HUMAN RIGHTS POLICY

Coca-Cola Amatil Group April 2020

Policy

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CONTENTS

1	HUMAN RIGHTS POLICY	3
1.1	Our Commitment	3
1.1.1	Community and Stakeholder Engagement and Respect	3
1.1.2	Competing obligations	3
1.2	Our approach	3
1.2.1	Implementation of the policy	3
1.2.2	Application of the policy	3
1.2.3	Our obligations	Error! Bookmark not defined.
1.2.4	Our expectations	Error! Bookmark not defined.
1.3	Our priority areas	4
1.3.1	Valuing Diversity	4
1.3.2	Freedom of Association and Collective Bargaining	4
1.3.3	Safe and Healthy Workplace	4
1.3.4	Workplace Security	4
1.3.5	Forced Labour, Child Labour, and Human Trafficking	5
1.3.6	Work Hours, Wages and Benefits and Right to Work	5
1.3.7	Land Tenure, Water Resources and Environmental Impacts	5
1.3.8	Healthy Lifestyles	5
1.3.9	Vulnerable Individuals and Communities	5
1.4	Reporting, assessment and development	5
1.4.1	Public Reporting	5
1.4.2	Ongoing Improvement	5

1 HUMAN RIGHTS POLICY

At Coca-Cola Amatil we make a distinctive and positive contribution to the world we live in and respect for human rights is fundamental to this. We recognise the importance of our obligation to promote and observe internationally recognised human rights in the way we conduct and operate our business. We are committed to ensuring our workplace, our supply chain and our community is safe, lawful, and diverse – respectful and responsible everywhere, every day.

Our Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Permanent Forum on Indigenous Issues and the United Nations Guiding Principles on Business and Human Rights.

1.1 Our Commitment

Coca-Cola Amatil respects human rights. We are committed to identify, prevent, and mitigate potential and actual adverse activities which may have an impact on human rights, resulting from or caused by our business.

1.1.1 Community and Stakeholder Engagement and Respect

we recognise our impact on the communities in which we operate. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from, and considering their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level, provided they comply with our commitments in this policy. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

1.1.2 Competing obligations

Where we encounter a conflict between internationally recognised human rights and the national laws of the country in which we operate, we will seek ways to promote and honour the principles of international human rights to the greatest extent possible.

1.2 Our approach

1.2.1 Implementation of the policy

Our Board of Directors is committed to achieving the highest standards of corporate governance and business conduct. The Coca-Cola Amatil Board and Group Leadership Team oversee implementation of and compliance with the Human Rights Policy.

1.2.2 Application of the policy

Our Human Rights Policy applies to Coca-Cola Amatil, the entities that we own, the entities in which we hold a majority interest, and the facilities that we manage. We are also committed to working with and encouraging our partners and suppliers to uphold the principles in this Policy and to adopt similar policies within their businesses. We consider seriously human rights when deciding to engage or end business relationships. Consistent with the guiding principles outlined above, this policy also commits Coca-Cola Amatil to work proactively to support human rights in the communities in which we operate.

1.3 Our priority areas

We recognise that we have a responsibility to respect all human rights. We also acknowledge that human rights concerns affect different businesses in different ways, so we have identified a number of key human rights priority areas that are particularly relevant to our operations and the way we conduct our business. We acknowledge that we need to take ongoing action to assess and address potential and actual human rights risks in these critical focus areas.

We also recognise that the human rights risks we face may vary in different operating environments, and understanding these concerns from a local perspective is crucial. We are committed to ongoing consultation with the local communities and our supply partners in which we operate to better understand the nature of the potential and actual human rights risks that are present in those areas and enhance our ability to effectively address and respond to these issues.

We acknowledge that our key human rights priority areas may change over time alongside changes to how and where we operate. That is why we continue to monitor these human rights priorities, assess the effectiveness of existing mechanisms and make ongoing improvements to our risk management processes for all human rights concerns.

1.3.1 Valuing Diversity

Coca-Cola Amatil values the diversity of the people with whom we work and the contributions they make. We are committed to equal opportunity and an inclusive workplace, and do not tolerate discrimination or harassment on the basis of race, gender, colour, national or social origin, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. Recruitment, hiring, placement, training, compensation, and advancement at Coca-Cola Amatil is based on merit, including qualifications, performance, skills, and experience.

We do not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

1.3.2 Freedom of Association and Collective Bargaining

We respect our employees' right to form, join or not to join a labour union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives in compliance with all applicable laws.

1.3.3 Safe and Healthy Workplace

We provide a safe and healthy workplace and complies with applicable safety and health laws, regulations, and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. We are committed to engaging with our employees to continually improve health, mental wellbeing, and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

1.3.4 Workplace Security

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.

Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity. We value the importance of the right to privacy, and we ensure that the ways we collect, store and handle personal information complies with applicable data protection and privacy laws.

1.3.5 Forced Labour, Child Labour, and Human Trafficking

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 do not employ children below minimum age provisions of applicable laws and require that our suppliers adhere to the same standards.

We are committed to ensuring that our operations and supply chains are free from modern slavery practices. 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.

1.3.6 Work Hours, Wages and Benefits and Right to Work

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.

1.3.7 Land Tenure, Water Resources and Environmental Impacts

We are committed to ensuring minimal impact on the environment, particularly avoiding impacts that may also result in increased risk to human rights such as access to water, sanitation, and clean environments. While we do not often purchase ingredients directly from farms, we are compelled, based on our values as a major buyer of several agricultural commodities, to act and to use our influence to help protect the land rights of local farmers and communities.

1.3.8 Healthy Lifestyles

We are committed to providing transparent nutrition information and a range of beverage options to enable consumers to make informed choices consistent with a healthy lifestyle.

1.3.9 Vulnerable Individuals and Communities

We are committed to respecting the human rights of individuals belonging to specific groups or populations who may be at heightened risk of becoming vulnerable or marginalised if adversely impacted by our activities or business relationships. We apply the principle of Free Prior and Informed Consent when consulting with communities.

1.4 Reporting, assessment and development

1.4.1 Public Reporting

We report to the public on our human rights-related risks, processes and commitments. We are committed to adhering to applicable legislative reporting obligations, including modern slavery reporting requirements.

We acknowledge the importance of being honest and transparent in our reporting to provide accountability to individuals, stakeholders, communities and other potentially affected parties who may be impacted by these matters. We believe that communicating openly about human rights risks and the initiatives we undertake to prevent and respond to these risks is a key component of our human rights due diligence.

1.4.2 Ongoing Improvement

We are committed to the ongoing improvement and development of our human right's due diligence and remediation processes. We continually assess and review the measures we have in place, and we look to explore new and better ways to take action against adverse human rights impacts.

As the human rights risks that are prevalent in our operations evolve, we will adapt our processes appropriately and ensure that we are always addressing and responding to human rights risks in a meaningful and effective way.