

Coca-Cola
EUROPACIFIC
PARTNERS



MODERN SLAVERY STATEMENT 2022

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This statement was approved by the Boards of Coca-Cola Europacific Partners plc, 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:



“Protecting human rights is fundamental to how we run our business. We are committed to ensuring that everyone who works for and with CCEP is treated with dignity and respect: the quality and integrity of our products depend on sustainable global supply chains with successful and thriving communities.

Everyone working at CCEP plays a role in respecting and protecting human rights across our business. Our employees are supported to recognise and address risks and issues, and we have recently refreshed our training and rolled out internal communications campaigns to ensure that we are all working to the highest standards in ethics and human rights.”



Damian Gammell – Chief Executive Office

INTRODUCTION

This is the third statement of CCEP under the Australian Modern Slavery Act and the sixth 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 recognise 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 our 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 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.

KEY AREAS OF ACTION IN 2022

At Coca-Cola Europacific Partners (CCEP) we are committed to continually improving our operations, and those of our partners, by identifying, preventing and mitigating modern slavery risks. This is a journey and each year we strive to make progress through continuing 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 CCEP, underpinned by the frameworks of The Coca-Cola Company (TCCC). In 2022, as CCEP continues its integration journey, we have sought to learn more about the potential risks of modern slavery that exist within our operations and critically within our supply chains.

1. Human Rights risk assessment

Following the implementation of new legislation on human rights due diligence and in line with the United Nations Guiding Principles (UNGPs) on Business Human Rights we continue to address actual and potential human rights risks. In 2022, we conducted three human rights risk assessments across our business units Indonesia, Spain and Norway. These assessments provide valuable insights into the specific risks in the countries. The risk assessments enabled us to identify the salient issues within these countries and to develop actions.

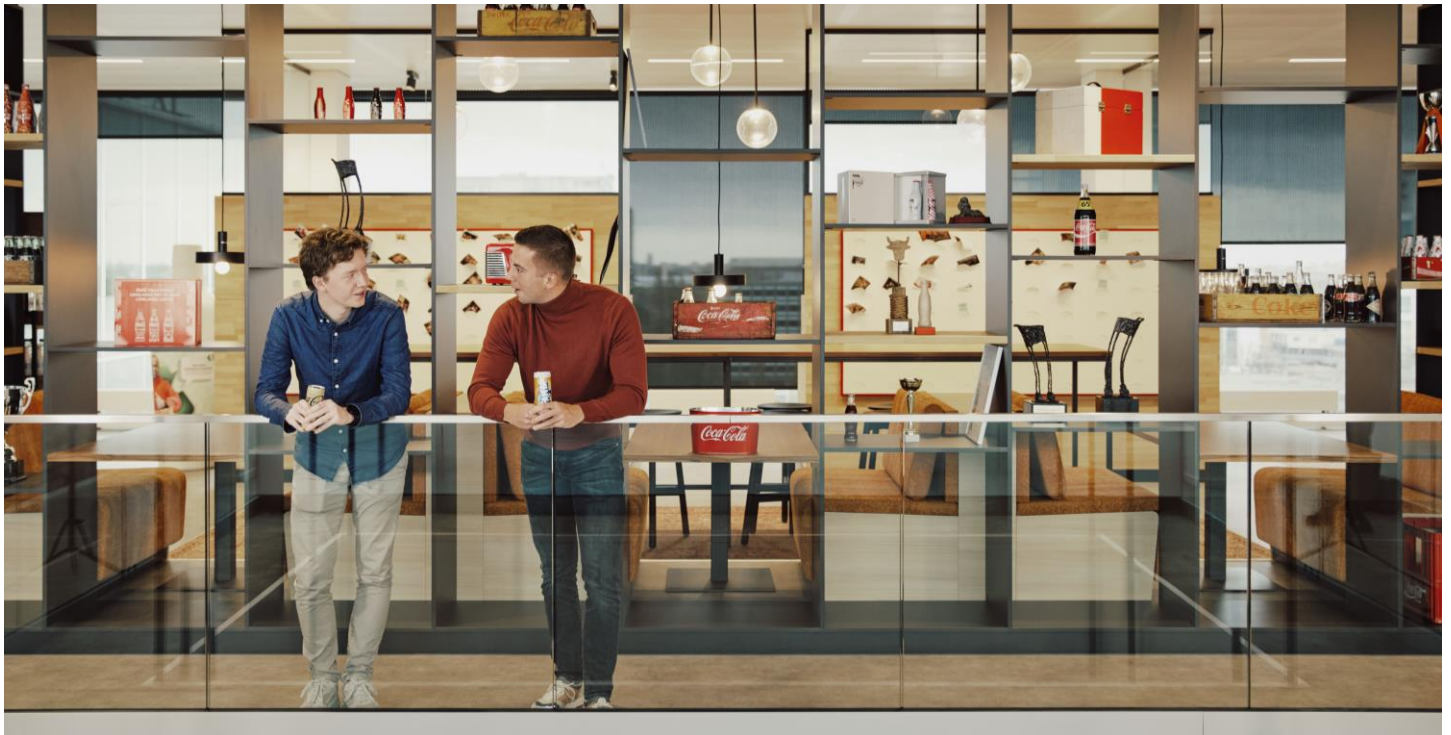
2. Internal assessments on labour and wages across Europe and API

We completed internal assessments which focused on evaluating and managing the potential risks to employees related to changes in labour frameworks and wages. Working with subject matter experts, risk assessments have been conducted in both Europe and API.

3. Launched one aligned Responsible Sourcing Policy (RSP) across CCEP and included a supplier questionnaire on Modern Slavery in API

All new suppliers to CCEP must go through an on-boarding process which includes evaluation of their organisation and processes to ensure compliance with CCEP policies. In our API markets we have extended this process in 2022 to include information gathering on the modern slavery risks in our supplier's supply chains to understand the level of risk in their supply chain and where risks are identified, action plans are agreed to address this.

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, 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 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.

CONSULTATION WITH CONTROLLED ENTITIES

Where CCEP held a “controlling interest” in an entity during FY22 we are informed that the majority of each appropriate organisational representative are aware of our policy framework and that they are taking the appropriate steps in mitigating modern slavery risks within our business and supply chains. During FY23 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.

For more information

- [A complete list of the entities of CCEP as of 31 December 2022 \(including ownership percentages\) is set out in the 2022 Integrated Report, which is available under Note 28, of the Consolidated Financial Statements found here.](#)

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE AND OPERATIONS

CCEP is one of the world's leading consumer goods companies. We make, move and sell some of the world's most loved brands – serving 600 million consumers and helping 2 million customers across 29 countries grow. We combine the strength and scale of a large, multi-national business with an expert, local knowledge of the customers we serve and communities we support. The Company is currently listed on Euronext Amsterdam, the NASDAQ Global Select

Market, London Stock Exchange and on the Spanish Stock Exchanges, trading under the symbol CCEP.

We operate 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
2,048 EMPLOYEES

IRELAND
3 EMPLOYEES
Non bottling location

BULGARIA
1,025 EMPLOYEES
working in a shared service centre

LUXEMBOURG
68 EMPLOYEES

CONTINENTAL FRANCE
2,516 EMPLOYEES

THE NETHERLANDS
795 EMPLOYEES

GERMANY
6,591 EMPLOYEES
16 production facilities

NORWAY
558 EMPLOYEES

GREAT BRITAIN
3,419 EMPLOYEES

PORTUGAL
353 EMPLOYEES

ICELAND
176 EMPLOYEES

SPAIN
3,585 EMPLOYEES

AUSTRALIA
3,621 EMPLOYEES

SWEDEN
740 EMPLOYEES

FIJI
608 EMPLOYEES



INDONESIA
5,373 EMPLOYEES

PAPUA NEW GUINEA
581 EMPLOYEES

NEW ZEALAND
1,172 EMPLOYEES

SAMOA
66 EMPLOYEES

For further information about our production facilities visit our [2022 Integrated Report](#).

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 customers in API and 1.1 million customers in Europe.

We employ around 33,200 people across our business (11,400 API and 21,800 Europe) and support thousands more jobs in the communities in which we operate. Across our teams we work as one, united by a shared purpose and common values.



OUR SUPPLY CHAIN

At CCEP we seek to create genuine, shared value with our supplier partners built on collaboration and innovation whilst putting sustainability at the heart of everything we do. We recognise the important role our suppliers have in managing the sustainability of our supply chains. We source products from over 17,000 suppliers, and spent approximately €7.4 billion with them in 2022. On average in 2022, 85% of supplier spend was with suppliers based in our countries of operation in Europe and API.

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.

How we source is critically important to CCEP and 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 with the entire requirement of our concentrates and syrups for Coca-Cola trademark beverages sourced from TCCC. Many of the purchases of our priority agricultural ingredients and primary packaging, such as sugar and juices, aluminium cans, glass bottles, PET resin, closures and secondary packaging are made together

with TCCC and other Coca-Cola bottlers and as a result, we address together as a joint Coca-Cola system many of the issues that we face in our supply chain, including that of Modern Slavery.

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. During 2022, we experienced significant supply challenges across many categories, both domestically and sourced from overseas. We recognise it is a joint effort, with our suppliers having a key role, to ensure CCEP's continued effort to support human rights. We sought to address these challenges across the year, without compromising on our values – ensuring that all goods and services were evaluated and approved in line with CCEP's policies and guidelines.

Agricultural categories continue to present a key modern slavery risk to CCEP. Of our two largest categories, sugar and juice, 97.6 % of CCEP's sugar is sourced via globally recognised accreditation schemes, these include Bonsucro, FSA and BMP Smartcane and in 2022 we increased our juices to close to 100% that are sourced under the TCCC Principles for Sustainable Agriculture (PSA).

OUR GOVERNANCE FRAMEWORK

Accountable
All CCEP Employees & Supply Chain Partners
Governance
Board Audit Committee (Board Committee) Compliance & Risk Committee of the Executive Leadership Team (Management Committee)
Policy
Code of Conduct Human Rights Supplier Guiding Principles Principles for Sustainable Agriculture Responsible Sourcing Guidelines Speak up Policy (Europe) Whistleblower Protection Policy (API)

At CCEP, our Code of Conduct, policies and guidelines have an important role in ensuring respect for human rights throughout our business and supply chains. These policies reflect our values, 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 ESG 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 oversight regarding the ethics and compliance programme.

Since the acquisition of Coca-Cola Amatil, we commenced work to develop one aligned policy approach across the organisation, this will continue in 2023.

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 and harmonised in 2022 and supported by the launch of a new company-wide multi-channel communication Campaign, ‘Is it Coke?’. We expect all third parties who work on our behalf to act in an ethical manner consistent with our CoC and to comply with our Responsible Sourcing Policy (RSP). The RSP was implemented in October 2022 covering the mandatory guidelines that suppliers directly or indirectly must comply with to be able to do business with CCEP. This includes obligations to Supplier Guiding Principles (SGPs), Principles of Sustainable Agriculture (PSA) and expectations around modern slavery.

The CoC applies to all our territories, as well as our shared service centres in Bulgaria. All employees are required to undergo CoC training annually, which is also a 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. Any employee who wishes to raise a concern about wrongdoing at CCEP is encouraged to seek advice from their line manager, or speak up through the Speak Up Resources which include internal and external channels. The ‘is it Coke?’ campaign encourages

employees to feel confident enough to stand up and speak up if something doesn’t feel right, just by asking a simple question: “**Is it OK?**” The campaign sets out the support available to all colleagues by driving awareness in standing up, seeking advice and speaking up. 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. We have reviewed our joined policy and embedded new requirements from legislations in Germany and Norway. However, the approval process of the adjustments will be finalised in 2023. We plan to have a specific information campaign in 2023 on the changes of the policy.

Our 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, Inclusion and Diversity 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 Policy Hub.](#)

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

<p>Forced Labour, Child Labour and Human Trafficking</p>	<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>
<p>Work Hours, Wages and benefits and Right to Work</p>	<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>
<p>Vulnerable Individual and Communities</p>	<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 business relationships.</p>
<p>Workplace Security</p>	<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

It is a requirement of The Coca-Cola Company and all bottlers within the Coca-Cola system to follow the Supplier Guiding Principles (“SGPs”) and Principles for Sustainable Agriculture (“PSA”). TCCC commissions independent audits to monitor how our ingredients and primary packaging suppliers comply with SGPs. 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. During 2022, we have been aligning our differing regional approaches to align our expectations to suppliers, including modern slavery and we now measure supplier compliance to one consistent policy across CCEP. The Responsible Sourcing Policy (RSP) is underpinned by the TCCC standards and we have communicated this to our strategic suppliers and the document is now publicly available on our [Corporate Website](#).

During 2022, we continued to review and develop our responsible sourcing processes to improve visibility of modern slavery risk in our supplier’s supply chains. In API, we have introduced a modern slavery questionnaire as part of the supplier onboarding process. This questionnaire requires all new suppliers to provide CCEP with visibility of their supply chains, reporting requirements, policies, training, risk management and governance procedures within their organisation. CCEP uses this information to evaluate risk level and determine any additional steps that need to be taken to evaluate the risk. Where additional risks are identified we work with our suppliers to develop a plan to mitigate this risk



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 RSPs.

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 supplier’s supplier, are not the product of modern slavery practices or contraventions of any human rights;
- an obligation to thoroughly investigate 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.

Our RSP processes enable CCEP to evaluate supplier compliance with their contractual commitments. 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” in accordance with our CoC.

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

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

The Fast Moving Consumer Goods (FMCG) industry is a complex supply chain and has been even more challenging since 2021 as a result of the ongoing COVID pandemic and the impact of the conflict of Russia and Ukraine. 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 or the conflict of Russia and Ukraine. The risks of modern slavery practices mean (as per the UN Guiding Principles) there is 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	The risk assessments conducted in Norway, Spain and Indonesia in 2022 show a low risk that our own employees can be exposed to modern slavery . However, we acknowledge we can be directly linked to modern slavery through poor contractual controls and monitoring processes of our own practices. Very low income can be seen as a driver for modern slavery. So we conduct due diligence across all our markets to ensure that we respect minimum wages.	There has been no change to the assessed risk level of ‘moderate’ for the risk of modern slavery in our suppliers’ supply chains. This is consistent across direct and indirect suppliers to CCEP.
Common Forms	<ul style="list-style-type: none"> • Exploitation • Excessive overtime • Underpayment 	<ul style="list-style-type: none"> • Forced, bonded and migrant labour • Exploitation • Excessive overtime • Underpayment
Categories	<ul style="list-style-type: none"> • Employment contracts, especially third-party labour and contingent workforce. 	<ul style="list-style-type: none"> • Raw materials – Juice and Sugar • Packaging – Plastic Resin, and Films, Aluminum, Pulp and Paper • Services related to a high number of workforce – e.g., facilities services, cleaning, security, haulage using third party drivers, third party labour
Countries	<ul style="list-style-type: none"> • All countries in which CCEP operates. 	<ul style="list-style-type: none"> • China, Taiwan, Vietnam, Indonesia, Papua New Guinea, and Thailand
Management	<ul style="list-style-type: none"> • Internal policy framework • Regular training • Close monitoring of legislative changes across our markets of operation • Enterprise risk management framework • Country based risk assessments and the CCEP due diligence exercise on minimum wage 	<ul style="list-style-type: none"> • RSP Third party and online assessments • Updated supplier onboarding processes • Formalised contract templates • Enterprise risk management framework • Ecovadis IQ

Modern Slavery has been assessed as a part of our corporate Enterprise Risk Management framework, and responsibility for managing its risk sits with a designated risk owner. In addition, we have a Human Rights Risk Assessment which covers detailed risks. The risk assessment is shared annually within our Modern Slavery Statement.

Risk Management



Following the implementation of new legislation on human rights due diligence in Norway and Germany and in line with the United Nations Guiding Principles (UNGPs) on Business Human Rights we continue to address actual and potential human rights risks. In 2019 in, at this time, separated legal entities in Europe and in API a human rights risk assessment was conducted. We decided to move to a country risk assessment approach, as we recognise that at a country level the risks for human rights might be different.

In 2022, we conducted three human rights risk assessments across our territories in Europe and API. Defending human rights and protecting against modern slavery continues to be a key priority. These assessments provide valuable insights into the specific risks in the countries Indonesia, Norway and Spain. The risk assessments enabled us to identify the salient issues within these countries and to develop actions.

Spain: In 2022, the Spanish government established a new labour framework, limiting the usage of temporary contracts and establishing new measures for Spain's short-time work scheme. Following this framework CCEP conducted a pilot human rights risk assessment in Spain and established a working group to analyse the current measures in place to prevent human rights breaches in these areas. Overall the pilot has been successful and highlighted that Spain has no human rights concerns when it comes to the new legislation. The risk assessment has enabled CCEP to build experience and capability on dealing with the increasing regulation on ESG due diligence.

Norway: Based on the Transparency Act in Norway, CCEP conducted a human rights risk assessment on the likelihood and severity of human rights breaches within our own operations and within our supply chain. Overall, the level of risk identified in Norway is low. In 2023 we will identify actions to strengthen our due diligence and management of the identified risks. A dedicated report will be published according to the legislation in mid 2023.

Modern slavery was included in the European risk assessments, however they have not been flagged as a salient issue so far.

Indonesia: In 2022, we started an assessment working with an external consultant on human rights risk in Indonesia. Based on the results of this assessment, that will available later in 2023, we will identify measures to be taken. However, the external consultant suggested further investigations related to modern slavery in our supply chains which will be taken into consideration for action in 2023.

OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY 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 91.5% and in API 91.1% of our team members were employed directly and on permanent contracts in 2022. 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 an 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 with to ensure compliance with such required activities.

Audits against the 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 2022, CCEP continued to assess the risk of modern slavery both within our operations and supply chains and no evidence of modern slavery was identified.

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. Given different technologies, we still have two different human rights trainings in Europe and API, which we plan to harmonise in 2023. However,

in 2022, we refreshed our human rights training for all employees in Europe and started the roll out in December 2022 on International Human Rights Day. We continue this roll out in 2023 to all European countries. In API we have encouraged employees to repeat the existing human rights training. As procurement plays a crucial role in respecting human rights, we have provided additional human rights training to all procurement employees in Europe, which was recorded and shared with the procurement employees in API. This training included general information on human rights, information about modern slavery and insights into the root causes of this human rights issue.



Reporting Concerns

The CCEP Speak-Up Policy supports the ability of employees to raise concerns related to Modern Slavery. This policy is available to employees, former employees, customers, contractors, suppliers, joint ventures, friends/relatives of employee and others. The Speak-Up Policy was updated and harmonised in 2022 and is embedded within the ‘Is it **Coke?**’ company-wide communication campaign. This Policy reinforces that CCEP 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 conducted human rights risk assessments in Norway, Spain and Indonesia which covers detailed risks.

CASE STUDY
PLASTIC WASTE



In July 2022 construction was completed on the Amandina Recycling plant, a joint venture with Dynapack of which CCEP is a 50% shareholder in Indonesia. By November 2022, Amandina obtained the required approvals to start commercial production of rPET resin. In parallel during this period, Amandina undertook a Supplier Guiding Principles audit process achieving Green status. Amandina produced over 6,000 tons of resin and flake for sale to customers during the second half of the year, including CCEP Indonesia.

Mahija, a not-for-profit Foundation was established to support the collection waste PET plastic bottles (feedstock) for processing in the Amandina plant. During 2022 Mahija activated 24 collection centres and implemented the three-step audit system to monitor the feedstock supply chain including for modern slavery. Monitoring occurs through daily audits of collection partners and has resulted in over 35,000 audit observations for review by the Mahija team. In addition, SGS, an independent third party, has started auditing the collection centres, based on The Coca-Cola Company standards (forced slavery, child labour, working hours, wages & benefits, and health & safety). All 24 collection centres are targeted to complete the audit process by end of 2023. To date, there have been no major findings, especially in the area of modern slavery and child labour.

In 2022, Mahija has collected circa 10,000 tonnes of feedstock from 24 collection centres in Java, Bali, Sumatera, Kalimantan and Sulawesi. The sourcing model has been proven to be effective in responsibly sourcing the quantity and quality of feedstock required by Amandina, all of which is recorded and monitored through our audit system.

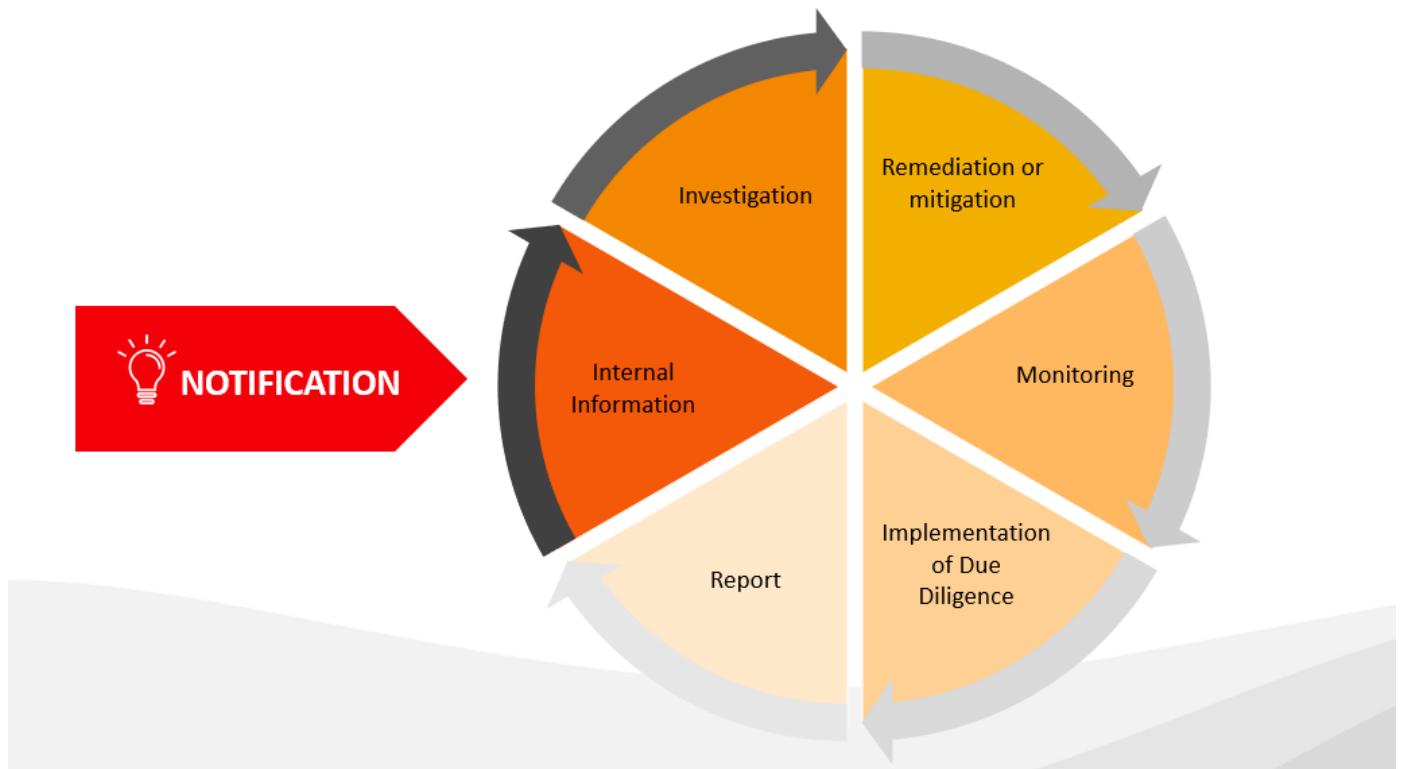
Mahija has started social programs for waste pickers, focusing on improving their livelihood. Mahija has conducted free health checks for 1,200 people and distributed over 10,000 packages of basic staples in low-income waste pickers’ communities. In addition, as the Foundation’s goal is to mitigate the risk of child labour, work is underway to explore options to enhance educational provision to the children of those working in the informal waste sector. This program will provide free education, nutrition, and health, for the children of waste-pickers.

For more information [Mahija Parahita Nusantara](#)



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 Channels set out in our CoC and in our Speak-Up 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 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 & Human Rights, 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 & Human Rights 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 have demonstrated strong compliance with our responsible sourcing policy. CCEP has appointed DNV Business Assurance Services UK Limited (DNV) to provide limited assurance over the SGPs and PSA metrics for the year ended 31 December 2022. The assurance engagement was planned and performed in accordance with the International Standard on Assurance Engagements (UK) 3000 (July 2020) Assurance Engagements Other than Audits or Reviews of Historical Financial Information ("ISAE (UK) 3000 (July 2020)"). DNV has issued an unqualified opinion over the selected data and their full assurance report and CCEP's basis of reporting for assured data are available on [Sustainability at CCEP](#).

TCCC Audits

Of the CCEP supplier sites applicable for audit under the SGPs framework, 97.5% were compliant to SGPs requirements. Of the sites requiring corrective action, CCEP have worked with the suppliers to understand the issues identified and agreed corrective action with each supplier. CCEP will continue to work closely with these suppliers to ensure the required changes identified are implemented.

Targets and performance ^(A)	
Spend covered by guiding principles 100% of suppliers to be covered by our SGPs	
Group	Target 100%
2022	97.5%
Europe	
2022	97.3%
2021	97.0%
API^(B)	
2022	98.4%
Sustainable sourcing (sugar) 100% of sugar sourced through suppliers in compliance with our PSA	
Group	Target 100%
2022	97.6%
Europe	
2022	100%
API	
2022	90.3%
Sustainable sourcing (pulp and paper) 100% of pulp and paper sourced through suppliers in compliance with our PSA	
Group	Target 100%
2022	99.2%
Europe	
2022	99.8%
API	
2022	98.3%

(A) The acquisition of API completed on 10 May 2021. The API sustainability metrics are presented on a full year basis for 2021 to allow for better period over period comparability.
 (B) API previously tracked performance against Responsible Sourcing Guidelines (RSGs), with 90.3% compliance in 2021.

Detailed information can be found in the 2022 [Integrated Report](#)



Digitisation of risk management

CCEP continues to recognise the growing importance of technology in increasing the visibility of risk with our supply chains. Whilst no evidence of modern slavery was identified during 2022, we continued to work with our technology partners to increase supply chain visibility and supplement existing controls to proactively identify risks in our suppliers and their supply chains.



During 2022, we developed our interaction with the Resilinc tool to map and monitor over 400 sub tier sites with AI scanning for over 100 risk types, some of which could indicate an elevated risk of modern slavery. This process included both tier 1 and tier 2 evaluations across multiple categories, suppliers and sites. The focus has been on suppliers to our European operations in 2022 with plans to extend to API in 2023.



During 2022 we continued to develop the FRDM platform which specialises in the mapping, monitoring and risk assessment of suppliers and their supply chains from a modern slavery perspective. FRDM is a startup organisation that uses publicly available shipping records to map suppliers' points of supply.



In 2022, CCEP remained focused on our 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. During 2022, we commenced a process to merge our supply bases across Europe and API onto a common platform to increase visibility across CCEP, this is expected to be completed during 2023. We have built the expectation of suppliers to achieve a minimum score of 50 into our responsible sourcing guidelines with the ambition to get to an average score of 65. By the end of 2022, 80% of our strategic suppliers in Europe and 62% of our strategic suppliers in API have undertaken an assessment via the EcoVadis platform and are sharing an updated scorecard with us and work is ongoing to increase the coverage of suppliers assessed.

Combined, these new technologies are 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 across the CCEP group. Whilst we have made progress, we recognise there are still more opportunities to fully leverage the data we have available and will continue to evolve our use of data in 2023.



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 an action plan with specific timings and scheduling a follow up audit. We seek to learn from all findings and assess for such issues across 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 2022 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 & Human Rights. In this annual review, policy owners review their policies and include changes according to new legislative requirements or caused by new or changed policies, which are connected. In 2022, we have further harmonised policies from Europe and API, which include the review of policies related to human rights such as the Human Rights policy, the Speak-Up policy and the Inclusion & Diversity Policy.

2. Employee training on Human Rights Policy

In 2022, we used different technologies for training in Europe and API, which we plan to harmonise in 2023.

We refreshed our human rights training for all employees in Europe and started the roll out in December 2022 on International Human Rights Day (IHRD). This was supported by an internal communication campaign to highlight the importance of human rights and policies, which ensure a fair and transparent treatment of our employees. We continue the roll out in 2023 to all European countries.

Within the communication campaign on IHRD in December 2022, we encouraged employees in API to repeat the existing human rights training. In 2021, in API, 91.5% of our employees had completed training on the commitments and requirements, of the Human Rights Policy. Since the beginning of the refresher campaign at the end of 2022, 12.5 % of employees in API completed the training on the Human Rights policy. In 2023, we are focused on encouraging employees to complete the training on Human Rights.

As procurement plays a crucial role in respecting human rights, we have provided additional human rights training to all procurement employees in Europe, which was recorded and shared with procurement employees in API. This training included general information on human rights, information about modern slavery and insights into the root causes of this human rights issue, such as recruitment fees, the Kafala system or poverty.

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 CCEP's European 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 plan to repeat the ID&E survey in October 2023.

We have set up a working group about fair, safe and harassment free workplaces to identify and take action built on the outcomes of the survey, to help ensure that all employees feel safe to speak up.

4. Speak Up Policy was harmonised and rolled out company-wide supported by the 'Is it Coke?' Communication Campaign

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.

In 2022, no issues raised relating to Modern Slavery. Overall there were 261 Code of Conduct reports received, investigated and closed, of which 40 were through the external Speak Up Channels.

In October 2022, CCEP launched "Is it **Coke**?" campaign in all its markets. The campaign focussed on improving the confidence of employees to 'Stand Up' in the moment when they see something that doesn't feel right, 'Seek Advice' if they are unsure and to 'Speak Up' via our internal or external resources to report an issue. In the two months post the launch CCEP experienced an increase in reporting.

**IS IT
COKE?**

5. Employee training on API’s Whistleblower Protection Policy

In 2022, an additional 813 employees completed the Online Whistleblowing training modules in API. This represents a total of 5,329 that have completed the training over the last three years, or approximately 50% of the total workforce and approximately 85% of the online workforce. Our Speak-up Channels set out in our CoC and in our Speak-Up Policy, enabling individuals to raise concerns anonymously if allowed under local law. To make an eligible disclosure and be protected by Whistleblower laws, regulations or policy applicable to the relevant territory, we refer employees to their local Speak Up Policy Guidance for processes and options available to them.

6. Internal risk assessment of Human Slavery Risk

In 2022, three human rights risk assessments in Norway, Spain and Indonesia have been completed. The aim of these has been 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.

The same salient risks have been identified by our own internal risk assessments, and by an external consultant. Working with an external consultant has grown our capability through learning and confirmed the success and suitability of our own risk assessments by identifying the same salient risks.

In 2023, based on upcoming legislative requirements, we plan to continue to conduct country specific risk assessments to identify new or existing risks to human rights as well as work to align a framework across all CCEP markets to support the growth of a culture of continuous improvement.



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. CDP’s Supplier Engagement Rating (SER)

We have been recognised for our leadership in supplier engagement on climate change for the fifth year running. We received the highest score, an A rating, on CDP’s Supplier Engagement Rating (SER), which evaluates corporate supply chain engagement on climate issues. Companies with the highest ratings are recognised as Supplier Engagement Leaders, of which we are amongst 36% of companies that reached Leadership Level in the Food and Beverage sector.





10. 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 RSP. 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 percentages of revenue 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 SGPs 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 SGPs requirements.

In 2022, on behalf of CCEP, TCCC conducted SGPs audits of 270 supplier sites, 235 of these audits were at sites supplying into CCEP Europe and 35 sites supplying into API. 217 sites have been fully compliant with the SGPs requirements in Europe and 30 are fully compliant in API. In API, the four non-compliant audits were in Australia and related to missing building security certificates and one in our Indonesian market related to government regulation changes that had not been reflected in employee compensation. CCEP have worked with the suppliers to understand the changes required and have received confirmation that any missed compensation has been paid and employment conditions updated for future work. In Europe, most of the non-compliant audits were linked to overdue audits and we are working with suppliers to arrange new dates, that will occur during 2023. The remaining issues were linked to Health and Safety issues and a corrective action plan has been agreed and implemented by the suppliers to address them.10.

11. 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 Directors.

FUTURE FOCUSED

We are committed to continually improving the 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 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.

On top of that, in 2022 we have established best practice exchanges within the Coca-Cola system including TCCC and other bottlers like Coca-Cola Hellenic, Coca-Cola İçecek and Coca-Cola Bottlers Japan Inc. on a regular basis.

In 2022, we have been successful in establishing a dedicated human rights page on the Germany CCEP webpage. In addition, we have established a dedicated page to our grievance mechanism.

These pages use optimised search engine technology to ease accessibility. In 2023, we plan to expand these pages to become available across Europe and API. The purpose is to provide knowledge of our human rights agenda and to ease accessibility to our Speak Up channels.

We understand even though our business might be similar in the different countries, the countries we are operating in have their specific set of legislations, cultures and circumstances, which may lead to different salient human rights issues. Following this insight, we are moving to country specific or specific situation based human right risk assessments as our future approach.

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

- cocacolaep.com
- [2022 Integrated Report](#)

