

	Title:	Global Employee Alcohol Responsibility Policy
Molson Coors Brewing Company Policy	Owner:	MCBC Corporate Responsibility
	Effective Date:	13Oct10

What is the purpose of this Policy?

Molson Coors Brewing Company (MCBC) is a great place to work and part of all of our jobs is to champion and protect our great brands.

This policy defines expectations for respecting the products we brew and sell. As a result, we safeguard the reputation of our brands, provide a safe workplace, and comply with applicable local laws as the way we do business.

Our Brew says that doing business the right way is how we work. In the beer business, employee alcohol responsibility is at the heart of the right way. We all have a part in demonstrating how proud we are to champion our products in a responsible manner.

Being recognized for corporate responsibility is one way for MCBC to become a top tier global brewer. Employee actions on and off the clock affect how MCBC is viewed. Being personally accountable in all we do means modeling alcohol responsibility at work, at home, and at play.

So, let's get to the specifics:

Alcohol responsibility on company premises

Company offices and company pubs

MCBC allows each one of us, if we choose, to enjoy our products responsibly on company property, following the rules and guidelines set out by our respective business unit leadership. It's a great opportunity to "talk shop" with fellow workers.

Consuming beer or any alcoholic beverage on company property is permitted only in designated areas; i.e. officially designated pubs, official tasting rooms, new product development areas, designated cafeterias, and other area(s) designated by senior management for hospitality or special events. Bartender service is not required at employee events on MCBC property, but only employees who have completed the company alcohol responsibility training may serve themselves or others.

Non-alcohol beverages and snacks should always be readily available.

Each business unit must provide a safe way home for anyone deemed unable to drive. Employees may be required to show company identification and all guests must be prepared to show proof of age. Hours and rules of operation must be established, documented, and visible at each company venue.

Manufacturing facilities

Special care must be taken in manufacturing environments due to the complexity and importance of working safely.

In compliance with established laws and safety practices, specific brewery work rules, and negotiated bargaining agreements, no alcohol may be consumed by employees during working hours unless it is a specific job

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requirement (e.g. sensory tasters) or express permission has been granted by leadership and then only in designated areas.

Alcohol responsibility at off-site company events

Hosting, attending, or participating in off-site company sponsored events is yet another great opportunity to champion our great brands, and demonstrate our commitment to responsibility.

A sponsoring employee, or their designee, must be present at any off-site company event for the duration of the event.

Trained bartenders are required to serve at off-site company events, and may even be required by local law. The same rules apply for MCBC hosted charitable or community events. People under the legal drinking age may not be served alcohol. All local laws regarding the sale and consumption of alcohol should be applied. Non-alcohol beverages and snacks should always be readily available.

Providing a safe way home for those that aren't able to make it home safely is always encouraged, and again shows our commitment to being responsible.

Responsibility for business entertainment or representing the company

These are occasions where we're particularly visible and that's a great opportunity to model responsible drinking yourself and promote responsibility by your guests and colleagues. If you ever feel that you or your guests have had too much to drink, be sure to arrange alternative transportation so everyone gets home safe.

Responsible conduct

As ambassadors for MCBC and the beer industry, employees can preserve our reputation by demonstrating a responsible attitude toward drinking alcohol beverages. The opposite is true as well. If employees drink irresponsibly or commit offenses related to or resulting from the consumption of alcohol or providing alcohol to minors, this places MCBC's business and reputation at risk. As beer champions, MCBC employees are expected to understand this and to act accordingly.

Alcohol responsibility when driving

All employees are prohibited from operating any MCBC owned or leased vehicle, or any vehicle during company working hours, while impaired by alcohol. Driving while impaired by alcohol or other controlled substances is not being a responsible employee nor is acceptable under any circumstances. And all local laws regarding drinking and driving apply.

Reporting driving incidents

Employees are required to report alcohol or other controlled substance-related incidents to the appropriate representative (Legal, Manager, Human Resource) within the next business day where the employee has been ticketed, cited, charged or convicted of an offense while driving an MCBC owned or leased vehicle.

Testing and disciplinary action

MCBC aspires to providing a safe working environment. MCBC reserves the right to test employees where there is reason to believe their ability to perform their job may be impaired by drugs and/or alcohol. In addition, any employee who is

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injured on the job, or has caused an injury to a fellow employee, has damaged property, or who has been involved in a "near accident," may be subject to drug and/or alcohol testing at the Company's discretion. The Company will incur costs associated with testing done at their request. Employees must submit to testing that is scheduled by the Company.

Reporting for work under the influence of alcohol, using alcohol during working hours, except at approved work-related activities, or other violations of this policy may result in disciplinary action, up to and including termination of employment. In the event of an alcohol problem, MCBC encourages employees to voluntarily seek help through the company's employee-assistance program(s) or their appropriate representative (Manager, Legal, Human Resource).

An employee's refusal to cooperate with an investigation or report related to an alcohol offense may result in disciplinary action up to and including termination. Local employment laws and procedures will be adhered to regarding incidences related to any alcohol offense.

General matters

Collective bargaining agreements

If this policy conflicts with a collective bargaining agreement to which MCBC is a party, the terms of the collective bargaining agreement apply.

Laws and regulations

If this policy conflicts with any local law or regulation, only the provision in conflict will be modified to comply with the local law or regulation.

Approvals

Date	Position	Name	Signature
13Oct10	Global Chief Legal Officer	Sam Walker	On File

Revision History

Date Revised	Description of Change
13Oct10	Original