



# MODERN SLAVERY STATEMENT 2021

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This statement was approved by the Boards of Coca-Cola Europacific Partners pc, Coca-Cola Europacific Partners Great Britain Limited, Coca-Cola Europacific Partners Services Europe Limited, CCEP Group Services Limited and Coca-Cola Europacific Partners API Pty Ltd.



## MESSAGE FROM OUR CEO:

“At Coca-Cola Europacific Partners, human rights are fundamental to how we run our business every day and the way we operate in our communities. This is part of our commitment to ensure that everyone who works for and with our business is treated with dignity and respect, wherever they work and live.

We’re working to the highest standards in ethics and human rights and expect the same from our suppliers. We have a zero-tolerance approach to modern slavery.”

A handwritten signature in blue ink, appearing to read 'D Gammell'.

Damian Gammell – Chief Executive Office

At Coca-Cola Europacific Partners we are committed to continually improving our operations, and those of our partners, by identifying, preventing and mitigating modern slavery risks. While we have made good progress, we recognise this is a journey and we will continue to enhance and implement the policies, frameworks and world class practices which underpin them, across every aspect of our business and supply chains.

Every employee, and supply partner plays a role in making that a reality.

We’ve come from a strong foundation across both Amatil and Coca-Cola European Partners underpinned by the frameworks of The Coca-Cola Company. A big focus for our business in 2021:

- Aligning policies across the Group
- Maintaining our internal and external audit schedules



## INTRODUCTION

**This is the second statement of Coca-Cola Europacific Partners under the Australian Modern Slavery Act and the fifth statement under the UK Modern Slavery Act.**

We consider human and workplace rights – as articulated in the United Nations’ Universal Declaration of Human Rights, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work – to be inviolable. Respect for human rights is fundamental to the sustainability of CCEP and the communities in which we operate. We are committed to ensuring that all people are treated with respect wherever they work or live.

We support the 10 principles of the UN Global Compact and take a proactive approach to respecting these rights in our workplace, in our supply chain, and in the communities in which we operate. We provide a safe and healthy workplace and comply with applicable health and safety laws, regulations and internal requirements.

We recognize the importance of our obligation to observe and promote internationally recognised human rights in the way we conduct our business. We acknowledge that the risk of modern slavery may exist throughout our operations and supply chains and this, our first joint Modern Slavery Statement for the European and Pacific region, sets out the steps we are taking to identify and manage those risks.

We have a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain and together with The Coca-Cola Company (TCCC), we expressly prohibit any form of human trafficking within our system or by any company that directly supplies or provides services to our business.



## REPORTING ENTITIES COVERED BY THIS STATEMENT

This statement is being made in accordance with the UK Modern Slavery Act 2015 (“UK Act”) and the Australian Modern Slavery Act 2018 (Cth) (“Australian Act”). It sets out the steps taken by Coca-Cola Europacific Partners plc (formerly known as Coca-Cola European Partners plc) and its group companies (“CCEP”) to prevent, identify, and address modern slavery risks across our business and supply chain.

In May 2021, Coca-Cola European Partners completed the acquisition of Coca-Cola Amatil and changed its name to Coca-Cola Europacific Partners. The reporting entities under the UK Act are Coca-Cola Europacific Partners Great Britain Limited and Coca-Cola Europacific Partners Services Europe Limited and CCEP Group Services Limited.

For the purposes of the Australian Act, the reporting entity is Coca-Cola Europacific Partners Australia Pty Ltd and this statement is being made under s.14(1) by Coca-Cola Europacific Partners plc. This statement also represents the approach and expectations

across the Australia Pacific Indonesia Group (“API Group”) of Coca-Cola Europacific Partners which includes three businesses: Australia, Pacific (including New Zealand, Fiji and Samoa), and Indonesia and Papua New Guinea which are owned by Coca-Cola Europacific Partners API Pty Ltd.

This statement was prepared in consultation with internal stakeholders of Coca-Cola Europacific Partners Australia Pty Ltd, and the members of the API Group, who were provided with drafts of this statement for review and commentary during the process.

### For more information

- [A complete list of the entities of CCEP as of 31 December 2021 \(including ownership percentages\) is set out in the Integrated Report, which is available here.](#)

## CONSULTATION WITH CONTROLLED ENTITIES

Where CCEP held a “controlling interest” in an entity during FY21 we met with the appropriate organisational representative to raise awareness of our policy framework and to ensure they are taking the appropriate steps in mitigating modern slavery risks within our business and supply chains. During FY22 we will work to ensure

we have a similar process in place with entities where CCEP holds a minority equitable interest, this will include communicating our expectations and providing policy documentation outlining our expectations and offering support as required.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

**Coca-Cola** EURO-PACIFIC PARTNERS

## OUR OPERATIONS

Coca-Cola Europacific Partners (CCEP) is a leading consumer good company making, selling and distribution an extensive range of alcoholic and non-alcoholic ready-to-drink beverages and is the world's largest Coca-Cola bottler based on revenue. CCEP is a listed company, trading on the London Stock Exchange, Euronext

Amsterdam, Spanish Stock Exchange and NASDAQ and operates across Andorra, Australia, Belgium, continental France, Fiji, Germany, Great Britain, Iceland, Indonesia, Luxembourg, Monaco, the Netherlands, New Zealand, Norway, Papua New Guinea, Portugal, Samoa, Spain and Sweden.



**BELGIUM**  
**2,044 EMPLOYEES**  
3 production facilities,  
16 production lines.

**IRELAND**  
**1 EMPLOYEES**  
0 production facilities,  
0 production lines.

**BULGARIA**  
**1,017 EMPLOYEES**  
working in a shared service centre

**LUXEMBOURG**  
**67 EMPLOYEES**  
0 production facilities,  
0 production lines.

**CONTINENTAL FRANCE**  
**2,506 EMPLOYEES**  
5 production facilities,  
21 production lines.

**THE NETHERLANDS**  
**781 EMPLOYEES**  
1 production facilities,  
10 production lines.

**GERMANY**  
**6,601 EMPLOYEES**  
16 production facilities,  
51 production lines.

**NORWAY**  
**548 EMPLOYEES**  
1 production facilities,  
2 production lines.

**GREAT BRITAIN**  
**3,276 EMPLOYEES**  
5 production facilities,  
32 production lines.

**PORTUGAL**  
**373 EMPLOYEES**  
3 production facilities,  
13 production lines.

**ICELAND**  
**171 EMPLOYEES**  
2 production facilities,  
5 production lines.

**SPAIN**  
**3,549 EMPLOYEES**  
9 production facilities,  
55 production lines.

**AUSTRALIA**  
**3,539 EMPLOYEES**  
9 production facilities,  
32 production lines.

**FIJI**  
**574 EMPLOYEES**  
1 production facilities,  
4 production lines.

**INDONESIA**  
**5,493 EMPLOYEES**  
8 production facilities,  
37 production lines.

**NEW ZEALAND**  
**1,131 EMPLOYEES**  
4 production facilities,  
11 production lines.

**PAPUA NEW GUINEA**  
**638 EMPLOYEES**  
2 production facilities,  
5 production lines.



As a brand owner and partner to a range of iconic businesses, we prepare, distribute and sell drinks including sparkling beverages, water, sports, energy, fruit juices, iced tea, flavoured milk, coffee, beer, cider and spirits. Our business relationships include more than 600,000 active retail customers in API and 1.1 million customers in Europe.

We employ around 33,000 people across our business (11,000 API and 22,000 Europe) and create thousands more jobs in the communities in which we operate. Across this team we work as one, united by a shared purpose and common values.



## OUR SUPPLY CHAIN

Our suppliers are critical partners for our business. We believe collaboration and innovation throughout our supply chain are essential in advancing our sustainable growth. In Europe, we source products from around 13,200 suppliers and 83% of our spend (excluding concentrate and syrup purchased from The Coca-Cola Company (“TCCC”) and other franchisors) is with suppliers in our territories. In API, we source from around 8,250 suppliers and most of our spend is based with suppliers in our territories.

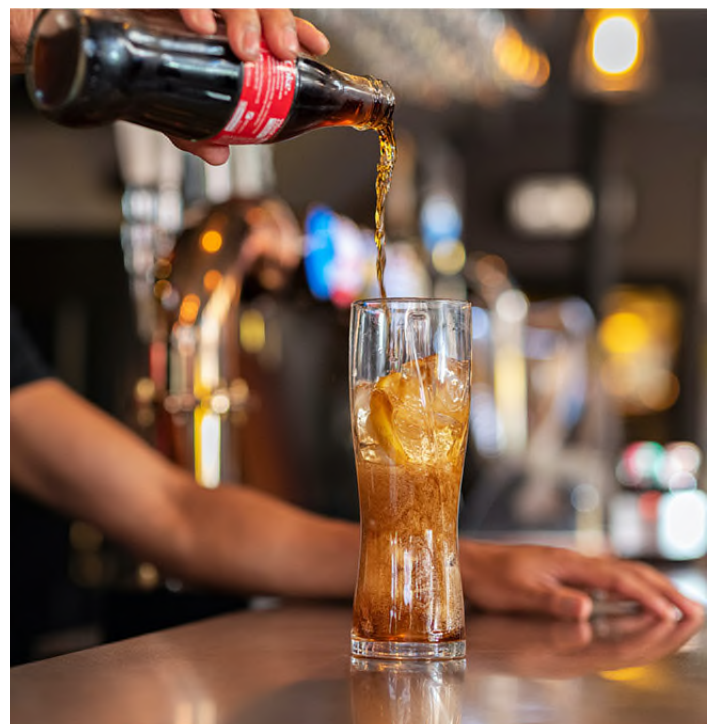
Our key supply categories include commodities and services such as ingredients, packaging, energy, capital equipment, building and facilities, fleet and logistics, sales and marketing, IT, telecoms, general administration and professional services.

We are committed to sustainably sourcing our ingredients, raw materials and packaging. Our largest spend category is concentrates and syrups which are supplied by our brand partners and other third parties. We purchase the entire requirement of our concentrates and syrups for Coca-Cola trademark beverages from TCCC. Many of the purchases of our priority agricultural ingredients, such as sugar and juices, are made together with TCCC and other Coca-Cola bottlers. As a result, we address many of the issues that we face in our supply chain, including that of Modern Slavery, as a joint Coca-Cola system.

The next largest spend category is packaging materials. This category consists of direct materials including aluminium cans, glass bottles, PET resin, closures and bag in box and secondary packaging categories including corrugated and carton board, shrink and stretch film. Currently ~80% of CCEP’s packaging requirements are manufactured within CCEP territories with approximately ~40% of inputs sourced overseas from countries including the US, Vietnam, Taiwan, Thailand, Korea and China.

Agricultural categories present a key modern slavery risk to CCEP. Of our two largest categories, 100% of CCEP’s sugar is sourced via globally recognized accreditation schemes, these include Bonsucro and BMP Smartcane and almost 60% of our juices are sourced under the TCCC Preferred Supplier Agreement.

Our suppliers have a key role in CCEP’s continued effort to support human rights and irrespective of size, all our suppliers are expected to operate in accordance with CCEP’s policies and guidelines which includes our expectations on mitigating modern slavery.



# OUR GOVERNANCE FRAMEWORK



At CCEP, our policies and guidelines have an important role in ensuring respect for human rights throughout our business and supply chains. These policies reflect our values and underpin our ways of working and form the basis of the governance framework we have in place to enable CCEP to monitor and remediate against modern slavery.

CCEP has a strong governance framework. The Board of Directors oversees the interests of all stakeholders. Five committees support the Board. These include the Corporate Social Responsibility Committee, which is responsible for overseeing CCEP’s sustainability strategy and all related policy issues and risks, including human rights. Management has also established a Compliance and Risk Committee, which among other things, advises the ethics and compliance function of our business and provides management level input regarding the ethics and compliance programmes.

Over the course of 2021, following the acquisition of Coca-Cola Amatil, we commenced work to develop one aligned policy approach across the organisation, this will continue in 2022.

## OUR CODE OF CONDUCT

Our Code of Conduct (CoC) seeks to ensure that we act with integrity and accountability in all our business dealings and relationships, in compliance with all applicable laws, regulations and policies. We expect everyone working at CCEP to adhere to the CoC which was updated in 2021. We also expect all third parties who work on our behalf to act in an ethical manner consistent with our CoC and to comply with with TCCC’s Supplier Guiding Principles (SGPs).

The CoC has been formally adopted in all our territories, as well as our shared service centers in Bulgaria. All employees are required to undergo CoC training, which is part of the induction process for

new employees. Training on specific topics related to their roles is also provided where needed. Our CoC specifically calls out manager responsibilities and includes a matrix to help with decision making and guidance on situations such as bullying and harassment.

Any employee who wishes to raise a concern about wrongdoing at CCEP is encouraged to speak to a line manager and/or raise a report via Code specified channels which include our dedicated Speak Up channels. When any employee raises a concern through our Code specified channels in relation to the CoC, CCEP will act promptly and appropriately.

## OUR HUMAN RIGHTS POLICY

In December 2021 we created a CCEP wide Human Rights Policy based on the European and API Human Rights Policies and included relevant parts of the TCCC Human Rights Policy.

The new CCEP Human Rights Policy is aligned with international human rights principles encompassed by the Universal Declaration of Human Rights, the United Nations’ Guiding Principles on Business and Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations’ Global Compact, the United Nations Declaration on Rights of Indigenous People and the CoC.

Our Human Rights Policy further outlines our commitment to supporting human rights and provides a consistent approach to ensuring our workplace, our supply chain and our community are safe, lawful, and diverse – respectful and responsible everywhere,

every day. We are committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities, before or if they occur, through human rights due diligence and mitigation processes.

### For more information

- [Further additional policies that assist CCEP in managing human rights include Anti-bribery and Corruption policy, Health and Safety policy, Procurement and Buying policy, Flexible Work Options policy, Working Together policy and our Speak-Up and Whistleblower policy, which can be found in our PolicyHub.](#)

Our internal policies and our expectation of external supply chains has a focus on the following key priority areas:

<b>Forced Labour, Child Labour and Human Trafficking</b>	<p>We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. We are committed to ensuring that our operations and supply chains are free from modern slavery practices. Retention of personal identity documents, recruitment fees or excessive loan terms are prohibited. We set clear expectations for our employees, contractors, business partners and suppliers to encourage the disclosure of potential human rights breaches and are prepared to take steps to prevent and address it.</p>
<b>Work Hours, Wages and benefits and Right to Work</b>	<p>We compensate employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws. We verify that all employees have the right to work in the jurisdictions in which they are employed.</p>
<b>Vulnerable Individual and Communities</b>	<p>We are committed to respecting the human rights of all individuals regardless of gender, origin, colour, religion, age and ethnic and social group, who may be at heightened risk of becoming vulnerable or marginalised if adversely impacted by our activities or</p>
<b>Workplace Security</b>	<p>We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.</p>

## OUR SOURCING GUIDELINES

All bottlers within the Coca-Cola system follow the SGPs and Principles for Sustainable Agriculture (“PSA”). TCCC commissions independent audits to monitor how our ingredients and packaging suppliers comply with SGPs and RSGs. PSA compliance is verified through adherence to global third-party sustainable agriculture standards approved by TCCC. These sourcing guidelines set out the minimum requirements we expect of our suppliers in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity and set out our expectations of suppliers in relation to human rights.

The SGPs, and PSA expressly prohibit the use of all forms of child labour and forced labour – including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The PSA also now specifically prohibit retention of personal identity documents, recruitment fees or excessive loan terms. Additionally, all children under 15 living on farms must have access to schooling.

At CCEP, we require all our suppliers to comply with our SGPs and (for agricultural based products) the PSA. In 2021 as part of the integration of Coca-Cola Amatil into CCEP we aligned the way our API markets classify suppliers with Europe. CCEP classifies strategic suppliers as those suppliers who represent 80% of our annual spend (excluding spend with brand partners, being TCCC, Beam Suntory and Monster Energy). This segmentation ensures we appropriately evaluate our entire supply base and enables CCEP to invest time and effort appropriately.

While we currently have differing regional approaches to measuring supplier compliance to our responsible sourcing programme, each approach is underpinned by the TCCC standards and we are aligning our activities in Europe and API to create a single global responsible sourcing programme, which we will launch in 2022

## OUR SUPPLY CONTRACTS

CCEP’s standard supplier contracts include the requirement for compliance with Modern Slavery and anti-bribery legislation as well as compliance with the SGPs.

CCEP’s standard supply contracts impose specific anti-slavery obligations on suppliers, including:

- compliance with modern slavery laws;
- that the product or services provided by the supplier, or suppliers’ supplier, are not the product of modern slavery practices or contraventions of any human rights;
- n obligation to thoroughly investigated its labour practices to ensure that there is no modern slavery used in its business; and

- an obligation to put in place all necessary processes, procedures, investigations and compliance systems to ensure compliance with modern slavery laws.

Where we find evidence of modern slavery or have cause for concern, we take action to remediate with our supply partner. Where a supplier fails to respond to take appropriate action to address issues identified, it may result in supply suspension or termination.



# RISKS OF MODERN SLAVERY IN OUR OPERATIONS



We recognise the risk of modern slavery existing within our own business operations and throughout our supply chain. At CCEP, we have zero tolerance for work practices or other activities which:

- contravene the human or other legal rights of any person we employ, contract or who is otherwise connected with our supply chain; and

- are not representative of “doing business the right way” and in accordance with our CoC.

CCEP recognizes the responsibility for identification and management of human rights risks sits throughout our organization and is an ongoing process.

Our People	Our Business	Our Supply Chain
<p>Belief in our Modern Slavery Statement</p> <ul style="list-style-type: none"> <li>• Completion of training, and compliance with relevant policies and procedures</li> <li>• Follow policies and report noncompliance using the frameworks and processes available</li> <li>• Participate in awareness raising activities</li> </ul>	<p>Appropriate engagement with direct and indirect third-party labour</p> <ul style="list-style-type: none"> <li>• Facilitation of easy-to-access training for all employees</li> <li>• Follow internal reporting mechanisms that compliment policies</li> </ul>	<p>Comprehensive third-party supply assurance program:</p> <ul style="list-style-type: none"> <li>• Physical audits of strategic suppliers and additional ad-hoc audits on high-risk categories, usually conducted by TCCC on behalf of CCEP</li> <li>• Online third-party audits for medium value suppliers</li> <li>• Self-assurance of tactical suppliers through the onboarding process</li> </ul>

The Fast Moving Consumer Goods (FMCG) industry is a complex supply chain and has been even more challenging during 2021 as a result of the ongoing COVID pandemic. We rely on global supply chains to make, sell and distribute our products. The prevalence of modern slavery risks is influenced by a number of factors including the goods or services sector and the location of supply, as well as evolving risks such as those related to COVID-19.

The risks of modern slavery practices means (as per the UN Guiding Principles) the potential for an entity to “cause, contribute to or be directly linked to” modern slavery through operations and supply chains. Hypothetical examples relevant to operations and supply chains of a consumer goods manufacturer could be;

- A consumer goods manufacturer may cause modern slavery, if it used exploited labour in a manufacturing site.
- A consumer goods manufacturer may contribute to modern slavery if it required an upgrade to a site to be constructed, and the KPIs for such construction were related to the quickest and cheapest provision of services which meant that forced labour and exploitation of workers would be highly probable.
- A consumer goods manufacturer may be directly linked to modern slavery if it purchases recycled resin to create plastic bottles, where the collection of the bottles for recycling by “waste pickers” was undertaken by a third party who exploited its workers.

	Our Operations	Our Supply Chain
Potential Risks	Whilst we have assessed the risk as low that our own employees have been at risk of modern slavery, we acknowledge we can be directly linked through poor contractual controls and monitoring processes of our own practices and implementation of external legislative changes	We have assessed the risk as moderate of being directly or indirectly, through our purchase of goods and services, at risk of the presence of modern slavery in our suppliers’ supply chains
Common Forms	<ul style="list-style-type: none"> <li>• Exploitation</li> <li>• Excessive overtime</li> <li>• Underpayment</li> </ul>	<ul style="list-style-type: none"> <li>• Forced, bonded and migrant labour</li> <li>• Exploitation</li> <li>• Excessive overtime</li> <li>• Underpayment</li> </ul>
Categories	<ul style="list-style-type: none"> <li>• Employment contracts, especially third-party labour and contingent workforce.</li> </ul>	<ul style="list-style-type: none"> <li>• Raw materials – juice and sugar</li> <li>• Packaging – plastic resin and films, pulp and paper</li> <li>• Services related to a high number of workforce – e.g., facilities services, cleaning, security, haulage using third party drivers, third party labour</li> </ul>
Countries	<ul style="list-style-type: none"> <li>• All countries in which CCEP operates.</li> </ul>	<ul style="list-style-type: none"> <li>• China</li> <li>• Taiwan</li> <li>• Vietnam</li> <li>• Indonesia</li> <li>• Papua New Guinea</li> <li>• Thailand</li> </ul>
Management	<ul style="list-style-type: none"> <li>• Internal policy framework</li> <li>• Regular training</li> <li>• Close monitoring of legislative changes across our markets of operation</li> <li>• Enterprise risk management framework</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier Guiding Principles (SGP)</li> <li>• Supplier Responsible Sourcing Guidelines (RSG)</li> <li>• Third party and online assessments</li> <li>• Supplier onboarding processes</li> <li>• Formalised contract templates</li> <li>• Enterprise risk management framework</li> </ul>

# OUR ACTIONS TO ASSESS AND ADDRESS RISK

## OUR PERFORMANCE

Human rights are fundamental to how we run our business and the communities in which we operate. We are committed to ensuring everyone who works at CCEP and in our supply chain is treated with dignity and respect.

## OUR BUSINESS

### Employment

At CCEP, in Europe 92.4% and in API 90.8% of our team members are employed directly and on permanent contracts. We understand the risks related to those team members operating through a third-party labour provider, and we are committed to ensuring our work environments are safe and compliant.

When selecting third party labour providers, for example, for contractors, labourers or security services, we evaluate a range of factors including their organisational structure, labour structure (i.e., permanent), employment tenure and require that each supplier undertakes a CCEP nominated third party assessment (TCCC SGP). Each of these steps provide greater visibility of the culture and relationship between an organisation and employee.

### TCCC Audit

The TCCC SGP framework involves a site audit of all CCEP manufacturing sites, co-filling manufacturing operations, ingredients and primary packaging raw material suppliers. Each audit is undertaken on a routine 3-year cycle. If a significant risk is identified, it will be notified to the supplier, along with required remediation and/or mitigation measures to be taken, before being followed up to ensure compliance with such required activities.

Audits against our SGPs generally include confidential interviews with employees and on-site contract workers. These audits include checks to ensure suppliers are not using child labour, forced labour, or any form of modern slavery, along with checks under other areas addressed in the SGPs. During 2021 CCEP continued to assess the risk of modern slavery both within our operations and supply chains and no evidence of modern slavery was identified. A small proportion of planned audits were postponed due to operational constraints of the COVID 19 pandemic, however these are being followed up jointly between TCCC and CCEP and will be completed in 2022.

### Training

A key foundation of our internal management of modern slavery is to raise awareness across our employees through regular training on our CoC, policies and modern slavery. In 2021, we provided additional human rights training to all procurement employees in Europe, which was recorded and shared with the procurement employees in API.

## CASE STUDY 1: PLASTIC WASTE



In 2020 Amandina, a Joint Venture of which CCEP is a 50% shareholder, commenced construction on a recycled polyethylene tetraphyte (“rPET”) plant in Indonesia which will process about 30,000 tonnes of plastic waste into a net output of 25,000 tonnes of recycled rPET resin for use in CCEP’s beverage bottles, closing the loop on packaging in Indonesia.

Unlike other CCEP markets, Indonesia does not have a formal waste collection network which increases the risk of modern slavery and child labour involvement in the collection of waste supplied to the recycling plant. To mitigate this risk, a not-for-profit Foundation, Mahija Parahita of which CCEP is a 50% shareholder, was formed to facilitate waste collection and support the waste collection community. The operation of the Foundation involves building and developing a network with waste collectors, NGOs, Government and waste banks in major cities to ensure an ethical supply of plastic waste at feasible prices.

This Foundation has developed a three-way audit process to monitor for any evidence of child labour in the collection process. This includes an initial visit to the collection partner to audit and observe activities at the centre, a driver audit at every point of collection and an external audit by a third-party auditor (SGS Indonesia) of each collection centre at least annually.

The Foundation supports several projects established to reduce the participation of children in the collection of waste and support the waste collector communities.

### For more information

- [Amandina and Mahija videos](#)

### Reporting Concerns

Supporting the raising of concerns related to Modern Slavery is the CCEP Speak-Up and Whistleblowing Policy which is available to employees, former employees, customers, contractors, suppliers, joint ventures, friend/relative of employee or others. The Speak-Up and Whistleblowing Protection Policy has been adopted to reinforce that Coca-Cola Europacific Partners provides a safe and confidential environment where concerns regarding misconduct, impropriety or wrongdoing may be raised without fear of retaliation or detrimental treatment.

### Enterprise risk management

CCEP recognises that review and management of human rights risks across our organisation and within our supply chain is an ongoing process. We assess our risk of modern slavery as a part of our corporate Enterprise Risk Management framework, and responsibility for managing its risk sits with a designated risk owner. The Enterprise Risk Management risks are reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team, and shared annually with the Board.

In addition, we have a Human Rights Risk Assessment which covers detailed risks.



## CASE STUDY 2: LOGISTICS



CCEP has identified that the use of third-party labour presents a higher risk of modern slavery within our supply chains and we use our frameworks to evaluate its presence and take seriously any concerns identified. In late 2020 our European operations became aware of a possible risk of modern slavery in the supply chain of one of our logistics suppliers. Claims were made around incorrect employment practices and potential facilitation and involvement of human trafficking. During late 2020 and in 2021, our European operation suspended supply from this supplier whilst we evaluated the claims and the supplier's labour practices. Only once it was established with confidence that employment practices were compliant with local regulation and modern slavery was not existing within the supply chain, CCEP recommenced supply with an increased audit frequency to monitor compliance. Had any evidence of inappropriate practices been identified, CCEP would have worked with the supplier to remediate the issues, addressing the employment practices and possible human rights violations.

# OUR PROCESS FOR RESPONDING TO A BREACH OF HUMAN RIGHTS

The following procedure is in place, for implementation, if a breach of human rights is found in our own operations or in our value chain.



## 1. Notification

A potential breach of human rights can be raised through different channels including:

- Speak-up and Whistleblower Protection Channels set out in our CoC and in our Speak-Up and Whistleblowing Policy, enabling individuals to raise concerns anonymously if allowed under local law
- Assessment reports from desktop supplier audits provided by our external provider EcoVadis
- Results of audits of supplier and CCEP’s sites and plants carried out by TCCC against SGPs
- Media

Each of the notifications will be treated with the same level of seriousness, irrespective of how it was raised.

## 2. Internal Information

Once a human rights breach has been identified, internal stakeholders within the following functions will be informed: Employment Practices, Ethics & Compliance, Enterprise Risk Management, Legal and Public Affairs, Communications & Sustainability. Additional relevant internal or external stakeholders will be informed and involved in the process as appropriate.

## 3. Investigation

The Employment Practices team will start an investigation immediately with the relevant internal and external stakeholders to understand the nature and location of the case; the circumstances which led to the case; the number of impacted people; whether the case can be substantiated and the potential impact of the case.

## 4. Remediation or mitigation

In cooperation with the involved persons, suppliers or communities, a remediation or mitigation plan will be established and implemented.

## 5. Monitoring

Depending on the nature of the case, the agreed remediation or mitigation can take some time. The remediation or mitigation plan is monitored on an ongoing basis to ensure it is implemented correctly.

## 6. Due Diligence

Single events can be an indication of a risk of further human rights violations. The due diligence process will be adjusted to prevent similar cases in the future when appropriate.

## 7. Report

Human rights cases will be included in CCEP’s internal and external reporting where appropriate.

## OUR SUPPLY CHAIN

We continue to improve the validation and proactive management of our suppliers in key areas such as human rights and modern slavery through our responsible sourcing framework. We regularly measure

our sustainable sourcing progress including sugar, pulp and paper and have demonstrated strong compliance to our supplier guiding principles.

### Spend covered by guiding principles<sup>(A)</sup>

% GHG emissions reduction across our value chain since 2010 and 2019.

#### Europe



Our spend with suppliers that are covered by the RSGs

#### API<sup>(B)</sup>



### Sustainably sourced sugar

Sugar sourced from suppliers that comply with the PSA.

#### Europe



#### API



### Sustainably sourced pulp and paper

Pulp and paper sourced from suppliers that comply with the PSA.

#### Europe



#### API<sup>(C)</sup>



In partnership with our suppliers we seek to source our raw materials and packaging from internationally recognisable sustainable accreditations and measure our compliance by category. In addition, we actively work with our operations and suppliers to increase our level of spend covered by the RSGs.

(A) The acquisition of CCL completed on 10 May 2021. The API sustainability metrics are presented on a full year basis for 2021 and 2022 to allow for better period over period comparability.

(B) Supplier spend in Australia, Indonesia and New Zealand only.

(C) 2021 is the first year we track PSA compliance for pulp and paper.

### For more information

- [Integrated Report](#)
- [This is Forward on Supply Chain Fact Sheet](#)

### TCCC Audits

Of the CCEP supplier sites applicable for audit under the SGP framework 93% were compliant to SGP requirements. Some planned audits were postponed due to operational constraints of the COVID 19 pandemic, however these are being followed up jointly between TCCC and CCEP and will be completed in 2022.



**Digitisation of risk management**

Whilst no evidence of modern slavery was identified in 2021, we identified opportunities for improvement. As a result, we are investing in technology to supplement existing controls and help proactively identify risks in our suppliers and their supply chains.



In Europe we deployed Resilinc in late 2021. Resilinc focusses on supplier surveys to map second and third tier supply chains. Work is underway to roll out Resilinc in API during 2022.



In late 2021 we contracted with FRDM which specialises in the mapping, monitoring and risk assessment of suppliers and their supply chains from a modern Slavery perspective. FRDM uses publicly available shipping records to map suppliers' points of supply.



Across both Europe and API we work in partnership with EcoVadis, an independent evaluation company to rate the sustainability performance of our suppliers, including environment, carbon management, human rights and fair business practices. We set minimum standards for our suppliers and evaluate closely scores below level to determine corrective actions, 720 key suppliers have undertaken an assessment via the EcoVadis platform and are sharing an update scorecard with us.

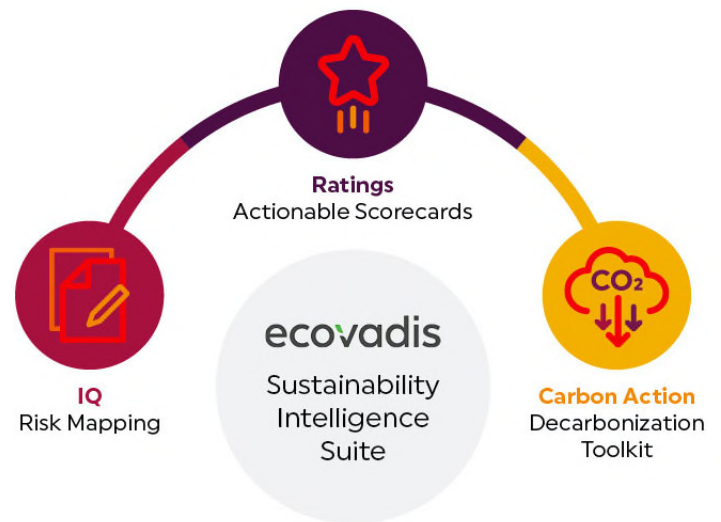
Spend IQ – we commenced implementation of a spend analytics tool across Europe and API. This enables CCEP to have full visibility of spend by country, supplier and CCEP site, which supports evaluation of risk across categories. CCEP utilises these platforms to provide greater visibility of potential risks of modern slavery within our supply chains.

Once fully deployed across the group this new technology will be a powerful addition to the capabilities of CCEP to proactively assess supplier risk, monitor and take corrective action in the area of modern slavery and human rights.

Wherever issues or opportunities for improvement are identified, CCEP initiates plans to address the concerns raised with the supplier and these sites will be subject to follow up audits during 2022.

**CASE STUDY 3:  
SUPPLIER TRAINING**

As an example, to drive a process of continuous improvement across the supplier community, training occurred in Q1 2021 with applicable Indonesian suppliers to improve understanding of changes to local labour regulations and requirements to drive compliance.



## REMEDIATION

We review the findings of all our supplier audits including from both physical and online platforms. Where concerns are identified we work with the supplier to agree a course of corrective actions to

address the findings and this includes both timings and scheduling a follow up audit. We seek to learn from all findings and assess for such issues across the balance of our supply base.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

To ensure we continue to understand the effectiveness of our actions and grow our culture of continuous improvement, identification and remediation of modern slavery we measure our progress. During the reporting period of 2021, CCEP assessed the effectiveness of its actions including:

### 1. CCEP policy framework in place

Our policy management process includes an annual policy review, led by Employment Practices. In 2021 we commenced harmonization of policies applicable to all CCEP countries. We commenced by identifying 30 policies to harmonise and, as part of this work stream, The Human Rights Policy was harmonized across Europe and API and approved by our Board of Directors in December 2021.

### 2. Employee training on Human Rights Policy

In API 91.5% of our employees are trained on the commitments, and requirements, of the Human Rights Policy.

In Europe, we plan to roll out the human rights training to all employees in 2022. In 2021 human rights training was provided to the Europe based procurement team, and this will be an annual training requirement.

We used the International Human Rights Day, 10th December, to communicate on Human rights within our operations in order to raise awareness within our employees.

### 3. Employee Survey

In 2021 we included two questions in the CCEP Inclusion, Diversity and Equity (ID&E) survey to assess the effectiveness and acceptance of our different Speak Up channels. The ID&E Survey was undertaken in all European CCEP countries and in Australia and New Zealand in the API region. The surveys took place across the CCEP territories between September 2021 to December 2021. The results have shown that the majority of our employees know how and where to report incidents of misconduct or inappropriate behaviour and feel able to speak up without fear of reprisal.

We have set up a working group about fair, safe and harassment free workplaces to identify and take actions to build on the outcomes of this survey ensuring all employees feel safe to speak up.

### 4. Whistleblower Protection Policy with reporting framework to API's Risk & Sustainability Committee of the Board and EU Summer Speak Up campaign

In 2021 there were NIL issues raised relating to Modern Slavery. Overall there were 19 disclosures received, investigated and closed.

In 2021 we conducted a summer Speak Up Campaign in European Business units. CCEP upholds a safe environment for employees to speak up in complete confidence, with no fear of retaliation about any concerns they may have, no matter how big or small they may seem.

### 5. Employee training on API's Whistleblower Protection Policy

84.6% of CCEP API employees have been trained on the Whistleblower Policy since its release in 2020. In 2021 we achieved 76% completion.

### 6. Internal risk assessment of Human Slavery Risk

In 2019 CCEP conducted its first human rights risk assessment in Europe and identified nine key areas, including forced labour, posing the greatest risk to our people at work and across our value chain. In 2019 API also conducted its first human rights risk assessment and identified twelve key areas comprising the same nine key areas identified by CCEP in its human rights risk assessment plus three additional key areas: (i) freedom from bribery and corruption; (ii) cultural rights of minorities; and (iii) children and young people's protection from exploitation. These key areas are our priority issues for Europe and API.

During 2021 our focus was on aligning a framework across all CCEP markets to support growth of a culture of continuous improvement.

In 2022, we plan to renew our 2019 CCEP wide human rights risk assessments to understand (a) if the identified risks highlighted in prior assessment by both CCEP and API are still valid, (b) if any new risks are to be identified (c) if the actions taken or planned need to be reviewed (d) the opportunities to further align across all CCEP.

### 7. Supplier assessment

Where concerns are identified we work with the supplier to agree a course of corrective action, and we assess the effectiveness of this by undertaking a follow up audit to assess compliance.

### 8. EcoVadis assessment of CCEP

We have also undertaken our own assessment by EcoVadis and have been proudly awarded platinum status which means we are in the top 1% of compliant companies.





### 9. Third party risk assessment of Modern Slavery Framework

We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the SGPs. Together with TCCC, we routinely verify and assess suppliers' compliance with our SGPs by using independent third parties. As part of the Coca-Cola system, we have relied on independent audits commissioned by TCCC to monitor supplier compliance with our SGPs. These audits include checks to ensure suppliers are not using child labour, forced labour, or any form of modern slavery.

To date, the audits have covered over 99% of our suppliers of ingredients and primary packaging. These audits generally include confidential interviews with employees and on-site contract workers. TCCC guidelines require auditors to select employees from different production lines and duties within the facility, including those of different genders, ethnic or religious backgrounds, employees who are pregnant, union representatives if available, and contingent workers. For more information on the audit guidelines of TCCC, please see its Human Rights Report.

TCCC is a member of the AIM-PROGRESS forum, a global forum promoting responsible sourcing practices and the harmonisation of supplier audits as a way of reducing duplication and costs for suppliers. The SGPs have been benchmarked against other members'

protocols and are recognised by AIM-PROGRESS members through a framework called Mutual Recognition. If a supplier fails to uphold any aspect of the SGP requirements the supplier is expected to implement corrective actions. TCCC reserves the right to conduct unannounced audits at their discretion and to terminate an agreement with any supplier that cannot demonstrate that it is upholding the SGP requirements.

In 2021, on behalf of CCEP, TCCC conducted SGP audits of 297 sites of different suppliers of CCEP in Europe and 13 sites in API. 279 sites have been fully compliant with the SGP requirements in Europe and 10 are fully compliant in API. In respect of those supplier sites which have not fully met the expectations, CCEP is working with the supplier to agree an action plan and follow up audits will be arranged.

### 10. Reporting and review by the Compliance and Risk Committee of the ELT and the Audit Committee of the Board

CCEP Enterprise Risk Management owns the responsibility for CCEP's risk management framework including the risk taxonomy for Enterprise Risks. Human Rights is included in the Enterprise Risk "People and Wellbeing". The risks are shared and reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team and annually with our Board of Director.

## FUTURE FOCUSED

We commit to continually improving our identification and management of human rights and modern slavery risk across all our operations and to evaluate risk by spend and category and continue to deep dive into higher risk supply throughout our supply chain.

We will use the experiences from Coca-Cola European Partners and Coca-Cola Amatil to drive our actions, as Coca-Cola Europacific Partners, on human rights and modern slavery in a holistic way. To deliver a holistic strategy and approach this will require an:

- understanding of the different situations across the countries we are operating in; and
- identification of best practices.

This work stream commenced in 2021 and will continue during the course of 2022.

**For more information on CCEP's management of Modern Slavery within our business and our supply chains**

- [Visit cocacolaep.com](https://www.cocacolaep.com)
- [Refer to our 2021 Integrated Report and sustainability factsheets](#)

