

# THE WAY WE WORK AT CCEP

OUR CODE of CONDUCT

*Coca-Cola*  
EUROPACIFIC  
PARTNERS



# MESSAGE

## from the CHIEF EXECUTIVE OFFICER

Dear Colleagues,

As the CEO of Coca-Cola Euro-pacific Partners, I take great pride in leading this company.

We have a simple but vital purpose as we move forward in refreshing Europe, Pacific and Indonesia and making a difference together. Our success is built on great people, great service and great beverages. We want to deliver sustainable growth while creating a better future for our business, our communities and the planet.

Everyone at CCEP has a role to play in helping us live up to this purpose, and a great employee experience – to which we all can contribute – is a vital part of this. Through our people strategy, we are building the right culture for growth and giving you what you need to make your experience the

best it can be. We call this ME@CCEP and it means being well, connected, valued, developed, rewarded and inspired.

We should be ambitious about our future and focus on sustainable growth. We're a leader in a soft drinks category that is worth over €125 billion, and our goal is to outperform the market – growing faster and building share. In order to achieve that goal, we need to conduct our business in the right way, with integrity at the heart of all of our actions.

The Code of Conduct set out in this document has been created to help guide us in our success. In line with our company purpose and behaviours, this Code should influence every business decision we make, every transaction we undertake and every

conversation we have internally and externally.

Read the Code carefully and consult it frequently for guidance. If you see something that does not match the requirements of the Code, please raise your concerns. Your information will be treated confidentially and with respect.

Embrace this Code and make it the foundation for how we conduct our business— only by doing that can we deliver our company purpose and ambitions.

Thank you for taking this journey with me.

**Damian Gammell**



## WHO WE ARE



## PURPOSE

**TO REFRESH EUROPE, PACIFIC AND INDONESIA.  
MAKE A DIFFERENCE.**

## WHAT WE DO

**GREAT PEOPLE, GREAT SERVICE,  
GREAT BEVERAGES**

Our success is built on great people, great service and great beverages.

**DONE SUSTAINABLY, FOR A BETTER SHARED FUTURE.**

We want to deliver sustainable growth while creating a better future for our business, our communities and the planet.

## HOW WE DO IT

### GREAT PEOPLE

- A great place to work, where people can grow, be happy and be well through ME@CCEP
- Winning capabilities and performance
- Following our Code of Conduct

### GREAT SERVICE

- Easy to do business with
- Known for world class execution
- Agile and flexible
- Decision making close to the customer

### GREAT BEVERAGES

- Category leadership with great tasting drinks and brands consumers love
- Top quality and right every time
- Bring brands to life in the market through powerful partnerships with brand owners

### DONE SUSTAINABLY

- Force for good
- Transitioning to a low carbon, zero waste, circular business
- Focused on the areas that matter most to our business and stakeholders: drinks, packaging, society, water, climate and supply chain

### FOR A BETTER SHARED FUTURE

- Creating value for all our customers big and small
- Contributing to local economies
- Supporting our communities
- Trusted by shareowners and stakeholders

## GROWTH PLATFORM

- Winning channel strategy and outlet coverage
- Grow the sparkling category and our share where we lead
- Build share where we don't lead
- Build a significant energy business
- Build a platform for growth in coffee
- World class RGM to drive mix and profit
- Unrivalled execution and customer service

## SUPPORTED BY

### FUTURE READY CULTURE

- Challenge status quo
- Inclusion, diversity and equality
- Enhanced wellbeing
- Agility and performance mind set

### GREEN FUTURE

- Accelerate This is Forward
- Science based and measurable carbon reduction targets
- Community support

### DIGITAL FUTURE

- Advance digital and online revenue
- Empower sales force
- Leverage analytics and AI
- Enable future workplace

### ACCELERATE COMPETITIVENESS

- Manage our cash
- Targeted approach to investment
- Competitive cost base
- Reduce complexity

## OUR WAYS OF WORKING

### FOCUS ON CUSTOMERS AND FRONT LINE

We do everything we can to help the front line team develop our business and delight our customers.

### EXECUTE WITH SPEED AND AGILITY

We move quickly, find ways to remove barriers and make things happen.

### EMPOWERED TO WIN TOGETHER

We work together to win, encouraging diverse ideas and supporting people at every level to make decisions.

### LISTENING AND CARING

We listen to what our colleagues, customers, consumers and communities tell us seeking to understand and take the right actions.

### PASSION FOR GROWTH

We show our determination to grow the business, take accountability and develop ourselves.

**Click!**



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*All references to examples in the Code are hypothetical and not actual situations that occurred at CCEP or actual CCEP employees.*



## An INTRODUCTION to our CODE

Helping to grow our business means taking responsibility and making daily decisions in the right way. This Code sets out the principles that we need to understand while working for CCEP. It also gives more information where to find help. Taking the right actions will ensure an inclusive and safe workplace for us all, making CCEP a great company to work for and to work with.



[Play animation](#)



Every one of us at CCEP is responsible for adhering to our Code and complying with applicable laws, regulations and policies. We also expect all third parties such as suppliers, vendors, contractors, consultants, distributors and agents who work on our behalf to act in an ethical manner consistent with our Code and to follow our **Supplier Guiding Principles**.

## HOW WE WORK at CCEP

**Our Code helps us to achieve our objectives in the right way and maintain our strong reputation. This means that all of us:**

- Act with integrity in everything we do
- Make the right decisions for the long-term sustainability of our business
- Consider the appearance of our actions
- Listen, seek to understand and take accountability for our decisions
- Seek guidance when we are uncertain about a situation or need advice



## ADDITIONAL RESPONSIBILITIES of CCEP MANAGERS

Those of us in **management positions** are trusted with additional responsibilities:

- Promoting our vision, purpose and way of working
- Leading by example and serving as role models
- Creating an open environment that encourages others to raise concerns without fear of retaliation
- Help resolve any questions or concerns by using our **Code Resources**
- Ensure that retaliation does not occur against those that ask questions or raise concerns



## MAKING the RIGHT DECISIONS

While the Code cannot cover every possible situation, it will help us when faced with difficult choices and needing to make the right decisions.

## PROTECTION AGAINST RETALIATION

When we raise genuine concerns, we should not fear negative consequences. CCEP does not tolerate any form of retaliation against anyone for making a genuine report or for cooperating in an investigation.

This means that no one can take disciplinary action against another individual for seeking guidance or raising a concern.

## WE SHOULD ASK OURSELVES:



IS IT RIGHT AND ETHICAL?



IS IT LEGAL AND IN LINE WITH OUR CODE, POLICIES AND EXPECTED BUSINESS BEHAVIOURS?



WOULD YOU BE HAPPY TO EXPLAIN IT TO YOUR FAMILY?



WOULD YOU ACCEPT FULL RESPONSIBILITY FOR THIS DECISION?



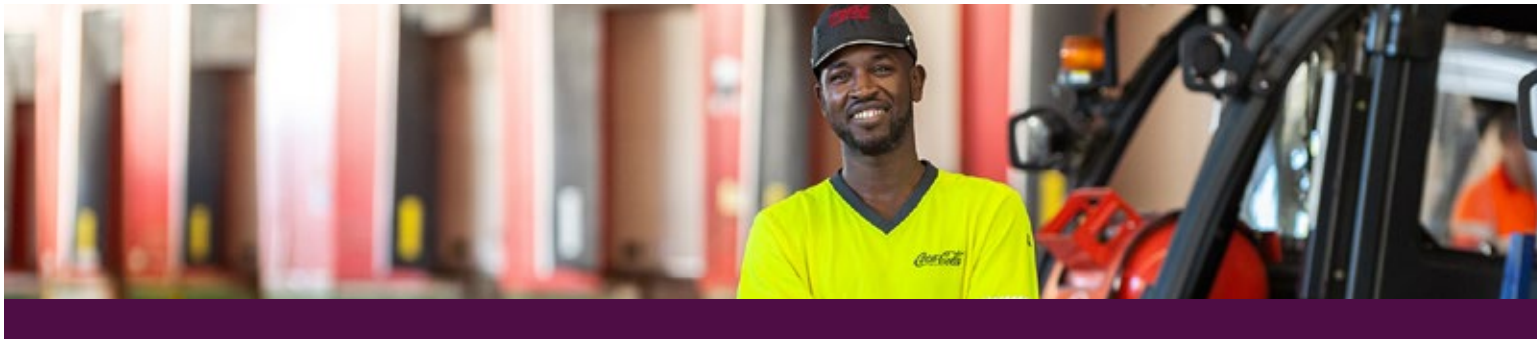
WOULD WE MIND IF IT WAS ON THE INTERNET OR TELEVISION?

If you answer 'no' to any of the questions or if you are uncertain, stop, speak up and seek guidance from our [Code Resources](#). Always consider how our actions might affect CCEP, each other, consumers, customers, communities, and other stakeholders.



## CREATING SHARED and SUSTAINABLE VALUE with OUR PEOPLE and COMPANY

Our success depends on our people—growth for our business goes hand in hand with growth for our employees. We respect each other and support a workplace where people share a **Passion for Growth**. We believe in engaging and developing each other and growing the business by **Listening and Caring** to other people's viewpoints and making the right decisions for CCEP.



## CREATING an INCLUSIVE and RESPECTFUL WORKPLACE

All of us provide unique perspectives and our differences help us to better understand how we delight our customers.

### HOW WE WORK at CCEP

- We treat each other fairly, honestly and with respect
- We promote inclusion and diversity by considering, respecting and valuing our differences
- We recognise we are all responsible for fostering an inclusive culture
- We provide support to empower people with disabilities to excel
- We make employment decisions based on a person's skills and competence
- We get the best out of everyone we work with and help them to develop fully

"During lunch, my colleague was telling me how his manager laughed at his 'funny accent' and tried to mimic it. Although he felt the manager was probably just joking around it made him feel self conscious. I advised him to seek guidance from our [Code Resources](#), in this case our People & Culture contact."

Michelle, Professional

To drive an inclusive and passionate culture we embrace diversity. Diversity is all the unique visible and invisible characteristics that make us who we are.

Examples of these are gender, gender identity, race, colour, religion, ethnicity, cultural heritage, age, social background, mental or physical ability or disability, national origin or sexual orientation. We create an environment that embraces the individual and collective potential of our people by fostering inclusion, collaboration and connections. All forms of harassment, direct or indirect discrimination and bullying are prohibited. Harassment may come in the form of physical actions, visual displays or verbal remarks.



For related policies [click here](#)



Play animation

# WORKING in a SAFE and HEALTHY ENVIRONMENT

**We believe in creating an environment that ensures the highest safety and health standards for us and the communities where we do business. In everything we do we put safety and health first. Each of us shares the responsibility to keep our colleagues and ourselves safe. We must always follow our operating procedures and comply with the applicable rules and regulations. Never be tempted to take shortcuts on safety to save time or money.**

## HOW WE WORK at CCEP

- We start work only if there are no apparent hazards, ensuring that all equipment is operating properly and safety controls are in place and working
- We ensure our vehicles are safe to drive, regularly maintained and that we respect the rules of the road
- We immediately stop work if a hazard arises
- We wear personal protective clothing and equipment whenever required
- We only work when we are medically fit and alert to do our job safely
- We conduct our jobs free from the misuse of alcohol and drugs, including the use of prescription drugs that make it unsafe to work
- We should never knowingly walk past an unsafe act or situation

“During the Fork Lift Truck pre-use inspection, Reggie informed me that the brakes were not functioning correctly so he immediately took the truck out of service for repair. Completing a thorough pre-use inspection prevented a major accident from happening.”

Antonio, Line Manager



For related policies [click here](#)

## Some examples of such business confidential information include:

- Financial or technical data
- Marketing strategies
- Trade secrets
- Business plans
- Major management changes
- Significant corporate developments
- Price lists

## Some examples of personal data include:

- Identifiers (e.g. name, user ID, passport number)
- Email address, phone number
- Other less obvious information that can be related to individuals (e.g. purchase history, customer ID)
- Sensitive personal data such as race, ethnicity, religious or philosophical beliefs, political opinions, trade union membership, health data, sexual orientation, biometric data, genetic data

A data breach is a situation leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to confidential information transmitted, stored or otherwise processed.



# PROTECTING INFORMATION

**We are trusted with business information and sometimes personal data of employees, customers, consumers, suppliers and business partners. Personal data is any information that can be used to identify an individual directly or indirectly either by itself or in combination with other information. All business information is classified as Public, Internal, Confidential, or Restricted and each classification requires a different level of protection. We collect, handle and process all personal data and all classified business information responsibly, transparently, and in compliance with all applicable laws, our policies and procedures and protect it from any unauthorised disclosure.**

## HOW WE WORK at CCEP

- We access confidential information only if we have a need-to-know and proper authorisation
- We are aware of data protection and privacy laws and make sure our access and use is in accordance with these laws
- We ensure that all information is kept in an organised, identifiable and accessible manner
- We remember that CCEP owns the rights to anything we create through our work to the extent permitted by law, regardless of whether this property is patentable or able to be protected by copyright, trade secret or trademark
- We never discuss, share or access information in unsecured locations (such as public places) without taking precautions
- We report a 'data breach', or loss or theft of personal data or confidential information immediately to our **BPT Service Desk**
- We ensure we follow the cyber security protocols
- We use data analytics and artificial intelligence (AI) in a beneficial, sustainable, respectful, fair and transparent way only



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“Mischa, who works in Tax, received an urgent email from her senior manager, John, requesting the full names and tax details of all employees in CCEP immediately. She wanted to act quickly but was suspicious so checked with her line manager who then checked with John who confirmed he had not sent the email. They immediately reported it to the **CCEP Fraud team**”

John's email address had been hacked.

## USING COMPANY ASSETS RESPONSIBLY

**We are all responsible and play an active role in protecting CCEP assets and resources from loss, theft, damage, unauthorised access or misuse to ensure we use these assets in an ethical, lawful and reasonable manner. This includes all company goods and services, whether we are talking about physical assets, such as computers and telephones, confidential company information or electronic assets such as data and reports. We must be aware that we are all under constant threat of criminal attack, e.g. social engineering, theft of information or cybercrime.**

**We immediately report to BPT Service Desk any cybercrime attempts, anytime we lose or misplace an IT asset such as a laptop or phone or if we suspect unauthorised access to or activity on a computer or system.**

## HOW WE WORK at CCEP

- We ensure that any personal use of our CCEP assets is reasonable and does not interfere with our work responsibilities
- We keep all passwords and user identification information private and secure and do not share them with others
- We should be prepared for cybercrime attempts through completion of the relevant training
- We never use company technology to download, view or record inappropriate, discriminating, sexually explicit or offensive materials
- We never use company assets to perform illegal or unethical activities or to conduct business for any other organisation
- We never use company technology to access protected information or to use unauthorised software
- We notify reception services of visitors in advance, escort them at any time on our premises, and we approach unidentified persons respectfully as to their business or immediately report to our line manager and/or site security



**For related policies  
click [here](#)**

Social media can be a valuable tool in the way we communicate. When using social media, we should use it in responsible, smart ways. Remember, everything on the internet is permanent and nothing is anonymous. Anything we post can be forwarded and spread around the world instantaneously. Therefore, we must use common sense and good judgement when using social media.



## RESPONSIBLE COMMUNICATIONS

**Our brands are trusted all over the world; we must always communicate honestly and responsibly.**

## HOW WE WORK at CCEP

- We only speak or post formally on behalf of CCEP if we have prior authorisation from Public Affairs, Communications, and Sustainability (PACS) to act as a company spokesperson
- If we share news or information about our company, we do so in a way that is not harmful to CCEP, each other, consumers, customers and other stakeholders
- We make it clear that our opinions and our personal social media accounts are our own
- We make sure our personal posts are not inappropriate or harmful to CCEP, our colleagues, customers or consumers
- We never post or share company trade secrets or confidential information
- We direct all (social) media inquiries to PACS and all investor-related questions to Investor Relations



For related policies  
click [here](#)

# INTEGRITY in OUR BUSINESS and FINANCIAL RECORDS

Regardless of what position we have at CCEP, we all play a part in ensuring that our financial and business records tell the truth. When we create business and financial records, we make sure that they are clear, accurate, complete, timely and in line with the law. In acting honestly and with integrity we must review, challenge and question all information to ensure the accuracy of our records.

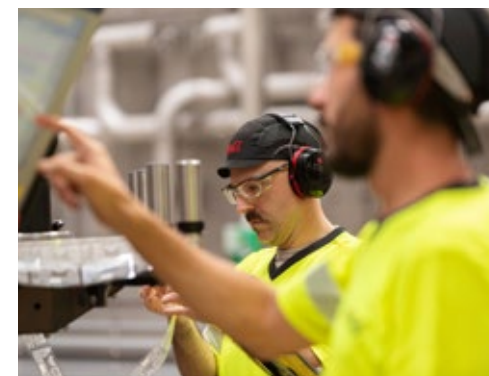
**Our business records are not limited to only our financial records. They include all types of business information including:**

- Payroll documents
- Timecards
- Travel and expense reports
- Job applications
- Quality reports
- Field Sales measures
- Customer agreements
- Inventory and sales reports

## HOW WE WORK at CCEP

- We maintain and destroy documents in accordance with our record retention guidelines
- We ensure that all transactions are authorised, recorded and reported correctly
- We obtain the required approvals before responding to a request for information from a regulatory agency or the government
- We provide all information requested in any investigation or audit conducted by our company or a governmental authority
- We never destroy, conceal or alter any records during a legal hold or investigation

A “legal hold” is a notification sent from the Legal team to employees instructing them not to delete records, either paper or electronic, that may be relevant to a legal matter.



Gavin has a challenging coverage target to meet this month and is afraid he may not achieve it in time. He decides to enter additional customer calls that he has not yet completed, and plans to cover them in the first few days of the next period. Gavin is actually falsifying business records by entering the calls for the wrong day the visits were actually made.



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**PDMR (Persons Discharging Managerial Responsibilities) are defined as "Directors and senior executives who have regular access to Inside Information relating, directly or indirectly, to CCEP and who have the power to make managerial decisions affecting the future development and business prospects of the company."**

## **ENGAGING in APPROPRIATE SHARE DEALING**

**Inside information is any information about CCEP or another company that is not publicly available. We take measures to protect this information, as it could, if used prior to disclosure, have an effect on the price of the security and the investor would likely use this information as a basis for their investment decision.**

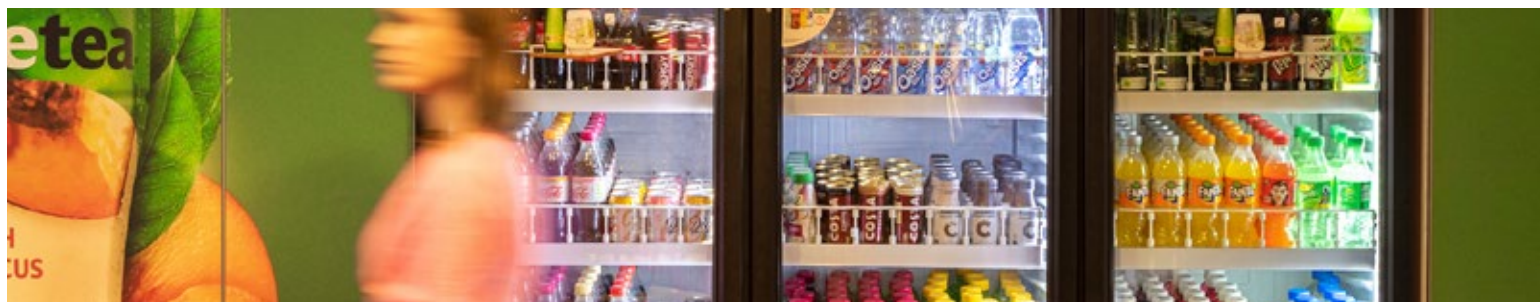
## **HOW WE WORK at CCEP**

- We understand and follow our policies and the laws and regulations related to share dealing
- We only engage in appropriate share dealing and never when in possession of inside information
- We never disclose or encourage use of information that is considered non-public or confidential to others, including other CCEP employees, unless required as a part of our job responsibilities
- We ask our Company Secretary or our Legal team if we are unsure of our obligations and restrictions

CCEP directors, members of management, key personnel or anyone else who has been designated as a Person Discharging Managerial Responsibilities (PDMR) have additional obligations and restrictions when engaging in share dealing. These obligations include receiving clearance to deal, and not engaging in dealing during "closed periods." These directors and employees are notified and are subject to additional policies and procedures.



**For related policies click [here](#)**



# AVOIDING CONFLICTS of INTEREST

In protecting our company's reputation, we also have a responsibility in avoiding conflicts of interests. This is when our personal activities, outside interests or relationships interfere, or appear to interfere, with our ability to act in the best interest of CCEP. We never use our position with CCEP for personal gain and do not allow conflicts of interest to limit our ability to perform our work objectively or make us appear biased.



## HOW WE WORK at CCEP

- We are able to identify a potential conflict of interest and must inform our manager of any by disclosing it via the Online **Conflict of Interest Register** (where available) or the disclosure form (search for 'conflict of interest' on **Genie**)
- We remove ourselves from the procurement and contracting process when we have a personal relationship with someone who works for the company we are negotiating with
- We base our business decisions on business need and not on personal relationships
- We are careful about the appearance of favouritism, including not directly or indirectly supervising a close friend, family member, relative or partner

"My partner secured a fantastic new job in the logistics department of a company that also sells soft drinks.

A colleague pointed out that I should inform our business, as he would be working for a competitor. I never even thought about it, as it was a completely different department. Lorna in the Legal team documented it and we reviewed the scope of my work to ensure avoiding (the appearance of) a conflict of interest."

Astrid, Key Account Manager



For related policies  
[click here](#)



## CREATING SHARED and SUSTAINABLE VALUE with OUR CUSTOMERS, SUPPLIERS, and FRANCHISORS

We **Focus on our Customers and Frontline** and strive to be our customers' preferred partner, create value together, and deliver the strongest execution while making it easy to do business with us. We look for suppliers and franchisors that share our commitment to **Execute with Speed and Agility** and advance our sustainable growth. Together, we conduct business with the highest levels of integrity and in compliance with the laws and regulations that govern our business.

"I noticed that the filler performance had changed and the numbers of rejects had increased. On investigation with my Team Leader I noticed the rejects were coming from one filler valve. We stopped the production line and found a component of the filling valve had broken and was missing. We isolated the stock as a precaution until we found the missing component in the outflow."

Jack, Filler Operator Technician

## DELIVERING HIGH-QUALITY PRODUCTS

**We are all dedicated to protecting the quality and food safety of our products and we will continue to demand only the best from our suppliers and business partners.**

## HOW WE WORK at CCEP

- We understand and follow our quality and food safety standards and processes to protect the integrity of our products
- We ensure that all of our business partners meet our standards for quality and food safety
- We monitor our business environment to anticipate future risks, mitigate them and seize any opportunities to further improve our standards
- We do not allow a product to leave our control without it meeting our quality and food safety standards



For related policies  
click [here](#)

**It is okay to gather intelligence about our competitors, TCCC, other bottlers, and other franchisors in order to compete more effectively with them or to better understand the competitive environment. However, when gathering such information, remember:**

- Publicly available information — from independent sources — such as trade press and market research — is one of the easiest and safest sources of gathering information
- We never obtain sensitive information from a competitor or their representatives
- We never use our customers or suppliers to communicate with our competitors, and never ask our customers to disclose confidential information
- We never seek to find out what our competitors are planning to do in the future other than from public sources



## **DEALING with CUSTOMERS, BUSINESS PARTNERS and SUPPLIERS FAIRLY**

**When we interact with our customers, business partners and suppliers, we always act honestly and responsibly. We are committed to competing fairly and solely based on the merits of our products and services and never in a manner that is unethical.**

## **HOW WE WORK at CCEP**

- We honour our commitments and never use unfair, deceptive or misleading practices
- We review and follow **TCCC's Responsible Marketing Policy** and never advertise or market our products to children under the age of 12
- We responsibly market our alcohol brands
- We never discuss pricing, costs, product supply, terms of sale, marketing, or other commercially sensitive information related to a contract with a third party
- We should discuss any collaborative arrangements, such as co-packaging arrangements, joint ventures, mergers or purchasing co-ops with the Legal team
- For those involved in dealing with customers and other third parties, we ensure that we read and apply the rules contained in CCEP's Competition Law Handbook and complete the Competition Law Training as applicable laws are complex, and violations carry serious consequences including fines for CCEP and possible criminal sanctions, in some cases imprisonment, for the individuals involved
- We expect our business partners and suppliers to act with integrity, meet our high standards, comply with the laws and follow our **Supplier Guiding Principles**



**For related policies click [here](#)**



"A long-term supplier had offered me tickets to a football match. However, since his company's contract was in the tender process I had to politely refuse the tickets."

Nicholas, PACS

## EXCHANGING GIFTS and ENTERTAINMENT

The giving and receiving of appropriate gifts and entertainment can help strengthen our third-party relationships; but it can also create a conflict of interest.

We must always use good judgement and never accept or give gifts or entertainment that could appear to influence business or other material decisions.

**Our Gift, Entertainment and Anti-bribery Policy defines gifts as anything of value, including services and entertainment where the person offering does not attend. We do not accept cash or cash equivalents (e.g. loans, discounts, gift cards, or gift certificates).**

**Entertainment is defined as all meals, outings and trips where the customer, supplier or other relevant person offering attends. For example, event tickets, golf outings, travel expenses and other forms of entertainment.**

## HOW WE WORK at CCEP

- We are committed to complying with our policy when giving or receiving gifts and hospitality, following the approval process via the **Online Gift & Entertainment Register** (where available) or using the approval form (search for 'gift', 'entertainment', 'anti-bribery' on **Genie** or accessible via the 'Can I?' mobile app)
- We ensure that any gift or entertainment offered or received is not lavish, does not violate the law, customary business practices or the policy of CCEP or the receiving party
- We remember that we cannot give or offer gifts or entertainment to public officials without prior written approval from the Chief Compliance Officer
- We consider how any gift or entertainment could be viewed by outside parties
- We seek guidance from our line manager or the **Ethics & Compliance** Team as needed when we are uncertain
- We complete the relevant training and understand what is and what is not compliant regarding gifts and entertainment



For related policies  
click [here](#)

We prohibit all forms of bribery. A bribe is the offering, promising, giving, requesting, agreeing to receive or accepting anything of value in order to influence a person's behaviour or decision. This includes facilitation payments, which are small payments made to secure or speed up a routine action, such as the issuing of a permit, a license or a service.




## PREVENTING BRIBERY and CORRUPTION

We ensure that all of our actions are free from corruption and bribery as even the appearance of such behaviours can be illegal, and do permanent damage to our reputation and future business transactions.

## HOW WE WORK at CCEP

- We refuse to offer, promise, give, request or agree to receive or accept a bribe or what could be perceived as a bribe
- We remember that we can be held liable for the actions of third parties who work on our behalf
- We clearly record all payments, transactions and expenses
- We conduct appropriate due diligence on all third parties and monitor their actions to ensure that their activities comply with applicable laws and company policies
- We report any form of bribery or corruption to the **Ethics & Compliance Team**, to the Legal Team or through the Speak Up channels

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## CREATING SHARED and SUSTAINABLE VALUE in OUR COMMUNITIES

We recognise the economic, social and environmental impact our business has on our communities, and we seek to make a positive contribution to society building on our strong local heritage and presence. We look for ways to get involved in the communities where we live and work and find ways to be **Empowered to Win Together**. We are committed to being good corporate citizens, protecting human rights and respecting local laws and customs.



# BEING a GOOD CORPORATE CITIZEN and STEWARD for ENVIRONMENTAL SUSTAINABILITY

We want to grow our business in a way that manages our social and environmental impacts responsibly and makes our people and our stakeholders proud. We are doing this through our Sustainability Action Plan “This is Forward”, created with The Coca-Cola Company in Western Europe. Through “This is Forward”, we are taking action on six key social and environmental areas where we know we have significant impact, and which our stakeholders want us to prioritise.

## HOW WE WORK at CCEP

- We look for ways to reduce our environmental impact by reducing our carbon emissions, energy consumption and water use and we focus on collecting 100% of our packaging we put in the market
- We continue to reduce the level of sugar in our drinks by altering our recipes, offering a wider choice and greater promotion of no and low calorie options
- We work with our stakeholders, suppliers and customers to reduce the environmental impact we have across our value chain
- We consider the potential environmental impact of all of our decisions
- We report any environmental concerns to our **Code Resources**
- We support our local communities by engaging as volunteers in activities connected to our broad scope of sustainability commitments



for more details click [here](#).



For related policies click [here](#).



## GETTING INVOLVED in POLITICAL ACTIVITIES

**An important part of getting involved in the communities where we live and work is engaging in the political process.**

## HOW WE WORK at CCEP

- We keep our personal political activities separate from CCEP by never using company assets, resources, time, email, reputation or the CCEP name
- We do not make payments or donations on behalf of CCEP – either direct or indirect – in money or in kind to political parties, political organisations (or trade unions) or individual politicians or candidates for public office without prior written authorisation from the Chief Compliance Officer
- We obtain approval before seeking or holding a public office or getting involved in working groups, public consultation and relevant trade organisations on behalf of CCEP



For related policies  
click [here](#).

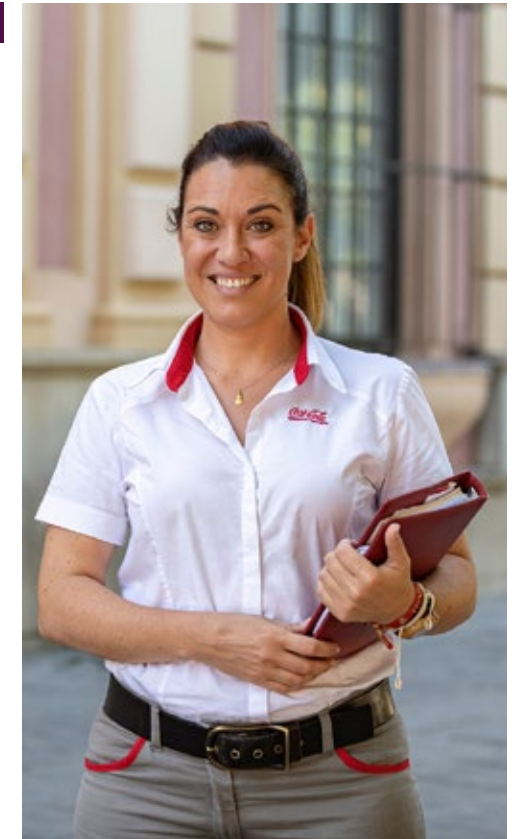
# PROTECTING HUMAN RIGHTS

**Respect for human rights is fundamental to the sustainability of CCEP and the communities in which we operate. We are committed to protecting human and workplace rights as articulated in the United Nations' Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact.**



## HOW WE WORK at CCEP

- We respect human rights and are committed to ensuring that people are treated with dignity and respect
- We have a zero-tolerance approach to Modern Slavery of any kind within our operations, including human trafficking, and the use of child, forced, indentured or involuntary labour
- We are committed to identifying, preventing and mitigating adverse human rights impacts resulting from or caused by our business activities before they occur, through human rights due diligence and risk mitigation processes
- We hold our supply chain to the same standards and prohibit any form of forced labour and human trafficking within our system or by any company that directly supplies or provides services to our business



**For related policies  
click [here](#).**



**[Play animation](#)**



## RESPECTING the GLOBAL and LOCAL LAWS and CUSTOMS

**We follow and respect the laws and regulations where we do business. We look for business partners who share these same principles and take measures to ensure our partners also respect these laws and regulations.**

## HOW WE WORK at CCEP

- We conduct our business with respect for the people wherever we work and in line with local laws and regulations
- We know at times the laws and regulations where we work may vary from country to country and we seek guidance from the Legal team or our **Code Resources** when in doubt or if we encounter conflicts



**For related policies click [here](#).**





## CONCLUSION to our CODE

# MESSAGE

## from the CHIEF COMPLIANCE OFFICER



Dear Colleagues,

We all play an important role in the success of Coca-Cola Europacific Partners. That starts with upholding and respecting the company purpose, culture and ways of working.

We will conduct business with integrity and accountability – it is our pledge to one another, to the business and our many stakeholders. By doing so, we can feel confident that we are making the right decisions.

Each of us is responsible for making sure the principles and guidelines of our Code of Conduct are reflected in our decisions and actions every day. Maintaining our ethical culture depends on each of us engaging our hearts as well as our heads and taking responsibility to speak up and ask any questions we may have.

I want to thank you personally for all that you do to help grow CCEP and make this a great company with great people doing the right thing.

**Frank Govaerts**

A handwritten signature in black ink, appearing to be 'F. Govaerts', written over a horizontal line.





## SEEKING ADVICE and SHARING CONCERNS

You can make a difference through contacting our **Code Resources** if you are concerned about wrongdoing. Although remaining silent may seem easier, it can harm our company and brand, decrease trust and make the situation worse. Voicing your concerns in the right way will help us all.

When sharing concerns through the Speak Up channels, you can report anonymously, where allowed by local law. However, in most circumstances, remaining anonymous makes it more difficult to investigate concerns thoroughly and sometimes makes it impossible to deal with them properly. CCEP will take all reasonable precautions to maintain confidentiality and to avoid anyone being penalised for raising concerns in good faith. To help maintain the confidentiality of investigations, we should avoid discussing them with others. Making a genuine report or sharing a concern means sharing full and accurate information we have about a situation that we believe to be true. If accused of wrongdoing, you will be informed of the allegations and given the opportunity to respond. CCEP will take appropriate corrective or disciplinary action for violations of our Code, policies or law in accordance with local law and company policy.

When we voice concerns, CCEP will promptly and appropriately conduct an investigation. Every Business Unit has a local Code of Conduct Committee made up of representatives from Legal, People & Culture, Security and Internal Control, who manage and review concerns raised or potential breaches of our Code. The company-wide Code of Conduct Committee oversees all incidents to ensure effective and consistent case management, understand trends and prevent wrongdoing in the future.

## OUR CODE RESOURCES FOR CCEP'S EUROPEAN BUSINESS UNITS





# THE SPEAK UP CHANNELS FOR CCEP'S EUROPEAN BUSINESS UNITS

The CCEP Speak Up channels are an additional resource on the internet, telephone or mobile intake site where employees can ask questions and voice concerns confidentially and anonymously, where allowed by local law. The Speak Up channels are available 24 hours a day, 7 days a week and in multiple languages.

To reach Speak Up on the web, visit



For the phone line in your country, please dial one of the numbers below (ensuring you have an outside line).

COUNTRY	PHONE NUMBER
Belgium	0800 76 055
Bulgaria	0800 46 237
France	0 800 99 07 57
Germany	0800 1817963
Great Britain	0800 949 6483
Iceland	800 4304
Luxembourg	800 27 304
Netherlands	0800 0224702
Norway	800 62 499
Portugal	800 180 780
Spain	900 999 448
Sweden	020 12 70 19

With your mobile device, either scan the QR code or go to



<https://ccep.navexone.eu>



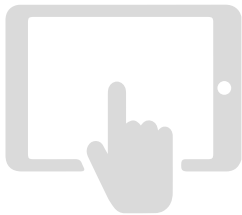
# OUR CODE RESOURCES AND THE SPEAK UP CHANNELS FOR CCEP'S AUSTRALIAN, PACIFIC AND INDONESIAN BUSINESS UNIT

If you believe Our Code has been breached, you have the responsibility to report it in good faith. If the matter relates to a workplace dispute or grievance then you must raise this with your Manager or a member of HR. Alternatively, breaches of Our Code may be directly reported to the Group Company Secretary at [AmatilCoSec@ccamatil.com](mailto:AmatilCoSec@ccamatil.com). We also have an externally hosted Whistleblower Hotline which is available to external parties, as well as to internal people in all countries which we operate. Please refer to the Whistleblower Policy for the processes

and options that are available for relevant disclosures. All actual or alleged contraventions of Our Code will be treated seriously, and this may include internal or external investigation, demotion, suspension, disciplinary action or even termination of your employment, a contract or any relationship you have with Amatil. We may also be required to report the contravention to local authorities or regulators which may also expose you to civil or criminal investigations or proceedings, fines and penalties, not to mention damage to your personal reputation.

## Webform

[kpmgfaircall.kpmg.com.au/  
CCA](https://kpmgfaircall.kpmg.com.au/CCA)



## Telephone

COUNTRY	HOTLINE NUMBER
Australia	1800 500 965
New Zealand	0800 100 526
Indonesia	0018 036 1547
Fiji	00685 800001
Papua New Guinea	180 2710

## E-mail

[faircall@kpmg.com.au](mailto:faircall@kpmg.com.au)

## Mail

The FairCall Manager  
KPMG Forensic  
PO Box H67  
Australia Square, NSW 1213

# INDEX of KEY TERMS



**FOCUS ON CUSTOMERS  
AND FRONT LINE**

**EXECUTE WITH SPEED  
AND AGILITY**

**EMPOWERED TO WIN TOGETHER**

**LISTENING AND CARING**

**PASSION FOR GROWTH**

**Click!**

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## GREAT PEOPLE, GREAT SERVICE, GREAT BEVERAGES

### ADDITIONAL USEFUL RESOURCES

Additional information on the business principles outlined in our Code can be found [here](#).

## COCA-COLA EUROPACIFIC PARTNERS PLC

### Registered office:

Pemberton House  
Bakers Road  
Uxbridge, UB8 1EZ  
Registered in England and Wales

### Company number:

09717350

[www.cocacolaep.com](http://www.cocacolaep.com)



The Way We Work at CCEP

### Our Code of Conduct

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