



ALCOHOL MANIFESTO

BAVARIA S.A.

May 2006

Message from the President of Bavaria S.A.

It must be clear to all of us in Bavaria that we, as an enterprise and as individuals engaged in the promotion of its interests, have a responsibility toward the consumers of our products and the public at large. The alcoholic beverages we produce are consumed by thousands of Colombians and play an important part in their enjoyment of life.

However, we are aware of the fact that the consumption of our products may have negative effects when used irresponsibly or when consumed by so-called risk groups. We therefore have a special obligation to promote responsible consumption and to contribute effectively to the prevention of alcohol abuse or misuse.

For these reasons, we have decided to establish an internal, but public, policy concerning our alcoholic beverages, which has as its core objective to promote responsibility in alcohol consumption and govern all types of commercial communications by the company.

This document, named our Alcohol Manifesto contains policy prescriptions, the Code of Commercial Communications, as well as the regulations governing the Commercial Communications Committee, to be established.

This policy document is intended to govern the commercial conduct of Bavaria S.A. and all its subsidiaries, including Cervecería Leona S.A. and Cervecería Unión S.A., as well as those third parties and agencies that provides services to us and on our behalf.

I therefore invite you to read this Alcohol Manifesto thoroughly, and comply with its prescriptions at all times.

KARL LIPPERT
President

INTRODUCTION

Alcohol beverages when consumed responsibly are compatible with a balanced and healthy lifestyle and may positively contribute to the lifestyle of those freely choosing to drink them.

Therefore, Bavaria S.A. is proud to offer its brands for responsible consumption.

At the same time, it cannot be denied that irresponsible or excessive alcohol consumption may result in negative health, personal and social consequences. Bavaria S.A. therefore assumes its responsibility for contributing to the education of its consumers aiming at effectively avoiding these negative consequences.

OBJECTIVES

1. To promote responsible consumption of alcohol beverages as part of a healthy lifestyle, while endeavouring to prevent alcohol misuse or abuse.
2. To ensure our commercial communications is aimed toward promoting our brands among people of legal age.
3. To ensure that the commitment to promote responsible drinking is maintained in Bavaria S.A. and in all its subsidiaries.

POLICY

The alcohol policy must be applied in Bavaria S.A., Cerveceria Leona S.A. and Cerveceria Union S.A. and consists of the following aspects:

1. Bavaria S.A. and its subsidiaries shall adhere to SABMiller's Code of Commercial Communication and are committed to its application, as well as to complying with the national legislation in force, the legal regulations issued by competent authorities and the compatible self-regulatory industry codes.
2. An internal committee will be responsible for supervising and reviewing all commercial communications to ensure they comply with the letter and spirit of the Code.
3. Bavaria S.A. shall include responsible consumption messages in its commercial communication when so determined by corporate policies and legal provisions.
4. Bavaria S.A. shall develop a policy on responsible alcohol consumption for its employees, providing guidelines on responsible behaviour.

5. Bavaria S.A. shall take measures to educate its distributors and retailers on the responsible use of the company's products, especially to avoid supplying alcohol to minors or inebriated consumers.
6. Bavaria S.A. shall take measures to educate consumers on the responsible use of the company's products, particularly aiming to reduce alcohol consumption by underage persons and driving under the influence of alcohol.
7. Bavaria S.A. shall participate, whenever possible, in conducting studies and compiling information on alcohol consumption patterns and associated problems, and it shall promote research projects providing data to guide efforts that aim to reduce alcohol misuse.
8. Bavaria S.A. shall positively influence and collaborate with the alcohol-beverage industry at national and international levels to promote responsible alcohol consumption.
9. Bavaria S.A. shall cooperate with the national and international authorities and with relevant NGO's in their efforts to develop effective controls and programs promoting responsible alcohol consumption.
10. Bavaria S.A. shall keep records about the progress in the application of the alcohol policy contained herein.



BAVARIA S.A.

**CODE OF COMMERCIAL
COMMUNICATIONS**

<p style="text-align: center;">CODE OF COMMERCIAL COMMUNICATIONS BAVARIA S.A.</p>
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Bavaria S.A. has established the following Code of Commercial Communications, in accordance with the alcohol policies above.

1. OBJECTIVE

The objective of Code of Commercial Communication is to provide an orientation for the commercial communications of the alcoholic beverages we produce. Therefore, it is additional to all the requirements of the regulation or self regulation that may exist in the country.

2. COMMERCIAL COMMUNICATIONS

By commercial communications we must understand any activity aiming at showing or positioning the company, its products and its brands, including advertising in all media (including the Internet), packaging, promotions and associated activities, placement of products at outlets, product marketing and sponsoring of events or of any other such activities.

3. GENERAL PRINCIPLES APPLICABLE TO ALL COMMERCIAL COMMUNICATIONS

All Bavaria S.A.'s commercial communications must:

- 3.1 Adhere to legal provisions in force.
- 3.2 Be honest and sincere in their contents and comply with the accepted principles of fair competition and good commercial practice.
- 3.3 Respect local cultural values.
- 3.4 Be socially responsible and be based on the principles of justice and good faith.
- 3.5 Meet the criteria of morale, integrity and human dignity prevailing in the society.
- 3.6 Be aware of sensitivities related to culture, gender, race and religion.

- 3.7 Abstain from employing terms, images, symbols or figures that may be considered offensive, derogative or denigrating.

4. SPECIFIC PRINCIPLES

- 4.1 Commercial communication will not be directed to persons under the legal drinking age.
- 4.2 Commercial communication will not incorporate images of people who are, or look as if they are, under the age of 21.
- 4.3 Commercial communication may not employ characters or icons which have unique appeal to children.
- 4.4 Commercial communication may not imply that alcohol beverage consumption is essential to business, academic, sporting or social success.
- 4.5 Commercial communication shall reflect moderate consumption. It may not show or encourage irresponsible, risky or abusive consumption of alcohol.
- 4.6 Commercial communication may not depict or suggest consumption of alcohol beverages under circumstances that are generally regarded as irresponsible, improper or illegal, for example before or during any operation requiring sobriety, skill or precision.
- 4.7 Commercial communication may not have an association with violent or anti-social imagery or behaviour, or with illicit drugs or drug culture.
- 4.8 Commercial communication must not feature pregnant or breast feeding women.
- 4.9 Commercial communication may not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative or tranquillizer
- 4.10 Commercial communication must not encourage the choice of a product based on higher alcohol content or its intoxicating effects. Factual information for the guidance of consumers about alcoholic strength may be included, dependent on existing regulatory requirements
- 4.11 Commercial communication may not portray persons in a state of intoxication nor in any way suggest that intoxication is acceptable.
- 4.12 Commercial communication may not present moderate consumption, refusal or abstinence in a negative light.

5. MESSAGES OF RESPONSIBLE DRINKING IN COMMERCIAL COMMUNICATIONS

- 5.1 The company must support campaigns that direct alcohol beverage sales to adults only.
- 5.2 The company must promote communications or advertising with messages on responsible drinking.
- 5.3 The company must not show commercials featuring drinking and driving, and must promote campaigns aimed at discouraging the practice of no drinking and driving.

6. SPECIFIC CRITERIA APPLICABLE TO ADVERTISING:

6.1 TV and movies

- a. The company must not advertise in media or at times dedicated to people under the legal drinking age.
- b. The company must only transmit advertisements in cinemas when the films shown are not specifically aimed at people under the legal drinking age.
- c. Any health warnings or responsible consumption messages contained in advertising must be played at the same sound and visual speed as the main commercial body.

6.2 Press & Magazines

- a. Beer advertising must only be included in publications having an adult target audience.
- b. Beer advertising shall include the transmission of institutional advertising encouraging responsible alcohol consumption.

6.3 Radio

- a. Beer advertising shall include the transmission of institutional advertising encouraging responsible alcohol consumption.
- b. Any health warnings or responsible consumption messages contained in advertising must be played at the same sound speed as the main commercial body.

- c. No beer commercials must be transmitted during programs for children.

6.4 Billboards

- a. The company shall not advertise on billboards placed near formal education centers.
- b. All billboards shall be subjected to the requirements indicated by the local competent authorities on location, content, size and registration, among others.

7. CONTROL OF COMMERCIAL COMMUNICATIONS

- 7.1 The company and all its employees, subsidiaries and agencies must comply with this Code of Commercial Communications.
- 7.2 Bavaria S.A. will establish Communications Compliance Committee, with the brief to ensure that all commercial communications are compliant with this Code.



**COMMUNICATIONS COMPLIANCE
COMMITTEE**

COMMUNICATIONS COMPLIANCE COMMITTEE

1. DUTIES OF THE COMMITTEE:

- 1.1 To monitor and review the company's commercial communications to ensure compliance with the policies and spirit of the following:
 - a. The provisions included in the Code of Commercial Communications.
 - b. Any additional legal requirement established by competent authorities.
 - c. Any self-regulatory requirement or the industry codes if adhered to by the Corporation.
- 1.2 To assess the brand and trademark positioning strategies with respect to the Code of Commercial Communication.
- 1.3 To periodically review compliance with the Code of Commercial Communication requirements, related to the demography of the target audiences of the media used for commercial communication.
- 1.4 To ensure that all external complaints about commercial communications and/or specific trade marketing activities are responded to.

2. COMMITTEE OPERATIONS & PERFORMANCE

2.1 Composition of the Committee

The Committee shall be composed of the following persons:

- a. The VP: Legal
- b. The VP: Corporate Affairs
- c. The VP: Marketing
- d. The Public Relations Director

The Committee shall appoint a Secretary, who can be one of the members or another company member of staff, for the sake of record keeping.

2.2 Training

The Corporate Affairs Vice-Presidency shall arrange sessions so all the members of the Committee may receive guidance and training on:

- a. Role, competence, procedures and criteria for Committee decision making.
- b. The objectives and provisions detailed in the Code of Commercial Communication.
- c. The local legislation related to the alcohol beverage industry.
- d. Local voluntary agreements and industry codes related to alcohol beverage marketing.
- e. Concerns and agendas of local stakeholders with an interest in the marketing of alcohol beverages.

2.3 Reviewing the communications

All commercial communications must be reviewed including, but not limited to, the following:

- a. TV and radio commercials
- b. External advertising (billboards, mobile billboards, posters, signs, events, brand activations)
- c. Advertising and other communications targeting customers via printed matter
- d. Advertising and other communications targeting customers in electronic media, including corporate and third-party web pages
- e. Advertising by mail
- f. Materials at outlets
- g. Promotions and sponsorships
- h. Packaging (eg bottles, cans, crates)

All commercial communications are subject to the Committee's revision, prior to application. Given that late submission can result in delays and unnecessary costs,

approval must be sought as early in the development of communications, materials or activities as possible.

2.4 External complaints

The Committee shall review all external complaints about specific commercial communications and/or activities. After the review, the Committee must decide whether the communication or activity must be stopped or changed, or not. The Corporate Affairs Vice-Presidency shall prepare a response to whoever filed the complaint.

Records must be kept of all decisions and shall include:

- a. The date the complaint was received
- b. The decision taken by the company
- c. The date the response was delivered to the complaint filer
- d. A copy of the response

2.5 Meetings

- a. The Committee shall meet once a month or whenever the circumstances should so require in order to ensure compliance with the Code and proper recording of decisions. However, in order to expedite commercial activities, the Committee must set up an electronic approval system, so that urgent decisions may be taken within 24 hours of requests for approval.
- b. Company staff and/or third parties interested in a specific subject to be dealt with may be invited to the Committee meeting, in order for them to contribute with their judgment to the decisions of the Committee.
- c. The Committee members must be available for informal consultation by the areas so requiring at any stage of the process in developing commercial communications.
- d. The Committee may create sub-committees to study and report on any specific topics within their area of competence.
- e. The quorum to deliberate is at least three (3) of its members.
- f. Decisions shall be reached by consensus. In cases where consensus cannot be reached, the President's decision will be final.

2.6 Minutes and dissemination of the Compliance Committee's decisions

- a. Minutes of each session shall be taken, certifying the existence of a quorum for decision making, the topics discussed as well as the decisions adopted at each meeting.
- b. Decisions shall be communicated in writing to the relevant staff requesting approval.

2.7 Administrative Support

The President and Vice-Presidents shall assure that the Committee has the required facilities and administrative support to conduct its affairs in an expeditious and effective manner.