



# **COCA-COLA EUROPACIFIC PARTNERS NORWAY**

## **DUE DILIGENCE REPORT 2023**

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## MESSAGE FROM COUNTRY DIRECTOR NORWAY



At Coca-Cola Europacific Partners, human rights are fundamental to how we run our business every day and the way we operate in our communities. This is part of our commitment to ensure that everyone who works for and with our business is treated with dignity and respect, wherever they work and live. We are working to the highest standards in ethics and human rights and expect the same from our suppliers. We have a zero-tolerance approach to modern slavery.

We are happy to share our Due Diligence report for 2022, and if you have questions related to any parts of the report or want more information on how we work with these questions, please do not hesitate to get in touch.

**Carl Lescroart**  
Country Director  
Coca-Cola Europacific Partners Norway

## INTRODUCTION

We are committed to ensuring that all people are treated with dignity and respect wherever they work or live.

We support the 10 principles of the UN Global Compact and take a proactive approach to respecting these rights in our workplace, in our supply chain, and in the communities in which we operate. We provide a safe and healthy workplace and comply with applicable health and safety laws, regulations, and internal requirements.

We recognize the importance of our obligation to observe and promote internationally recognized human rights in the way we conduct our business. The aim of this report is to reflect on the due diligence conducted in accordance with the OECD Guidelines of Multinational Enterprises. The due diligence and reporting follow the United Nations Guiding Principles framework.

## OUR HUMAN RIGHTS STRATEGY AND POLICIES

We consider human and workplace rights – as articulated in the United Nations' Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work – to be inviolable. Respect for human rights is fundamental to the sustainability of CCEP and the communities in which we operate.

At CCEP, our policies and guidelines have an important role in ensuring respect for human rights throughout our business and supply chains. These policies reflect our values, underpin our ways of working and form the basis of the governance framework we have in place to enable CCEP to monitor and remediate against human rights breaches. CCEP has a strong governance framework. The Board of Directors oversees the interests of all stakeholders. Five committees support the Board. These include the ESG Committee, which is responsible for overseeing CCEP's sustainability strategy and all related policy issues and risks, including human rights. Management has also established a Compliance and Risk Committee, which among other things, advises the ethics and compliance function of our business and provides management level input regarding the ethics and compliance programmes.



## OUR CODE OF CONDUCT

Our Code of Conduct (CoC) seeks to ensure that we act with integrity and accountability in all our business dealings and relationships, in compliance with all applicable laws, regulations and policies. We expect everyone working at CCEP to adhere to the CoC which was updated and harmonised in 2022 and supported by the launch of a new company-wide multi-channel communication Campaign, 'Is it **Coke**?'. We expect all third parties who work on our behalf to act in an ethical manner consistent with our CoC and to comply with our Supplier Guiding Principles (SGPs).

The CoC applies to all our territories, as well as our shared service centres in Bulgaria. All employees are required to undergo annual CoC training, which is also a part of the induction process for new employees. Training on specific topics related to their roles is also provided where needed. Our CoC specifically calls out manager responsibilities and includes a matrix to help with decision making.

Any employee who wishes to raise a concern about wrongdoing at CCEP is encouraged to seek advice from their line manager or speak up through the Speak Up Resources which include internal and external channels. The 'is it **Coke**?' campaign encourages employees to think about if something doesn't feel right, to feel confident enough to stand up and speak up, just by asking a simple question: **is it OK?** The campaign set out the support available to all colleagues by driving awareness in standing up, seeking advice and speaking up. When any employee raises a concern through our code specified channels in relation to the CoC, CCEP will act promptly and appropriately.

  
**IS IT  
COKE?**

### IF SOMETHING'S NOT OK:

#### 1. STAND UP


Don't ignore it. Act in the moment and support your colleagues. Work together to find a solution.

#### 2. SEEK ADVICE

If something doesn't feel right, speak to your line manager or P&C.

#### 3. SPEAK UP

If things still don't work out, use one of our resources to Speak Up.



Should it happen that the laws or requirements from our CoC are violated or if there is an observation of a violation of human rights, we have both internal and external Speak Up channels which our employees are encouraged to use. Details of our Speak Up Channels and how to report a case using our complaint mechanism can be found on our intranet and on the Human Rights area of our external CCEP and Norwegian webpage. Online, details of our Speak Up channels are easily accessible for employees where direct links have been added to make it easy for employees to report a concern. Furthermore, it is stated that anonymous reporting is allowed using our external Speak Up channels.

## HUMAN RIGHTS POLICY

Our Human Rights policy clarifies our commitment to human rights and how we apply its principles to our policies, platforms, relationships and ways of working. Our Human Rights policy ensures human rights are respected in our own workplace and requires suppliers to do the same. Additionally, our operations are adapted to evolve appropriately to ensure we respond to human rights in a meaningful and effective way. Complying with applicable international and local legislation is paramount, and contracts with suppliers should include the Supplier Guiding Principles (SGPs) or Principles for Sustainable Agriculture (PSA). Our employees are encouraged to Speak Up through internal or external channels if they become aware of a breach of human rights.

Our internal policies and our expectation of external supply chains has among others a focus on the following key priority areas:

<b>Forced labour, child labour and human trafficking</b>	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 are committed to ensuring that our operations and supply chains are free from modern slavery practices. Retention of personal identity documents, recruitment fees or excessive loan terms are prohibited. 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.
<b>Work Hours, wages and benefits and right to work</b>	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.
<b>Vulnerable individuals and communities</b>	We are committed to respecting the human rights of all individuals regardless of gender, origin, colour, religion, age and ethnic and social group, who may be at heightened risk of becoming vulnerable or marginalised if adversely impacted by our activities.
<b>Workplace security</b>	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.

## MODERN SLAVERY STATEMENT

In 2022, we released our second statement under the Australian Modern Slavery Act and the fifth statement under the UK Modern Slavery Act as one joint statement. In this statement we recognize the importance of our obligation to observe and promote internationally recognised human rights in the way we conduct our business. We acknowledge that the risk of modern slavery may exist throughout our operations and supply chains and this joint Modern Slavery Statement for the European and Pacific region, sets out the steps we are taking to identify and manage those risks.

We have a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain and together with The Coca-Cola Company (TCCC), we expressly prohibit any form of human trafficking within our system or by any company that directly supplies or provides services to our business. The Modern Slavery Statement can be found on our corporate website.

## CCEP STRUCTURE AND OPERATIONS

CCEP is one of the world's leading consumer goods companies. We make, move and sell some of the world's most loved brands – serving 600 million consumers and helping 1.75 million customers across 29 countries grow. We combine the strength and scale of a large, multi-national business with an expert, local knowledge of the customers we serve and communities we support. The Company is currently listed on Euronext Amsterdam, the NASDAQ Global Select Market, London Stock Exchange and on the Spanish Stock Exchanges, trading under the symbol CCEP.

We operate across Andorra, Australia, Belgium, continental France, Fiji, Germany, Great Britain, Iceland, Indonesia, Luxembourg, Monaco, the Netherlands, New Zealand, Norway, Papua New Guinea, Portugal, Samoa, Spain and Sweden. We employ around 33,000 people across our business ([11,200 API and 21,800 Europe) and support thousands more jobs in the communities in which we operate. Across our teams we work as one, united by a shared purpose and common values.

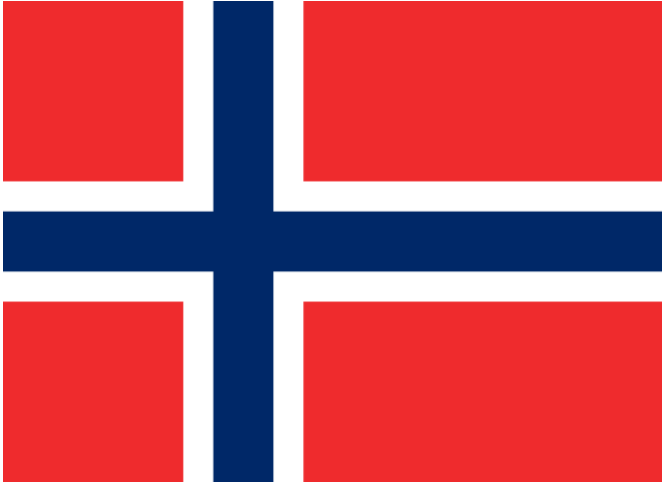
As a brand owner and partner to a range of iconic businesses, we prepare, distribute and sell drinks including sparkling beverages, water, sports, energy, iced tea and coffee. Our business relationships include more than 600,000 active customers in API and 1.1 million customers in Europe.

In Norway we have 548 employees, 1 production facility at Lørenskog + two co-bottlers, Mack (Tromsø) and Telemark Kildevann (Fyresdal) and 3 production lines - large and small PET line + can line.



## COUNTRY AND INDUSTRY CONTEXT

### HUMAN RIGHTS CONTEXT IN NORWAY



Bordered by Sweden, Russia and Finland, Norway is situated in the western half of the Scandinavian peninsula with a total population of 5,526,000 which is concentrated in coastal cities including Bergen and Trondheim.<sup>1</sup> The majority of the country's inhabitants are ethnically Nordic, however in the late 20<sup>th</sup> century immigrants mostly from southern Europe and Asia resided in the Oslo region.

Norway is a constitutional monarchy and parliamentary democracy. A monarch is head of state, executive power is exercised by a government chaired by the prime minister. State

power is divided between the Parliament, the Cabinet and the Supreme Court. Laws in Norway follow a civil law system, meaning laws are created and amended in Parliament. These laws are regulated under courts of justice of Norway.

Norway is part of the United Nations<sup>2</sup>, but not part of the European Union. Norway is however part of the European Economic Agreement (EEA) which enables Norwegians and the Norwegian business sector to have the same rights and obligations in other EEA countries. This includes trade, investment, services and the right to work, live and study in other EEA countries<sup>3</sup>. This relationship is vital for Norwegian business and to develop the Single Market.

### Profession and education

The main challenge Norway faces is the shift from economic focus on producing oil and gas to becoming more focused on sustainable green industries. Competent local people are vital in order to maintain high levels of employment and a positive welfare state. To build these industries and employment opportunities requires investment in research and innovation.

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<sup>1</sup> [Norway - Health and welfare | Britannica](#)

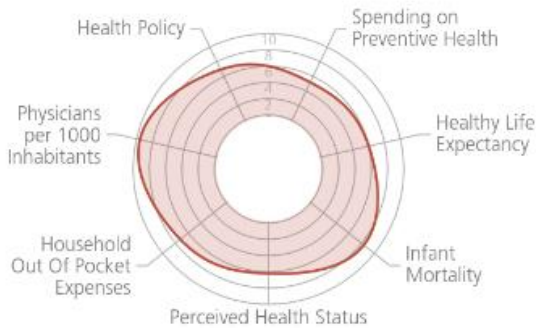
<sup>2</sup> [Norway and the UN - Norway in the UN](#)

<sup>3</sup> [What the EEA Agreement covers - regjeringen.no](#)



## People and health

Health | Norway



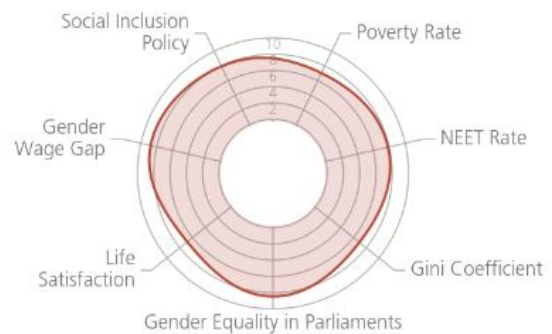
SGI 2022 | Norway

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Norway’s national health service provides free health care to all, and dental care to children under 18. Life expectancy rates in Norway are amongst the highest in the world with Norway ranking in the top 10 countries with the highest Gross National Product per capita. Education is also free at all levels, however the number of degrees granted in scientific disciplines is low compared to the international standard, limiting Norway’s innovation capacity<sup>4</sup>.

A ‘people’s pension’ was established in 1967 to ensure citizens were able to maintain a high standard of living after retirement. Norway has the highest standard of living with life expectancy age 75 for men and 81 for women. Norway’s family policy has been driven by a widely shared objective of providing women the same economic and career opportunities as those available to men. Norway has been ranked highly in the Human Development Index (HDI) since the first report in 1990 receiving a score of 0.96/1 in 2022, and frequently ranks highly in the World Economic Forums Global Gender Gap report.

Social Inclusion | Norway



SGI 2022 | Norway

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Immigration policy aims to ensure access to education and employment for immigrants to prevent dependency on economic benefits. This is well organised and well-funded in Norway, and although non-western immigrants continue to suffer higher unemployment rates, Norway is more successful than other OECD countries on integrating immigrants into the labour market<sup>5</sup>.

<sup>4</sup> [SGI 2020 | Norway | Social Policies \(sgi-network.org\)](https://www.sgi-network.org/2020/Norway/Social-Policies)

<sup>5</sup> [SGI 2020 | Norway | Social Policies \(sgi-network.org\)](https://www.sgi-network.org/2020/Norway/Social-Policies)

## Industry, law and policy in Norway

The Norwegian food and beverages industry has grown gradually since the end of the 19th century and is currently Norway's second-largest industrial sector<sup>6</sup>. As part of the EEA, Norwegian food legislation is harmonized with the EU, and Norway is obliged to follow EU legislation on the food area. The EEA opens Norway to opportunities such as financing schemes which mainly support the development of a green, competitive and inclusive Europe by supporting the development of knowledge-based economies. Investing in people, knowledge, innovation and employment means Norwegian companies can continue

to work with recipient companies that are part of the EEA. Additionally, Horizon 2020 and Horizon Europe provide the EU's framework for research and innovation. Access to international networks and market knowledge enhances companies' competitiveness for which Norwegian business' account for almost one third of the Norwegian return from the Horizon 2020 programme.

Standards Norway adopts and publishes up to 1,500 new Norwegian Standards annually, including those on Food Safety. These standards are based on national requirements, and European and International standards. In 2020, the regulation No 852/2004 on food hygiene introduced new considerations of food safety culture, including beverages<sup>7</sup> which is applicable to Norway. Introducing food safety as a general principle aims to increase awareness and improve the behaviour of employees. To build a culture which is committed to food safety, the legislation asks management and employees to commit through training, supervision and controls which ensure documentation is up to date.



## CONCLUSIONS FOR BUSINESS

Norway scores highly on the Human Development Index (HDI) with a score of 0.96/1.0 (2021/22). This strong score reflects high levels of Gross Domestic Product (GDP), Education and Health Care, and although Norway is not considered to be a country at risk of human rights breaches, evaluations of risks are no less insightful in response to the new legislation.

<sup>6</sup> [Business and industry in Norway - The food, beverages and tobacco industry - regjeringen.no](#)

<sup>7</sup> [EU legislation to include food safety culture - Norway Exports](#)

## OUR GOVERNANCE FRAMEWORK

At CCEP, our Code of Conduct, policies and guidelines have an important role in ensuring respect for human rights throughout our business and supply chains. These policies reflect our values, underpin our ways of working and form the basis of the governance framework we have in place to enable CCEP to monitor and remediate against human rights breaches.

CCEP has a strong governance framework. The Board of Directors oversees the interests of all stakeholders. Five committees support the Board. These include the ESG Committee, which is responsible for overseeing CCEP’s sustainability strategy and all related policy issues and risks, including human rights. Management has also established a Compliance and Risk Committee, which among other things, advises the ethics and compliance function of our business and provides management level input regarding the ethics and compliance programmes.

<b>Accountable</b>
All CCEP Employees & Supply Chain Partners
<b>Governance</b>
Board   Audit Committee (Board Committee)   Compliance & Risk Committee of the Executive Leadership Team (Management Committee)
<b>Policy</b>
Code of Conduct   Human Rights   Supplier Guiding Principles   Principles for Sustainable Agriculture   Responsible Sourcing Guidelines   Speak Up Policy (EU)   Whistleblower Protection Policy (API)

### Addressing Human Rights together

Human rights are everybody’s business. We are focused on building long-term relationships which will help us to build our capability and play a proactive role in protecting human rights. This year we are joining the International Organization of Employers (IOE) Global Industrial Relationships Network (GIRN) meeting in an exchange of best practice and collaboration with other businesses across industry sectors. We have also established a best practice sharing system with TCCC and other bottlers.

## CONDUCTING HUMAN RIGHTS DUE DILIGENCE AND DISCLOSURE

### ENTERPRISE RISK MANAGEMENT

CCEP recognizes that review and management of human rights risks across our organization and within our supply chain is an ongoing process. We assess our risk of human rights as a part of our corporate Enterprise Risk Management framework, and responsibility for managing its risk sits with a designated risk owner. The Enterprise Risk Management risks are reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team and shared annually with the Board.



## NORWEGIAN RISK ASSESSMENT

In June 2022 employees from Norway representing different functions and management levels were invited to take part in an online risk assessment regarding CCEP and supplier operations in Norway in the form of a survey. The purpose of the survey has been to highlight the most salient risks in both Coca-Cola Europacific Partners Norway (CCEPN) and supplier operations. Highlighting these risks means strategies can be produced to mitigate these in the future. The survey focused on 10 key human rights; Right to privacy, Discrimination, Freedom of Association, Integrity to Life and Health, Safety of workers,

Freedom of slavery and forced labour, Prohibition from torture, Occupational health, and Wages. Employees were able to highlight additional human rights they believe could be at risk which had not been initially included in the risk assessment. No additional human rights were raised by employees.

Participants were invited to take part via email and followed by two introductory meetings to brief participants on the nature and purpose of the risk assessment. Hosting two meetings increased the opportunity of invited participants to attend the briefing. The main purpose of the meeting was to educate participants on the Norwegian Transparency Act, explain the role of a risk assessment and the importance of their role within the risk assessment. Additionally, the differentiation between likelihood and severity was also explained, as this is key to the risk assessment.

The survey was comprised of five sections and took approximately 15 minutes to complete. Of importance is that the survey was completely anonymous. Section 1 required participants to rate the severity of 10 human rights risks from 'very severe' to 'less severe'. Section 2 focused on vulnerable groups and asked participants to decide if specified vulnerable groups such as women, LGBTQ+ or young people may be more at risk of facing human rights abuses within CCEP operations or supplier

operations. Section 3 allowed participants to offer additional groups they thought could be more at risk of facing a human rights risk that has not been listed in Section 2. Section 4 asked participants to rate the likelihood of the 10 human rights risks occurring within CCEP operations and supplier operations from 'very likely' to 'never'. Finally, section 5 allowed participants to list any other human rights would they thought could be likely which had not been listed.

## Results of the risk assessment

The response rate of the survey was strong at 69%. Of the 10 risks included in the assessment, all were identified as low risk. No human rights risks were identified as medium or high within CCEPN or supplier operations. The 10 risks which have been assessed include:

Discrimination	Occupational Health
Right to Privacy	Safety
Integrity of Life and Health	Forced Labour
Freedom of Association	Protection form torture
Wages	Child labour

Low risks for CCEPN operations identified in the risk assessment included:

- Discrimination
- Right to Privacy
- Integrity of Life and Health
- Freedom of Association
- Wages

Low risks for supplier operations identified in the risk assessment included:

- Discrimination
- Wages
- Right to Privacy
- Freedom of Association
- Integrity of life and health

Identification of human rights risks as low in the assessment is to be expected for Norway as this positively reflects the HDI score 0.96/1 (2021/22). This is due to strong legislations regarding human rights, and CCEP's robust processes which are in place to ensure human rights are respected. However, an analysis of risks in both CCEP and supplier operations is necessary to understand how these risks are currently managed, and how CCEP can create an action plan for the future.

	Our operations	Our Suppliers
<b>Risk level</b>	Based on feedback of the likelihood and severity of a breach of human rights within CCEPN operations, the risk to human rights in Norway is low.	We have assessed the risk as low of being directly or indirectly, through our purchase of goods or services, at risk of human rights risks in our supplier supply chains.
<b>Most salient risks</b>	<ul style="list-style-type: none"> <li>• Discrimination</li> <li>• Right to privacy</li> <li>• Integrity of life and health</li> <li>• Freedom of association</li> <li>• Wage</li> </ul>	<ul style="list-style-type: none"> <li>• Discrimination</li> <li>• Wages</li> <li>• Right to privacy</li> <li>• Freedom of Association</li> <li>• Integrity of life and health</li> </ul>
<b>Management</b>	<ul style="list-style-type: none"> <li>• Internal policy framework</li> <li>• Regular training</li> <li>• Close monitoring of legislative changes across our markets of operation</li> <li>• Enterprise risk management framework</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier Guiding Principles (SGP)</li> <li>• Supplier Responsible Sourcing Guidelines (RSG)</li> <li>• Third party and online assessments</li> <li>• Supplier onboarding processes</li> <li>• Formalised contract templates</li> <li>• Enterprise risk management framework</li> </ul>

Section 2 of the survey focused on identifying vulnerable groups at a higher risk of being impacted by human rights risks and whether this was more likely in CCEPN operations or supplier operations.

The vulnerable groups included in Section 2:

Temporary workers	Elderly people
Migrant workers	Ethnic minorities
Disabled people	LGBTQ+
Workers Union members	Women
Young people	

### **Findings within CCEPN operations**

All the vulnerable groups included in the risk assessment have been identified to have a LOW risk of being affected by a human rights breach. No group has been identified as in danger. Although low risk, the vulnerable groups highlighted as at some level of risk within CCEPN operations were temporary workers, disabled people, elderly people, ethnic minorities and LGBTQ+. Temporary workers may be perceived to be vulnerable within CCEPN operations because they are not protected by tariff agreements in the same way as employees of CCEPN.

Each of the groups identified in section 2 could be targets of discrimination which has been highlighted as a low human rights risk in section 1.

### **Findings for supplier operations**

Vulnerable groups within supplier operations are also at a low risk of being affected by human rights. However, the risk to all vulnerable groups within supplier operations has been rated slightly higher than within CCEPN operations. One exception has been elderly people. Elderly people have been identified as a group equally at risk within CCEPN and supplier operations.

Although 9/10 vulnerable groups are more at risk within supplier operations, this risk is low and the differentiation of risk between groups is small. Therefore, there is no vulnerable group which needs specific focus in order to minimise risk.

In addition, employees were invited to include other vulnerable groups they believed could be at risk of a breach of human rights. No additional groups were included.



## ACTIONS WITH REGARDS TO SALIENT RISKS WITHIN OUR OWN OPERATIONS

The results from the human rights risk assessment show that the overall risk of a breach of human rights within CCEP and supplier operations is low. Due to the low overall scores, only the five highest scoring risks have been included in the analysis. Below are the actions we have taken at a wider CCEP level and within Norway more specifically.

### Discrimination

We aim to be an organisation where people feel they belong, and where our inclusive culture drives innovation and performance, creating a trusted and successful business that our colleagues, customers and communities admire and support. Building a diverse, equitable and inclusive workplace which is free from any kind of discrimination and harassment, including sexual harassment is one of our top priorities as a business. All of us provide unique perspectives and our differences help us to better understand how we delight our customers.

**Everyone's  
welcome**

  
**EUROPACIFIC  
PARTNERS**

CCEP's number one priority is the safety and wellbeing of our employees. We want everyone to feel happy and healthy, and to work in an environment which everyone can expect integrity, compliance, fairness, equal treatment, mutual respect and care so we can all thrive at work and at home. Through an environment of safety, trust and belonging, we ensure diversity can thrive and make sure that employees feel welcome to bring their authentic selves to work. All CCEP employees are entitled to respectful treatment at the workplace and to be free from the negative effects of harassment or unwelcome, offensive, or improper conduct.

CCEP has a zero-tolerance approach to all forms of discrimination, bullying, or harassment. This includes sexual harassment, racial harassment, homophobia or ableism. Such behaviour is prohibited and may lead to disciplinary action up to and including summary dismissal subject to applicable laws and internal policies. It also may be a criminal offence. This applies not only in the workplace but also outside work where there is a work connection.



Our philosophy is that “everyone’s welcome to be themselves, be valued and belong” at CCEP. We are committed to building a diverse workforce, with an inclusive culture and equity at its core. We have created an environment with opportunities for people of every culture, faith, ethnicity, heritage, ability, gender, sexual orientation and age. We believe this commitment will enable us to take positive action for people, better represent the society we serve and support our sustainable business growth. Led by our Inclusion, Diversity and Equity (ID&E) Centre of Expertise and sponsored by our ELT members, we deliver our ID&E strategy by listening to our people’s lived experiences, developing action plans and tracking progress against our five pillars: culture and heritage; disability; gender; LGBT+; and multi generations. We have dedicated groups of employees and Executive Leadership Team sponsors catalysing action at scale to remove identified barriers to inclusion.

We run annual ID&E workplace audits on gender equality, disability and LGBT+ matters to identify best practices for implementation and prevent situations of discrimination. We featured colleague experiences of working successfully across generations at CCEP. We shared videos featuring advice from our

employees on using culturally inclusive words and the importance of allyship. For the first time, we ran a voluntary, anonymous survey focused on ID&E in most of our countries in 2021. This provided our people with the opportunity to give feedback on their inclusion experience at CCEP and self-declare personal diversity information. Employees participated in Europe, Australia and New Zealand. The results have shown that the majority of our employees know how and where to report incidents of misconduct or inappropriate behavior and feel able to speak up without fear of reprisal. We plan to repeat the ID&E survey in October 2023. We expect the outcomes to enable us to better understand the diversity of our workforce at all levels, improve the inclusivity of our people’s experience and ensure equity is embedded in our infrastructure and people policies. We have set up a working group about fair, safe and harassment free

workplaces to identify and take action built on the outcomes of the survey, to help ensure that all employees feel safe to speak up. In addition, as part of our commitment to inclusive, diverse and equitable workplace practices, we continue to partner with organisations and bodies such as European Network Against Racism, the Valuable 500, the Business Disability Forum, LEAD Network, the United Nations Women’s Empowerment Principles, Stonewall and the Social Mobility Index.

All employees have a responsibility to act inclusively and to ensure a safe and harassment free workplace environment at CCEP, in line with our Everyone’s Welcome Principles and our Code of Conduct. Discrimination of any kind will not be tolerated and may lead to disciplinary action, including dismissal without notice, in line with local laws. Managers and Leaders have additional responsibility to take appropriate action to consider and promote equity, diversity and inclusion in the workplace and, with the support of the Code of Conduct respond appropriately in circumstances where actions and/or behaviour are not in line with our values or Everyone’s Welcome Principles. Any person who feels that they have suffered discrimination or harassment, or who is aware of conduct that may violate our policies regarding discrimination, is encouraged to share their concerns as outlined in our Code of Conduct.

In CCEPN we have regularly CoC meetings to update, coordinate and take necessary actions if needed on specific cases.



## Right to Privacy

Every day we are trusted with the personal data of employees, customers, consumers, suppliers, business partners and other individuals – and we work hard to protect that trust by managing data fairly and safely, as stated in our CoC. To mitigate risks related to right to privacy, CCEP set-up a Data Privacy Programme which concentrates on global and local risk mitigating activities of CCEP.

CCEP Data Privacy Programme described in the Data Privacy Policy sets the standards for CCEP to act in a responsible and transparent way by implementing the necessary processes to ensure all personal data entrusted to CCEP is protected and processed in a safe, fair and lawful manner.

The objective of the Programme is to ensure ongoing and sustainable compliance with applicable Data Protection laws and regulations, and specifically with the EU General Data Protection Regulation 2016/679 (GDPR). The Programme is aligned to a best-practice Privacy Management Framework in order to facilitate demonstrating accountability on the basis of documented evidence. The details of the activities in scope of the Programme and the associated governance organization are described in the CCEP Privacy Policy Guidance. The Programme maturity is permanently self-assessed against the Privacy Management Framework structure.



The Data Privacy Programme mission is: “To achieve long term sustainable growth and build trust with our employees, customers, consumers, suppliers, and business partners, we process Personal Data in a safe, fair and lawful manner.”. The Programme vision is: “Fair and lawful processing of personal data”, internally branded as “Make Privacy Personal”.

The programme is supported with a robust privacy governance structure which includes Privacy Office team and a broader Privacy Community. The Privacy Office team is led by appointed Chief Data Protection Officer while Privacy Community is built on appointment of Local Legal Data Protection Coordinators in each country from the Legal function.

The scope of the programme spans across all business functions and countries where CCEP processes personal data including Norway. In Norway we primary focus on compliance with the GDPR which is imposed locally through European Economic Area agreement. All regional mitigating activities in Europe are applicable to our business activities in Norway, this includes but not limited to, all-employee privacy training, functional privacy trainings, awareness campaigns, maintenance of local Records of Processing Activities, imposed Privacy by Design procedure on any new project/process or change to project/process, management of data transfers outside the EEA, established procedure for incident management and established procedure for data subject requests management.

## Integrity of Life & Health

### Wellbeing and safety strategy

Our people's physical and mental wellbeing is a priority. We're committed to providing our employees with a safe and healthy work environment that safeguards their mental, emotional and physical wellbeing. We expect all employees, contractors and individuals under our supervision to keep themselves, their colleagues and others safe by using their common sense and following our policies, procedures and processes to mitigate all foreseeable risks at all times. We encourage our people to take action if they become aware of any activity, situation or behavior that could compromise the physical or mental wellbeing of another person, and report any harms avoided. Managers are responsible for ensuring that workplaces, processes and equipment are kept safe, and must consider the physical and mental wellbeing of their teams as paramount. They are also expected to demonstrate through their behavior that health, safety and wellbeing come first above all other considerations. Health and safety is addressed with status and actions each quarterly AMU meeting. CCEPN have developed a wellbeing calendar structuring initiatives related to mental, physical and general wellbeing for our employees throughout the year.



If our people are injured or suffer any mental or physical health issues at CCEP, we endeavor to make any reasonable adjustments to their duties and working environment to support their recovery and continued employment.

Our Board of Directors receives, as part of the regular updates from the CEO, insights into health and safety of our people and the continued challenges presented by COVID-19.

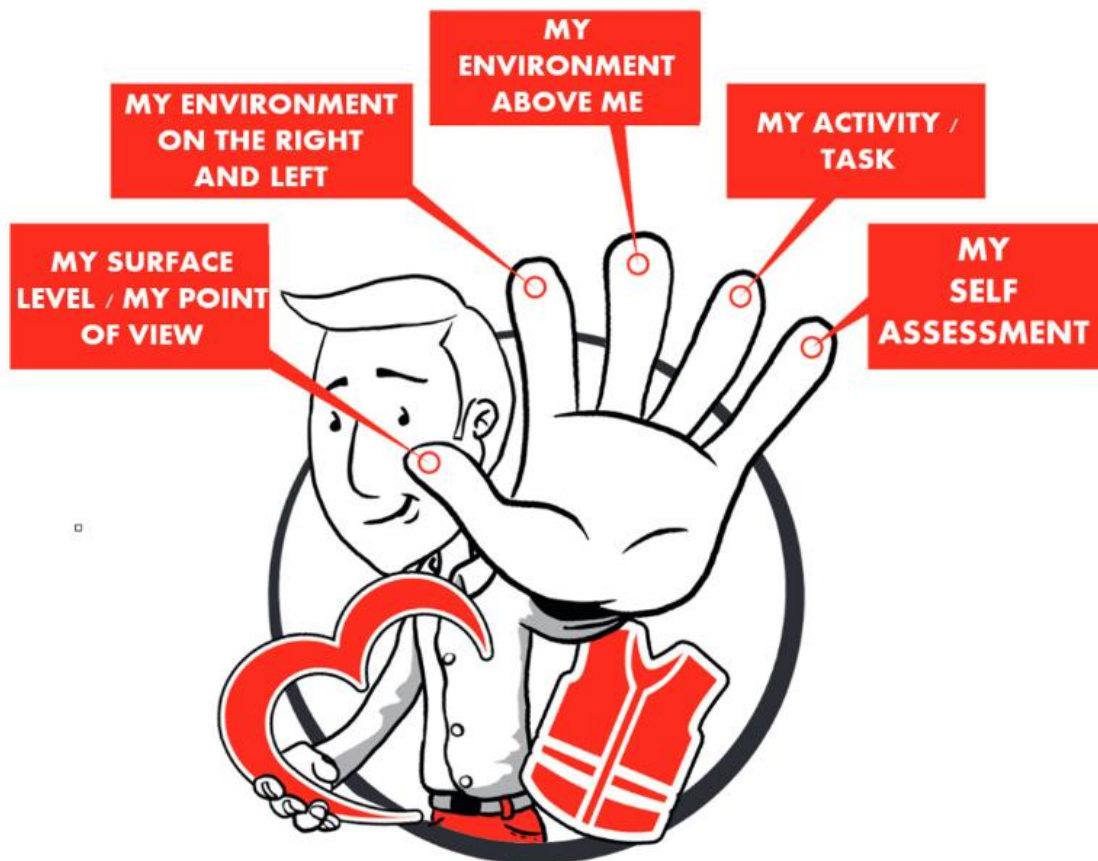
## Safety commitment

We believe all injuries are preventable and that no task is so important that it can't be done safely - everyone has the right to go home safely, and together we make it happen. Our strong health and safety culture, systems, processes and programmes, include a target to reduce our total incident rate (TIR) to below 1 by 2025 and our lost time incident rate (LTIR) below 0.5.

2022 saw Norway have 5 LTI and 2 MTI with an overall TIR of 1.27.

We will be further working on a safety campaign for all employees in Norway based on the Human Organisational Performance training and Life Saver training aimed at all employees.

## Take 5 -Think smart before you start



We consult in every single Business Unit with their employees / employee representatives through committee meetings, risk mitigation workshops, works councils and union appointed meetings. We have clearly defined performance review meetings on a quarterly basis with local leaders as well as the executive leadership team, with clearly defined annual plans where the goals are reviewed regularly. We set and communicate targets throughout the organization, based on actual performance and continuous and sustainable improvement. All our health and safety policies are signed and approved by our CEO.

## Measuring safety performance

Our integrated management systems and programmes measure our safety performance. Our safety KPIs are total incident rates (TIR) and lost time incident rates (LTIR). For TIR, any incident per 100 full-time equivalent (FTE) employees leading to an injury that requires medical treatment is counted in the overall rating. With LTIR, we calculate the number of incidents per 200,000 hours worked, which equals 100 full-time equivalent employees across our whole business that result in time away from work.

We have a contractor management system in place across all our territories. Under this system, all contractors are required to pass a risk-based assessment before they are permitted to work at our sites. We also completed a safety maturity profile assessment for all our production facilities. We track contractor lost-time incidents, but we don't have visibility of contractors' hours of work, only their hours present on CCEP premises. As a result, we do not currently calculate a LTIR for contractors - we track their incidents as a standalone data point. In 2021, there were 6 contractor lost time incidents in Europe.

## Safety management systems

Our health and safety management system includes our supply chain (production, procurement and route to market), our commercial teams and our support functions, as well as contractors. It is a roadmap for a harmonized approach to mitigating risks, creating an environment for continuous improvement and a culture of safety for our employees to share and learn from.

Tools like dynamic risk assessment, management safety walks, safety conversations, capturing learnings through near-misses and potential events are commonly used. Any potential hazard or work incident is investigated by a diverse investigation team to identify and prioritize the immediate, short, mid-, and long-term action plans and ways to communicate the learnings.

CCEP provides health and safety training to its employees that are regulated by health and safety regulations, required by the global Coca-Cola health and safety procedures, related with the company risk management procedures, essential for capability and competence development. Furthermore, CCEP is an active member of a global health and safety committee within the Coca-Cola System and proactively corresponds to any learnings coming through the network. In 2022 we trained over 1430- man hours of health & safety training.



## Encouraging behaviors that lead to good mental health and wellbeing

We communicate clear expectations and role descriptions and provide constructive and appreciative feedback to our colleagues. Our managers have to ensure that workloads enable employees to do their best and are not overwhelming or under-demanding.

We offer flexible working where possible, respecting the right of employees to work or to be disconnected outside of their regular working hours where appropriate and adapted to local legislation. Our employees can propose alternative work patterns according to our “Ways of Working” Policy.



CCEP has a maternity policy and adoption leave policy, which varies by country based on local legislation and practice. In Norway, parents are entitled to paid parental leave for a total of 12 months.

In June 2022, we conducted an engagement survey, including questions on Safety and Wellbeing. The results showed strong engagement scores: our people feel

safe at work, the well-being score has improved or is stable in some countries. Results also identified some areas for improvement and management will be taking action to reduce barriers to execution, personal growth opportunities and communication.

We're dedicated to making sure all our colleagues can access the support and resources they need to manage their health and wellbeing, wherever they work. In 2022, we grew our Wellbeing First Aider initiative and expanded an internal mental health support network of over 800 (33 in Norway) trained employees across our territories. 1,8% people in Norway have received support and benefitted from our Employee Assistance Program (EAP), a 24/7 independent service offering free professional care and counselling, self-help programs, interactive tools and educational resources for our people and their family members.

In 2022, we organized 2 large campaigns in April and October to expand the culture of health and wellbeing and to promote our programs with training and conferences, both virtually and on site.

We also organized many prevention campaigns (promotion of sport, cancer screening, ...) to encourage our employees to take care of their physical and mental health.

In 2023, we will continue to expand the culture of wellbeing in amplifying our existing programs and in training all people leaders with a specific wellbeing leader training.

We will also simplify access to information for all our CCEP colleagues with a wellbeing hub accessible from all devices.

## Freedom of Association

In CCEPN there are 3 unions; NNN, Lederne and Negotia. 43,2% of our employees are registered members. Unions and members from the management team have monthly meetings, they are represented in AMU quarterly meetings and consulted when obliged to do so in projects or relevant changes for employees.. We have annual salary negotiations with all unions.

CCEP is committed to open and transparent social dialogue. We are upholding freedom of association and collective bargaining as a human right according to our Human Rights policy. Based on the OECD Guidelines for Multinational Enterprises we have developed our CCEP Human Rights Restructuring Guidelines in 2018. This document describes our commitment for identifying, preventing and mitigating adverse human rights impacts resulting from or caused by our business activities including restructuring activities.



Within CCEP Norway in total 100% of employees (Jan 23) are covered by collective bargaining agreements (CBA).

In 2019, a European Works Council agreement was signed. Each year, 2 Plenary meetings and 3 select committee are setting up. The agenda is prepared with the Spokesman and topics could vary. However, there always are update on the business and Management provide the members with an update on commercial and on Customer Service and

Supply Chain. Some countries have also established strong relationships with central and national committees like in Norway.

Following our commitment, we meet regularly with European works council (EWC), and local work councils, as well as trade unions that represent our people. CCEPN have monthly meetings with Union representatives and HVO (“hovedvernombud”).

We encourage constructive and meaningful dialogue. During consultation, our employee representatives have the opportunity to ask questions, share views and propose alternatives to proposals before management makes a final decision.

## Wages

We pay salaries in line with appropriate market rates, as well as providing our people with a range of other benefits. Among our benefits we include medical insurance, life insurance, travel insurance, holiday time and leave compensations to cover sickness, parental leave, bereavement or long-term illness in the family. We offer also highly competitive pension plans for our employees.

### Monitoring pay equity

It is paramount for us to treat our employees fairly with equal pay for equal job also reflecting capabilities and experiences. Our pay equity analysis has been run on a national level for Norway, on base payment paid for the month of October 2021. The salaries of part-time employees were scaled up to be comparable to those of full-time employees. In addition, CCEP created a mapping of similar jobs into position classes (PC), 16 of those used for Norway's jobs. The analysis included 543 employees, 403 men (74%) and 140 women (26%).

The unadjusted pay gap is 8.3% in favor of women. This measures the difference between the average pay for men and the average pay for women. The adjusted pay gap is 1.9% in favor of men. The adjusted gender pay gap is the average difference in pay between men and women, measured after controlling for the determinants of pay. In this analysis, the effects of business function, position class, working location, contract type, secondment status, and the years the employee has been with the organization and the years in their current role have been accounted for. After considering these factors, women are paid an average of 1.9% less than men with a similar profile that performs similar work. More male employees have far longer experience executing the role than rather recently hired female employees. Male employees are on average also older than female employees within the same type of role. Age and more years employed, and hence more years of salary evolution seems to be root cause of the minor pay gap of 1,9%.

From approximately 550 employees, approx. 160 are part of a local bargaining agreement with local unions. For those jobs the salary is clearly defined.

The other employees are subject to an annual compensation cycle. Through annual compensation cycle we negotiate revised salary level with unions. Particular assessments with diversity and gender lenses on are done to highlight any potential pay gaps to close. Relevant exceptional salary adjustments are executed. Likewise, when concluding on compensations at the back end of any recruitment process, we execute objective salary analysis vs relevant other positions holders in the same role to make needed salary adjustments reflecting equal pay vs equal job, but also including particular personal capabilities, education vs position requirements, experiences and premium skills vs market conditions. It is a continuous focus to avoid any pay gaps.



## HOW WE INCLUDE HUMAN RIGHTS IN OUR SOURCING PROCESS



It is a requirement of all bottlers within the Coca-Cola system to follow the Supplier Guiding Principles (“SGPs”) and Principles for Sustainable Agriculture (“PSA”). TCCC commissions independent audits to monitor how our ingredients and primary packaging suppliers comply with SGPs. PSA compliance is verified through adherence to global third-party sustainable agriculture standards approved by TCCC. These sourcing guidelines set out the minimum requirements we expect of our suppliers in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity and set out our expectations of suppliers in relation to human rights.

The SGPs, and PSA expressly prohibit the use of all forms of child labour and forced labour – including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The PSA also now specifically prohibit retention of personal identity documents, recruitment fees or excessive loan terms. Additionally, all children under 15 living on farms must have access to schooling.

During 2022 we have been aligning our differing regional approaches to one unique Responsible Sourcing Policy (RSP) for suppliers, including human rights. This policy underpinned by the TCCC standards has been communicated to our strategic suppliers and the document is now publicly available on our [corporate Webpage](#). We also measure supplier’s compliance against it.

During 2022 we continued to review and develop our responsible sourcing processes to improve visibility of human risk in our supplier’s supply chains. With the help of Ecovadis IQ we have started mapping out our total supply chain for Norway and so far, all partners supplying Norway have a medium risk profile. Additional tools like Resilinc or Freedom are under development to support live tracking of any human rights risks with our suppliers.

## OUR SUPPLIERS

Our suppliers are critical partners for our business. We believe collaboration and innovation throughout our supply chain are essential in advancing our sustainable growth. In Europe, we source products from around 13,200 suppliers and 83% of our spend (excluding concentrate and syrup purchased from The Coca-Cola Company (“TCCC”) and other franchisors) is with suppliers in our territories.

Our suppliers have a key role in CCEP’s continued effort to support human rights and irrespective of size, all our suppliers are expected to operate in accordance with CCEP’s policies and guidelines which includes our expectations on respecting human rights.

At CCEP we seek to create genuine, shared value with our supplier partners built on collaboration and innovation whilst putting sustainability at the heart of everything we do. We recognise the important role our suppliers have in managing the sustainability of our supply chains. We source products from over 17,000 suppliers, and spent approximately €7.4 billion with them in 2022. On average in 2022, 85% of supplier spend was with suppliers based in our countries of operation in Europe and API. For Norway we source products from over 853 suppliers, and spent approximately €118 million with them in 2022. On average in 2022, 65,18% of supplier spend for Norway was with suppliers based in Norway.

Our key supply categories include commodities and services such as ingredients, packaging, energy, capital equipment, building and facilities, fleet and logistics, sales and marketing, IT, telecoms, general administration and professional services.



How we source is critically important to CCEP and we are committed to sustainably sourcing our ingredients, raw materials and packaging. Our largest spend category is concentrates and syrups which are supplied by our brand partners and other third parties with the entire requirement of our concentrates and syrups for Coca-Cola trademark beverages sourced from TCCC. Many of the purchases of our priority agricultural ingredients and primary packaging, such as sugar and juices, aluminum cans, glass bottles, PET resin, closures and secondary packaging are made together with TCCC and other Coca-Cola bottlers and as a result, we address together as a joint Coca-Cola system many of the issues that we face in our supply chain, including that of human rights.

Currently ~80% of CCEP's packaging requirements are manufactured within CCEP territories with approximately ~40% of inputs sourced overseas from countries including the US, Vietnam, Taiwan, Thailand, Korea and China. During 2022, we experienced significant supply challenges across many categories, both domestically and sourced from overseas. We recognize it is a joint effort, with our suppliers having a key role, to ensure CCEP's continued effort to respect human rights. We sought to address these challenges across the year, without compromising on our values – ensuring that all goods and services were evaluated and approved in line with CCEP's policies and guidelines.

Agricultural categories continue to present a key human rights risk to CCEP. Of our two largest categories, sugar and juice, 98% of CCEP's sugar is sourced via globally recognized accreditation schemes, these include Bonsucro, FSA and BMP Smartcane and in 2022 we increased our juices to close to 100% that are sourced under the TCCC Preferred Supplier Agreement (PSA).



## SUPPLY CONTRACTS

CCEP’s standard supply contracts impose specific human rights obligations on suppliers, including:

- compliance with anti-bribery and modern slavery laws:
- compliance with legislation including all Human rights conventions applicable in the territories where supplier deploys activities and, supplier commits to require from its suppliers and subcontractors to do the same.
- an obligation to put in place all necessary processes, procedures, investigations and compliance systems to ensure compliance with human rights laws.

Our RSP processes enable CCEP to evaluate supplier compliance with their contractual commitments. Where we find evidence of human rights issues or have cause for concern, we take action to remediate with our supply partner. Where a supplier fails to respond to take appropriate action to address issues identified, it may result in supply suspension or termination.

## SUPPLIER ASSESSMENT

CCEP validates suppliers’ approach to Human Rights and Modern slavery at various step through the supplier lifecycle:

- Supplier on-boarding and contract negotiation via our Seven Step Sourcing Process (7SSP)
- Supplier assessment via Ecovadis scorecard and assessment
- Supplier Coca-Cola Company audits
- Supplier Proactive monitoring using digital tools

Where concerns are identified we work with the supplier to agree on a course of corrective action, and we assess the effectiveness of this by undertaking a follow up audit to assess compliance.

CCEP operates a robust Seven Step Sourcing Process (7SSP) which incorporates assessments of current and potential suppliers to various standards and policies including Human Rights and Modern Slavery. All CCEP contracts and Purchase Orders include appropriate supplier commitments to all areas of compliance.

Where concerns are identified we work with the supplier to agree on a course of corrective action, and we assess the effectiveness of this by undertaking a follow-up audit to assess compliance.



## Supplier assessment via EcoVadis

We have also undertaken our own assessment by EcoVadis and have been proudly awarded platinum status which means we are in the top [1%] of compliant companies.



In 2022, CCEP remained focused on our partnership with EcoVadis, an independent evaluation company to rate the sustainability performance of our suppliers, including environment, carbon management, human rights and fair business practices. During 2022 we commenced a process to merge our supply bases across Europe and API onto a common platform to increase visibility across CCEP, this is expected to be completed during 2023. We have built the expectation of suppliers to achieve a minimum score of 50 into our responsible sourcing guidelines with the ambition to get to an average score of 65. By the end of 2022, 80% of our strategic suppliers in Europe and 62% of our strategic suppliers in API have undertaken an assessment via the EcoVadis platform and are sharing an updated scorecard with us, and work is ongoing to increase the coverage of suppliers assessed.



## **COCA-COLA STANDARDS AND THIRD PARTY RISK ASSESSMENT OF HUMAN RIGHTS FRAMEWORK**

We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the SGPs. Together with TCCC, we routinely verify and assess suppliers' compliance with our SGPs by using independent third parties. As part of the Coca-Cola system, we have relied on independent audits commissioned by TCCC to monitor supplier compliance with our SGPs. These audits include checks to ensure suppliers are not using child labour, forced labour, or any form of modern slavery.

To date, the audits have covered over 99% of our suppliers of ingredients and primary packaging. These audits generally include confidential interviews with employees and on-site contract workers. TCCC guidelines require auditors to select employees from different duties within the facility, including those of different genders, ethnic or religious backgrounds, employees who are pregnant, union representatives if available, and contingent workers. For more information on the audit guidelines of TCCC, please see its Human Rights Report.

TCCC is a member of the AIM-PROGRESS forum, a global forum promoting responsible sourcing practices and the harmonization of supplier audits as a way of reducing duplication and costs for suppliers. The SGPs have been benchmarked against other members' protocols and are recognized by AIM-PROGRESS members through a framework called Mutual Recognition. If a supplier fails to uphold any aspect of the SGP requirements the supplier is expected to implement corrective actions. TCCC reserves the right to conduct unannounced audits at their discretion and to terminate an agreement with any supplier that cannot demonstrate that it is upholding the SGP requirements.

In 2021, on behalf of CCEP, TCCC conducted SGP audits of 297 sites of different suppliers of CCEP in Europe and 13 sites in API. 279 sites have been fully compliant with the SGP requirements in Europe and 10 are fully compliant in API. In respect of those supplier sites which have not fully met the expectations, CCEP is working with the supplier to agree an action plan and follow up audits will be arranged.

### **TCCC Audits**

Of the CCEP supplier sites applicable for audit under the SGP framework 92% were compliant to SGP requirements. Of the sites requiring corrective action, CCEP have worked with the suppliers to understand the issues identified and agreed corrective action with each supplier. CCEP will continue to work closely with these suppliers to ensure the required changes identified are implemented.

# PROACTIVE RISK ASSESSMENT AND SUPPLIER MONITORING USING DIGITAL TOOLS



**Ecovadis IQ** – CCEP utilises an additional Ecovadis module, Ecovadis IQ, to monitor all our suppliers for adverse media.



**Resilinc** – During 2022 we developed our interaction with the Resilinc tool to map and monitor over 400 sub tier sites with AI scanning for over 100 risk types, some of which could indicate an elevated risk of modern slavery. This process included both tier 1 and tier 2 evaluations across multiple categories, suppliers and sites. Currently we have 48 key suppliers operating in 89 locations in Norway mapped and monitored. The focus has been on suppliers to our European operations in 2022 with plans to extend to API in 2023



**FRDM** – During 2022 we continued to develop the FRDM platform which specializes in the mapping, monitoring and risk assessment of suppliers and their supply chains from a modern slavery perspective. FRDM is a startup organization that uses publicly available shipping records to map suppliers' points of supply.

**Digitization of risk management** – CCEP continues to recognize the growing importance of technology in increasing the visibility of risk with our supply chains. Whilst no evidence of human rights breaches has been identified during 2022, we continued to work with our technology partners to increase supply chain visibility and supplement existing controls to proactively identify risks in our suppliers and their supply chains.

## PROVIDING ACCESS TO REMEDY

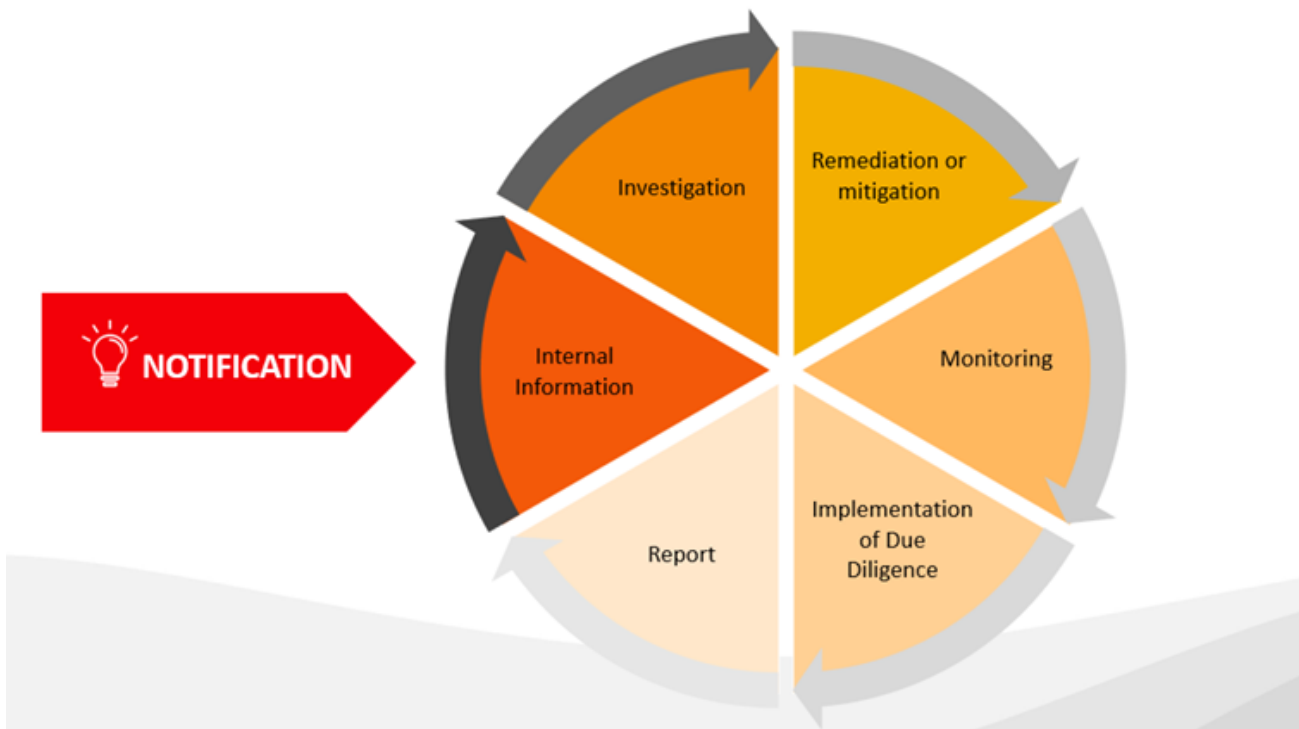
### REPORTING CONCERNS

Supporting the raising of concerns related to Human Rights is the CCEP Speak-Up Policy which is available to employees, former employees, customers, contractors, suppliers, joint ventures, friend/relative of employee or others. The Speak-Up Policy was updated and harmonized in 2022 and embedded within the 'Is it **Coke?**' company-wide communication Campaign. This Policy reinforces that CCEP provides a safe and confidential environment where concerns regarding misconduct, impropriety or wrongdoing may be raised without fear of retaliation or detrimental treatment.

Any employee who wishes to raise a concern about wrongdoing at CCEP is encouraged to seek advice from their line manager or speak up through the Speak Up Resources, which include internal and external channels. The 'is it **Coke?**' campaign encourages employees to think about If something doesn't feel right, to feel confident enough to stand up and speak up, just by asking a simple question: **is it OK?** The campaign set out the support available to all colleagues by driving awareness in standing up, seeking advice and speaking up. When any employee raises a concern through our Code specified channels in relation to the CoC, CCEP will act promptly and appropriately.

### OUR PROCESS FOR RESPONDING TO A BREACH OF HUMAN RIGHTS

The following procedure is in place, for implementation, if a breach of human rights is found in our own operations or in our value chain.





## 1. Notification

A potential breach of human rights can be raised through different channels including:

- Speak-up Channels set out in our CoC and in our Speak-Up Policy, enabling individuals to raise concerns anonymously if allowed under local law
- Assessment reports from desktop supplier audits provided by our external provider EcoVadis
- Results of audits of supplier and CCEP's sites and plants carried out by TCCC against SGPs
- Media

Each notification will be treated with the same level of seriousness, irrespective of how it was raised.

## 2. Internal Information

Once a human rights breach has been identified, internal stakeholders within the following functions will be informed: Employment Practices & Human Rights, Ethics & Compliance, Enterprise Risk Management, Legal and Public Affairs, Communications & Sustainability. Additional relevant internal or external stakeholders will be informed and involved in the process as appropriate.

## 3. Investigation

The Employment Practices & Human Rights team will start an investigation immediately with the relevant internal and external stakeholders to understand the nature and location of the case; the circumstances which led to the case; the number of impacted people; whether the case can be substantiated and the potential impact of the case.

## 4. Remediation or mitigation

In cooperation with the involved persons, suppliers or communities, a remediation or mitigation plan will be established and implemented.

## 5. Monitoring

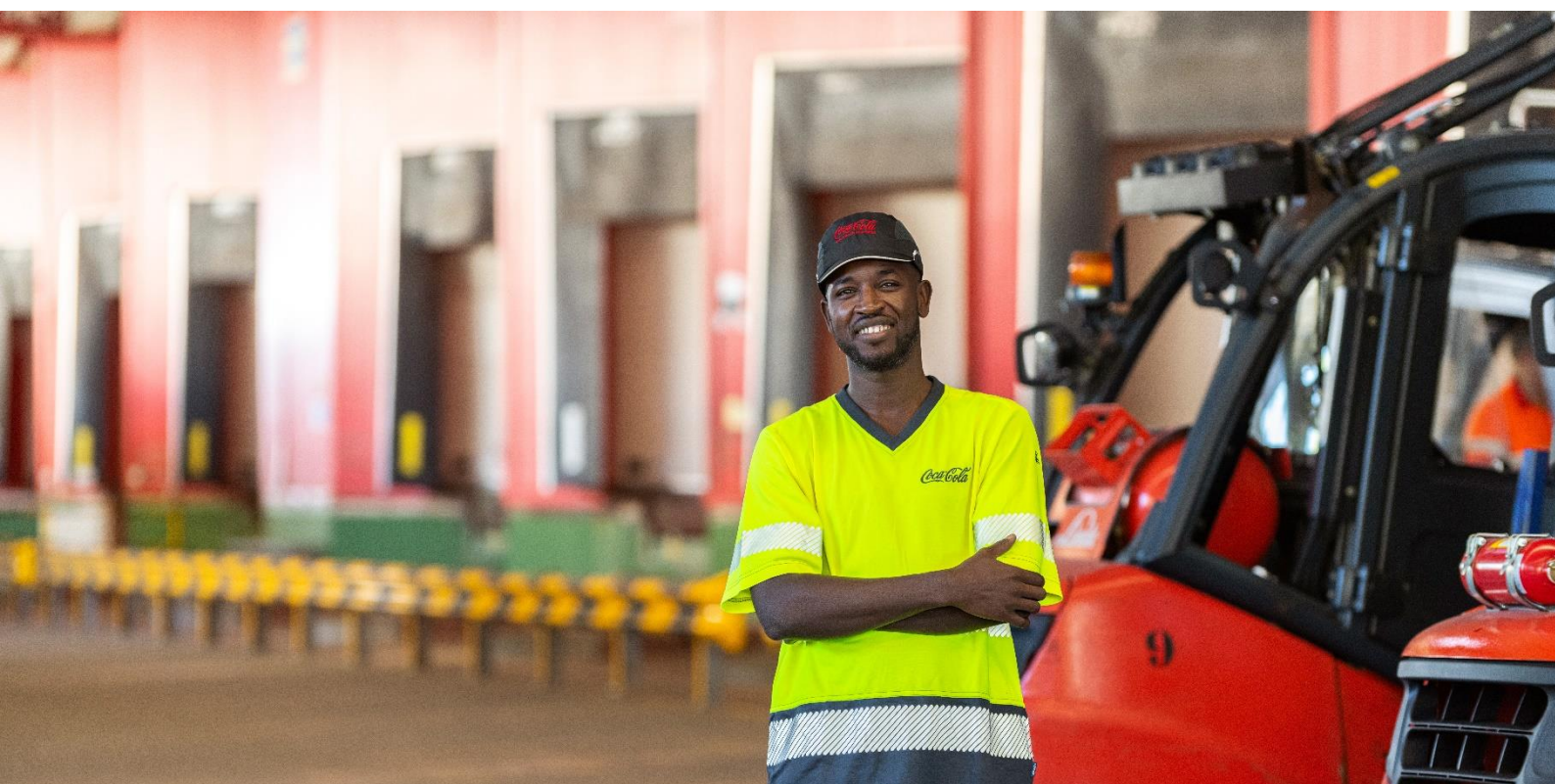
Depending on the nature of the case, the agreed remediation or mitigation can take some time. The remediation or mitigation plan is monitored on an ongoing basis to ensure it is implemented correctly.

## 6. Due Diligence

Single events can be an indication of a risk of further human rights violations. The due diligence process will be adjusted to prevent similar cases in the future when appropriate.

## 7. Report

Human rights cases will be included in CCEP's internal and external reporting where appropriate.



## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS



To ensure we continue to understand the effectiveness of our actions and grow our culture of continuous improvement, identification and remediation of human rights risks we measure our progress. CCEP assessed the effectiveness of its actions including:

### **1. CCEP policy framework in place**

Our policy management process includes an annual policy review, led by Employment Practices & Human Rights. In this annual review, policy owners are reviewing their policies and include changes according to new requirements out of legislations or caused by new or changed polices, which are connected. In 2022 we have further harmonized policies from Europe and API, which includes the review of policies related to human rights such as the Human Rights policy, the Speak up policy and the Inclusion & Diversity Policy.

### **2. Employee training on Human Rights Policy**

In 2022, we refreshed our human rights training for all employees in Europe and started the roll out in December 2022 on International Human Rights Day (IHRD). This was encompassed with an internal communication campaign to highlight the importance of human rights and policies, which ensure a fair and transparent treatment of our employees. We continue the roll out in 2023 to all European countries. As Procurement plays a crucial role in respecting human rights, we have provided additional human rights training to all procurement employees in Europe, which was recorded and shared with the procurement employees in API. This training included besides of general information to human rights insights to modern slavery and the root causes of this human rights issue like recruitment fees, the Kafala system or poverty.

### 3. Employee Survey

In 2021 we included two questions in the CCEP Inclusion, Diversity and Equity (ID&E) survey to assess the effectiveness and acceptance of our different Speak Up channels. The ID&E Survey was undertaken in all European CCEP countries and in Australia and New Zealand in the API region. The surveys took place across the CCEP territories between September 2021 to December 2021. The results have shown that the majority of our employees know how and where to report incidents of misconduct or inappropriate behavior and feel able to speak up without fear of reprisal.

We have set up a working group about fair, safe and harassment free workplaces to identify and take actions to build on the outcomes of this survey ensuring all employees feel safe to speak up.

### 4. Speak Up policy

The Speak Up Policy was harmonized and rolled out company-wide supported by the 'Is it Coke?' Communication Campaign. CCEP upholds a safe environment for employees to speak up in complete confidence, with no fear of retaliation about any concerns they may have, no matter how big or small they may seem.

In October 2022 CCEP launched the "is it Ok" campaign globally. The campaign focused on improving the confidence of employees to Stand Up in the moment when they see something that doesn't feel right, Seek Advice if they are unsure and to Speak Up via our internal or external resources to report an issue. In the 2 months post the launch CCEP experienced an increase in reporting in the Netherlands in Europe.

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**IS IT  
COKE?**

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## **5 Human rights risk assessments**

In 2022, two human rights risk assessments in Spain and Indonesia have been successful. The aim of these has been to understand (a) if the identified risks highlighted in prior assessment by both CCEP and API are still valid, (b) if any new risks are to be identified (c) if the actions taken or planned need to be reviewed (d) the opportunities to further align across all CCEP-

The same salient risks have been identified by our own internal risk assessments, and by an external consultant. Working with an external consultant has grown our capability through learning and confirmed the success and suitability of our own risk assessments by identifying the same salient risks.

In 2023, using the pattern of new legislation we plan to continue to conduct country specific risk assessments to identify new or existing risks to human rights as well as work to align a framework across all CCEP markets to support growth of a culture of continuous improvement.

## **6. Reporting and review by the Compliance and Risk Committee of the ELT and the ESG Committee of the Board**

CCEP Enterprise Risk Management owns the responsibility for CCEP's risk management framework including the risk taxonomy for Enterprise Risks. Human Rights is included in the Enterprise Risk "People and Wellbeing". The risks are shared and reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team and annually with our Board of Directors.

## **7. Dedicated online Human Rights and Grievance mechanism page**

In 2023 we have been successful in establishing a dedicated human rights page on the CCEPN webpage. In addition, we have established a dedicated page to our grievance mechanism. These pages use optimized search engine technology to ease accessibility. In 2023 we plan to expand these pages to become available across Europe. The purpose is to provide knowledge of our human rights agenda and to ease accessibility to our Speak Up channels.

## FUTURE FOCUSED

We commit to continually improving our identification and management of human rights risks across all our operations, to evaluate risk by spend and category and continue to deep dive into higher risk supply throughout our supply chain.

We use the experiences from Coca-Cola European Partners and Coca-Cola Amatil to drive our actions, as Coca-Cola Europacific Partners, on human rights and modern slavery in a holistic way. To deliver a holistic strategy and approach this will require an:

- understanding of the different situations across the countries we are operating in; and
- identification of best practices.

On top of that, in 2022, we have established best practice exchanges within the Coca-Cola system including TCCC and other bottlers like Coca-Cola Hellenic, Coca-Cola İçecek and Coca-Cola Bottlers Japan Inc. on a regular basis.

In 2023 we have been successful in establishing a dedicated human rights page on the CCEP Norwegian webpage. In addition we have established a dedicated page to our grievance mechanism. These pages use optimized search engine technology to ease accessibility. In 2023 we plan to expand these pages to become available across Europe. The purpose is to provide knowledge of our human rights agenda and to ease accessibility to our Speak Up channels.

We understand even though our business might be similar in the different countries, the countries we are operating in have their specific set of legislations, cultures and circumstances, which may lead to different salient human rights issues. Following this insight, we are moving to country specific or specific situation based human rights risk assessments as our future approach.

For more information on CCEP's management of human rights within our business and our supply chains visit [cocacolaep.com](http://cocacolaep.com) and refer to our 2022 Integrated Report and online sustainability pages.

