

Public process description for complaints

Complaints procedure according to the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG)

German Supply Chain Act - LkSG:

The law should

Define the responsibilities of companies in protecting human rights and how they can meet them in their supply chains;

Require companies to report on their efforts;

Strengthen the rights of workers in court and open up a way to assert claims for damages in Germany.

(Source: Federal Ministry for Economic Cooperation and Development)

01 INTRODUCTION:

Through the complaint procedure, CCEP wants to give those who suffer from a human rights violation in their own business area or due to the actions of a supplier along the entire supply chain of Coca-Cola Europacific Partners Germany GmbH (CCEP DE) or those who discover an environmental risk defined in the German Supply Chain Act at CCEP the opportunity to report the situation to CCEP.

CCEP uses this complaint procedure, on the one hand side, as an early warning system, through which problems can be identified as early as possible and, at best, solved before people or the environment are actually harmed. CCEP therefore encourages everyone to provide information as early as possible on human rights or environmental risks or inadequate prevention and remedial measures.

On the other hand side, in the context of the complaint procedure, CCEP will have access to appropriate remediation and get the opportunity of taking preventive measures.



02 WHO CAN USE THE COMPLAINT PROCEDURE?

CCEP DE offers this complaint procedure to all potentially affected parties. These can be CCEP's own employees, employees with direct or indirect suppliers or residents around the company locations. Persons who are not directly affected by risks or breaches must also be able to submit information on risks and possible breaches of duty through the complaint procedure. This can also be done on behalf of directly affected persons. Of course, CCEP DE makes these options available via its external Speak Up channels.

03 HOW CAN I ALERT CCEP TO (POTENTIAL) VIOLATIONS OF THE SUPPLY CHAIN ACT?

If you believe that our Code of Conduct has been breached or you have concerns about suspected, actual or potential violations of the law – in this context with special focus on the German Supply Chain Act - our Code of Conduct, CCEP Policies, or other unacceptable conduct (referred to as "potential violations"), CCEP encourages you to report the matter.

As far as the general conditions permit, contact us either via our internal Speak Up resources and/or our **dedicated and confidential external Speak Up channels**.



QUICK LINKS

Speak Up channel online (maybe connection fees are charged):

<https://ccepsspeakup.ethicspoint.com>



Speak Up channel for mobile devices (maybe connections fees from the mobile service provider for data transmission are charged):

<https://ccep.navexone.eu>



Phone reporting:

Germany 0800 1817963 (toll-free)

Our internal reporting options (our so-called "Speak Up resources" and our external Speak Up channels are specified in detail in the [Code of Conduct](#) on page 33 or can be found [here](#).

Our Speak Up channels are barrier-free. They are available 24 hours a day, 7 days a week and in multiple languages.

04 WHAT HAPPENS WHEN I REPORT?

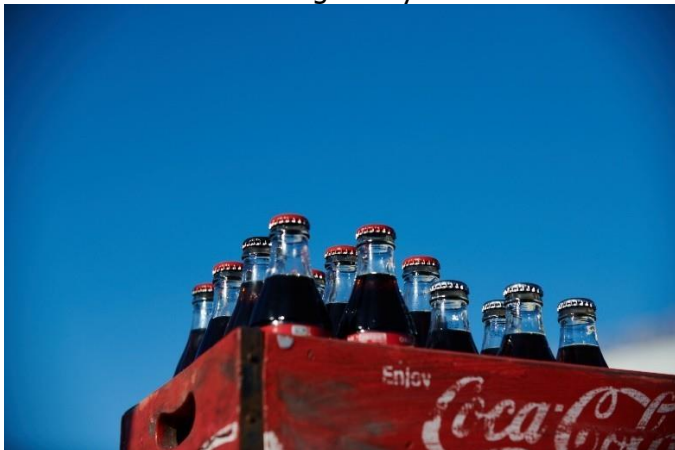
If you wish to report a human rights violation, please choose the principle of 'Protecting human rights' from our Code of Conduct. If you wish to report an environmental risk according to the German Supply Chain Act, please use the category 'Being a good corporate citizen and steward for environmental sustainability' from our Code of Conduct. If possible, please indicate that this is a complaint under the German Supply Chain Act.

CCEP DE first checks whether or not the complaint

the complaint falls within the scope of the complaint procedure within the framework of the German Supply Chain Act. In the event of a rejection, you, as a reporter, will receive a brief explanation for the rejection.



Regardless of via which reporting channel the report is received (internal Speak Up resources, telephone reporting, online reporting or reporting via mobile devices), you will receive a confirmation of receipt within 7 days at the latest. Cases received via Speak Up channels (online reporting, notification via mobile devices or telephone reporting) are initially transferred to selected functions of the international Code of Conduct Committee at Group level – composed of VP Internal Audit, Chief Compliance Officer, Director Ethics & Compliance – forwarded and handed over to the responsible function at CCEP DE within 48 hours using the system.



When you submit your complaint via the telephone reporting, you will receive a report key (numeric code) that allows you to receive new messages about your complaint or provide further information later on via the hotline. Without this report key, access to the complaint is impossible. Therefore, CCEP DE strongly recommends that the contact details and report key be kept in a safe place. If you raised your complaint via online

reporting or via mobile devices, you set a personal password and receive a report key (numeric code) that allows you to receive new messages about your complaint or provide further information later on via the website or via mobile device.

Without this report key and personal password, it is impossible to access the complaint. Therefore, CCEP DE strongly recommends that the contact details and report key be kept in a safe place.



Upon receipt of your complaint, CCEP DE will review your report as soon as possible. Responsibilities and processing steps are defined internally. If necessary, the matter must be discussed with you as the reporter. You will - provided that there is no differing interest in confidentiality – be informed about the progress of the investigation and of case-related deadlines. If the matter is not considered to be true, you will receive a justification. If applicable and necessary, a remediation proposal will be drawn up, and you may be involved in the preparation of the remediation. After the case is closed, you will receive final information on the assessment of the validity of the complaint and the reasons for the decision.

CCEP DE is committed to consistently implementing and tracking the remediation measures. The result obtained will be checked, if necessary together with the reporter. The effectiveness of the complaint procedure will be reviewed annually or on an occasion-by-event basis. If necessary, adjustments will be made to the procedure or to the remediation measures taken.

This means that no one can take disciplinary action against another individual for seeking guidance or raising a genuine concern.

CCEP will take all reasonable precautions to maintain the confidentiality of your report and to protect your identity. It is also committed to take all reasonable measures to prevent any retaliation against any person reporting concerns. To help maintain the confidentiality of investigations, you should avoid discussing them with others.



05 WHO IS RESPONSIBLE FOR COMPLAINTS UNDER THE GERMAN SUPPLY CHAIN ACT AT CCEP DE?

The employee practices department within our People & Culture (Human Resources) function is responsible for (potential) human rights violations.

The department responsible for (potential) environmental risks is QESH - Quality, Environmental, Safety and Health.

You do not need to name any responsible persons in your complaint. All you have to do is to submit your complaint and CCEP DE takes care of the correct assignment and further processing internally.

CCEP DE guarantees that your complaint will be processed impartially.

06 AM I PROTECTED FROM RETALIATION OR PUNISHMENT DUE TO A COMPLAINT?

When you raise a genuine concern, you should not fear negative consequences. CCEP does not tolerate any form of retaliation, including the threat or attempt of retaliation, against any reporting person or other connected persons for making a report or cooperating in investigations.



CCEP expects you to make your report in good faith. That means that at the time of reporting you have reasonable grounds to believe that the information indicating any potential violations is true. CCEP on its part is committed to treat your report seriously and take all reasonable actions to address it adequately.

07 WHICH SYSTEM DOES CCEP USE?

The electronic case management system 'Ethics Point Incident Manager' (EPIM) is used to report potential cases or concerns about possible violations of the Code of Conduct, policies or the law – i.e. also violations of the German Supply Chain Act – as a supplement to other internal reporting options (our so-called 'internal Speak Up resources').



EPIM is an internet- and telephone-based reporting and case management system, through which employees, customers, suppliers and business partners of CCEP DE can report potential cases or concerns regarding possible violations of the Code of Conduct, policies or the law.

The EPIM case management system consists of four components, the so-called Speak Up website (online reporting) and the Speak Up Hotline (telephone reporting), an application for mobile devices and the case management system itself.

EPIM is a system for order data processing offered by the service provider GCS Compliance Services Europe Limited, headquartered in the United Kingdom (100% subsidiary of Navex Global, headquartered in the USA). Data processing by GCS is carried out on the basis of a GDPR-compliant order data processing agreement with CCEP.

The application is web-based and designed as a software-as-a-service (SaaS) solution. The solution is based on the 3-layer architecture with

- Web servers,
- Application servers and
- Database servers.

Hosting and data storage is carried out on servers within the EU.

The web structure is the basis for processing all web-based requests and controls the application's display function.

The application structure is the basis for business logic and data queries. The database structure contains all data/information.

Each structure has redundant structures to ensure seamless continuity in the active session in the event of server failures or outages and to prevent data loss.

Each segment is protected by firewalls and intrusion prevention (IPS) systems. All firewalls have both an input and output data filter.

In addition, all queries and data requests are protected by user login and password.

All reported concerns and (potential) violations are recorded, processed, documented, closed and archived in the system, as well as used for evaluations and internal and external reporting and data analysis. Only personal data that is strictly necessary for the specific purposes will be processed.



Retention and deletion periods, which result from the applicable legal regulations and/or internal regulations for the respective area, apply.

The personal data provided shall be accessible to the investigating functions for the processing and investigation of the report as long as necessary to close the case, impose sanctions and comply with legal or financial requirements. If legal proceedings are initiated, the processing of personal data for this purpose is permitted until such proceedings are finally concluded.

08 HOW IS MY (PERSONAL) DATA PROTECTED?

CCEP protects your data in accordance with legal requirements. For more details, please see CCEP's Privacy Notice [here](#).