

CODE OF CONDUCT

Our [Code of Conduct](#) (CoC) seeks to ensure 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 and comply with our [Supplier Guiding Principles](#) (SGPs).

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](#).

The CoC has been formally adopted in all the territories in which we operate, as well as our shared-service centres in Bulgaria. All employees are required to undergo CoC training, and it is part of the induction process for new employees. Training on topics related to specific roles is also provided where needed. 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.

Raising concerns

Any employee who wishes to raise concerns about wrongdoing at CCEP can do so in a number of different ways, including contacting a line manager or through our dedicated [Speak Up](#) channels. When any employee voices concerns in relation to the CoC, CCEP will promptly and appropriately conduct an investigation.

We received no fines for CoC breaches in 2020. Breaches of the CoC, by type, can be found in our [2020 Integrated Report](#) (page 43).

Preventing bribery and corruption

We aim to prevent all forms of bribery and corruption in our business dealings. Our CoC sets out our principles and standards to prevent bribery and corruption, including conflicts of interest and the exchange of gifts and entertainment.

In 2019, we launched our [Anti-bribery, Gifts and Entertainment Policy](#) and our [Conflicts of Interest Policy](#), applicable to all employees, following consultation with works councils in each of the countries in which we operate. Both policies are accompanied by a mandatory training for a targeted audience.

Code of Conduct committee

Management has also established a compliance and risk committee, which advises the ethics and compliance (E&C) function and provides management input regarding the E&C programme. Our E&C programme ensures we are conducting our operations in a lawful and ethical manner. The programme is applicable to our people, officers and Directors. It also supports how we work with our customers, suppliers and third parties.

Investigations into (potential and actual) breaches of our CoC are overseen in each business unit by the local CoC committee, chaired by the business unit's Vice President, Legal. All (potential and actual) 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 also has an ethics committee formed of members of the Iberia business unit leadership team. The IB BU ethics committee have autonomous authority for initiative and oversight of the local crime prevention model, including the BU CoC committee. It reports to the Iberia business unit boards of directors and the Chief Compliance Officer.