Yes, through external inc	dependent monitorir	ng		
Yes, through other mech	nanisms			

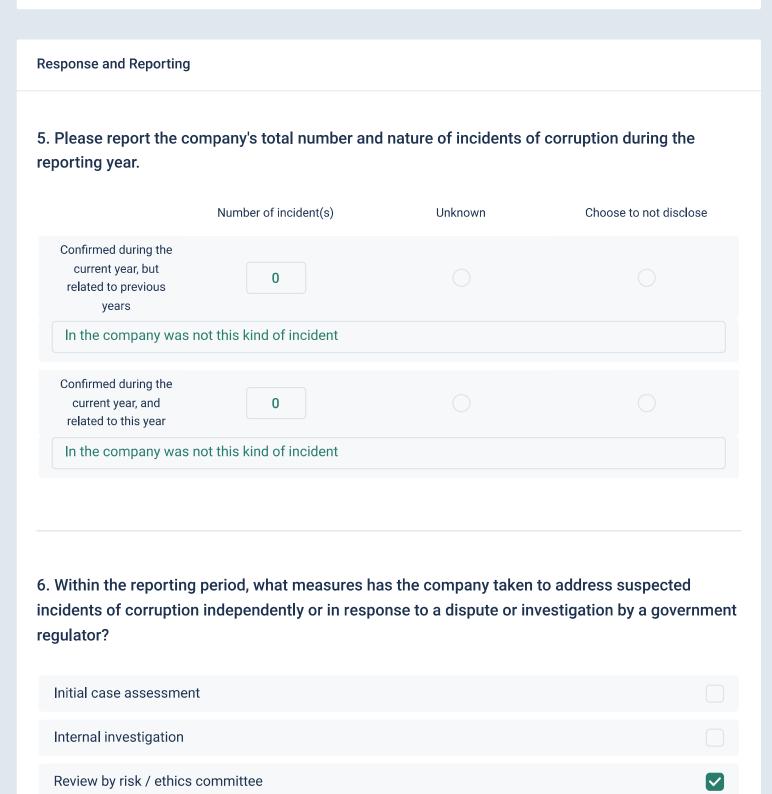
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Review by board of directors	
External audit / review	
Other (please provide additional information)	
Not applicable/no incidents in the reporting period	
7. Does your company engage in Collective Action against corruption?	
No, it is not an immediate business priority	0
No, but we plan to in the next two years	
Yes (please explain)	
B. Briefly describe practical actions the company has taken during the reporting period plans to take to implement the anti-corruption principle, including any challenges faced actions taken towards prevention and/or remediation.	
Annual training about the ethics code for all employees.	

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