

Code of Business Conduct

Our [Code of Conduct \(CoC\)](#) ensures that we act with integrity and accountability in all of 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. We also expect all third parties who work on our behalf to act in an ethical manner consistent with our CoC.

In 2017, our Board of Directors approved a new CCEP Code of Conduct (CoC). The CoC covers items including share dealing, anti-bribery, data protection, environmental regulation and managing gifts and entertainment. It aligns with the [UN Global Compact](#), the [US Foreign Corrupt Practices Act](#), the [UK Bribery Act](#), the 2016 and 2018 [UKCGCs](#), The [EU General Data Protection Regulation](#), the [Spanish](#) and [Portuguese](#) Criminal Codes and [Sapin II](#).

As of 31 December 2018, the new Code of Conduct (CoC) has been formally adopted in all the territories in which we operate, as well as our shared-service centre in Bulgaria. All employees are required to do CoC training, and it is part of the induction process for new employees. Training on topics related to specific roles is also provided where required. All people managers receive a CoC guide that addresses their responsibilities. This includes a matrix to help with decision making and guidance on situations such as bullying and harassment.

We received no fines for CoC breaches in 2018. Breaches of the CoC, by type, can be found in our [2018 Integrated Report](#).

Preventing bribery and corruption

All forms of bribery and corruption in both public and private sector are forbidden. Our CoC sets out our principles and standards to prevent bribery and corruption, and to avoid conflicts of interest. It also provides guidance on the exchange of gifts and entertainment.

Code of Conduct Committee

Investigations into potential breaches of our CoC are overseen in each business unit by local CoC Committee, chaired by the business unit's Vice President, Legal. All (potential) CoC breaches and corrective actions are overseen by the Group CoC Committee, which is a subcommittee of the Group Compliance and Risk Committee and is chaired by the Chief Compliance Officer. The Group CoC Committee also:

- Ensures that all reported cases have been recorded, investigated and a conclusion reached
- Evaluates trends
- Ensures consistent application of the CoC across CCEP

As required under the Spanish Criminal Code, the Iberia business unit has an Ethics Committee formed of members of the Iberia business unit leadership team. It is responsible for any ethics and compliance activities, including overseeing the local crime prevention model. It reports to the Iberia business unit leadership team and the Chief Compliance Officer.

