

# THE WAY WE WORK AT CCEP

OUR CODE of CONDUCT



# MESSAGE

## from the CHIEF EXECUTIVE OFFICER

Dear Colleagues,

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

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

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

We call this ME@CCEP and it means being connected, being recognised, being well & inspired and being developed and valued.

We should be ambitious about our future and focus on sustainable growth. We are committed to creating value and winning in the market with our customers. In order to achieve that goal, we need to conduct our business in the right way, with integrity at the heart of all of our actions.

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

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

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

Thank you for taking this journey with me.

**Damian Gammell**





**FURTHER  
TOGETHER**

## OUR PURPOSE

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

## WHAT WE DO

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

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

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

We want to deliver sustainable growth, create value for all our stakeholders and build a better future for our business, our communities and the planet.

## HOW WE DO IT

### GREAT PEOPLE

- A great place to work, where people can grow, be happy and be well
- A safe, open, diverse and inclusive workplace
- Winning capabilities, agility and a performance mindset

### GREAT SERVICE

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

### GREAT BEVERAGES

- Category leadership with great-tasting drinks for every occasion and brands people love
- Top quality and right every time
- Brought to life through powerful partnerships with brand owners

### DONE SUSTAINABLY

- Unwavering commitment to our sustainability action plan, This is Forward
- Ambition to reach net zero emissions by 2040, lead the way toward a circular economy and provide a great choice of low and no calorie drinks

### FOR A BETTER SHARED FUTURE

- Creating sustainable value for all stakeholders: customers – big and small, our communities, suppliers, shareholders, partners and colleagues

## OUR GROWTH PLATFORM

### GOING FURTHER AND FASTER THROUGH A SHARED VISION FOR GROWTH

**We are becoming a stronger business for the future, delivering sustainable growth through our:**

- Consumer led portfolio expansion together with our brand partners
- Collaborative customer growth approach to create shared value
- Innovation-led routes to market to meet growing consumer needs

**Powered by transformative ways of doing business with our people, customers and suppliers:**

- Digital commercial capabilities
- Analytics and AI
- Future-ready workplace
- Achieving more through scale

## OUR WAYS OF WORKING

### FOCUS ON CUSTOMERS AND FRONT LINE

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

### EXECUTE WITH SPEED AND AGILITY

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

### EMPOWERED TO WIN TOGETHER

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

### LISTENING AND CARING

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

### PASSION FOR GROWTH

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

**Click!**



## TABLE of CONTENTS

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**Click!**

- 2 MESSAGE from the CHIEF EXECUTIVE OFFICER**
- 6 An INTRODUCTION to OUR CODE**
- 7 How We Work at CCEP
- 9 Making the Right Decisions
- 9 Protection Against Retaliation
- 10 CREATING SHARED and SUSTAINABLE VALUE with OUR PEOPLE and COMPANY**
- 11 Creating an Inclusive and Respectful Workplace
- 12 Working in a Safe & Healthy Environment
- 13 Protecting Information
- 14 Using Company Assets Responsibly
- 15 Responsible Communications
- 16 Integrity in Our Business and Financial Records
- 17 Engaging in Appropriate Share Dealing
- 18 Avoiding Conflicts of Interest
- 19 CREATING SHARED and SUSTAINABLE VALUE with OUR CUSTOMERS, SUPPLIERS and FRANCHISORS**
- 20 Delivering High-Quality Products
- 21 Dealing with Customers, Business Partners and Suppliers Fairly
- 22 Exchanging Gifts and Entertainment
- 23 Preventing Bribery and Corruption

- 24 CREATING SHARED and SUSTAINABLE VALUE in OUR COMMUNITIES**
- 25 Being a Good Corporate Citizen and Steward for Environmental Sustainability
- 26 Getting Involved in Political Activities
- 27 Protecting Human Rights
- 28 Respecting the Global and Local Laws and Customs
- 29 CONCLUSION to OUR CODE**
- 30 Message from the Chief Compliance Officer
- 31 Seeking Advice and Sharing Concerns
- 33 Our internal Speak Up Resources and external Speak Up Channels
- 34 Our external Speak Up Channels
- 35 Consequences of Breaching our Code
- 36 Index of Key Terms

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



## An INTRODUCTION to our CODE

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





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

## HOW WE WORK at CCEP

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

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



## ADDITIONAL RESPONSIBILITIES of CCEP MANAGERS

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

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

## MAKING the RIGHT DECISIONS

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

## PROTECTION AGAINST RETALIATION

When we raise genuine concerns, we should not fear negative consequences. CCEP does not tolerate any form of retaliation, including the threat or attempt of retaliation, against any reporting person or other connected persons for making a report in accordance with our Speak Up Policy and Policy Guidance or for cooperating in an investigation.

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

You may consult our Speak Up Policy for further information on the protection of your rights.

## WE SHOULD ASK OURSELVES:



IS IT RIGHT AND ETHICAL?



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



WOULD YOU BE HAPPY TO EXPLAIN IT TO YOUR FAMILY?



WOULD YOU ACCEPT FULL RESPONSIBILITY FOR THIS DECISION?



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

If you answer 'no' to any of the questions or if you are uncertain, stop, speak up and seek guidance from our **Speak Up Resources and/or Channels**. Always consider how our actions might affect CCEP, each other, consumers, customers, communities, and other stakeholders.



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

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



## CREATING an INCLUSIVE and RESPECTFUL WORKPLACE

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

### HOW WE WORK at CCEP

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

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

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

"During lunch, my colleague was telling me how his manager laughed at his 'funny accent' and tried to mimic it. Although he felt the manager was probably just joking around it made him feel uncomfortable. I told him that everyone should have a great experience at CCEP and acts like this shouldn't be allowed to happen. Hopefully next time someone will say something or stand up for him. Upstanders can make a big difference because they show solidarity and stop these sorts of acts from happening again. I also suggested he raise it with his line manager or P&C contact."

Michelle, Professional



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# WORKING in a SAFE and HEALTHY ENVIRONMENT

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

## HOW WE WORK at CCEP

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

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

Antonio, Line Manager



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## Some examples of such business confidential information include:

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

## Some examples of personal data include:

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

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



# PROTECTING INFORMATION

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

## HOW WE WORK at CCEP

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

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

John's email address had been hacked.

## USING COMPANY ASSETS RESPONSIBLY

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

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

## HOW WE WORK at CCEP

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



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



## RESPONSIBLE COMMUNICATIONS

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

## HOW WE WORK at CCEP

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



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# INTEGRITY in OUR BUSINESS and FINANCIAL RECORDS

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

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

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

## HOW WE WORK at CCEP

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



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



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

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

## **ENGAGING in APPROPRIATE SHARE DEALING**

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

## **HOW WE WORK at CCEP**

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

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



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# AVOIDING CONFLICTS of INTEREST

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



## HOW WE WORK at CCEP

- We are able to identify a potential conflict of interest and must inform our manager of any by disclosing it using the online application (where available) or the disclosure form
- We avoid personal transactions, situations or activities (including investments and outside employment or directorships) in which our personal interests actually, potentially or may appear to conflict with those of CCEP
- We remove ourselves from the procurement and contracting process when we have a personal relationship with someone who works for the company we are negotiating with
- We base our business decisions on business need and not on personal relationships
- We are careful about the appearance of favouritism, including not directly or indirectly supervising a close friend, family member, relative or partner

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

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

Astrid, Key Account Manager



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

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

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

Jack, Filler Operator Technician

## DELIVERING HIGH-QUALITY PRODUCTS

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

## HOW WE WORK at CCEP

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



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

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



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## DEALING with CUSTOMERS, BUSINESS PARTNERS and SUPPLIERS FAIRLY

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

## HOW WE WORK at CCEP

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



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

Nicholas, PACS

## EXCHANGING GIFTS and ENTERTAINMENT

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

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

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

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

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## HOW WE WORK at CCEP

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

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



## PREVENTING BRIBERY and CORRUPTION

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

## HOW WE WORK at CCEP

- We refuse to offer, promise, give, request or agree to receive or accept a bribe or what could be perceived as a bribe
- We only make payments to third parties for services or products properly provided, independently and without undue influence
- We remember that we can be held liable for the actions of third parties who work on our behalf
- We clearly record all payments, transactions and expenses
- We conduct appropriate due diligence on all third parties and monitor their actions to ensure that their activities comply with applicable laws and company policies
- We report any form of bribery or corruption through our internal Speak Up Resources or our external Speak Up Channels, to the **Ethics & Compliance Team**, or to the Legal Team.



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## CREATING SHARED and SUSTAINABLE VALUE in OUR COMMUNITIES

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

# BEING a GOOD CORPORATE CITIZEN and STEWARD for ENVIRONMENTAL SUSTAINABILITY

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

## HOW WE WORK at CCEP

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



for more details click [here](#).

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## GETTING INVOLVED in POLITICAL ACTIVITIES

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

## HOW WE WORK at CCEP

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



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# PROTECTING HUMAN RIGHTS

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



## HOW WE WORK at CCEP

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



**For related policies  
click [here](#) for EU  
Business Units**

**click [here](#) for API  
Business Unit**



**[Play animation](#)**



## RESPECTING the GLOBAL and LOCAL LAWS and CUSTOMS

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

## HOW WE WORK at CCEP

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



For related policies click [here](#) for EU Business Units

click [here](#) for API Business Unit



## CONCLUSION to our CODE

# MESSAGE

## from the CHIEF COMPLIANCE OFFICER



Dear Colleagues,

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

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

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

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

**Frank Govaerts**

A handwritten signature in black ink, appearing to read 'Frank Govaerts', written over a faint horizontal line.





## SEEKING ADVICE and SHARING CONCERNS

You can make a difference through contacting our [Speak Up Resources and/or Channels](#) if you are concerned about wrongdoing. Although remaining silent may seem easier, it can harm our company and brand, decrease trust and make the situation worse. Voicing your concerns in the right way will help us all.



## SEEKING ADVICE AND SHARING CONCERNS WITH OUR INTERNAL SPEAK UP RESOURCES OR OUR EXTERNAL SPEAK UP CHANNELS

If you believe our Code has been breached or have concerns about suspected, actual or potential violations of the law, our Code of Conduct, CCEP Policies and other unacceptable conduct (to be referred to as potential violations), we encourage you to report it. Seek advice from your line manager and/or raise a report through our internal Speak Up Resources and/or **our dedicated and confidential external Speak Up Channels**.

When sharing concerns through our confidential Speak Up Channels, you can report anonymously, where allowed by local law. However, remaining anonymous may make it more difficult to address your concern adequately and efficiently.

When you want to report a protected matter under your local whistleblower protection laws or regulations, make sure to familiarise yourself with the applicable reporting ways and which matters fall under this protection. You can find more specific information for your territory in your local Speak Up Policy.

CCEP will take all reasonable precautions to maintain the confidentiality of your report and to protect your identity. It

is also committed to take all reasonable measures to prevent any retaliation against any person reporting concerns. To help maintain the confidentiality of investigations, you should avoid discussing them with others.

You are expected to make a report in good faith. That means that at the time of reporting you have reasonable grounds to believe that the information indicating any potential violations is true. CCEP on its part is committed to treat your report seriously and take all reasonable actions to address it adequately.

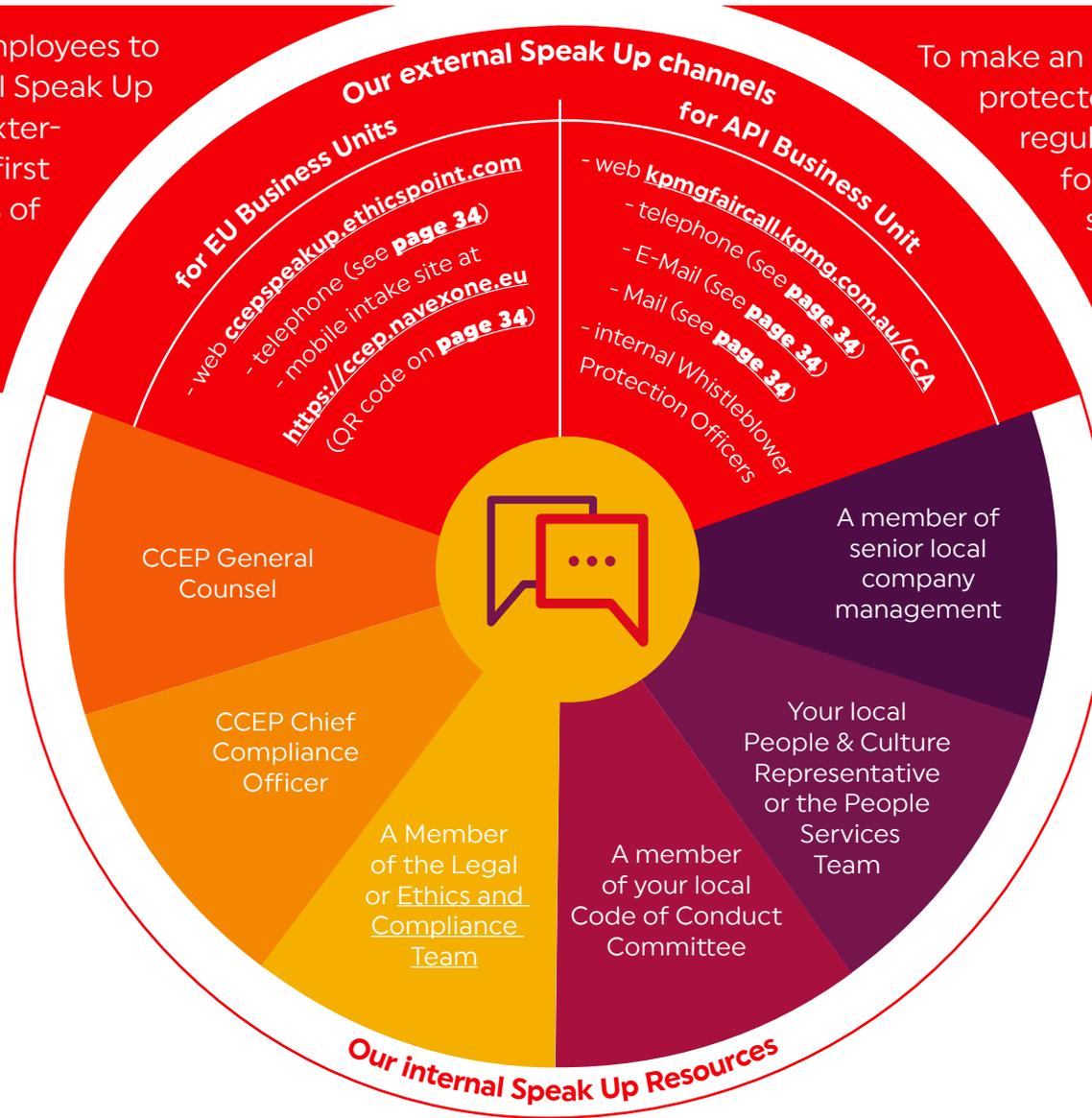
Every Business Unit or territory has a local Code of Conduct Committee made up of representatives from Legal, People & Culture, Security and Internal Control, who manage and review concerns raised of potential violations of our Code. The company-wide Code of Conduct Committee oversees all incidents to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

If the matter relates to a workplace dispute or grievance, then you should raise it with your line manager and/or a member of People & Culture.

# OUR INTERNAL SPEAK UP RESOURCES AND EXTERNAL SPEAK UP CHANNELS

CCEP encourages all employees to reach out to our internal Speak Up Resources and/or our external Speak Up Channels first before using other ways of reporting (such as relevant local authorities or press).

To make an eligible disclosure and be protected by Whistleblower laws, regulations or policy applicable for your territory, please make sure to refer to your local Speak Up Policy for processes and options available to you.



For related policies click [here](#) for EU Business Units

click [here](#) for API Business Unit



# OUR EXTERNAL SPEAK UP CHANNELS

In all our Business Units we have set up our external Speak Up Channels. They are hosted externally and provide an additional way where CCEP workers and everyone else connected to CCEP through a work-related context can ask questions and voice concerns confidentially and anonymously, where allowed by local law. The external Speak Up Resources are available 24 hours a day, 7 days a week and in multiple languages. The use of CCEP's external Speak Up Resources is not mandatory. Alternative ways exist for asking questions or raising concerns – our

internal Speak Up Resources. Work-related grievances can be raised with your line manager and/or a member of People & Culture.

To make an eligible disclosure and be protected by Whistleblower laws, regulations or policy applicable for your territory, please make sure to refer to your local Speak Up Policy for processes and options available to you.

## EU BUSINESS UNITS



To reach Speak Up on the web, visit

[ccepsspeakup.ethicspoint.com](https://ccepsspeakup.ethicspoint.com)



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

<https://ccep.navexone.eu>

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

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

## API BUSINESS UNIT



Webform

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



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

E-mail

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

Telephone

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

Mail

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

Our Internal Whistleblower Protection Officers - see [here](#)

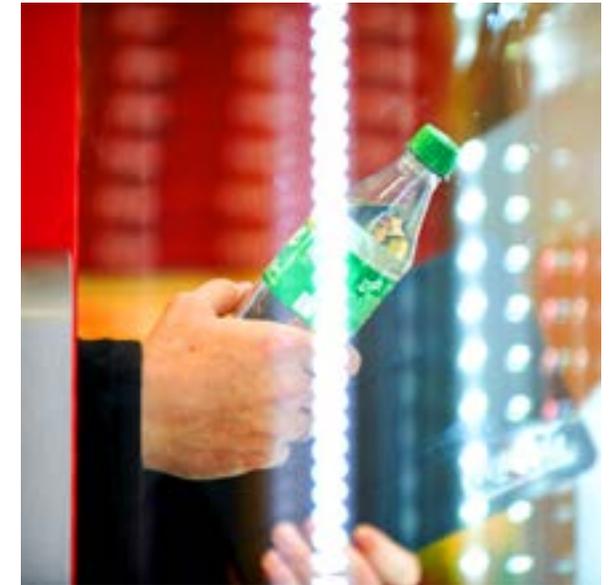
# CONSEQUENCES OF BREACHING OUR CODE

CCEP will take appropriate corrective or disciplinary action for violations of our Code, applicable laws, regulations and policies.

All potential violations of our Code will be treated seriously, and this may include internal or external investigation, demotion, suspension, disciplinary action or even termination of your employment, a contract or any relationship you have with CCEP.

All allegations of retaliation or victimisation will be fully investigated and may be grounds for disciplinary action.

We may also be required to report the breach to local authorities or regulators which may also expose you to civil or criminal investigations or proceedings, fines and penalties.



# INDEX of KEY TERMS



## FOCUS ON CUSTOMERS AND FRONT LINE

## EXECUTE WITH SPEED AND AGILITY

## EMPOWERED TO WIN TOGETHER

## LISTENING AND CARING

## PASSION FOR GROWTH

**Click!**

ANYTHING OF VALUE	22   23
BRIBE	23
BUSINESS RECORDS	16
CONFIDENTIAL INFORMATION	13   15   21
CONFLICTS OF INTEREST	18
DIVERSITY	11
FACILITATION PAYMENTS	23
FAMILY MEMBER	9   18
GIFTS	22
GOOD FAITH	32
HOSPITALITY AND ENTERTAINMENT	22
INSIDE INFORMATION	17
PERSONAL DATA	13
PHYSICAL ASSETS	14
RETALIATION	8   9   32   35



## GREAT PEOPLE, GREAT SERVICE, GREAT BEVERAGES

### ADDITIONAL USEFUL RESOURCES

Additional information on the business principles outlined in our Code can be found [here](#) for EU Business Units and [here](#) for API Business Unit.

## COCA-COLA EUROPACIFIC PARTNERS PLC

### Registered office:

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Registered in England and Wales

### Company number:

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



The Way We Work at CCEP

**Our Code of Conduct**

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