

CONFLICT OF INTEREST POLICY GUIDANCE

Coca-Cola Europacific Partners

POLICY INDEX

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1. POLICY GUIDANCE CONTENT

We should always, act in accordance with the highest standards of professional and personal behaviour and demonstrate integrity in all our actions.

1.1 General

A conflict of interest can arise at any time and can affect any employee of Coca-Cola Europacific Partners (CCEP). Therefore, it is important to be aware of situations that could be deemed a conflict of interest and to deal with them appropriately.

We respect the privacy of everyone who works for CCEP and are normally not concerned with what people do outside of work. However, a conflict of interest can arise if your personal activities, outside interests, or relationships, influence or appear to influence your ability to act in the best interest of CCEP during working hours.

This endangers the relationship CCEP has with our business partners; it may harm the competitiveness of CCEP and even lead to loss of business. In addition, it may damage CCEP's reputation as well as your personal reputation and credibility.

Never use your position with CCEP for personal gain.

1.2 What to do

- Any potential conflict of interest must be disclosed to and approved by your manager. Managers are responsible for assessing potential conflicts and determining how best to address them. consult with your line manager, P&C (People & Culture) or Ethics & Compliance if you have a potential conflict of interest. Your line manager may consult with the Legal team as needed. Inform your manager as soon as there are circumstances when decision-making may be affected by personal activities, outside interests, or relationships such as friends, family members, relatives, or (business) partners. Once you have confirmed you have a conflict of interest you must register it via the Global CCEP conflict of interest register;
- withdraw from any decision-making that creates or could be perceived to create a conflict of interest. As an example, you should remove yourself from the procurement, hiring or contracting process when you have a personal or previous relationship with someone who works for or the company CCEP is negotiating with;
- be careful about the appearance of favoritism. Avoid directly or indirectly supervising a close friend, family member, relative, or (business) partner. Even the appearance of a conflict of interest can be damaging to your reputation and the reputation of CCEP and must therefore be addressed.

1.3 Side activities

You may not conduct any side activities that could create a conflict of interest or that may harm CCEP's reputation. You need prior written approval from your line manager if you consider activities - either occasional or on a regular basis - outside of work for CCEP which:

- are of a commercial nature and touch on the business affairs of (one or more of) the CCEP companies; and/or
- compete for time or impact your ability to perform your duties for CCEP

You also need prior written approval from your line manager if you consider:

- accepting a board or paid position with a commercial organisation; and/or
- accepting a board or paid position with a non-profit entity, when there may be a business relationship with a CCEP company, or an expectation of financial or other support from a CCEP group company.

Your line manager must always consult with the P&C team before deciding on side activities.

1.4 Mandatory annual declarations

The annual disclosure of potential conflicts of interest – including ancillary activities - is mandatory for Directors and above and must be made in accordance with the disclosure of interest procedure.

1.5 Gifts, Entertainment, Sponsoring & Charity

Be aware that some gifts, entertainment and hospitality can create a conflict of interest, either for you as an employee or for the party with whom we have a business relationship (supplier, customer, franchisor, government official etc.). They can also be perceived as a means to exercise improper influence. Refer to our Gifts, Entertainment and Anti-bribery Policy and Policy Guidance on this subject.

1.6 Seeking advice and sharing concerns

Conflicts of interest aren't always easy to recognise. It can be difficult to establish what conduct, under specific circumstances, is permitted and what conduct is not.

If you have any questions about this Policy, the Policy Guidance, or the Code of Conduct, you can contact your local P&C team or the Ethics & Compliance team.

Please escalate to our Internal Speak Up Resources or External Speak Up Channels if you suspect that there might be a violation of this Policy, the Policy Guidance, or our Code of Conduct.

2. REGULATORY FRAMEWORK

This Policy must be interpreted in the context of CCEP's Code of Conduct (section '*Avoiding Conflicts of Interest*') and applicable policies, as well as in accordance with the provisions of any applicable legislation.

Company policies are largely based on applicable laws and regulations and are therefore subject to change and may vary depending on location. If you are uncertain which rule or policy you should follow, or if you are concerned that there might be a conflict between applicable law and the guidance within our Policy, please consult the Policy Owner listed below.

3. POLICY COMPLIANCE

As our policies are based on applicable legislation, please note that non-compliance could lead to disciplinary measures including instant dismissal per applicable laws and/or internal policies and/or potentially criminal prosecution.

Policy Overview

Risk	A conflict of interest can result in sub-optimal decision-making and reputational damage
Title of the Policy	Conflict of Interest Policy and Policy Guidance
Scope	Company-wide
Policy Owner	Chief Compliance Officer
Initial date of approval	04/05/2023
Revision Date	May 2024
Version	5

3.1 Approval of the Policy

The Policy owner has obtained the approval for this Policy as set out below.

Department	Name	Position	Signature	Date
CCEP's Board of Directors	Related to Conflict of Interest	Board of Directors		04/05 /2023
CCEP's Compliance and Risk Committee	As above	ELT (Executive Leadership Team) members and one GM (General Manager) representative		04/05 /2023

3.2 Effective Date and Validity

This Policy and Policy guidance shall apply with immediate effect once it has been approved by the appropriate responsible person within CCEP on the date indicated at the beginning. The date of revision, from which this policy is effective, is set out in the policy outline section above.

Should some regulations of this policy become ineffectual because of changing laws in one Country or Business Unit, the remaining will stay effectual.

3.3 Change Control

The policy and the policy guidance will be revised when appropriate as circumstances change.

At minimum, this policy and guidance should be reviewed annually.

CCEP intends to notify employees of changes to its policies where possible. However, CCEP reserves the right to change, revise, withdraw or add to its policies, processes, procedures, or guidance at any time, without notice if necessary.

Employment Practices keeps a record of all changes to the policy and policy guidance. If you have questions, please reach out to employment.practices@ccep.com.