

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

41 C.F.R. Section 60-741.44(a); 60-300.44(a)

The employment policy of North American Breweries is to provide equal opportunity to all persons. Our company, therefore, has made a commitment to equal employment opportunity through a positive and continuing affirmative action program. No employee or applicant for employment will be discriminated against because of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status or any other Federal or State legally-protected classes.

North American Breweries will recruit, hire, train and promote qualified individuals in all job titles, and ensure that all other personnel actions are administered without regard to race, color, religion, sex, sexual orientation, gender identity, protected veteran status, or disability in accordance with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans Readjustment Assistance Act of 1974, which require affirmative action to ensure equal opportunity in all aspects of employment. North American Breweries does not discriminate on the basis of national origin or citizenship status as provided under the Immigration Reform and Control Act of 1986.

To further implement these policies, North American Breweries will continue to:

- A. Base decisions on employment so as to further the principle of equal employment opportunity;
- B. Insure that promotion decisions are in accordance with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities;
- C. Insure that all personnel actions (including but not limited to compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs) are administered without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status or any other Federal or State legally-protected classes.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- A. Filing a complaint;
- B. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of affirmative action and equal opportunity regulations;
- C. Opposing any act or practice made unlawful by affirmative action and equal opportunity regulations, including Federal, State, and local law;
- D. Exercising any other right protected by affirmative action and equal opportunity regulations.

Harvey Beldner, Vice President, Human Resources, has been designated EEO Coordinator and is responsible for compliance with State and Federal equal employment opportunity laws, and for implementing the affirmative action program, including equal employment practices, monitoring, and internal reporting. Employees believing they have not been treated in accordance with this policy are encouraged to contact Harvey Beldner at (585) 263-9222, during regular business hours. The affirmative action plan is available for review at Harvey Beldner's office during the business hours of 9:00 a.m. to 4:00 p.m. by appointment. Employees and applicants wishing to self-identify as a protected veteran or individual with disability, including voluntarily updating their disability status, or to request a reasonable accommodation necessary for the performance of the essential functions of a job, may do so by contacting Harvey Beldner.

This policy statement has the support of the Kris Sirchio, Chief Executive Officer. The continued success of our Affirmative Action Program requires maximum cooperation from every employee throughout our organization. Equal employment opportunity is not only the law, but it is a principle of North American Breweries.

Read and approved by


Kris Sirchio/Chief Executive Officer

5/4/16