

## Supplier Guiding Principles

As an ethical business organization, Coca-Cola HBC AG and its subsidiaries (collectively, “Coca-Cola Hellenic” or the “Company”) takes responsibility to ensure that its business operations do not contribute directly or indirectly to human rights abuses. We use our influence internally to ensure that our employees fully understand the company’s commitment to human rights and their own rights and responsibilities.

Those who do business with us across the countries, in which we operate, know we are committed to managing our business with a consistent set of values that represent the highest standards of quality, integrity and excellence. We respect the unique customs and cultures in communities where we operate. In pursuing this policy, we seek to develop relationships with suppliers that share similar values and conduct business in an ethical manner. We strive to treat our suppliers in the same manner we expect to be treated.

As part of ongoing effort to develop and strengthen our relationships with suppliers, we have adopted these Supplier Guiding Principles for use with our direct suppliers. These Principles are based on the belief that good corporate citizenship is essential to our long-term business success and must be reflected in our relationships and actions in the marketplace, the workplace, the environment and the community.

We are pleased to work with suppliers to ensure an understanding of and compliance with the requirements set forth in our Supplier Guiding Principles.

### Workplace Practices

At Coca-Cola Hellenic, we support fair employment practices consistent with our commitment to human rights in our workplace. We seek to:

1. Establish a strong and direct relationship with our employees through open and honest communications.
2. Treat our employees with fairness, dignity, and respect.
3. Abide by applicable local labour laws, including those that address working hours, compensation, discrimination, and third party representation.
4. Value diversity in its broadest sense.
5. Hold each other accountable for performance at the highest levels.
6. Reward our employees commensurate with performance.
7. Provide opportunities for employees to develop personally and professionally.
8. Ensure, with our employees, the safety of the workplace.

We expect our suppliers to follow applicable laws, and similar standards and principles in the countries in which they operate.

### Work Environment

We expect our suppliers to judge their employees and contractors based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no discrimination based on race, colour, gender, religion, political opinion, national origin or sexual orientation.

### Health and Safety

We expect our suppliers to provide a safe workplace with policies and practices in place to minimise the risk of accidents, injury, and exposure to health risks.

### **Child Labour; Abuse of Labour**

We expect our suppliers neither to employ anyone under the legal working age nor to condone physical or other unlawful abuse or harassment, in any of their operations.

### **Slavery, Forced Labour and Human Trafficking**

We expect our suppliers not to hold any person in slavery or servitude and not to use forced, bonded or compulsory labour or engage in any form of human trafficking.

### **Wages and Benefits**

We expect our suppliers to compensate their employees fairly and competitively relative to their industry, in full compliance with applicable local and national wage and hour laws, and to offer opportunities for employees to develop their skills and capabilities.

### **Third Parties**

In the event their employees have lawfully chosen to be represented by third parties, we expect our suppliers to recognise such parties in good faith and not to retaliate against employees for their lawful participation in labour organisation activities.

### **Environmental Practices**

We expect our suppliers to conduct business in ways that protect and preserve the environment. At a minimum, we expect our suppliers to meet applicable environmental laws, rules and regulations in their operations in the countries in which they do business.

### **Conflicts of Interest**

Coca-Cola Hellenic employees are expected to always select and deal with suppliers who are doing, or seeking to do, business with the Company in a completely straightforward, honest manner, based upon the merits of such persons and their products and services and without any special considerations given back to them or their friends or families. Accordingly, employees should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of Coca-Cola Hellenic. For example, suppliers should not employ or otherwise make payments to any employee of Coca-Cola Hellenic during the course of any transaction between the supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but suppliers should take care that any personal relationship is not used to influence the Coca-Cola Hellenic employee's business judgment. If a supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or domestic partner) to an employee of Coca-Cola Hellenic, or if a supplier has any other relationship with an employee of Coca-Cola Hellenic that might represent a conflict of interest, the supplier should disclose this fact to Coca-Cola Hellenic.

### **Gifts, Meals and Entertainment**

Employees of Coca-Cola Hellenic are prohibited from accepting anything more than normal business hospitality from suppliers that is reasonable and appropriate under the circumstances. Ordinary business meals and small tokens of appreciation generally are fine, but suppliers should not offer Coca-Cola Hellenic employees excessive or lavish gifts, meals or entertainment that may give the appearance of undue influence. Gifts of cash or cash equivalents, such as gift cards, are never allowed. Gifts and entertainment for suppliers must support the legitimate business interests of the Company and should be reasonable and appropriate under the circumstances. Our employees should always be sensitive to our suppliers' own rules on receiving gifts and entertainment.



## **Business and Financial Records**

Both the supplier and Coca-Cola Hellenic must keep accurate records of all matters related to the supplier's business with Coca-Cola Hellenic. This includes the proper recording of all expenses and payments. If Coca-Cola Hellenic is being charged for a supplier employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

## **Bribery**

Coca-Cola Hellenic applies a "zero tolerance" approach for bribery. Suppliers acting on behalf of Coca-Cola Hellenic must comply with all applicable anti-bribery and anti-corruption laws dealing with bribery of public officials or private parties. Suppliers must comply with Coca-Cola Hellenic's Code of Business Conduct and Anti-Bribery Policy, as these apply to third parties and are available at Coca-Cola Hellenic's website: <http://www.coca-colahellenic.com>. In connection with any transaction as a supplier to Coca-Cola Hellenic, or that otherwise involves Coca-Cola Hellenic, the supplier must not transfer anything of value, directly or indirectly, to any public official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Coca-Cola Hellenic, or out of funds provided by Coca-Cola Hellenic. Suppliers must furnish a copy of this accounting to Coca-Cola Hellenic upon request. Prior to the engagement of third parties which may interact with public officials on its behalf, Coca-Cola Hellenic conducts an anti-bribery due diligence for such parties. Supplier shall promptly submit all data and information that may be requested by Coca-Cola Hellenic for the purposes of such anti-bribery due diligence.

## **Protecting Information and Personal Data**

Suppliers should protect the confidential information of Coca-Cola Hellenic. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by Coca-Cola Hellenic. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received from Coca-Cola Hellenic. If a supplier believes it has been given access to Coca-Cola Hellenic's confidential information in error, the supplier should immediately notify its contact at the Company and refrain from further distribution of the information.

Similarly, a supplier should not share with anyone at Coca-Cola Hellenic information related to any other company if the supplier is under a contractual or legal obligation not to share the information.

Suppliers should comply with applicable Data Protection laws, including the EU General Data Protection Regulation ("GDPR").

## **Reporting Potential Misconduct**

Suppliers who believe that an employee of Coca-Cola Hellenic, or anyone acting on behalf of Coca-Cola Hellenic, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. We would also like you, as our suppliers, to feel able to freely raise any issues of compliance or ethics you come across in our company and feel confident that your concerns will be taken seriously and handled appropriately by Coca-Cola Hellenic. Concerns should be raised initially with employee's manager in Coca-Cola Hellenic or with Coca-Cola Hellenic Chief Compliance Officer at [compliance@cchellenic.com](mailto:compliance@cchellenic.com), or you can use our Speak Up! Line at [www.coca-colahellenic.ethicspoint.com](http://www.coca-colahellenic.ethicspoint.com). Coca-Cola Hellenic will not tolerate a reprisal by any of our employees against suppliers for reporting a concern in good faith or assisting with an investigation.

## **International Sanctions**

We expect our suppliers to comply with CCHBC Sanctions Policy available at Coca-Cola Hellenic’s website: <http://www.coca-colahellenic.com>, any sanctions, embargoes, trade restrictions or similar or related requirements, administered and/or enforced by the US Department of State or US Department of the Treasury, and any sanctions or restrictive measures imposed by the United Nations Security Council, the European Union, Switzerland or any European Union member state or any other governmental authority under whose jurisdiction Coca-Cola Hellenic, the supplier or any affiliate there of operates.

**Compliance with Applicable Laws and Standards**

*At a minimum*, suppliers to Coca-Cola Hellenic will be required to meet the following standards with respect to their operations as a whole:

<b>Laws and Regulations</b>	Supplier will comply with all applicable laws, rules, regulations and requirements in the manufacture and distribution of products and supplies and in providing services to Coca-Cola Hellenic.
<b>Child Labour</b>	Supplier will not use child labour as defined by local law.
<b>Slavery, Forced Labour and Human Trafficking</b>	Supplier will not hold any person in slavery or servitude and will not use forced, bonded or compulsory labour or engage in any form of human trafficking. Supplier will not impose to workers any fees to secure their employment or placement, or to compensate any cost whatsoever Supplier incurred in the recruitment process.
<b>Abuse of Labour</b>	Supplier will not abuse labour, physically or otherwise.
<b>Third Parties</b>	Supplier will respect employees' rights to choose whether to be represented by third parties and to bargain collectively in accordance with applicable laws.
<b>Wages and Benefits</b>	Wages and benefits will comply with applicable laws.
<b>Working Hours &amp; Overtime</b>	Working hours and overtime will comply with applicable laws.
<b>Health and Safety</b>	Working conditions will comply with applicable laws.
<b>Environment</b>	Supplier will comply with applicable environmental laws
<b>Conflicts of Interest</b>	Coca-Cola Hellenic employees and our suppliers should avoid situations where a conflict of interest may occur.
<b>Business and Financial Records</b>	Supplier will comply with all applicable laws concerning financial recordkeeping and reporting.
<b>Bribery</b>	Supplier will comply with all applicable anti-bribery laws and will not use bribes or fraudulent practices.
<b>Protecting Information and Personal Data</b>	Supplier will safeguard Coca-Cola Hellenic’s and other third party non-public information disclosed to supplier. Supplier will comply with applicable Data Protection laws including EU GDPR.
<b>Sanctions</b>	Supplier will comply with applicable International Sanctions.

**Demonstration of Compliance**

Supplier must be able to demonstrate compliance with the Supplier Guiding Principles at the request and to the satisfaction of Coca-Cola Hellenic.

If the eight Core Convention of the International Labour Organisation establish higher standard than local law, the Supplier shall meet the ILO standards. These minimum requirements are part of all agreements between Coca-Cola Hellenic and its direct suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with these Supplier Guiding Principles. We



collaborate with The Coca-Cola Company, which routinely utilize independent third parties to assess suppliers' compliance with the Supplier Guiding Principles; the assessments include confidential interviews with employees and on-site contract workers. If a supplier fails to uphold any aspect of the requirements of the Supplier Guiding Principles, the supplier is expected to implement corrective actions. Coca-Cola Hellenic reserves the right to terminate an agreement with any supplier that cannot demonstrate that they are upholding the requirements of these Supplier Guiding Principles.

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