

The way we work at CCEP

Our
Code of
Conduct



Coca-Cola
EUROPACIFIC
PARTNERS

Message from the Chief Executive Officer



Dear Colleagues,

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

We have a vital purpose – to refresh consumers and customers, and make a difference.

Our success is built on our great brands, great people and great execution. And we are committed to doing this sustainably.

Everyone at CCEP has a role to play in helping us deliver on this purpose.

We are ambitious about the future. We are focused on delivering sustainable growth, creating value and winning in the market with our customers.

In order to do that, we need to do business in the right way.

This Code of Conduct is our guide in making

sure we operate with integrity in everything we do. Alongside our company story and behaviours, the Code should influence every business decision we make, every transaction we undertake and every conversation we have internally and externally.

So, I have a simple request of all of you.

Read the Code carefully and consult it frequently for guidance. If you see something that does not match the standards set out in the Code, please seek advice from your line manager and raise your concerns through our Speak Up Channels. Your information will be treated confidentially and with respect.

Embrace this Code and make it the foundation for how we conduct our business.

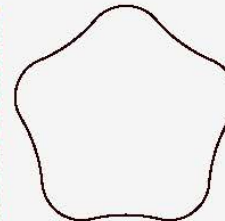
Thank you.

Damian Gammell

A handwritten signature in black ink, appearing to read 'D. Gammell'.

WE

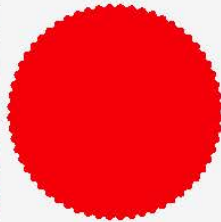
Make, move and sell the world's most loved drinks.



THROUGH

Great brands. Great people. Great execution. Done sustainably.

TO



Refresh our consumers and customers.
Make a difference.

BY BEING

● Customer & Consumer Focused ● Curious & Caring ● Empowering ● Passionate for Growth



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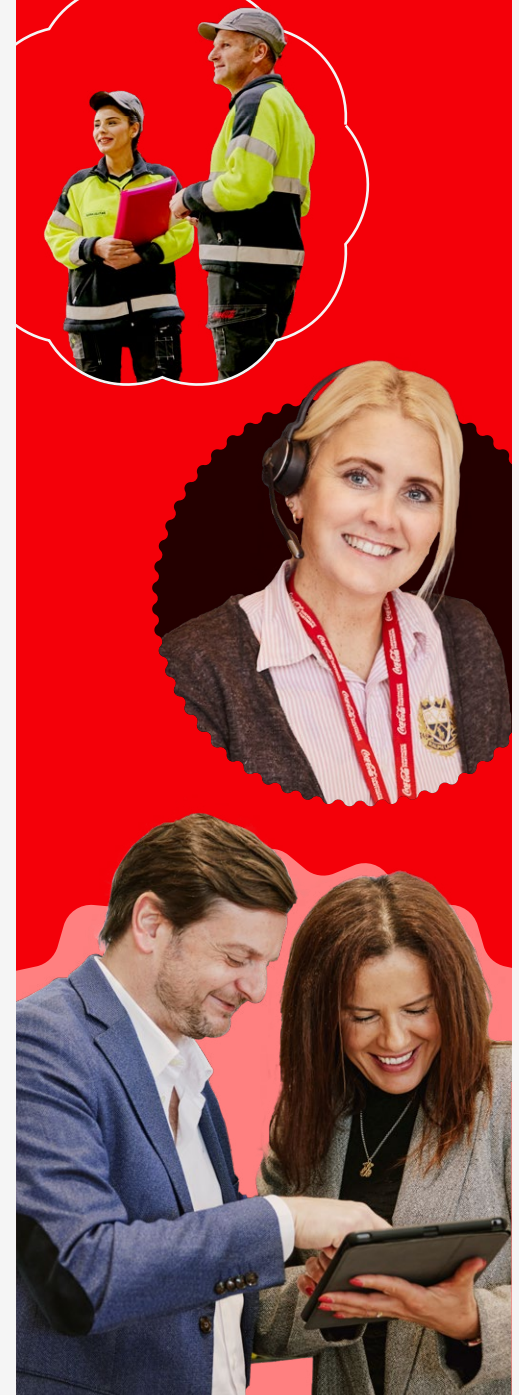
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Part 1

An introduction to our Code

Helping to grow our business means taking responsibility and making daily decisions in the right way. This Code of Conduct is our guide in making sure we operate with integrity in everything we do. 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.



How we work at CCEP

Our Code helps us to achieve our objectives in the right way and maintain 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



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 Responsible Sourcing Policy.

- [Responsible Sourcing Policy \(EN\)](#)
- [Responsible Sourcing Policy \(IN\)](#)

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





Part 2

Our people: Driving sustainable growth

Our success is driven by our diverse and talented team of great people. We all share a passion for making, moving and selling the world's most loved brands. We work to support our customers, bringing the same focus and dedication to our brands, partnerships, and quality.



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.

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, religion and belief, socio-economic status and background, disability and neurodivergence, gender and gender identity, marriage and civil partnership, ethnicity and cultural heritage, nationality, parenthood and carer obligations, sexual orientation, or any other characteristics which make us unique.

We create an environment that embraces the individual and collective potential of our people by fostering inclusion, collaboration and connections. All forms of harassment, including sexual harassment, direct or indirect discrimination and bullying are prohibited. Harassment may come in the form of physical actions, visual displays or verbal remarks.



Case study

“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**

**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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.



Case study

“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**

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

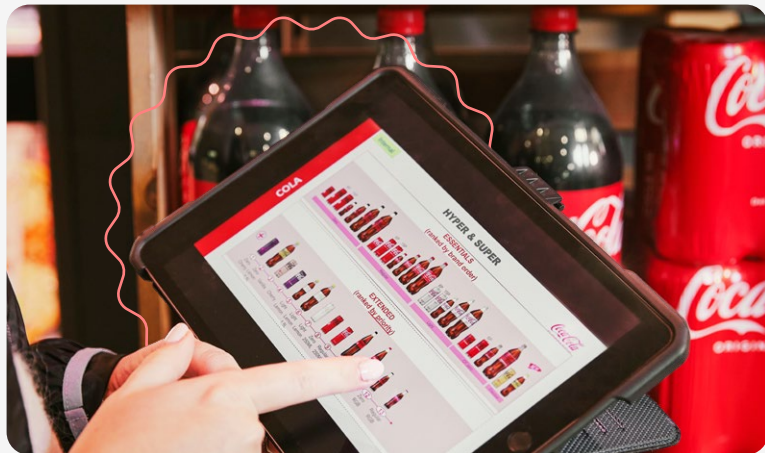
For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.



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.

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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.



Case study

“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.

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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

Responsible communications

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

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.



**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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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

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.

Case study

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.

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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.

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.”



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.

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.



Case study

"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

How we
work
at CCEP

- We are able to identify a potential conflict of interest and must inform our manager of any and disclose it using the online [Conflicts of Interest Register](#)
- 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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

Part 3

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.



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.



Case study

“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

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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.

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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines



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 Responsible Sourcing Policy

- [Responsible Sourcing Policy \(EN\)](#)
- [Responsible Sourcing Policy \(IN\)](#)

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.



Case study

“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



How we
work
at CCEP

- We are committed to complying with our policy when giving or receiving gifts and entertainment, following the approval process via the online [Gifts & Entertainment Register](#)
- 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 government officials without seeking prior approval through the [Gifts & Entertainment Register](#)
- 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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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.



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, or gain an advantage. This includes facilitation payments, which are small payments made to a government official to secure or speed up a routine action, such as the issuing of a permit, a license or a service.

**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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

Part 4

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 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

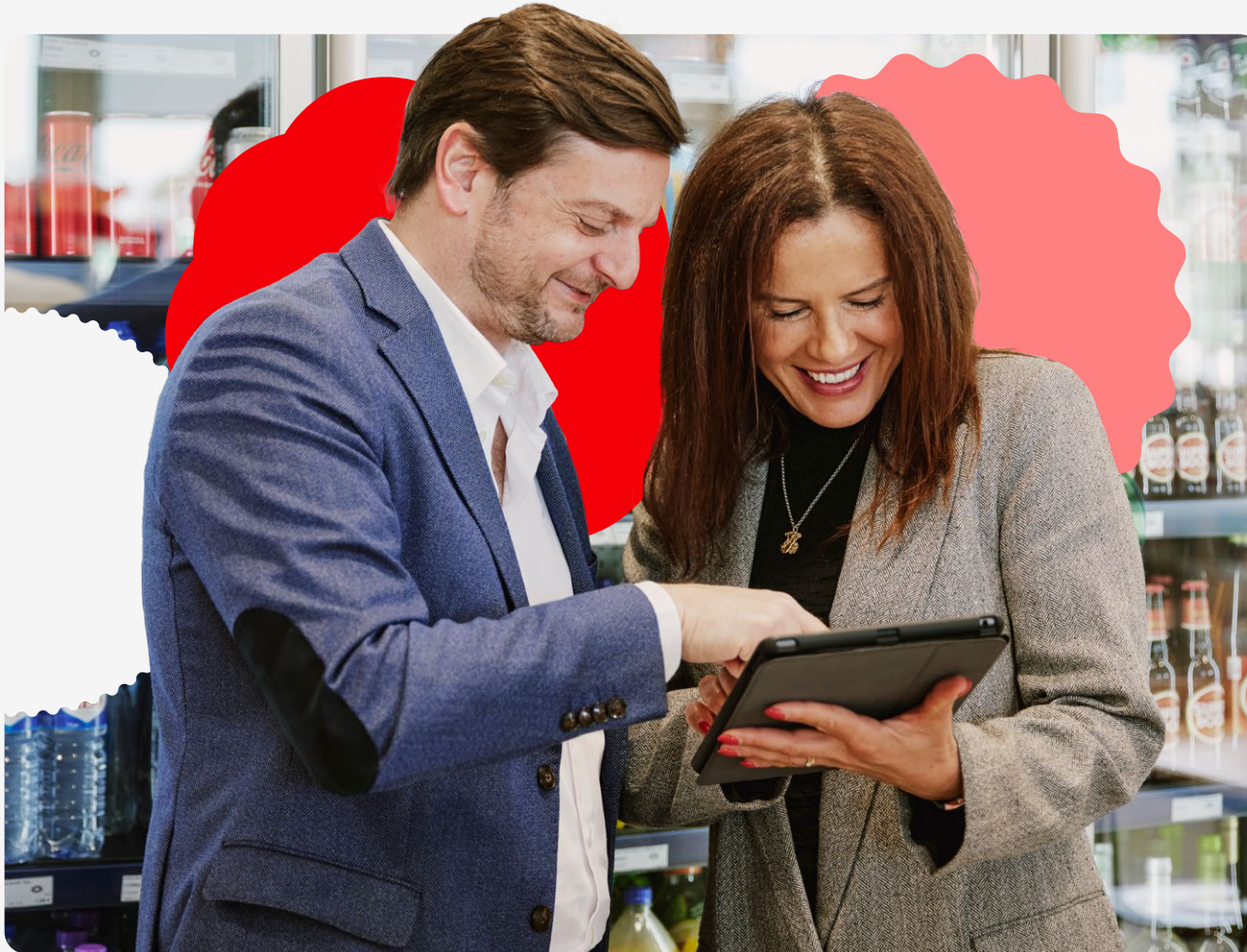
For more details on This is Forward, [click here](#)

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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 contributions, payments or donations on behalf of CCEP – either direct or indirect to political parties, political organisations (or trade unions) or individual politicians or candidates for public office. Any deviation from this rule, requires prior written authorisation from the Chief Compliance Officer and Business Unit senior management
- 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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines

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
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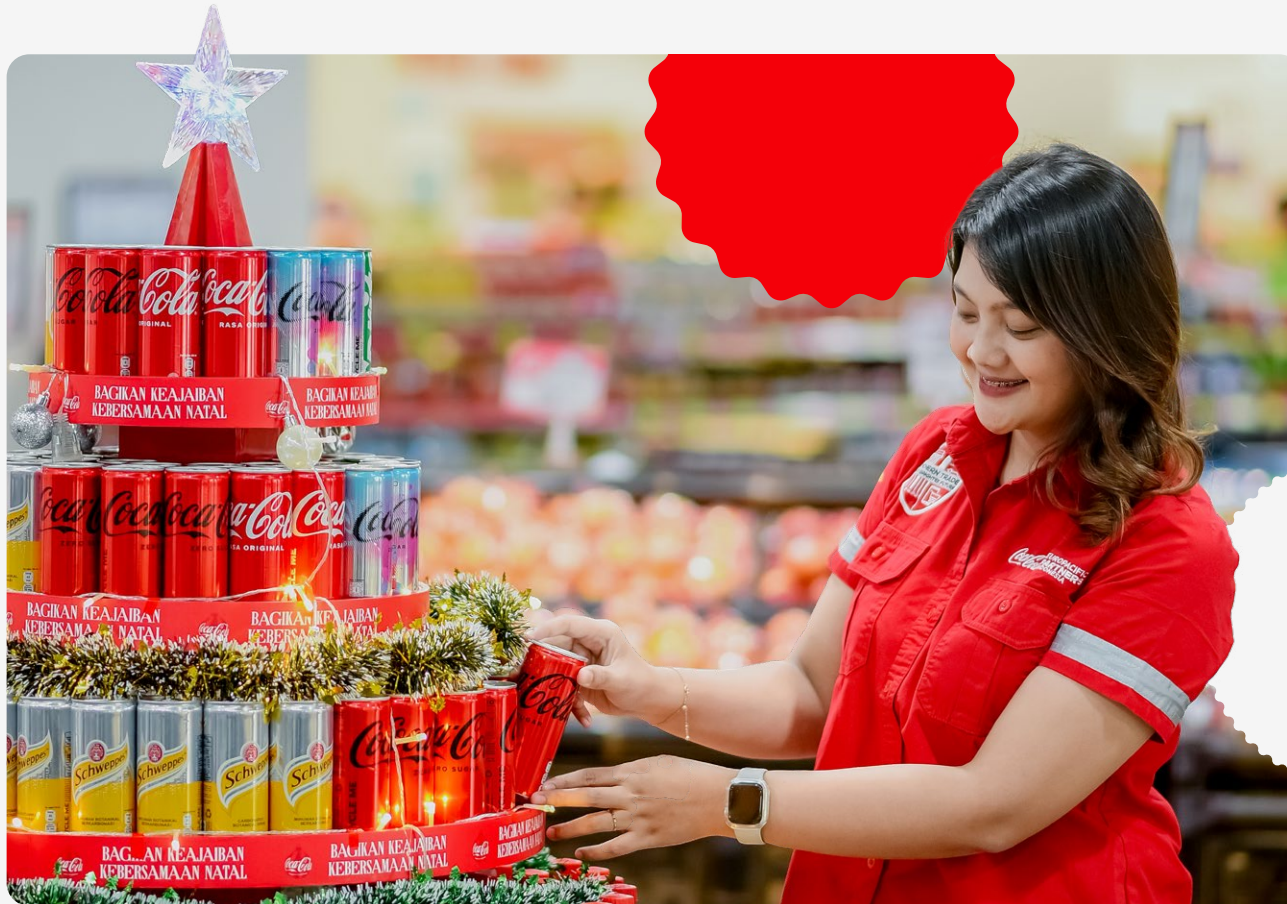
- **We respect human rights and are committed to ensuring that people are treated with dignity and respect**
- **We have a zero-tolerance approach to Modern Slavery of any kind within our operations, including human trafficking, and the use of child, forced, indentured or involuntary labour**
- **We 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 and APS Business Units
- [Click here](#) for the Philippines

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

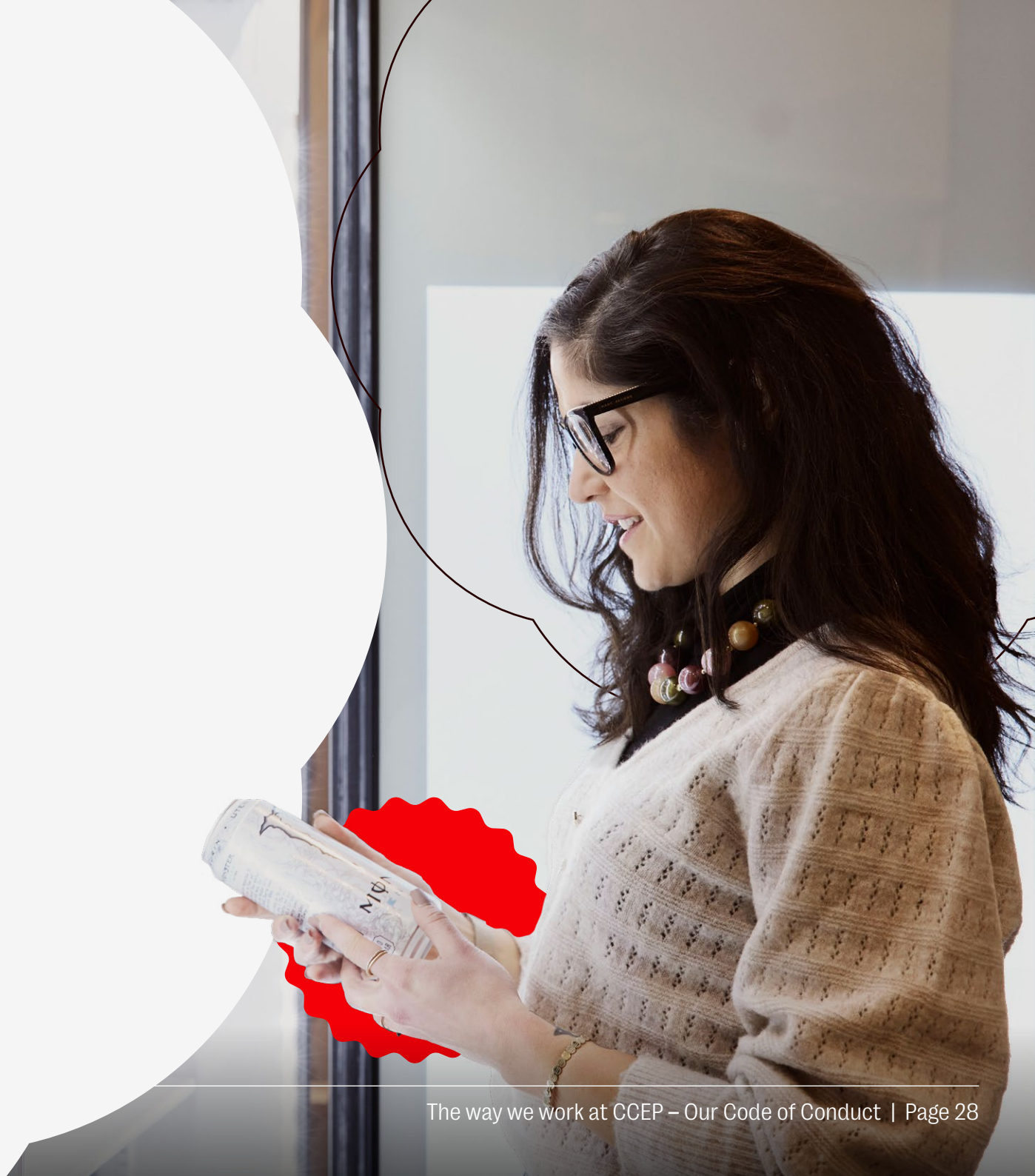
- We conduct our business with respect for the people wherever we work and in line with local laws and regulations
- We know at times the laws and regulations where we work may vary from country to country and we seek guidance from the Legal team or our Speak Up Resources and/or Channels when in doubt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

For related policies

- [Click here](#) for EU and APS Business Units
- [Click here](#) for the Philippines



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, consisting of a stylized 'F' and 'G' followed by a horizontal line.

Part 6

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.

How to report misconduct?

Our internal Speak Up Resources and external Speak Up Channels

Internal Speak Up Resources

A senior member of your local company management

A member of the Legal team or the Ethics & Compliance team

A member of your local Code of Conduct Committee

CCEP Chief Compliance Officer

Your local People & Culture representative or the People Services team

CCEP General Counsel



Australia only:

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

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 Whistleblowing 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.

External Speak Up Channels

Web reporting:

ccep.speakup.ethicspoint.com

Mobile device reporting:

ccep.navexone.eu
or scan QR code

Phone reporting:

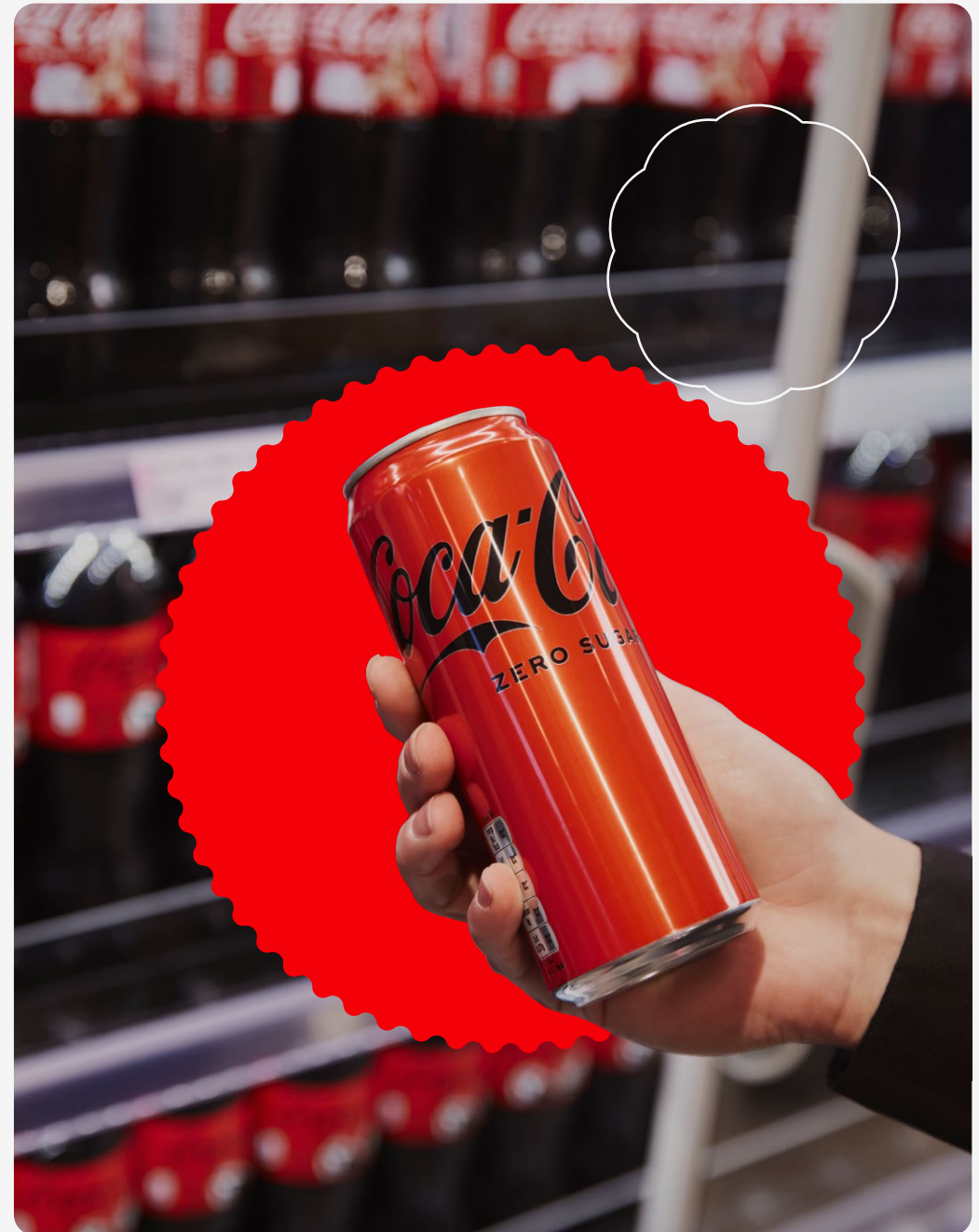
	Australia	1800961543
	Belgium	0800 76 055
	Bulgaria	0800 46 237
	Fiji	N/A
	France	0800 99 07 57
	Germany	0800 1817963
	Great Britain	0800 949 6483
	Iceland	800 4304
	Indonesia	021 31141492
	Luxembourg	800 27 304
	Netherlands	0800 0224702
	New Zealand	0800 466 436
	Norway	800 62 499
	Papua New-Guinea	000885225
	Portugal	800 180 780
	Samoa	N/A
	Spain	900 999 448
	Sweden	020 12 70 19
	The Philippines	02 8231 2120

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.

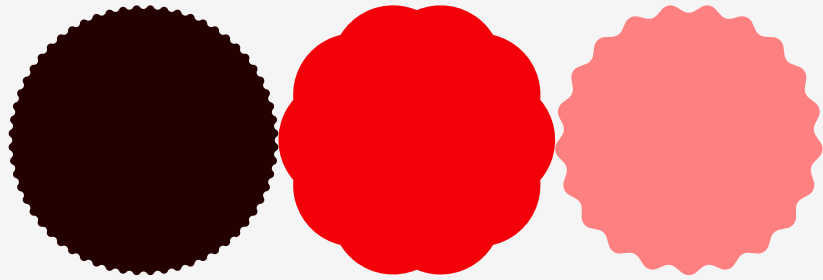


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Focus on customers and front line
Execute with speed and agility
Empowered to win together
Listening and caring
Passion for growth.

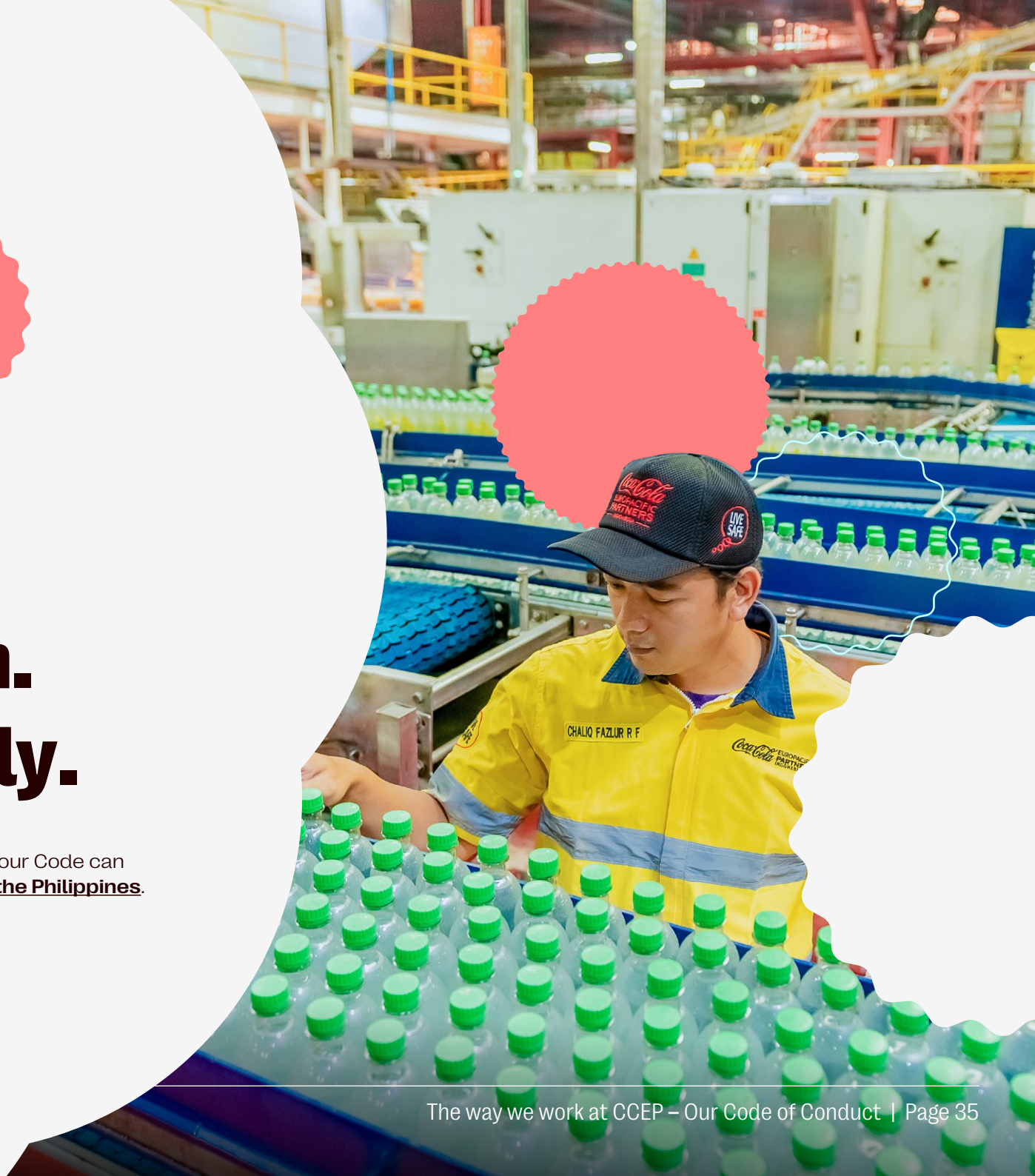




**Great brands.
Great people.
Great execution.
Done sustainably.**

Additional useful resources

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





The Way We Work at CCEP:
Our Code of Conduct

Coca-Cola Europacific Partners PLC

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