

Equal Employment Opportunity

Birmingham Beverage Company, Inc. (“Alabev” or “the Company”) is strongly committed to providing equal employment opportunity including but not limited to preventing race discrimination, which is made unlawful by Title VII, with respect to recruitment, hiring, training, promotion, layoff, pay, benefits, and all other terms and conditions of employment. The Company does not discriminate on nor does it tolerate any harassment on the basis of age, disability, race, religion, color, sex, pregnancy, national origin, military membership, veteran status, genetic information, family medical history, citizenship, sexual orientation, gender identity, or any other protected classification. The Company encourages any employee who believes that they or others have experienced any such discrimination, harassment, or retaliation to report it as described in this policy. The Company prohibits any retaliation against any employee who raises a concern that this policy has been violated. The Company does not tolerate any retaliation against employees for reporting concerns about whether or not this policy is being followed. The Company will provide training on equal employment opportunity obligations to all supervisors and managers. Any manager, supervisor, lead person, or Human Resources staff member who receives a complaint of discrimination, harassment, or retaliation shall report it immediately to Michael Silinsky (205-422-1064, msilinsky@alabev.com) OR the Company’s Title VII Coordinator, Charles Wilkinson (205-977-3908, charles@hrmasap.com) OR our confidential toll-free employee hotline number (1-844-222-1581 – English; 1-800-216-1288 – Spanish; reports@lighthouse-services.com (you must reference the Company name in the email)) for further investigation.

Additional details on our commitment to providing equal employment opportunity are found below in our policies against discrimination, harassment, and retaliation, and our policy on responding to concerns.

Any employee who violates these policies may be subjected to discipline up to and including discharge.

Prohibited Discrimination

The Company does not tolerate discrimination. The term “discrimination” includes, but is not limited to, taking any adverse employment action due to age, disability, race, religion, color, sex, pregnancy, national origin, military membership, veteran status, genetic information, family medical history, citizenship, sexual orientation, gender identity, or any other classification protected by law. This policy applies to all employment actions taken by any person at the Company including, but not limited to, actions affecting compensation; hiring; promotion; job assignment; pay; benefits; transfers; terminations; layoffs; recalls; company sponsored training, education, and tuition assistance; and all other employment actions or decisions at the Company.

Any employee who believes he or she has experienced discrimination, who believes he or she has witnessed another employee being discriminated against, or who is aware of any other employee who believes that he or she has been discriminated against must report it immediately to Michael Silinsky (205-422-1064, msilinsky@alabev.com) OR the Company’s Title VII Coordinator, Charles Wilkinson (205-977-3908, charles@hrmasap.com) OR our confidential toll-free employee hotline number (1-844-222-1581 – English; 1-800-216-1288 – Spanish; reports@lighthouse-services.com (you must reference the Company name in the email)). These concerns may be relayed orally or in writing. The Company prohibits and will not tolerate retaliatory responses to employees who report concerns of discrimination.

Prohibited Harassment

The Company does not tolerate any form of harassment of or by any employee or any non-employee (including customers, vendors and contractors). Prohibited harassment includes, but is not limited to, any unwelcome behavior or statements that are offensive, threatening, vulgar, intimidating, or degrading. Prohibited harassment also includes, but is not limited to, offensive and unwelcome behavior or statements based on age, disability, race, religion, color, sex, pregnancy, national origin, military membership, veteran status, genetic information, family medical history, citizenship, sexual orientation, gender identity, or any other classification protected by law. Examples of prohibited harassment include: bullying; threatening words or gestures; fighting or other unwelcome physical contact; repeating a disruptive behavior after a request that the behavior cease; unprofessional and excessive swearing, epithets, slurs; displaying objects, cartoons, images, websites, or memes that depict a negative attitude towards a protected characteristic of a person or group; statements that reflect a negative attitude towards a protected characteristic of a person or group. Any employee who believes he or she has experienced harassment, who believes he or she has witnessed another employee being harassed, or who is aware of any other employee who believes that he or she has been harassed must report it immediately to Michael Silinsky (205-422-1064, msilinsky@alabev.com) OR the Company's Title VII Coordinator, Charles Wilkinson (205-977-3908, charles@hrmasap.com) OR our confidential toll-free employee hotline number (1-844-222-1581 – English; 1-800-216-1288 – Spanish; reports@lighthouse-services.com (you must reference the Company name in the email)). These concerns may be relayed orally or in writing. The Company prohibits and will not tolerate retaliatory responses to employees who report concerns of harassment.

Prohibited Sexual Harassment

As part of its commitment against harassment, the Company strictly prohibits sexual harassment. No one -- whether they are an employee of the Company or not (such as customers, vendors or contractors) -- may threaten or suggest that an employee's submission to or rejection of sexual advances will have any impact on any employment decision affecting the employee. Examples of prohibited sexual harassment include: unwelcome sexual flirting; requests for sexual activity; sending, displaying, or describing sexual images or sexual activity; descriptions of a person or a person's body in sexual or sex-specific terms; sexually explicit or offensive jokes; sexual gestures or mimicking sexual activity; unprofessional or sexual touching of oneself or another; physical or sexual assault or threats; inappropriate staring; or any other unwelcome conduct which a person reasonably believes is sexual in nature. Any employee who believes he or she has experienced sexual harassment, who believes he or she has witnessed another employee being subjected to sexual harassment, or who is aware of any other employee who believes that he or she has been sexually harassed must report it immediately to Michael Silinsky (205-422-1064, msilinsky@alabev.com) OR the Company's Title VII Coordinator, Charles Wilkinson (205-977-3908, charles@hrmasap.com) OR our confidential toll-free employee hotline number (1-844-222-1581 – English; 1-800-216-1288 – Spanish; reports@lighthouse-services.com (you must reference the Company name in the email)). These concerns may be relayed orally or in writing. The Company prohibits and will not tolerate retaliatory responses to employees who report concerns of sexual harassment.

Prohibited Retaliation

It is also a violation of Company policy for anyone to retaliate, threaten or seek any type of reprisal against an individual acting in good faith who reports any suspected violation of this policy, who participates or cooperates in an investigation regarding any

violation of this policy, or who requests an accommodation as provided in this policy. Any employee who believes he or she has experienced retaliation, who believes he or she has witnessed another employee being retaliated against, or who is aware of any other employee who believes that he or she has been retaliated against must report it immediately to Michael Silinsky (205-422-1064, msilinsky@alabev.com) OR the Company's Title VII Coordinator, Charles Wilkinson (205-977-3908, charles@hrmasap.com) OR our confidential toll-free employee hotline number (1-844-222-1581 – English; 1-800-216-1288 – Spanish; reports@lighthouse-services.com (you must reference the Company name in the email)). The Company prohibits and will not tolerate retaliatory responses to employees who report concerns of retaliation.

How the Company Will Investigate and Respond to Concerns

The Company will promptly, fairly, and reasonably investigate any reported concern that its policies against discrimination, harassment, or retaliation have been violated. In investigating such concerns, the Company will at a minimum take the following steps: (a) document the complaint; (b) interview potential victims and witnesses identified in the complaint; (c) interview any individuals alleged to have participated in or condoned the complained of conduct; (d) review any documents that are relevant to the complaint, including prior confidential investigation files of any involved individual; (e) make and document a finding as to whether the Company's equal employment opportunities policies were violated; (f) maintain any notes related to the investigation and findings in a confidential investigation file; (g) maintain any notes related to any corrective action implemented. The Company will endeavor to provide as much confidentiality as feasible to those who initiate an investigation under this policy and to those who participate in an investigation under this policy. At the conclusion of the investigation, if a violation is found,

the Company will take appropriate corrective actions to make any victims whole and eradicate any conduct which does not meet the standards of this policy or the law.

Documents related to the investigation shall not be placed in any complainant's personnel files but will be stored separately and securely in confidential investigation files. If an employee is disciplined or terminated for violating this policy, the disciplinary documentation memorializing that shall remain in his/her personnel file.

If the Company determines that an employee has violated any of these policies, it will take appropriate disciplinary or corrective action against the offender, up to and including termination of employment. If the Company determines that a non-employee has violated any of these policies, it will take all necessary action to prevent the non-employee from repeating the behavior.

The Company will not tolerate any retaliation or threatened or actual reprisal against any individual who, in good faith, reports a suspected violation of this policy or who participates or cooperates truthfully in an investigation regarding any suspected violation of this policy.

From time to time this policy may be revised, and you will receive a new, dated copy of the policy when that occurs.

Date of last revision: July 29, 2021.