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Anti-Corruption Policy

AMBEV S.A.



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1. INTRODUCTION

Ambev's Ethics & Compliance Program reflects the culture of integrity and compliance with national and foreign legislation to which Ambev and its subsidiaries in Brazil and abroad ("Ambev" or "Company") are subject. The provisions contained in this Anti-Corruption Policy ("Policy") aim to maintain the highest standards of business ethics, reinforcing our policy of zero tolerance for corruption.

2. OBJECTIVE AND SCOPE

Ambev expects its directors, officers, employees (in conjunction or separately "Employees") and Intermediaries, as defined below, to comply with its Code of Business Conduct and applicable laws, and maintain the highest ethical standards of business conduct.


This Policy, therefore, complements the general provisions set out in the Code of Business Conduct and was developed to assist all Employees to comply with Law 12.846/2013 (Brazilian Anticorruption Law) and its regulations, the *US Foreign Corrupt Practices Act - FCPA* ("FCPA"), Law No. 8,429/1992 (Administrative Improbity Law) and other national and international laws related to bribery and corruption (including private) applicable to Ambev (collectively, "Anti-Corruption Legislation"). This policy also applies to subsidiaries or joint ventures in which Ambev has a majority or control interest. In instances in which Ambev does not have a majority stake or holds control, we encourage our business partners and subsidiaries with a minority stake in Ambev to abide by the principles of this Policy.

The Policy applies without distinction to all Ambev Employees, and to all transactions to which Ambev is part, in Brazil and abroad, further expressing the principles that subjects and entities acting on our behalf, especially the Intermediaries, are expected to follow.

Finally, acts of corruption may occur when dealing with commercial partners. Consequently, this Policy applies to the Company's dealings with counterparties in both the public and commercial sectors.

3. DEFINITIONS

3.1 Ambev: Ambev S.A. and all of its subsidiaries.

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3.2 Ethics & Compliance Area: Ethics & Compliance Department of Ambev's Legal Department.

3.3 Public Official: a person who, even if temporarily or without remuneration, holds, in Brazil or abroad, any position, job or function in public bodies, entities, agencies, or departments, government entities or diplomatic representations, legal entities controlled, directly or indirectly, by the public power, or international organizations.


Examples of Public Officials include (i) employees/officers/members of the Federal, State and Municipal Executive, Legislative, and Judiciary Branches or the Public Prosecutor's Office, (ii) officers/employees of government bodies (including regulatory and executive agencies); (iii) employees/officers of state-owned or mixed-economy companies, (iv) diplomats, including ambassadors, consuls and chancellors; (v) members of the Military Police and Military Fire Departments, (vi) employees of international organizations (such as, for example, the United Nations), among others.

For the purposes of this Policy, the following are also considered as Public Officials (i) members, employees, agents or anyone acting in the name of or on behalf of a political party; (ii) political parties or officials thereof; (iii) candidates to political or elective position; (iv) unions leaders; and (v) any private person acting in an official capacity in the name of or on the behalf of one of the persons or entities listed above.

3.4 Governmental Authority: any body, entity, agency or department of the Federal, State, and Municipal Executive, Legislative, and Judiciary Branches or the Public Prosecutor's Office, diplomatic representation, a legal entity controlled, directly or indirectly, by the public power (including state and mixed-economy companies), political party, Union or international organization.

3.5 Intermediaries: any Ambev representative and/or contractor who has or may come into contact with Government Authorities or Public Officials on behalf and/or in the interest or benefit of Ambev, or that represents or may come to represent Ambev before Government Entities and/or Public Officials, such as:

- Consulting companies;
- Brokers;
- Customs brokers and other professionals in the import and export sector;
- Distributors and carriers;
- Event producers;
- Law firms;
- Tax consultants;
- Marketing and events companies;
- Proponents of incentive events;
- Contractors and consultants related to the expansion/legalization of industrial and commercial activities;

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- Any other service provider that may be identified as such by the Ethics Committee or the Company's Ethics & Compliance Area.

3.6 Undue Advantage: any payment or thing of value, tangible or intangible, offered, promised, given or authorized, directly or indirectly, to a Public Official or related third parties (natural or legal persons), for obtaining or maintaining business or any other improper benefit or advantage, tangible or intangible, for the Company. The definition of Undue Advantage should be broadly interpreted, and may include, for example:

- Payments or donations in products or cash;
- Business opportunities;
- Favors;
- Giveaways or gifts;
- Entertainment, including tickets to shows and events;
- Travel, airfare, lodging, or meals;
- Free provision of products or with special discounts;
- Job offers, including internship, paid or unpaid, for Public Official or people close to him.

Transactions (such as described above) that observe items 4 and 5 and its subitems of this Policy, thus preserving compliance with the Anti-corruption Legislation, do not constitute Undue Advantage.


4. ANTI-CORRUPTION POLICY

Ambev has a policy of zero tolerance for acts of corruption. To promise, offer, give, or authorize the payment of an Undue Advantage, directly or indirectly, to a Public Official or related third parties (individuals or legal entities), clients, agents, representatives, distributors, or suppliers, as well as any activity to frustrate, defraud or manipulate public bidding procedures and/or public contracts are strictly prohibited conducts and could lead to personal liability under the Anti-Corruption Legislation, in addition to the sanctions applicable by the Company.

Remember: everything that this Policy forbids to be done directly cannot be done indirectly (through third parties, such as, for example, Intermediaries).

For a payment or thing of value to violate the Anti-Corruption Legislation, it is not necessary to prove the intention of corrupting or that the obtaining of the benefit or advantage supposedly intended has materialized.

Ambev does not tolerate any adverse consequences imposed on any Employee or Intermediary for refusing to (i) offer, promise, pay, give, or authorize an Undue Advantage to a Public Official, or (ii) frustrate, defraud, or manipulate public bidding

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procedures and/or public contracts, even if such refusal results in the loss of business opportunities for Ambev.

An Employee or Intermediary will not be penalized for conduct that violates this Policy if they are under imminent threat to his or her life or safety or that of a third party. Such conduct must, however, be reported immediately to the Ethics & Compliance Area. This exception will be interpreted restrictively.

4.1 Undue Advantage

Ambev employees and intermediaries are strictly prohibited from, directly or indirectly, (through third parties, such as intermediaries), promising, offering, giving, or authorizing the payment of an Undue Advantage, regardless of the amount, to a Public Official or related third parties (individuals or companies).

This prohibition also applies to payments that may be requested by a Public Official with the purpose of expediting or ensuring the performance of a non-discretionary procedure or action to which the Company is legally entitled ("facilitation payments").


Employees and Intermediaries must inform the Ethics & Compliance Area immediately if they become aware of or suspect that any Undue Advantage has been promised, offered, given, or authorized to a Public Official or to related third parties (individuals or legal entities), as well as any other violation of this Policy or Anti-Corruption Legislation.

To ensure compliance with this rule, **any and all payments or things of value, tangible or intangible, to be promised, offered, paid, given, or authorized to Government Authorities or Public Officials that do not arise from a legal obligation must be approved in advance, in writing, by the Ethics & Compliance Area** pursuant to item 5 of this Policy.

Likewise, Ambev's Employees and Intermediaries are strictly prohibited from directly or indirectly asking, requesting, agreeing to receive or accept payment, anything of improper or illegal value, benefit, favor, treatment or advantage.

4.2 Public Biddings and contracts

With regards to public biddings and contracts, Ambev Employees and Intermediaries are strictly prohibited from (i) frustrating or defrauding the competitive nature of public bidding procedure; (ii) preventing, disturbing, or defrauding the performance of any act of a public bidding procedure; (iii) removing or seeking to remove a bidder by means of fraud or offering an advantage of any kind; (iv) defrauding a public bidding or any contract arising therefrom; (v) creating, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract; (vi)

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obtaining undue advantage or benefit, fraudulently, from amendments or extensions of contracts entered into with the public administration, without authorization by law, in the invitation to public bidding or in the correspondent contractual instruments; or (vii) manipulating or defrauding the economic-financial balance of contracts entered into with the public administration.

To ensure compliance with this rule, **any and all contracts that involve a Government Authority, even if indirectly, must be submitted to the prior written approval of the Ethics & Compliance Area and the Legal Department**, as per item 9 of this Policy.

4.3 Commercial Bribery

In addition to corruption involving Public Officials or related third parties, this Policy also prohibits commercial bribery. Accordingly, no Ambev Employee or Intermediary shall, directly or indirectly, promise, offer, give, or authorize the payment, anything of improper or illegal value, benefit, favor, treatment, or advantage in the private environment, to any agent, employee, representative, or a third party related to a private company, in order to exercise undue influence or obtain any improper benefit or advantage, in a personal capacity or for Ambev.


Some gifts, meals, and entertainment may be offered, promised or provided to an agent, employee, representative, or third party related to **private companies** as long as there is no intention to bribe the recipient and the guidelines below are followed:

Such gifts, meals or entertainment

- is intended for legitimate and adequate purposes, linked to the Company's core activities;
- is not linked to any intended retribution or bound to return;
- is limited and reasonable in value, type and amount;
- is allowed by the internal rules of the recipient;
- is openly delivered to the recipient (and not hidden);
- does not embarrass Ambev if publicly disclosed; and
- does not contradict or violate the Anti-Corruption Legislation or the rules and procedures established in this Policy.

Such guidelines do not apply to commercial actions and bonifications, which must, however, follow Ambev's commercial and tax guidelines.

5. GIFTS, GIVEAWAYS, ENTERTAINMENT, MEALS, AND TRAVEL EXPENSES FOR PUBLIC OFFICIALS AND PUBLIC AUTHORITIES

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Ambev Employees and Intermediaries are prohibited from promising, offering, giving, or authorizing any gift, giveaway, entertainment, meal, payment of travel expenses or other hospitality (collectively, "Gifts and Hospitality") to Government Officials or Public Officers without prior written approval from the Ethics & Compliance Area.

Ethics & Compliance Area will only authorize Gifts and Hospitality to Government Authorities or Public Officials that:

- Are intended for legitimate and adequate purposes, linked to the Company's core activities;
- Are not linked to any intended retribution or bound to return;
- Are limited and reasonable in value, type and amount;
- Are allowed by the internal rules of the recipient;
- Are openly delivered to the recipient (and not hidden);
- Do not embarrass Ambev if publicly disclosed;
- Do not contradict or violate the Anti-Corruption Legislation or the rules and procedures established in this Policy.

The rules of this Policy regarding Gifts and Hospitality for Government Authorities and Public Officials are also applicable to Intermediaries when they are acting on behalf or in the interest of Ambev.


For all expenses incurred with Gifts and Hospitalities for Government Authorities and Public Officials, the respective supporting documents must be registered. Such expenses must be accurately identified and have their supporting documentation (receipts, invoices, etc.) duly filed and recorded in the Company's books and accounting records, as described in item 10 of this Policy, in addition to being recorded in the Compliance Channel.

These rules apply to all situations described in items 5.1 to 5.4 below.

5.1 Gifts and Giveaways

Ambev Employees and Intermediaries are prohibited from promising, offering, giving, or authorizing any gift to Government Authorities or Public Officials without prior written approval from the Ethics & Compliance Area and must also formalize such gifts and giveaways, including (i) the person responsible for such request, (ii) diligences performed, (iii) required approvals and (iv) rationale for offering gifts or giveaways.

In addition to the topics above, Gifts or Giveaways for Public Officials are only allowed if (i) they have a nature of a giveaway without commercial value, or they are giveaways generally distributed for courtesy, advertising or promotion purposes or on

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the occasion of special events or commemorative dates, provided that they do not exceed the amount determined by the Ethics Committee; and (ii) their delivery is not prohibited by the Anti-Corruption Legislation.

Gifts and Giveaways, including donations in products, are allowed to every single Government Authority in the total maximum reference value determined by the Ethics Committee. Donations of a philanthropic nature made to Government Authorities may exceed such amount. In any case, the amount of each donation must be reasonable and proportional to its purpose. The same formalizations for approval of such donations will be necessary, including written approval and formalization by the Ethics & Compliance Area.

For Public Officials, gifts in cash or equivalents (such as gift cards or certificates) are **prohibited**.

Gifts or Giveaways of a lower value than the threshold set out above do not exempt the applicant from the obligation to open a ticket in the Compliance Channel for prior written approval.

Any exception to the rules of this item 5.1, including requests that exceed the reference values, must be previously approved in writing by the Ethics & Compliance Director, subjected to confirmation by the Ethics Committee.


5.2 Entertainment

Due to the market segment in which we operate, events are legitimate means for Ambev to promote and give visibility to its business, either through its own events or through sponsorship of third-party events. In this context, Ambev may offer entertainment, such as tickets for events held or sponsored by the Company, in order to promote and give visibility to its practices and its business to third-parties.

Notwithstanding the foregoing, **Ambev's Employees and Intermediaries are prohibited from promising, offering, giving, or authorizing any entertainment to Government Authorities or Public Officials without prior written approval from the Ethics & Compliance Area.**

Entertainment can only be offered or given to Public Officials by Ambev Employees or by an Intermediary if in compliance with the foregoing, and when the Public Official is to **represent an institution** in such event, being recommended the presence of at least one Ambev Employee to accompany.

The provision of entertainment by the Company is not allowed to third parties related to the Public Official, such as companions or guests, nor is entertainment approved if there is a potential negative exposure for the Company.

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Any exception to the rules in this item 5.2 must be approved in advance, in writing, by the Ethics & Compliance Director, subjected to confirmation by the Ethics Committee.

5.3 Meals

In the context of conduction of our business, meals with third-parties related to our activities may occur.

Meals may only be promised, offered, or paid to Public Officials when the matter to be dealt with is related to the **institutional functions of that Public Official** and **at least one Ambev Employee is present**. Intermediaries are prohibited from doing so when they are acting on Ambev's behalf or interest.

The maximum amount of a meal to be offered to Public Officials shall be determined by the Ethics Committee, and provided that it does not involve items considered to be luxurious (such as excessively expensive beverage and food). **The payment of meals, by the Company, to third parties related to the Public Official, such as companions or guests, is not allowed.**

Meals offered to Public Officials must be previously authorized, in writing, by the Ethics & Compliance Area, even if the amount actually spent on the meal is updated later.


Exceptional cases where meals are offered without prior approval from the Ethics & Compliance Area must be reported to the Ethics & Compliance Area within a maximum period of 1 (one) business day from the date of the meal and are also subject to the rules above, and must follow the same procedure for expenses approval.

Any exception to the rules in this item 5.3 must be approved, in writing, by the Ethics & Compliance Director, subjected to confirmation by the Ethics Committee.

5.4 Travel expenses

Ambev's Employees and Intermediaries are prohibited from promising, offering, paying, or authorizing payment of any travel expenses to or on behalf of the Public Official, including transportation, meal or lodging, without prior written approval from the Ethics & Compliance Area.

Payments for travel expenses for Public Officials will be approved if the event giving reason to the travel, such as seminars, conferences, technical visits and meetings, is directly related to the promotion of Company products and/or initiatives or the execution of a contract with a Government Authority, provided that such event is related to the duties, job, or function of the Public Official in case.

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The invitation to take part in the events described here shall be sent to the highest of the authorities of the Governmental Authority that the Public Official is part of, or to another body or authority designated by the Government Authority, which will appoint, in case of acceptance, the appropriate Public Official to represent it, in view of the nature and matters to be discussed at the event.

Travel expenses will only be paid if:

- the travel has a legitimate business purpose;
- the cost is reasonable and in accordance with the Company's policies;
- no third party related to the Public Official, such as a guest or companion, is traveling at the Company's expenses; and
- there are no planned stops that are not directly related to the business purpose of the travel, unless the additional expenses arising from such stops are borne by the Public Official and not by the Company.

Expenses in an amount above what would be deemed reasonably necessary for the business purpose, including luxurious meals or accommodations or expenses with accompanying persons or guests, or that are not in accordance with the Company's internal policies, will not be approved.


The payment of daily expenses (defined as fixed payments to a person intended to cover the expenses in a certain day, regardless of the nature and extent of the expenses effectively incurred on that day) is prohibited, unless required by applicable law or previously agreed in writing with the Government Authority to which the Public Official is part of. The payment of remuneration to the Public Officials due to their participation in any event is prohibited.

In order to avoid misappropriations, whenever possible the expenses shall be paid directly by the Company to the provider (for example, airfares shall be paid directly to the travel agency or to the airline company).

Any exception to the rules of this item 5.4 must be approved, in writing, by the Ethics & Compliance Director, subjected to confirmation by the Ethics Committee.

6. DONATIONS TO NON-PROFIT INSTITUTIONS

Donations to non-profit institutions or associations must be approved in advance in writing by the Ethics & Compliance Area, and the institution or association receiving the donation shall expressly agree to the compliance with item 4 of this Anti-Corruption Policy.

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In case the donation is requested by a Public Official, the following rules shall also be observed:

- not be made as part of an exchange of favors with a Public Official;
- not be paid in cash;
- not be made to a private or individual account or to a for-profit organization;
- not be regarded as a political contribution under relevant laws; and
- be transparent with regard to the identity of the receiving party, the amount and the intended purpose.

The request will be denied in case the Public Official requesting the donation offers or promises any benefit or advantage, or makes any threat in relation to the donation request.

The Employee from Ambev in charge of the donation is responsible for monitoring the donations. Such monitoring may include requests for audited financial statements or the confirmation, by writing, with the receiving party that the funds donated by Ambev were appropriately used.


For all donations to philanthropic institutions, the respective supporting documents must be registered. Such expenses must be accurately identified and have their supporting documentation (receipts, invoices, etc.) duly filed and recorded in the Company's books and accounting records, as described in item 10 of this Policy, in addition to being recorded in the Compliance Channel.

The above provisions also apply to donations to institutions or non-profit associations made by Intermediaries whenever they do so in the name or in the interest or benefit of Ambev.

7. CONTRIBUTIONS TO POLITICAL PARTIES AND ELECTION CAMPAIGNS

Ambev and its subsidiaries are **prohibited** from making political contributions of any kind, even in countries or regions where such contributions are allowed under local law.

Political contributions are understood to mean any type of donations made directly or indirectly to political parties, candidates for elected public office or their representatives, whether such donations are made during electoral periods or not. Donations include – but are not limited to – cash, products, gifts, giveaways, travel, tickets, entertainment, and goods of any kind, regardless of their price. As noted, **eventual donations of Gifts and Hospitality to Public Officials in accordance with item 5, must be approved in advance, in writing, by the Ethics & Compliance Area, which will assess whether such donations constitute political contributions, in which case they will be rejected.**

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Members of the statutory board of directors and employees of the Corporate Affairs area of Ambev and its subsidiaries shall not make political contributions on a personal basis, either directly or indirectly. Indirect political contribution is defined as one in which a director of Ambev or an employee in the Corporate Affairs area of Ambev or any of its subsidiaries provides resources for or requests that a third party make a political contribution on its behalf.

Other Ambev Employees who choose to personally make political contributions will not be able to do so on Ambev's behalf or benefit and must bear all related costs and expenses. No reimbursement related to these costs and expenses can be requested or made to the Company.

8. ENGAGING INTERMEDIARIES AND FORMER PUBLIC OFFICIALS


8.1 Engaging Intermediaries

Ambev regularly engages Intermediaries, as defined in item 3 of this Policy. As they might interact with Government Authorities or Public Officials on behalf of Ambev or while rendering services to Ambev, **it is expressly prohibited to engage Intermediaries, even for occasional service, without prior and periodic written approval by the Ethics & Compliance Area.**

Ambev's Ethics Committee and the Ethics & Compliance Area are responsible for identifying which third parties will be considered Intermediaries.

The following rules apply to engagement with Intermediaries:

- All payments made to Intermediaries must be supported by a suitable document in order to prove the destination of the payment and must be regularly accounted for in a way that accurately reflects their nature and purpose. Ambev will seek to register all contracted Intermediaries in formal agreements;
- The contracts must be clear and precise with regards to its scope, the goods or services to be delivered by the Intermediary and the remuneration, and must have a specific clause that binds the contracted party to comply with the applicable Anti-Corruption Legislation, with any breach leading to termination of the agreement by the Company;
- Intermediaries are not allowed to participate, directly or indirectly, in any activities designed to influence Public Officials in the political and legislative sphere to make decisions that benefit Ambev;

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- The engagement of Intermediaries shall not include variable remuneration resulting from approval or influence in (i) the law or bill of law; (ii) acts, normative instructions, resolutions and other government regulations; (iii) public policies; (iv) tax incentives or benefits; and (v) contracts with public entities, subject or not to law 8.666/93;
- No payment can be made or promised to an Intermediary, except in exchange for legitimate goods or services or reimbursement of legitimate expenses, in both cases duly proven and provided for in the agreement;
- Any payment must be in an amount that is not greater than the fair market value of the legitimate goods or services received;
- Intermediaries must comply with Anti-Corruption Legislation and all Ambev policies and standards applicable to Intermediaries and maintain the highest ethical standards of business conduct.

Notwithstanding the prior validation of the Ethics & Compliance Area, **Ambev employees responsible for engaging the Intermediary must monitor the relationship and be alert to any “red flags” that may arise.** It is the responsibility of the Ambev Employee to report immediately to the Ethics & Compliance Area any irregularity or suspected irregularity on the part of the Intermediary in violation of this Policy or the Anti-Corruption Legislation.


8.2 Engaging a Former Public Official

The hiring or engagement, by Ambev, of Public Officials, former Public Official or persons or entities related to them as an Employee or Intermediary, may only occur:

- In the case the former Public Officials, or persons or entities related to them, have ceased to be a Public Official for over 180 days of his or her exoneration, or after the period set out by law, whichever is greater;
- Exceptionally, if approved in advance by the Ethics Committee or Ethics & Compliance Area, Public Officials or former Public Officials, or persons or entities related to them, that have recently ceased to be a Public Official, as long as it observes the defined guidelines by the Ethics Committee and does not result in a violation of this Policy and the Anti-Corruption Legislation.

9. CONTRACTING WITH GOVERNMENT AUTHORITIES

Any and all contracts involving a Government Authority, even if indirectly, must be submitted to the prior written evaluation of the Ethics & Compliance Area and the

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Legal Department, via the Compliance Channel. The requesting Employee must submit, in a timely manner, all available information regarding the subject matter of the agreement and the bidding procedure to be adopted, as well as any justifications for the waiver or nonrequirement of a bid.

It is strictly forbidden to discuss prices, offers, conditions or proposals with other interested parties, potential interested parties or participants in any biddings in which Ambev is participating or intends to participate, directly or indirectly, as well as taking any measures that may affect the participation of third parties or negatively affect the competitive nature of the bidding process (such as, for example, assisting or directing the preparation and/or specifications of notices, having early and irregular access to draft notices, or dismissing the bidder through fraud or offering of an advantage of any kind).

10. ACCOUNTING RECORDS

Ambev's Employees and Intermediaries must always act to ensure that Ambev's financial statements, books and records are accurate, clear and complete, and in a properly detailed manner, representing all of the Company's businesses and operations.


All transactions shall be recorded and managed in accordance with the Company's accounting policy and with other policies of the Finance Department, including those related to budget, as follows:

All recorded transactions must

- have a direct business purpose related to the transaction;
- be carried out in accordance with the Power Delegation (Delegation of Authority) – Company's DAG
- clearly and accurately reflect the Company's operations
- be recorded so as to enable the preparation of financial statement in accordance with applicable accounting standards;
- comply with the applicable tax legislation; and
- keep accountability of the assets. All supporting documentation shall be kept in accordance with the applicable requirements for retention of records.

No fund or asset that is not accounted in the Company's financial statements shall be established or maintained for any purpose.

No Employee or Intermediary shall be involved in the falsification of accounting records or any other business record, and all employees and Intermediaries shall

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correctly and completely answer any inquiry that may be carried out by internal or external auditors of the Company or by auditors from any regulatory agency.

11. MANDATORY NATURE AND VIOLATIONS

It is the obligation of every Employee and Intermediary to know and understand the content of this Policy, as well as comply with all the rules provided herein.

No Employee or Intermediary has the authority to request or take any action that violates this Policy. This Policy is not subject to any type of waiver or exception due to business or competitive demands, or other requirements.

The failure to comply with this Policy may result in civil and criminal penalties for Ambev and for the Employees or Intermediaries involved, in addition to possible disciplinary sanctions for those Employees, including, but not limited to, dismissal with cause and compensation for damages caused.

12. COMPLIANCE CHANNEL AND WHISTLEBLOWING

In case you have any **doubt** on the application of this Policy, please contact the Ethics & Compliance Area or open a ticket on the Compliance Channel available on Ambev's intranet.

In case of an actual or suspected **deviation of conduct** or **violation** of the Code of Business Conduct, this Policy or the Anti-Corruption Legislation, Employees and Intermediaries must immediately report to Ambev's whistleblowing channels.

The Ambev Whistleblowing Channel is a direct channel for reporting breaches of laws, regulations, policies and procedures of Ambev. The Ambev Ombudsman is available 24/7 via telephone (+55 0800 725 0011) or online (www.ouvidoriaambev.com.br). All reports are handled with confidentiality and secrecy, to the extent possible. Such reports are encouraged by the Company and may be made anonymously, if the reporter so prefers.

Ambev prohibits and will not tolerate any threatened or actual retaliation against any persons, or their legitimate representatives, who, in good faith, (i) raise concerns or reports misconduct, formally or informally; (ii) seeks help from another Employee to report misconduct; (iii) seeks guidance from the Ethics & Compliance Area; or (iv) participate in an investigation or legally protected litigation regarding a report made under this policy. Any victim of threat or retaliation must immediately report that fact in the Whistleblowing Channel or directly to the Ethics & Compliance Area. If such report is confirmed, who threatened or retaliated will be subjected to disciplinary action.