

## **SANCTIONS POLICY**

### **POLICY STATEMENT**

Coca-Cola HBC ("Company") will comply with all economic sanctions laws, regulations, embargoes or restrictive measures ("Sanctions") to which it is subject. Coca-Cola HBC will maintain effective measures to ensure compliance with and awareness of its Sanctions-related obligations.

To give effect to this Policy, we have adopted, and will maintain, a sanctions screening procedure. The procedure sets out the key steps and principles for ensuring compliance with applicable Sanctions. Failure to comply with Sanctions can lead to severe civil and criminal penalties, both for our business and individual employees, officers and directors, as well as significant reputational damage for Coca-Cola HBC.

Non-compliance with this Policy is a serious matter that may lead to disciplinary action, up to and including dismissal. Violations of Sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment. Employees should report any suspected violations of this Policy either to the Ethics and Compliance Officer as soon as possible for further guidance or through our Speak Up! Line.

### **TO WHOM DOES THIS POLICY APPLY?**

This Policy applies to everyone working for the Company worldwide regardless of location, role or level of seniority. This includes all employees, Managers, Executive Leadership Team Members, and Directors of the Company.

We require that temporary and contract employees, consultants, agents and any other third party which acts in the Company's name, comply with the principles of the Policy.

Every non-wholly-owned subsidiary and joint ventures which the Company controls must adopt a similar sanctions policy. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Policy in both the joint venture and their own operations.

### **WHAT ARE SANCTIONS?**

Sanctions are measures imposed by governments and international bodies (such as the United Nations) to restrict dealings with certain countries, entities and individuals. They take various forms, including:

- broad prohibitions on dealings with or within certain countries, individuals or corporate entities;

<sup>1</sup>The Company's Recusal Policy has further details of who must comply with applicable sanctions where a non-EU / non-Swiss / non-US / non-UK CCHBC entity is, in accordance with applicable laws, permitted to engage in business that would be a prohibited transaction under EU, Swiss, UK or US sanctions.

- trade restrictions, including arms embargoes and prohibitions on exports of certain equipment;
- financial sanctions, such as asset freezes and prohibitions on financial transactions; and
- travel bans.

Both the targets of Sanctions and nature of the restrictions imposed by Sanctions are subject to change on a regular basis, and for compliance purposes it is therefore essential to maintain up-to-date information about all Sanctions that apply to our business. Of particular importance are Swiss Sanctions, given that Coca-Cola HBC is headquartered in Switzerland, and EU sanctions, given that Coca-Cola HBC conducts a significant proportion of its business in the EU.

#### **EU Sanctions** apply to:

- EU companies and EU nationals in relation to anything they do anywhere in the world – even if an EU national is employed by a non-EU company;
- non-EU companies and non-EU national employees in relation to anything they do in the EU and any business conducted wholly or partly in the EU.

#### **US Sanctions** apply to:

- US companies and their overseas branches (and, for certain sanctions, non-US subsidiaries of US companies) in relation to anything they do anywhere in the world;
- US citizens and permanent resident aliens (i.e. "green card" holders) in relation to anything they do anywhere in the world;
- non-US companies and non-US nationals in relation to anything they do in the US and any business conducted wholly or partly in the United States;

US sanctions can also be applied to transactions that touch or concern the United States, including those that take advantage of the US financial system (e.g. dollar-denominated transactions) and those that involve US companies and individuals or US-origin items.

The United States has also implemented so-called "secondary sanctions" against certain countries – for example, Iran, Russia– that directly apply to non-US companies and individuals who engage in specific kinds of transactions with those countries. These Sanctions provide for the imposition of a range of measures designed to exclude the non-US Person violator from the US economy.

#### **Swiss Sanctions** apply to:

- Swiss persons, any business organized under Swiss law and any person, regardless of citizenship, while in Switzerland.
- Persons and companies located outside Switzerland in relation to anything they do in Switzerland and any business conducted wholly or partly in Switzerland.

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**UK Sanctions** apply to:

- UK companies and UK nationals in relation to anything they do anywhere in the world – even if a UK national is employed by a non-UK company.
- non-UK companies and non-UK national employees in relation to anything they do in the UK and any business conducted wholly or partly in the UK.

**COMPLIANCE WITH SANCTIONS**

Coca-Cola HBC and its subsidiaries, as well as its employees, must comply with all Sanctions applicable to the relevant person and may not engage in any business that could violate applicable Sanctions. In general, sanctions:

- Prohibit dealing with individuals or entities listed on applicable assets freeze lists, such as the US list of specially designated nationals and blocked persons, the EU consolidated list of financial sanctions targets, or any list maintained by any relevant authority (including in Switzerland and the UK).
- Prohibit dealing with entities owned or controlled by entities on the lists referred to above.
- Prohibit or restrict dealing with certain countries or territories. For example, US Persons are generally prohibited from dealing with Cuba, Iran, Syria, North Korea and Crimea (“Restricted Territories”). EU, Swiss and UK companies and nationals are restricted in their dealings with some of those locations as well.
- Prohibit facilitation of transactions that you cannot engage in directly yourself. For example, a US national cannot support or approve a non-US company’s dealings with Crimea. Likewise an EU company cannot use its non-EU subsidiary to conduct business with an EU asset freeze target or to undertake business prohibited by EU Sanctions<sup>1</sup>.

Please note that Sanctions apply to individuals – not just companies – for example, EU, US, Swiss and UK nationals operating outside the EU/US/Switzerland/UK must be aware of the specific Sanctions applicable to them, in addition to those that apply to their employer company.

In order to enable compliance with Sanctions, Coca-Cola HBC operates a screening process for its counterparties. The screening process is aimed at determining whether a proposed counterparty is named on assets freeze list or may be owned or controlled by such a person. An approval process for transactions that would involve Restricted Territories is outlined below.

Coca-Cola HBC and its subsidiaries should also be mindful of the Sanctions-related obligations in their financing agreements, such as lending and insurance agreements, which can extend beyond the legal obligations imposed by Sanctions.

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## REQUIRED APPROVALS

Any proposed transaction, activity or project that involves a Restricted Territory or a person or entity that is an apparent match on a relevant sanctions list requires prior written approval from a lawyer in the relevant legal department of the Company ("Ethics and Compliance Officer"). The Ethics and Compliance Officer that you should contact depends on your role:

- Country Employees: Country Legal Director
- Country Legal Directors and Group Function Employees: Head of Legal Compliance
- General Managers, Executive Leadership Team Members and CEO: General Counsel

Copies of these approvals should be maintained by the Ethics and Compliance Officer and made available to auditors or investigators if required.

## RAISE CONCERNS

If you become aware that Coca-Cola HBC or one of its subsidiaries has inadvertently become involved in any business contrary to applicable Sanctions, you should either notify your Ethics and Compliance Officer as soon as possible for further guidance or report this through our Speak Up! Line. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to the Company's reputation.

## NON-COMPLIANCE

We will consider non-compliance of this Policy as a serious matter warranting disciplinary action, up to and including dismissal, where allowable by law. Violations of Sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment.

## WHEN IN DOUBT, SEEK GUIDANCE

If you are ever unsure of how to react to a situation or whether certain conduct may be improper or contrary to the Policy, you should always seek guidance from your Ethics and Compliance Officer before you take action.

If you have any questions about this Policy, please contact your manager or, alternatively, your Ethics and Compliance Officer.

This Policy may be amended and updated by from time to time in accordance with the Group Chart of Authority. The latest version of this Policy can be obtained upon request from the Head of Legal Compliance and is available on the Company's Intranet and website [www.coca-colahellenic.com](http://www.coca-colahellenic.com).

Last update: November 2022

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