# KnowTheChain 2023 Food & Beverage Benchmark

# **Additional Disclosure**

Company Name: Coca-Cola Europacific Partners

Date:

# Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note <u>KnowTheChain has already undertaken a review of your website</u>. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

# INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

See our 2022 Integrated Report page 50 https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

In 2022, we launched our Responsible Sourcing Policy (RSP), which sets out mandatory guidelines for all our suppliers<sup>(A)</sup>. Supplier Guiding Principles and and Principles for Sustainabile Agriculture are incorporated into this policy. RSP is incorporated into all new contracts, and are part of our standard conditions of purchase.

(A) Responsible Sourcing Policy covers the mandatory guidelines that suppliers directly or indirectly (such as sub-contractors) must comply with to be able to do business with CCEP

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Link to our Responsible Sourcing Policy (RSP) https://www.cocacolaep.com/assets/Sustainability/Documents/2021/CCEP-Responsible-Sourcing-Policy-July-2022.pdf

This policy is a set of mandatory guidelines that all our suppliers directly or indirectly (such as subcontractors) must comply with to be able to do business with CCEP. While our desire is to work only with suppliers that adhere to our mandatory guidelines, we want to go beyond and show preference to suppliers that exceed them and move towards best practices.

We expect our suppliers to support this policy and to work towards compliance by ensuring the suppliers' organisations and their employees have full knowledge of this policy and abide by its

requirements. We expect all our suppliers to engage with us in a journey of continuous improvement and to verify their responsible sourcing processes and practices in line with this policy.

SGPs: If the eight Core Conventions of the International Labor Organization establish higher standards than local law, the ILO standards need to be met by the supplier. These minimum requirements are a part of all agreements between Coca-Cola Europacific Partners and its direct and authorized suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the Supplier Guiding Principles.

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

# Link to our Responsible Sourcing Policy (RSP)

https://www.cocacolaep.com/assets/Sustainability/Documents/2021/CCEP-Responsible-Sourcing-Policy-July-2022.pdf

We expect our suppliers to ensure that their suppliers are compliant with obligations no less onerous than those of the supplier in this policy.

CCEP will use a range of due diligence and verification tools to ensure that suppliers are compliant with the principles laid out in this policy as follows; • inclusion of policy within Supplier Agreements (as required) and on Purchase Orders; • acknowledgement of the policy; • annual reviews of EcoVadis certification and scores; • adherence to TCCC 3rd party audits as required; • annual submissions of letters of attestation and/or certifications of compliance to PSA; and • 6 monthly review of compliance to carbon reduction commitments. • Ongoing External third party monitoring tools

# See our 2022 Integrated Report page 50 https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

We recognise that all our employees and supply partners have a role in identifying and mitigating human rights risks across our business. Employees and managers are empowered to recognise and address human rights risks and issues as they conduct their work and this extends to the arrangements we agree with workers and trade unions, membership of which we always foster. Our human rights training was refreshed in 2022 to focus on modern slavery for procurement managers

# INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

See our 2022 Integrated Report page 102

https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

The CEO and CFO inform the Board on key supplier relationships and payments. Supplier risk management is also a topic of discussion at the Board generally and as part of the annual Enterprise

Risk Management discussions. We have Supplier Guiding Principles considered at Board level setting out requirements of our suppliers, for example, in relation to human rights, health and safety, the environment and other matters

# See our 2022 Integrated Report page 64 https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

Day to day Enterprise Risk Management work is overseen by the Compliance and Risk Committee (CRC), a management committee chaired by the Chief Compliance Officer. Every quarter, the CRC invites risk owners to share updates on key risks and how they are being managed. In 2022, these included updates on: geopolitical risks and action plan updates, business continuity and resilience planning, CoC, safe culture and fair treatment, human rights and policy management, GDPR compliance, corporate security and corporate integrity programme, health and safety and wellbeing campaigns. We also share and discuss results of targeted risk exercises such as assessments, scenarios and simulations. The CRC reports to the Board Committees, such as the Audit Committee, at least five times per year.

Further details on the responsibility and management of human rights risks that sits throughout our organisation will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

# 2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

See our 2022 Integrated Report pages 50, 70 https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

Our human rights training was refreshed in 2022 to focus on modern slavery for procurement managers

We have set up a strong policy framework, regular training and supplier management to strengthen our human rights commitments, such as modern slavery

Further details on how we train our people on our human rights policy will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website https://www.cocacolaep.com/sustainability/download-centre/

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

See our 2022 Integrated Report page 102 https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

The ESG Committee updates the Board on whistleblowing arrangements, reports and investigations. During the year, as part of its terms of reference review, these matters and others such as health and safety became the remit of the ESG Committee with relevant matters still brought to the Audit Committee Further details will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

# INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

3.1 the names and addresses of first-tier suppliers;

We do not publicly disclose this information

3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

We do not publicly disclose this information

3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

We do not publicly disclose this information

#### INDICATOR 4: RISK ASSESSMENT

4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

Further details will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

4.2 details on forced labour risks identified in different tiers of its supply chains; and

We do not disclose this information

4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

We do not disclose this information

INDICATOR 5: DATA ON SUPPLY CHAIN RISKS

5.1 the percentage or number of supply chain workers who are women;

We do not disclose this information

5.2 the percentage or number of supply chain workers who are migrant workers' and

We do not disclose this information

5.3 the percentage or number of supply chain workers that are being paid a living wage.

We do not disclose this information

INDICATOR 6: PURCHASING PRACTICES

# 6.1 commits to responsible buying practices in its contracts with suppliers;

See our 2022 Integrated Report page 50

https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

Our Responsible Sourcing Policy is incorporated into all new contracts, and are part of our standard conditions of purchase

(A) Responsible Sourcing Policy covers the mandatory guidelines that suppliers directly or indirectly (such as sub-contractors) must comply with to be able to do business with CCEP

Further details will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

# We do not disclose this information

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.

# We do not disclose this information

# INDICATOR 7: RECRUITMENT-RELATED FEES

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitmentrelated fees should be borne not by the worker but by the employer ("Employer Pays Principle");

See our Principles for sustainable agriculture where we state that Retention of personal identity documents, recruitment fees or excessive loan terms are prohibited. www.cocacolaep.com/assets/Sustainability/Documents/Principles for Sustainable-<u>Agriculture PSA.pdf</u>

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

# We do not disclose this information

7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

See our 2022 Integrated Report page 51

https://www.cocacolaep.com/assets/Sustainability/Documents/2022/2022-CCEP-Integrated-Report.pdf

The 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 95% of our suppliers of ingredients and primary packaging. If a supplier fails to uphold any aspect of the SGPs, 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 SGPs requirements. PSA compliance is verified through adherence to a limited set of third party sustainable agriculture standards approved by TCCC.

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# INDICATOR 8: RESPONSIBLE RECRUITMENT

8.1 discloses information on the recruitment agencies used by its suppliers; and

We do not disclose this information

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).

We do not disclose this information

INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

# We do not this information

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

We do not this information

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

We do not this information

INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

10.1: We would welcome clarification on whether a) the Speak Up mechanism can be freely accessed online, b) whether the mechanism is available to workers in any tier of the Coca-Cola EP's supply chain, as well as their legiitimate representatives (if so - where can workers/representatives access the mechanism?)

See our code of conduct page 34 https://view.pagetiger.com/Code-of-Conduct-Policy/ENCCEPCoC2022-08-29.pdf

# **OUR EXTERNAL SPEAK UP CHANNELS**

In all our Business Units we have set up our external Speak Up Channels. They are hosted externally and provide an additional way where CCEP workers and everyone else connected to CCEP through a work-related context can ask questions and voice concerns confidentially and anonymously, where allowed by local law. The external Speak Up Resources are available 24 hours a day, 7 days a week and in multiple languages. The use of CCEP's external Speak Up Resources is not mandatory. Alternative ways exist for asking questions or raising concerns – our

internal Speak Up Resources. Work-related grievances can be raised with your line manager and/or a member of People & Culture.

To make an eligible disclosure and be protected by Whistleblower laws, regulations or policy applicable for your territory, please make sure to refer to your local Speak Up Policy for processes and options available to you.

# **EU BUSINESS UNITS**





With your mobile device, either scan the QR code or go to https://ccep.navexone.eu

For the phone line in your country, please dial one of the numbers below (ensuring you have an outside line).

COUNTRY	PHONE NUMBER	COUNTRY	PHONE NUMBER
Belgium	0800 76 055	Luxembourg	800 27 304
Bulgaria	0800 46 237	Netherlands	0800 0224702
France	0 800 99 07 57	Norway	800 62 499
Germany	0800 1817963	Portugal	800 180 780
Great Britain	0800 949 6483	Spain	900 999 448
Iceland	800 4304	Sweden	020 12 70 19

faircall@kpmg	.com.au
Telephone	
COUNTRY	HOTLINE NUMBER
Australia	1800 500 965
New Zealand	0800 100 526
Indonesia	0018 036 1547
Fiji	00685 800001
Papua New	
Guinea	180 2710
Samoa	N/A

API BUSINESS UNIT

Webform

all.kpmq.com

E-mail



Mail The FairCall Manager KPMG Forensic PO Box H67 Australia Square, NSW 1213

Our Internal Whistleblower Protection Officers - see <u>here</u>

Further details will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

# We do not disclose this information

10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.

We do not disclose this information

# INDICATOR 11: MONITORING

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

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11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

# We do not disclose this information

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities).

We do not disclose this information

# INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

See our code of conduct page 35 <u>https://view.pagetiger.com/Code-of-Conduct-Policy/ENCCEPCoC2022-08-29.pdf</u>

CCEP will take appropriate corrective or disciplinary action for violations of our Code, applicable laws, regulations and policies. All potential violations of our Code will be treated seriously, and this may include internal or external investigation, demotion, suspension, disciplinary action or even termination of your employment, a contract or any relationship you have with CCEP. All allegations of retaliation or victimisation will be fully investigated and may be grounds for disciplinary action. We may also be required to report the breach to local authorities or regulators which may also expose you to civil or criminal investigations or proceedings, fines and penalties.

Further details on internal information, investigation, remediation or mitigation, monitoring, due diligence and reporting will be disclosed in our 2022 Modern Slavery statement which will be published in May on our Corporate website <a href="https://www.cocacolaep.com/sustainability/download-centre/">https://www.cocacolaep.com/sustainability/download-centre/</a>

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers.

We do not disclose this information