



Modern Slavery Statement.

BEVERAGE SERVICES LIMITED - DECEMBER 2022

Contents

3
Modern Slavery. What Is It?

4
Coca-Cola Company
Business Structure

6
Embedding Our Values into
Our Policies and Contracts

7
Salient Human Rights

8
Monitoring and Evaluating

11
Educating and Training
Our People

12
Reporting Grievances

13
Case Studies

14
Looking Forward

Modern Slavery. What Is It?

Modern slavery continues to be a critical human rights issue. It can take many forms, including forced work through physical or psychological coercion, extreme indebtedness, and restrictions on freedom of movement through document retention. The International Labour Organization (ILO) estimates that more than 27 million people are in forced labour situations¹, many of whom are in industries that may ultimately feed into global supply chains.

It is imperative that companies make clear that there is no place for such practices in any value chain. Respect for human rights is fundamental to The Coca-Cola Company and its subsidiaries, and the Company is committed to ensuring that people connected to our supply chain are treated with dignity and respect. The Coca-Cola Company's Human Rights Policy, Supplier Guiding Principles and Principles for Sustainable Agriculture 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.

Combating forced labour and human trafficking is essential to achieving globally agreed targets set forth in the UN Sustainable Development Goals (SDGs). The SDGs have become an important framework for companies, and they address an array of complex, interrelated global issues. Goal 8 focuses on promoting inclusive and sustainable economic

growth and decent work for all, and specifically calls out the need to eradicate forced labour to end modern slavery and human trafficking. We recognise that we cannot achieve any one of the SDGs on our own, but through collaboration with our partners and industry peers we aim to amplify our actions and positive impact.

In evaluating our supply chain, the potential risk areas are agricultural commodity inputs and geographical corridors with high rates of migrant workers. We continue to be committed to working with our system, supply chain, peers and stakeholders to collectively address the issue of modern slavery. This summary report outlines the Company's overall human rights due diligence approach as well as 2021 progress updates.

¹ <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

Coca-Cola Company Business Structure

The Coca-Cola Company markets, manufactures and sells:

— Beverage concentrates and syrups

— Finished beverages

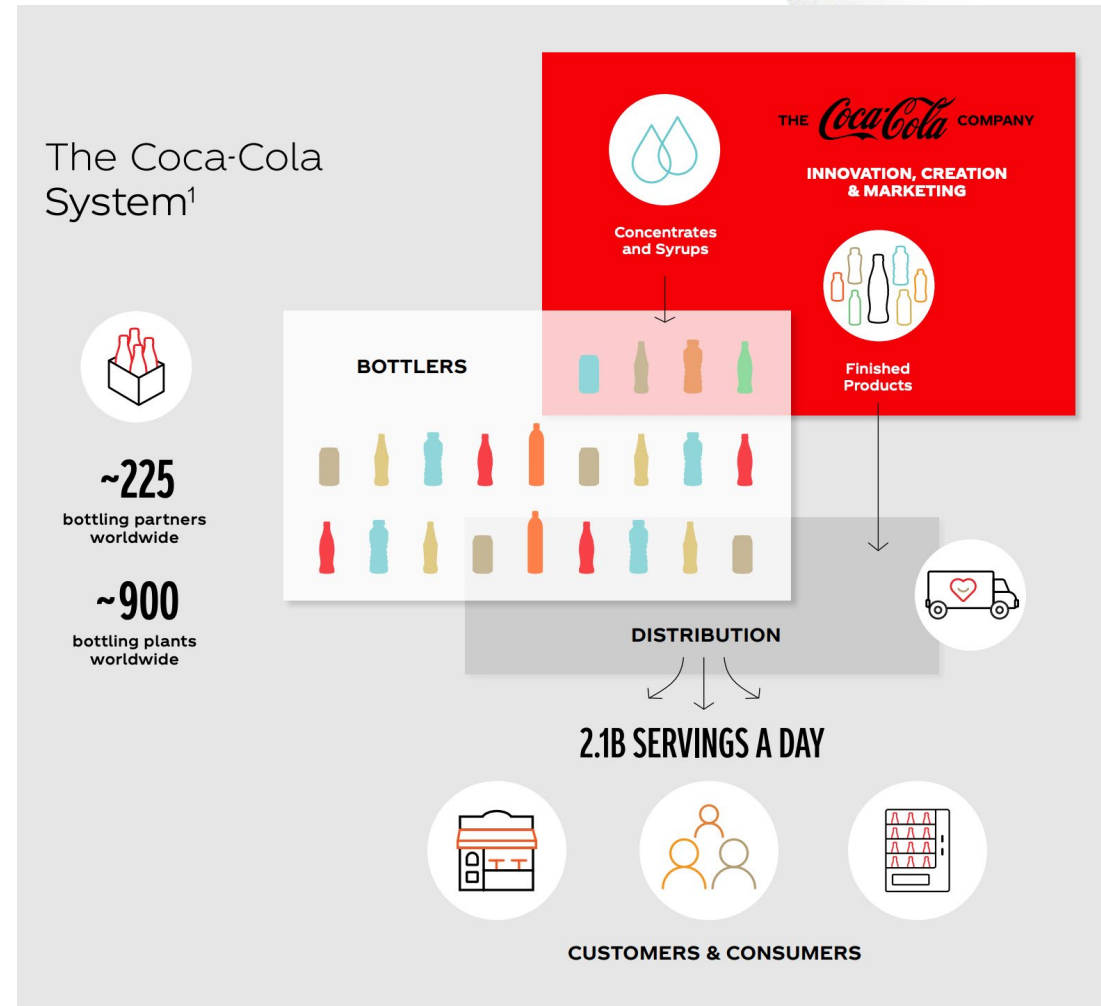
(including sparkling soft drinks; hydration, sports, coffee and tea; nutrition, juice, dairy and plant-based beverages; and emerging beverages).

In our concentrate operations, The Coca-Cola Company typically generates net operating revenues by selling concentrates and syrups to authorised bottling partners.

Our bottling partners combine the concentrates and syrups with still or sparkling water and sweeteners (depending on the product), to prepare, package, sell and distribute finished beverages.

Our finished product operations consist primarily of company-owned bottling, sales and distribution operations

We also operate retail outlets through Costa Limited, which has nearly 4,000 Costa coffee shops and over 13,000 Costa Express self-serve coffee bars worldwide. Costa's portfolio also includes at-home coffee solutions.



¹ The Coca-Cola Company and its bottling partners are collectively known as the Coca-Cola system. The Coca-Cola Company does not own, manage or control most local bottling companies.

Coca-Cola Company Business Structure

Company Facts



135 YEARS

of refreshing the world and making a difference



ATLANTA, GA

Global Headquarters



200+

Countries and Territories Where Our Products Are Sold



~200

Master Brands

The Coca-Cola System



~225

Bottling Partners Worldwide



~900

Bottling Plants



700K+

Employed by the Company and Bottling Partners



~30M

Retail Customer Outlets

Performance

\$33.0B

Net Operating Revenues
(2020, as reported)

\$235.9B

Market Capitalization
(As of 12/31/2020)

2020 Global Unit Case Volume by Operating Segment

23%

Asia Pacific

28%

Europe, Middle East & Africa

28%

Latin America

18%

North America

3%

Global Ventures

Our Sustainability Business Priorities



Water Leadership



Reducing Added Sugar



World Without Waste



Climate

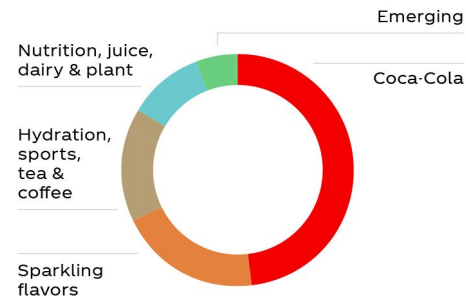


Sustainable Agriculture



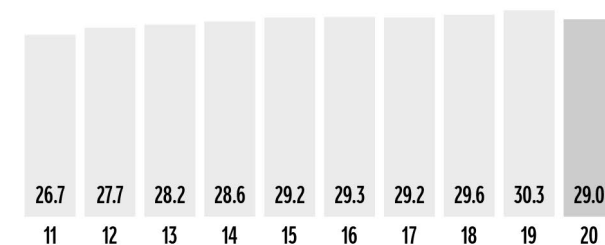
People & Communities

Retail Value



Volume Growth

Total Company Unit Cases
(in billions)



Embedding Our Values into Our Policies and Contracts

The Coca-Cola [Company's Human Rights Policy](#), [Supplier Guiding Principles](#), and [Principles for Sustainable Agriculture](#) 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. The Company's Human Right Policy applies to Company owned and controlled operations worldwide, and clearly articulates its corporate commitment to respect human rights in its operations. The Supplier Guiding Principles (SGP) apply to our supplier partners and independent bottlers, and align with our overall vision for respecting human rights. The Principles for Sustainable Agriculture (PSA) set expectations of our agricultural ingredient suppliers. PSA address sustainability challenges specific to agriculture, and are founded on principles to protect the environment, uphold human and workplace rights, and help build more sustainable communities.

Together these policies establish a strong and cohesive foundation for the business globally.

The Supplier Guiding Principles are embedded into contractual agreements and purchase orders between the Company and direct and authorised suppliers. The Company expects partners and suppliers to develop and implement appropriate internal business processes to ensure compliance with the Supplier Guiding Principles. We closely monitor the implementation of our Supplier Guiding Principles by utilising independent third parties to assess supplier and bottler compliance (see section Monitoring & Evaluation).

Our policies and practices align with the United Nations Guiding Principles (UNGP) on Business and Human Rights. The Coca-Cola Company has publicly supported the UNGP on Business and Human Rights from its inception. We continue to focus on all three components necessary in a corporate context under the UNGPs:

- A policy commitment to respect human rights
- A due diligence process to identify, prevent, mitigate and be accountable for adverse human rights impacts
- Processes to enable the remediation of the adverse human rights impacts the Company causes or to which it contributes. This framework is the foundation of our policies and programs related to human rights.

We continuously strive to demonstrate our commitment through our sustainability and community initiatives, as well as our efforts to identify and remedy human rights impacts.

Salient Human Rights

The UNGP Reporting Framework encourages companies to focus their human rights disclosure on “the most severe actual and potential impacts on human rights associated with their activities and business relationships.” These risks are called a company’s salient human rights risks.

With the help of Shift, we focused on identifying human rights risks in our Company and value chain. We mapped and prioritised our human rights risks according to scale, scope and ability to remediate, which were then discussed and evaluated in workshops with participants from all functions across four continents, involving more than 180 experts. To ensure a broad variety of stakeholders participated openly in this engagement, the risk ranking that resulted from these workshops was further discussed in a broad consultation process with more than 57 civil society groups, including NGOs, socially responsible investors, Global Union Federations and many others, to ensure a broad variety of stakeholders participated openly in this engagement.

These salient issues are not new for us. Although the Company has engaged in all these topics, our extensive mapping and consultation process confirmed that much of our human rights focus is appropriate, equipping us to move in a more strategic and prioritised direction in addressing these issues. In addition, the regional consultations gave us a deeper view into risk profiles. The consultations also raised the awareness of colleagues on these issues and strengthened engagement on tackling salient human rights risks.

As a result of that process, we launched our first stand-alone Human Rights Report in 2017, and recently released an updated report. The reports offer a comprehensive picture of our human rights engagement approaches as well as impacts on people and communities. In the reports, we discuss 12 salient human rights issues associated with the Company’s activities and business relationships as viewed through the lens of “impacts to people”.

Forced Labour and Human Trafficking is one of the salient human rights identified and we continue to monitor action and progress as outlined in this summary.

12 Salient Human Rights

- | | |
|--|--------------------------------|
| — Safety and health of all workers/security/rights to life | — Working hours |
| — Equality/non-discrimination and related issues/risks | — Healthy lifestyles |
| — Child labour | — Land rights |
| — Forced migrant labour/forced labour of seasonal workers | — Product safety/quality |
| — Freedom of association | — Rights linked to sponsorship |
| — Access to water | — Rights to privacy |

Monitoring & Evaluation

Identifying, preventing and mitigating human rights impacts is a critical aspect of our program. Third party audits remain an important tool for confirming adherence to the Human Rights Policy and Supplier Guiding Principles, including any evidence of any forced labour or human trafficking. The Coca-Cola Company facilitates more than 2,000 Third-party audits of company office locations, franchise bottlers, and suppliers each year, and more than 35,000 Third-party audits since the audit program began in 2003.

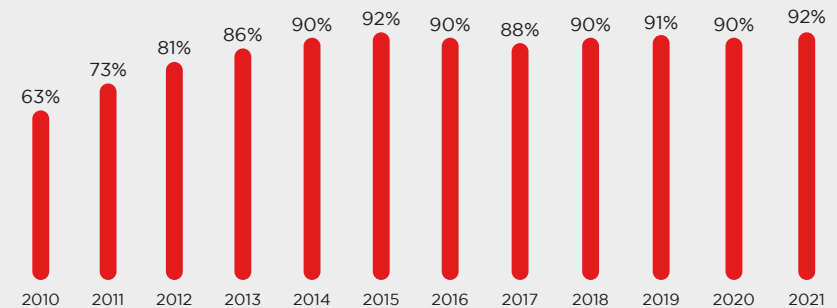
Last year, we completed 2,848 audits. By the end of 2021, 95% of company operations, 93% of our bottling partners, and 92% of our direct suppliers demonstrated compliance with our Human Rights Policy and Supplier Guiding Principles. The Company works with those sites that have not yet achieved compliance to remediate issues, make continuous improvement and then demonstrate progress during the next audit. Our target is to maintain 98% compliance for company and bottling operations and 95% compliance among suppliers.

As an active member of a number of industry and cross-sector initiatives, The Coca-Cola Company supports a collaborative approach to eradicating human trafficking and forced labour. Our VP for Global Human Rights is the co-chair for the Consumer Goods Forum's (CGF) workstream on human rights and forced labour.

A key element of this workstream is focusing on implementing the Priority Principles within our own operations. Priority Principles on the eradication of forced labour include: Every worker should have the freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work.

The Coca-Cola Company co-chairs the work stream focused on implementing the resolution among members. As part of the implementation, we are working with the Fair Labor Association (FLA) to enhance due diligence in company operations starting with priority risk areas. We actively engage with suppliers and peers to promote awareness of these principles.

Compliance of direct, authorised suppliers, bottlers, and company-owned facilities with the Human Rights Policy and the Supplier Guiding Principles



Our Goal: Validate at least 98% compliance with independent franchise bottling partners and 95% compliance with our Supplier Guiding Principles (SGP) among our suppliers.

Monitoring & Evaluation: 2021 Audits

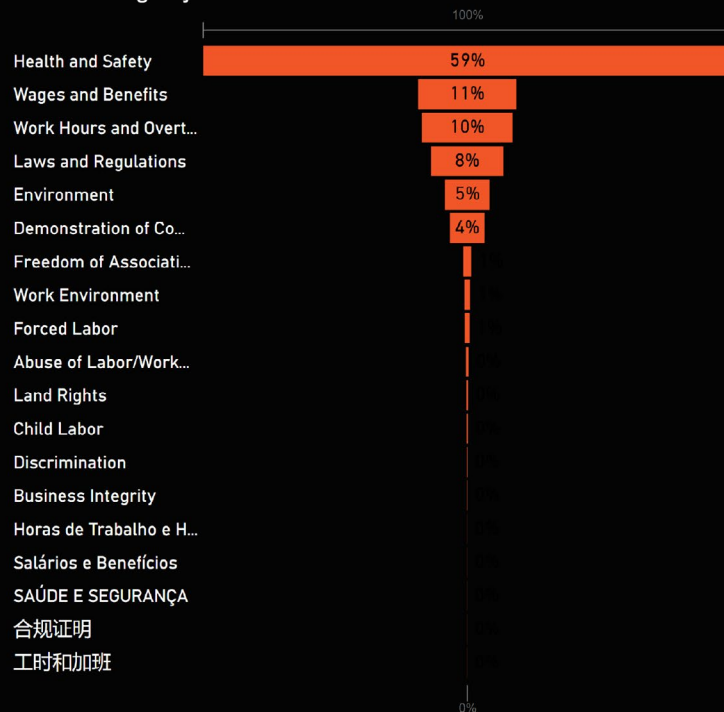
The below charts outline SGP audit result from period selected. In cases where non compliance are found, we work with suppliers to implement corrective actions to ensure remediation.

Facilities Identified	Findings	Assessments
8,450	4,954	2,925

Facilities and %
Facilities by Country
and Audit Rating



% of Findings by Code Element



Workers Distribution By Gender
at Audited Facilities



Total Workforce	Workers male	Workers Female	Workers Interviewed
2,072,086	1,516,954	555,132	99,975

Monitoring & Evaluation: Risk Areas

Certain sectors of the business and geographical areas run a higher risk of employing workers who may be vulnerable to the risk of forced labour. For example, certain geographical areas tend to employ migrant workers, who are at higher risk of forced labour as they can often be trapped by debt or have their government paperwork withheld. Auditing firms are therefore required to look more closely at topics like:

- Recruitment process to ensure workers are not charged fees
- Hours of work including maximum overtime hours and overtime wage rates
- Ensure identity documents, including passports, are not withheld
- Summary of the living conditions, if applicable
- No inappropriate or excessive wage deductions overtime wage rates
- Legalities regarding terminating employment

Through our due diligence efforts, we know that agriculture is a risk area for forced labour. As part of our longstanding commitment to drive transparency, accountability and sustainability throughout our business and supply chain, we are working to conduct commodity studies with a focus on sugar in key markets. The studies focus on child labour, forced labour, and land rights in countries from which we source sugar. Overall, the issues identified through the studies were largely at the farm level. The nature and extent of the risks varied in terms of severity. The risk of child labour is highest in small, independent farms. Third-party labour contractors were less likely to have proper policies and protections in place to prevent forced

labour. The complicated landscape for child and forced labour requires a multi-stakeholder approach. We have followed up on findings of the studies through direct remediation, supplier engagement and broader initiatives including bringing brands together to provide better access to clean water and sanitation, and sponsoring multi-stakeholder convenings. All sugar mill suppliers are expected to uphold our Principles for Sustainable Agriculture and demonstrate compliance through Bonsucro certification or SGP audits.

The Coca-Cola Company uses a variety of approaches to address child labour, forced labour, and land rights in our sugar supply chain.

The chart outlines the various approaches to address issues identified.

	Mills	Mill-owned/operated farms	Independent farms
Policies	SGP audits	Sustainable Agriculture Guiding Principles	
	Written guidance		
Approaches	Training (e.g. AIM-Progress)	Extended SCP audits	
	Industry engagement and support for multi-stakeholder initiatives		
	Certification (Bonsucro or equivalent)		
			Smallholder productivity & sustainability programs

Examples of efforts to address risks vary from new commitments to achieve certifications, to developing community-based child and forced labour monitoring through Fairtrade producer associations. In Mexico, we are working through Pan-Americana Mexico to create capacity building for mills and mill-owned farms. In parallel, we are working with peer companies under the umbrella of AIM-PROGRESS to drive improvement at the industry level and in collaboration with the Mexican government. The methodology for the studies can be found on our website, and more information on results and remediation is available [here](#). By the end of 2021, the Company had completed and published 22 studies.

Educating and Training Our People

We want to make sure our employees know their rights. The Company conducts regular training and provides online resources to our employees related to Human Rights Policy and Supplier Guiding Principles. To further bring human rights to the forefront of the workplace environment, we have simplified brochures outlining to both employees and leaders their human rights in 14 languages. For suppliers, in person training as well as online resources are provided. The Human and Workplace Rights Implementation Guide is available in multiple languages and outlines how to uphold the Supplier Guiding Principles.

We provide virtual and in-person human and workplace rights training programs for our bottlers, suppliers and auditors. Focused training on forced labour was rolled out as part of the CGF Human Rights Coalition for high risk operations.

Collaboration with businesses

The Coca-Cola Company has been an active member in industry initiatives to support human rights.

Our roles include:

- Founding member of the Leadership Group for Responsible Recruitment, which advocates for the “Employer Pays Principle”
- Appointed to Steering Committee of Responsible Labor Initiative (RLI)
- Co-leader for the Consumer Goods Forum Human Rights Coalition workstream on implementing the “Priority Principles” related to forced labour
- Collaborator with Global Business Coalition Against Trafficking and Centre for Sports and Human Rights
- Active member of AIM-PROGRESS, a forum for peer Consumer Goods manufacturers focused on responsible sourcing. TCCC representatives sit on the Advisory Board, Leadership Team and Human Rights working group

Reporting Grievances

At Coca-Cola we are determined to empower our employees to do the right thing, and therefore we've created a comprehensive system of reporting grievances. Company employees are provided multiple internal mechanisms to report violations of Company policy or law. The Company provides third-party services to allow employees and workers in the supply chain to report violations in multiple languages via [KOethics.com](https://kcoethics.com) 24 hours a day.

The ethics line is a global web and telephone information and reporting service. Telephone calls are toll-free, and the ethics line is open 24 hours a day, seven days a week, with translators available.

Resolving abuses can be very complex, requiring a comprehensive approach that includes cooperation with NGOs, local government and other organisations, but we are always determined at resolving them.

Key Elements of a Grievance Mechanism

- As per UNGP guidance, easily accessible, trusted and fair method for workers and/or external individuals to report concerns or violations including: accidents or safety issues, harassment or discrimination, abuse, bribery or potential conflicts of interest
- There is a written grievance procedure that's shared with all employees explaining how the process works, how long each step takes, who the employee should contact about a grievance and how it is understandable and accessible to all
- Workers are able to report a concern anonymously
- Reports are kept confidential
- Training and clear explanation are provided to all workers (and repeated at regular intervals) to ensure all workers know how to use the system, and that they understand the process for handling any issues that are raised
- Reports are followed up with appropriate action taken, in a timely manner
- Workers are entitled to have a representative assist them with any complaint
- If the problem can't be resolved informally there would be a meeting with the employee, (a grievance hearing), to hear evidence and make a decision on the case, which should be in writing. If either party isn't happy with the decision, they can appeal
- There is a policy in place prohibiting retaliation against workers and other stakeholders who lodge good faith grievances or concerns. Employers are careful to ensure this is carried out and no worker is poorly treated or harassed because of reporting a concern

Case Studies

Technology-Led Due Diligence

TCCC partnered with Diginex Solutions and another peer company to develop an online platform to track migrant worker employment experiences in the Gulf region. Given the high prevalence of migrant workers, we know the risk of modern slavery is also higher. The tool, called Lumen 360, improves transparency, identifies risks, and increases governance. In hopes of improving transparency in the sector overall, we have made the tool open source and invited peers to join the effort. The platform collects information on employment terms to ensure practices are in line with TCCC expectations, and also includes a worker voice element. The pilot has been extended beyond Tier 1 suppliers to include labour and recruitment agencies.

Industry Collaboration

Industry collaboration is critical to progressing towards a common baseline of responsible recruiting. We seek to be active participants and leaders in collaborative platforms such as the Consumer Goods Forum Human Rights Coalition (HRC), the Leadership Group for Responsible Recruitment (LGRR), Responsible Labor Initiative (RLI) and the Global business Coalition against Trafficking (GBCaT). As co-chair of the HRC, our VP for Global Human Rights engages with the 20+ companies in the workstream to pursue the priority principles for responsible recruitment in our collective operations. The coalition has identified priority markets and sectors to focus on and, in collaboration with the Fair Labor Association, delivered trainings and rolled out self-assessments to monitor progress.

Looking Forward

In the year ahead, the Company intends to continue to advance due diligence efforts related to monitoring recruitment practices and to update related guidance in the Supplier Guiding Principles. We will pursue joint training initiatives with peer companies, seek out innovative solutions to pilot, and continue to use our voice to leverage change among the business community.

When non-compliances occur, the Company will continue to pursue remediation. The Company strives to enable any consumer anywhere in the world to enjoy a moment of happiness, from a beverage that has been made in line with the values and with respect for human rights.



This Statement has been approved by the board of Beverage Services Limited at their meeting on 28 November 2022.

Signed: _____

Caryn G. Davis

VP of HR, Europe Operating Unit

Date: 28 November 2022