

CODE OF CONDUCT



Our [Code of Conduct](#) (CoC) seeks to ensure that we act with integrity and accountability in all of 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 our [Supplier Guiding Principles](#) (SGPs).

It aligns with the [UN Global Compact](#), the [US Foreign Corrupt Practices Act](#), the [UK Bribery Act](#), the 2016 and 2018 [UKCGCs](#), The [EU General Data Protection Regulation](#), the [Spanish](#) and [Portuguese](#) Criminal Codes and [Sapin II](#).

The CoC has been formally adopted in all the territories, as well as our shared-service centres 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.

RAISING CONCERNS

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

We received no fines for CoC breaches in 2021. Breaches of the CoC, by type, can be found in our [2021 Integrated Report](#) (page 40).

PREVENTING BRIBERY AND CORRUPTION

We aim to prevent all forms of bribery and corruption in our business dealings. Our CoC sets out our principles and standards to prevent bribery and corruption, including conflicts of interest and the exchange of gifts and entertainment.

Our [Gifts and Entertainment and Anti-bribery Policy](#) and our [Conflicts of Interest Policy](#) apply to all employees. There is mandatory training for a targeted audience.

CODE OF CONDUCT COMMITTEE

Management has also established a Compliance and Risk Committee, which advises the Ethics and Compliance (E&C) function and provides management input regarding the E&C Programme. Our E&C Programme ensures we are conducting our operations in a lawful and ethical manner. The Programme is applicable to our people, officers and Directors. It also supports how we work with our customers, suppliers and third parties.

Investigations into (potential and actual) breaches of our CoC are overseen in each business unit by the local CoC committee, chaired by the business unit's Vice President, Legal. All (potential and actual) CoC breaches and corrective actions are overseen by the Group CoC committee, which is a subcommittee of the Group compliance and risk committee and is chaired by the Chief Compliance Officer.

The Group CoC committee also:

- ensures that all reported cases have been recorded, investigated and a conclusion reached
- evaluates trends
- ensures consistent application of the CoC across CCEP

As required under the Spanish Criminal Code, the Iberia business unit also has an Ethics Committee formed of members of the Iberia business unit leadership team. The IB BU ethics committee have autonomous authority for initiative and oversight of the local crime prevention model, including the BU CoC committee. It reports to the Iberia business unit boards of directors and the Chief Compliance Officer.