

Corporate Policy

Title: Global Anti-Bribery/Anti-Corruption Policy		Policy Owner: Chief Ethics and Compliance Officer	
Date of Issue: July 27, 2021		Effective Date: August 1, 2021	
Supersedes:	Kraft Heinz Global Anti-Corruption Policy , Dated October 1, 2015		
	Heinz CC.07 Anti-Bribery Policy	Dated: October 11, 2011	
	Kraft C-17 Policy Against Corruption and Bribery	Dated: October 1, 2012	

POLICY OVERVIEW

At Kraft Heinz, “We Do The Right Thing.”

Doing things the right way means that we deal honestly with the government, our business partners, our competitors and the public. **We do not pay bribes for any reason.**

Neither the Company (including directors, officers, and employees) nor third parties acting on the Company’s behalf may offer, promise, authorize, or provide anything of value to a Government Official or any other person or entity, including those in the private commercial sector, to induce the recipient to take (or refrain from taking) any action in violation of the law or the recipient’s lawful duties.

Under certain anti-bribery/anti-corruption laws, the Kraft Heinz can be held liable for bribes offered by third parties acting on the Company’s behalf. Accordingly, Business Units and Functions, in consultation with the Ethics and Compliance team, must perform due diligence on any third parties that are likely to interact with a Government or Government Official on the Company’s behalf.

Any gifts, business entertainment, donations or other expenditures provided to a Government Official **must** be approved in advance by the appropriate Business or Function Approver **and** the Head of Global Government Affairs (in the U.S.) or a Compliance Officer (outside of the U.S.).

Any payments or Items of Value, including gifts or business entertainment, that are given to any person, including a Government Official, **must** be supported with adequate documentation and properly and accurately recorded in the Company’s books and records.

Violations of anti-bribery/anti-corruption laws carry significant civil and criminal penalties and reputational risk for both Kraft Heinz as a company and for individual employees. Any employee who fails to comply with this Policy will be subject to appropriate disciplinary action, up to and including termination of employment.

However, no person subject to this Policy will suffer adverse consequences for refusing to offer, promise, pay, give, or authorize an improper or unlawful payment, benefit, advantage, or reward, even if doing so results in the loss of business opportunities for Kraft Heinz.

For more details and further information, please read the body of this policy.

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PURPOSE

This Global Anti-Bribery/Anti-Corruption Policy supplements the general provisions set out in Kraft Heinz’s Code of Conduct. This Policy is designed to help Kraft Heinz employees, officers, directors, and anyone acting on behalf of the Company comply with the applicable laws and Company policies against corruption and bribery, particularly the bribery of Government Officials. This Policy should be read in conjunction with Kraft Heinz’s [Interacting with Government Officials Policy](#), the *Global Business Partner Due Diligence Policy* and [Global Gifts and Entertainment Policy](#). This Policy also extends to all the Company’s financial record-keeping activities.

As discussed below, not all benefits are prohibited, but “anything of value” involving a Government Official *must be* pre-cleared by the appropriate Business or Function Approver **and** the Global Head of Government Affairs (in the U.S.) or a Compliance Officer (outside of the U.S.) before it can be offered. Generally speaking, to constitute prohibited bribery, the payments must be offered, given, promised, or authorized with a “corrupt intent.” In other words, the action must be intended to induce or reward the recipient for improper conduct, like:

- misusing their official position or violating their official duties;
- failing to perform an official function;
- rewarding a commercial counterparty who has unlawfully redirected business to us; or
- to cause non-enforcement of tax, environmental, safety, or labor law requirements.

This policy is not meant to prohibit giving Items of Value in the ordinary business context for the purpose of lawful relationship building, where there is no expectation of favorable treatment for the Company or *quid pro quo* in return and the Items of Value otherwise comply with our [Global Gifts and Entertainment Policy](#).

SCOPE

This Policy applies to all Kraft Heinz employees, including contingent and contract employees, globally, including all of its Business Units, subsidiaries, and majority-owned joint ventures (collectively, “Kraft Heinz” or the “Company”). The Policy also applies to agents, contractors, and other third-party Business Partners of the Company through contractual provisions requiring compliance with relevant Policies, Directives, and all applicable international anti-corruption laws.

Because it is a global policy, it supersedes any regional or local policies, except in cases where regional laws or regulations address specific content that must be or cannot be

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included by law. Any addendums or variations from this Global Policy must be approved, in writing, by the Global Policy Owner.

Employees who manage an agent, contractor, or other third-party Business Partner are responsible for ensuring that he or she understands this Policy and follows it. To help you communicate these requirements, provide the Business Partner with a copy of this policy.

BACKGROUND

Corruption violates the public’s trust, threatens economic and social development, and substantially impedes fair trade. It is also contrary to the principles of the Kraft Heinz Company, which requires its employees and Commercial Representatives to comply strictly with this policy, the company’s Code of Conduct, and all applicable legal requirements relating to bribery, corruption, and improper payments in each jurisdiction where Kraft Heinz conducts business.

The anti-bribery/anti-corruption laws that apply to Kraft Heinz and its employees are generally broad in their scope and application. These laws make it illegal for anyone to offer, promise, give, solicit, or receive – directly or indirectly – money or “anything of value” to or from a Government Official or someone in the private sector in order to obtain or retain business or secure some other “improper advantage.” Under these laws, bribes can take many forms, including cash, gifts, entertainment, travel, charitable donations, or favors given (e.g., getting a job at the Company for the child of a Government Official).

Some of these laws, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010 have extraterritorial reach and may apply to activities engaged outside of the U.S. or UK. In circumstances where applicable laws are more stringent than this Policy or other applicable local policies, colleagues must comply with applicable laws.

DEFINITIONS

“**Bribe**” means a payment (or an offer, promise or authorization to pay) of anything of value to a Government Official or any other person or entity in the private or commercial sector, made to induce the recipient to take (or refrain from taking) action or otherwise misuse his or her position to provide the Company with an improper commercial advantage or obtain or retain business for Kraft Heinz.

“**Business Partners**” are current and potential sales intermediaries and/or distributors, suppliers, vendors, bidders, and any other parties (including Government Officials) who conduct business with Kraft Heinz or any other parties with whom you develop a relationship as a result of your employment at Kraft Heinz. Business Partners include

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commissioned sales agents, distributors, sales representatives, consultants, lobbyists, transportation or logistics providers, customs clearing agents, brokers and joint venture partners, temporary or contract staff, and any non-Company third parties operating under a power of attorney granted by the Company.

“Compliance Officers” include the Global General Counsel, Zone or Geographical Region General Counsels, the Chief Ethics & Compliance Officer, and Zone Compliance Managers.

“Facilitation Payments” are small, unofficial payments made to a Government Official (or other person) to secure or expedite the performance of a routine, non-discretionary or necessary action to which the Company is otherwise entitled. They are sometimes referred to as “grease” payments.

“Family Members” include, by biological relationship or by marriage as “in-laws”, children, spouse, domestic partner, parents, grandparents, siblings, nieces, nephews, aunts, uncles, first cousins and the spouse of any of these people, and any other individuals who share the same household as the person in question.

“FCPA” means the Foreign Corrupt Practices Act, a U.S. law that prohibits corrupt payments to non-U.S. Government Officials in order to acquire or retain business. The FCPA also requires corporations to create and maintain accurate books and records and to establish an adequate system of internal accounting controls.

“Government” includes any agency, instrumentality, subdivision or other body of any national, state or local government, including:

- Administrative, legislative, judicial or executive branches or institutions related to the government,
- Hospitals or other health facilities and educational facilities which are owned or operated by the government,
- Administrative or regulatory agencies (such as environmental regulators or zoning or planning authorities),
- Government-owned or controlled businesses, corporations or societies (such as government-owned airlines, power companies or media organizations),
- Political parties,
- Public international organizations (such as the World Bank or the United Nations).

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“Government Official” is construed very broadly by regulatory authorities and includes officers or employees of a government-owned or controlled entity. A Government Official includes:

- Any official or employee of a government, including any political party, administrative agency, executive or regulatory agencies (such as civil servants, regulatory inspection officials, customs officials; members of the armed forces, public safety officers);
- Any person acting in an official capacity on behalf of a government entity (such as elected officials and members of their staffs),
- Employees or agents of a business or entity that is owned or controlled by a government (such as employees of government-owned or controlled hospitals, health care facilities, distributors or cooperatives, universities or airlines),
- Any person or firm employed by, or acting for or on behalf of, any government (such as employees of entities contracted by a government entity to perform government functions),
- Any political party official, employee or agent of a political party, or candidate for political office (or political party position); officials, representatives, or employees of an international organization (e.g., the World Bank or United Nations); and
- Any family member or other representative of any of the above.

See Kraft Heinz’s [Global Interactions with Government Officials and Political Contributions](#) Policy for a more detailed definition of this term. If you are unsure whether a person is a Government Official, you should consult with a Compliance Officer. You should treat that person as a Government Official unless a Compliance Officer directs you otherwise.

Items of Value. Anything the recipient would find of any value. It is not limited to tangible items or economic value and, for purposes of this Policy, has no minimum value. It includes, but is not limited to:

- Cash or a cash equivalent, including gift vouchers or gift cards or other financial instruments (such as stock);
- Gifts of goods or services;
- Entertainment, meals, and travel;
- Company products;
- Business, employment, and investment opportunities;
- Personal discounts or credits;
- Offers of favors or other benefits to Family Members or friends;
- Payment of medical expenses;

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- Political contributions; and
- Charitable contributions.

UKBA. The UK Bribery Act is the UK law that criminalizes bribery between private commercial parties as well as public officials. The UKBA applies to bribes made in the UK by foreign companies and bribes made overseas by UK citizens. It also covers bribes made by third parties anywhere in the world on behalf of or for the benefit of any company that does business (or a part of its business) in the UK.

REQUIREMENTS

A. Improper Payments Prohibited

Kraft Heinz has **zero tolerance** for the payment or acceptance of bribes. Employees are prohibited from promising or offering to bribe or otherwise pay Items of Value directly, or indirectly through a Business Partner, to a Government Official or any other person to secure any improper commercial advantage, to improperly obtain or retain business for Kraft Heinz, or to induce their performance or non-performance of a lawful function.

Employees and Business Partners are similarly prohibited from accepting a Bribe or taking action premised on a promise or offer of a Bribe from any third party.

Kraft Heinz also prohibits commercial bribery which involves a situation where something of value is given to a current or prospective business partner with the intent to improperly obtain business or corruptly influence a business decision.

Violation of this policy will be treated seriously and shall be grounds for disciplinary action, up to and including termination of employment, and where appropriate, referral to appropriate law enforcement agencies.

No person subject to this Policy will be subjected to discipline or other adverse consequences for refusing to pay a Bribe or for bringing to management’s attention a Bribe request, even if the employee’s action results in the Company losing business. Employees must report any Bribe request to their supervisors, a Compliance Officer, or through the Ethics & Compliance reporting channels.

B. Facilitation Payments Prohibited

The laws of most countries, including the UK, do not permit making facilitation payments. Accordingly, the Company strictly prohibits Facilitation Payments. Consult with a

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Compliance Officer if you receive a request for a Facilitation or “grease” payment, or are asked to provide a tip to a Government Official.

For example, the Company’s Assistant Accounting Manager is requested to pay a “tip” to the clerk at the government tax office to purchase tax forms. Without paying such a tip, he would probably be told “we are out of forms today.” The facilitation payment is prohibited by this Policy. The Kraft Heinz employee should inform the clerk’s supervisor that Company policy prohibits the payment and notify a Compliance Officer immediately.

Facilitation payments do not include instances where government agencies may impose official fees that may be paid directly in the name of a governmental entity or enterprise itself, as set out in published fee schedules or other official documents. These official government fees can be paid to expedite passports, licenses or other services, provided that they are deposited in the treasury of a government, an official government receipt is collected, and the expense is accurately recorded in the Company’s books. However, Facilitating Payments provided for the benefit of Government Officials in their personal capacity (i.e., are not deposited in an official treasury account belonging to a government) will violate this Policy.

C. Payments for the Benefit of Government Officials

Under certain narrow circumstances, gifts, entertainment, and travel for the benefit of a Government Official may be permitted. There must be a legitimate business purpose (e.g., to promote goodwill or to promote, demonstrate or explain Kraft Heinz products and services) and the payments must meet the following requirements:

- The payment may **never** be provided or offered to improperly influence any official act or decision in order to secure an improper commercial advantage or obtain or retain business for Kraft Heinz; or improperly influence governmental decisions, on behalf of Kraft Heinz;
- Reasonable in value and consistent with local custom; the value of any single gift must follow local law and should not exceed USD \$25;
- Permitted under local laws;
- Consistent with Kraft Heinz [Gifts and Entertainment Policy](#), including obtaining all necessary approvals pursuant to that policy, including completion of the A-B1 form;
- Offered infrequently, as defined in the Kraft Heinz Gifts and Entertainment Policy); and
- Accurately documented and recorded properly in the books and records of the Company.

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Prior to offering a gift or entertainment for the benefit of a Government Official, employees must complete the AB-1 Form, and get approval from Business or Functional Approver (e.g., Head of Finance, General Manager) **and**:

- the Head of Global Government Affairs (in the U.S.), or
- a Compliance Officer (e.g. local General Counsel or Ethics and Compliance Manager) (outside the U.S.).

Prior to offering or agreeing to pay for training, travel, and associated costs for Government Officials, employees must complete the AB-1 Form, get approval from Business or Functional Approver (e.g., Head of Finance, General Manager), **and**:

- the Head of Global Government Affairs (in the U.S.), or
- a Compliance Officer (e.g. local General Counsel or Ethics and Compliance Manager) **and** the Global Chief Ethics and Compliance Officer.

For more information, see the Kraft Heinz [Gifts and Entertainment Policy](#), including the “Gifts & Entertainment Approval Schedule” and the “AB-1 Form -- Approval of Gift or Entertainment Given to Government Officials.”

D. Third Parties/Business Partners

Bribes and other payments made by the Kraft Heinz that are prohibited under this Policy **cannot be made indirectly** on the Company’s behalf – or to the Company’s benefit -- by a third-party Business Partner. Anti-bribery laws prohibit indirect bribery payments and offers, and the Company and its employees may be held liable for the conduct of Business Partners acting on behalf of the Company.

Written agreements with Business Partners should include a representation by the Business Partner that it will comply with the FCPA, UKBA and local anti-bribery provisions of the appropriate legal jurisdiction. In situations where a Kraft Heinz entity is operating without a written contract, in accordance with the [Global Contractual Documentation and Review Directive](#), the Business Partner must execute a Compliance Certification Letter.

Commissions and other compensation paid to a Business Partner must be in amounts that are customary and reasonable in relation to the services provided. Commissions, expenses and other payments must be properly reflected in the Company’s records and financial statements. There should not be any false or misleading entries in Kraft Heinz’s books, including entries that are falsified to disguise improper transaction. Likewise, “off-the-books,” secret, or unrecorded funds or assets are also prohibited.

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1. Engaging New Third-Party Business Partners

When engaging any new Business Partner, the business unit should:

- select the Business Partner in part based on their reputation, experience, ethical business practices and their willingness to conduct business consistent with the principles set forth in this Policy;
- inform the Business Partner of the Company’s anti-bribery policies and of our expectation that the Business Partner will comply with all applicable anticorruption and anti-bribery laws;
- obtain assurances from the Business Partner of compliance with applicable anti-corruption and anti-bribery laws; and
- maintain a record of these communications, including any agreements to comply by the Business Partner, and any due diligence performed.

2. Third Party Due Diligence Requirements

All business units are responsible for performing, in coordination with the Global Ethics and Compliance team, due diligence procedures for Business Partners so that the Company can be reasonably assured that the Business Partners are not likely to engage in corrupt activities. Due diligence is performed on both new Business Partners and periodically on existing Business Partners.

The business unit must consult the Global Ethics & Compliance team on due diligence prior to engaging any Business Partner that could raise a corruption risk to Kraft Heinz. This includes, but is not limited to, Business Partners that:

- may interact with a Government or Government Official on behalf of the Company; or
- requests payment to be made to bank accounts or entities that are not affiliated with the Business Partner; or
- appears reluctant or refuses to provide an assurance that it will abide by applicable anti-corruption and anti-bribery laws.

Some examples of Business Partner interactions with Government or Government Officials include, but are not limited to:

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1. obtaining Government licenses or certifications on behalf of the Company;
2. clearing Kraft Heinz products through Customs on behalf of the Company;
3. obtaining government approvals on behalf of the Company to import and/or distribute Kraft Heinz products; or
4. selling on behalf of the Company to a Government, Government agency or Government-owned entity.

Detailed information on Kraft Heinz’s Due Diligence procedures are fully described in Kraft Heinz’s Global Third Party Due Diligence Policy and the Due Diligence Playbook maintained by Ethics and Compliance. Contact your local Compliance Officer for more information on the due diligence requirements for your specific situation.

3. Third Party Business Partners – Red Flags

While conducting due diligence and throughout any subsequent relationship, you must monitor for any “red flags.” A “red flag” is a fact or circumstance which requires additional consideration and extra caution. Red flags may appear in many forms and can include, but are not limited to, the following:

- History or reputation of corrupt behavior or bypassing normal business channels;
- Lacking the qualifications or resources to perform the services offered;
- Business scope in its commercial registration or other organization documents do not cover the services proposed;
- Provide services for KH in a country where the third party has no office or experience;
- Refusing to certify that they will not engage in corrupt activity or sign any required acknowledgments;
- Commercial registration number or tax identification number has expired;
- Negative news media, press reports or credible rumors of inappropriate activity;
- Requesting unusual payment patterns or financial arrangements;
- Requesting payments to be made to another party on their behalf;
- Requesting payment to an account in the name of another party or in a different county from where the third party is located or is doing business for KH, particularly to a country with a history or reputation for corruption or tax avoidance;

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- Use of a shell or holding company that obscures ownership without credible explanation;
- Requesting cash payments only;
- Requesting a large upfront payment or a bonus;
- Requesting payment that is disproportionate to the services, above the market rate, or otherwise usually high;
- Requesting unreasonably large discounts, credits, or unsupported expense reimbursements;
- Distributor sells to government entities at higher prices without a justified reason;
- Provision of services in a different line of business than the contemplated engagement;
- Use of another third party to complete their work (sub-agents);
- Recommended by a Government Official or customer;
- Representations or boasting about influence or connections;
- Individual Third-Party Intermediary is employed by a government entity or a customer;
- Have close relatives or associates who work with the government or a customer;
- Recommend a business relationship with a Government Official who is a relative;
- Conflicts of interest exist (e.g. the third party also works for KH or has a relative that is employed by KH);
- Requests to be able to make agreements without the company’s approval;
- Requests that agreements or communications be kept secret;
- Refusing to be forthcoming about the details of their company, including its owners and employees who will be providing our services, etc.; and
- Making statements or inferences that a particular payment, gift, etc. is necessary “to get the business” or similar expressions.

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The KHC employee who manages the relationship with the third party is responsible for monitoring your email and other communications and documents for red flags. Any red flags should be brought promptly to the attention of your supervisor or a Compliance Officer. Failure to do so is considered a violation of this Policy.

E. Extortion Demands

We value the safety of our employees. You will not be penalized for actions take that would otherwise violate this policy where there is an imminent threat of danger to life or safety. If such a payment is made, it is critical that it is reported as soon as possible to the Ethics and Compliance team and Zone or Regional Counsel. Additionally, the Zone or Region Controller should also be notified promptly so that the payment is properly recorded in the Company’s books and records.

This exception will be interpreted narrowly. Any employee who relies in bad faith on this provision to provide an otherwise prohibited payment will be subject to appropriate discipline, up to and including termination.

F. Political and Charitable Contributions

Political and charitable contributions may never be provided to influence any official act or decision, to secure an improper commercial advantage, or improperly obtain or retain business for Kraft Heinz.

The use of Company funds, property, services, or Items of Value for, or in aid of, political parties or candidates for public office must comply with all local laws and regulations. Business units are generally discouraged from making political contributions.

Before discussing, promising, offering or giving a political contribution from Kraft Heinz, employees should consult a Compliance Officer **and must** obtain prior written approval from the Global Government Affairs team. The Global Government Affairs Team maintains records regarding any such contributions as required. See Kraft Heinz’s [Interacting with Government Officials and Political Contributions](#) Policy for more details.

Donations made to charities (for example, not-for-profit organizations that seek to address social or medical needs) in which Government Officials or their Family Members possess a role, such as trustee, cause concerns under international anti-corruption laws. The giving of charitable gifts to a Government Official on behalf of the Company is subject to strict controls in order to ensure compliance with anti-corruption laws, the US Patriot Act and other applicable laws.

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Accordingly, any donation made to a charity associated with or requested by a Government Official (or the Family Member of a Government Official) requires prior written approval by the Global Head of Government Affairs **and** the Chief Ethics and Compliance Officer.

Consult Kraft Heinz’s [Interacting with Government Officials and Political Contributions](#) Policy or [Charitable Donations](#) Policy for further guidance.

G. Proper Accounting

In accordance with the Global Code of Conduct, all employees must do their part to ensure that the Company’s books and records are made and kept accurately and in reasonable detail to ensure that payments or Items of Value to third parties are not used for bribery or corruption.

This means that any payment or Item of Value given to any person or third party, including a Government Official or Business Partner, must be properly recorded in the books and records of the appropriate Business Unit. For example, using the term “consulting fees” on your expense report to describe a dinner with a Government Official would violate this Policy.

No payment shall be made to any person or third party, including a Government Official or Business Partner, without adequate supporting documentation, and no payment shall be made for any purpose other than as described in such documentation. There should not be any false or misleading entries in Kraft Heinz’s books, including entries that are falsified to disguise improper transaction. Likewise, “off-the-books,” secret, or unrecorded funds or assets are also prohibited.

H. Employee Training

All white collar employees and selected blue collar employees must undergo anti-corruption training provided by the Company on a periodic basis. The nature, content and frequency of that training will be determined by the Company based on your job responsibilities, seniority, and location.

SPEAK UP

All employees have an obligation to speak up. If you become aware of any actual or potential violations of this (or any other) policy, please use the Ethics & Compliance reporting channels to report it immediately.

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Please remember that when you raise concerns or report wrongdoing in good faith, you are doing what's right and Kraft Heinz will not tolerate any retaliation against you. If you think someone has retaliated against you or any other employee for raising a concern, let us know as soon as possible.

- Report online at [KraftHeinzEthics.com](https://www.kraftheinzethics.com)
- Country specific reporting Hotline numbers are also available at [KraftHeinzEthics.com](https://www.kraftheinzethics.com)
- You can also email ethics@kraftheinz.com