

Supplier Guiding Principles

As an ethical business organization, Coca-Cola HBC AG and its subsidiaries (collectively, "Coca-Cola HBC" or the "Company") takes responsibility to ensure that its business operations do not contribute directly or indirectly to human rights abuses. We use our influence internally to ensure that our employees fully understand the company's commitment to human rights and their own rights and responsibilities.

Those who do business with us across the countries, in which we operate, know we are committed to managing our business with a consistent set of values that represent the highest standards of quality, integrity, transparency and excellence. We respect the unique customs and cultures in communities where we operate. In pursuing this policy, we seek to develop relationships with suppliers that share similar values and conduct business in an ethical manner. We strive to treat our suppliers in the same manner we expect to be treated.

As part of ongoing effort to develop and strengthen our relationships with suppliers, we have adopted these Supplier Guiding Principles for use with our direct suppliers. These Principles are based on the belief that good corporate citizenship is essential to our long-term business success and must be reflected in our relationships and actions in the marketplace, the workplace, the environment and the community.

We are pleased to work with suppliers to ensure an understanding of and compliance with the requirements set forth in our Supplier Guiding Principles.

Workplace Practices

At Coca-Cola HBC, we support fair employment practices consistent with our commitment to human rights in our workplace. We seek to:

1. Establish a strong and direct relationship with our employees through open and honest communications.
2. Treat our employees with fairness, dignity, and respect.
3. Abide by applicable local labour laws, including those that address working conditions including working hours, physical and mental demands of the workplace (i.e., mental health etc.), compensation, wages, benefits, discrimination, and third-party representation.
4. Value diversity in its broadest sense.
5. Hold each other accountable for performance at the highest levels.
6. Reward our employees commensurate with performance.
7. Provide opportunities for employees to develop personally and professionally.
8. Ensure, with our employees, the safety of the workplace.

We expect our suppliers to follow applicable laws, and similar standards and principles in the countries in which they operate.

Work Environment

We expect our suppliers to judge their employees and contractors based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no discrimination based on race, colour, gender, age, religion, political opinion, national origin or sexual orientation.

Health and Safety

We expect our suppliers to provide a safe workplace with policies and practices in place to minimise the risk of accidents, injury, and exposure to health risks.

Child Labour; Abuse of Labour

We expect our suppliers neither to employ anyone under the legal working age nor to condone physical or other unlawful abuse or harassment, in any of their operations.

Slavery, Forced Labour and Human Trafficking

We expect our suppliers not to hold any person in slavery or servitude and not to use forced, bonded or compulsory labour or engage in any form of human trafficking.

Wages and Benefits

We expect our suppliers to compensate their employees fairly and competitively relative to their industry, in full compliance with applicable local and national wage and hour laws, and to offer opportunities for employees to develop their skills and capabilities, and to follow the principle of equal remuneration for men and women workers for work of equal value

Third Parties

In the event their employees have lawfully chosen to be represented by third parties, we expect our suppliers to recognise such parties in good faith and not to retaliate against employees for their lawful participation in labour organisation activities.

Freedom of Association and Collective Bargaining

Subject to national and local laws, respect employees' right to join, form, or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

Environmental Practices

We expect our suppliers to conduct business in ways that protect and preserve the environment. At a minimum, we expect our suppliers to meet applicable environmental laws, rules and regulations in their operations in the countries in which they do business.

We prompt suppliers to actively work on the reduction of Greenhouse Gas Emissions and the purchase or production and use of energy from renewable sources (e.g., hydroelectric, wind, solar, geothermal, bioenergy) and to the efficient use of energy by reducing the waste/loss of energy or upgrading equipment with lower energy consumption.

Suppliers should operate in a manner that secures pollution prevention and actively embrace waste management practices as well as improve overall resource efficiency of their operations and products throughout the life cycle.

CCH Environmental Policy: <https://www.coca-colahellenic.com/en/about-us/corporate-governance/policies/environmental-policy>

Biodiversity, Deforestation, and Land Conservation

Where possible, suppliers shall avoid and, in any case, minimise impacts on biodiversity and deforestation, promote the natural habitats and employ practices for the management of soil to avoid loss of nutrients, erosion, and land pollution.

Suppliers shall seek opportunities for biodiversity conservation linked to their activity.

If a Supplier's production facilities are located in or in close proximity to the areas critical for conserving biodiversity and maintaining ecosystem functioning, the Supplier shall apply all reasonable efforts to avoid any damage to as well as to restore such biodiversity and ecosystems. For more information Suppliers should refer to the CCH Biodiversity Statement in our public web site:

CCH Biodiversity Statement: <https://www.coca-colahellenic.com/en/about-us/corporate-governance/policies/biodiversity-statement>

Conflicts of Interest

Coca-Cola HBC employees are expected to always select and deal with suppliers who are doing, or seeking to do, business with the Company in a completely straightforward, honest manner, based upon the merits of such persons or entity and their products and services and without any special considerations given back to them or their friends or families. Accordingly, employees should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of Coca-Cola HBC. For example, suppliers should not employ or otherwise make payments to any employee of Coca-Cola HBC during the course of any transaction between the supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but suppliers should take care that any personal relationship is not used to influence the Coca-Cola HBC employee's business judgment. If a supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or domestic partner) to an employee of Coca-Cola HBC, or if a supplier has any other relationship with an employee of Coca-Cola HBC that might represent a conflict of interest, the supplier should disclose this fact to Coca-Cola HBC.

Gifts, Meals and Entertainment

Employees of Coca-Cola HBC are prohibited from accepting anything more than normal business hospitality from suppliers that is reasonable and appropriate under the circumstances. Ordinary business meals and small tokens of appreciation generally are fine, but suppliers should not offer Coca-Cola HBC employees excessive or lavish gifts, meals or entertainment that may give the appearance of undue influence. Gifts of cash or cash equivalents, such as gift cards, are never allowed. Gifts and entertainment for suppliers must support the legitimate business interests of the Company and should be reasonable and appropriate under the circumstances. Our employees should always be sensitive to our suppliers' own rules on receiving gifts and entertainment.

Business and Financial Records

Both the supplier and Coca-Cola HBC must keep accurate records of all matters related to the supplier's business with Coca-Cola HBC. This includes the proper recording of all expenses and payments. If Coca-Cola HBC is being charged for a supplier employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Bribery and Corruption

Coca-Cola Hellenic applies a "zero tolerance" approach towards any form of bribery and corruption. Suppliers acting on behalf of Coca-Cola HBC must comply with all applicable anti-bribery and anti-corruption laws dealing with bribery of public officials or private parties. Suppliers must comply with Coca-Cola HBC's Code of Business Conduct and Anti-Bribery Policy, as these apply to third parties and are available at Coca-Cola Hellenic's website:

CCH Code of Business Conduct: <https://www.coca-colahellenic.com/en/about-us/corporate-governance/policies/code-of-business-conduct>

CCH Anti-Bribery Policy: <https://www.coca-colahellenic.com/en/about-us/corporate-governance/policies/anti-bribery-policy>.

In connection with any transaction as a supplier to Coca-Cola HBC, or that otherwise involves Coca-Cola HBC, the supplier must not transfer anything of value, directly or indirectly, to any Public Official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Coca-Cola HBC, or out of funds provided by Coca-Cola HBC. Suppliers must furnish a copy of this accounting to Coca-Cola HBC upon request. Prior to the engagement of third parties which may interact with Public Officials on its behalf, Coca-Cola HBC conducts an anti-bribery due diligence for such parties. Supplier shall promptly submit all data and information that may be requested by Coca-Cola HBC for the purposes of such anti-bribery due diligence.

Protecting proprietary information

In the context of its collaboration with Coca-Cola HBC, the Supplier is expected to ensure that nothing occurs that would lead to a breach on the Supplier's part of any confidentiality obligation that the Supplier has undertaken vis a vis a third party, or that would result in breach of any laws relating to misuse of any party's confidential information, know-how or intellectual property. Equally, any and all information provided to the Supplier by Coca-Cola HBC which is not in the public domain shall be deemed confidential and should only be used by the Supplier for its designated purpose, not to be disclosed to any third party.

Competition and Antitrust laws

Suppliers are expected to compete with integrity around the world, and to comply with all competition and antitrust laws which are applicable to their business and to their collaboration with Coca-Cola HBC, including by way of indication to refrain from engaging in any illegal activities that may restrict competition, and avoid any action that may directly or indirectly lead to unlawful collaboration among competitors, such as price fixing or bid-rigging.

Responsible Marketing

Our brands must be advertised and marketed responsibly, and our Suppliers, which are engaged to provide marketing and promotional services for our products, such as advertising and digital agencies, must be aware and understand the principles of the responsible marketing policies implemented by Coca-Cola HBC regarding our brands as well as brands that we bottle or distribute on behalf of other brand owners. Such Suppliers should also ensure that the personnel or third parties they engage in the provision of such services are also aware and comply with our responsible marketing policies.

Protecting Information and Personal Data

Suppliers should protect the confidential information of Coca-Cola HBC. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by Coca-Cola H. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received from Coca-Cola HBC. If a supplier believes it has been given access to Coca-Cola HBC's confidential information in error, the supplier should immediately notify its contact at the Company and refrain from further distribution of the information.

Similarly, a supplier should not share with anyone at Coca-Cola HBC information related to any other company if the supplier is under a contractual or legal obligation not to share the information.

Suppliers should comply with applicable Data Protection laws, including the EU General Data Protection Regulation ("GDPR").

Reporting Potential Misconduct

Suppliers who believe that an employee of Coca-Cola HBC, or anyone acting on behalf of Coca-Cola HBC, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. We would also encourage all our suppliers to freely raise any issues of compliance or ethics you come across in our company and feel confident that your concerns will be taken seriously and handled appropriately by Coca-Cola HBC. Concerns should be raised initially with employee's manager in Coca-Cola HBC or with Coca-Cola HBC Head of Legal Compliance at compliance@cchellenic.com, or you can use our Speak Up! line at www.coca-colahellenic.ethicspoint.com. Coca-Cola HBC will not tolerate a reprisal by any of our employees against suppliers for reporting a concern in good faith or assisting with an investigation.

International Sanctions

We expect our suppliers to comply with CCHBC Sanctions Policy and Recusal Policy available at Coca-Cola HBC’s website: <http://www.coca-colahellenic.com>, any applicable sanctions, embargoes, trade restrictions or similar or related requirements, administered and/or enforced by the US Department of State or US Department of the Treasury, and any applicable sanctions or restrictive measures imposed by the United Nations Security Council, the European Union, any European Union’s member state, Switzerland, the United Kingdom or any other governmental authority under whose jurisdiction Coca-Cola HBC the supplier or any affiliate there of operates.

Compliance with Applicable Laws and Standards

At a minimum, suppliers to Coca-Cola HBC will be required to meet the following standards with respect to their operations as a whole:

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| Laws and Regulations | Supplier will comply with all applicable laws, including applicable tax laws, rules, regulations and requirements in the manufacture and distribution of products and supplies and in providing services to Coca-Cola HBC |
| Child Labour | Supplier will not use child labour as defined by local law. |
| Slavery, Forced Labour and Human Trafficking | Supplier will not hold any person in slavery or servitude and will not use forced, bonded or compulsory labour or engage in any form of human trafficking. Supplier will not impose to workers any fees to secure their employment or placement, or to compensate any cost whatsoever Supplier incurred in the recruitment process. |
| Abuse of Labour | Supplier will not abuse labour, physically or otherwise. |
| Third Parties | Supplier will respect employees' rights to choose whether to be represented by third parties (freedom of association) and to bargain collectively in accordance with applicable laws (collective bargaining). Supplier will comply with all applicable local and national laws on freedom of association and collective bargaining. |
| Wages and Benefits | Wages and benefits will comply with applicable laws. |
| Working Hours & Overtime | Working conditions, including working hours and overtime, physical and mental demands will comply with applicable laws. |
| Health and Safety | Working conditions will comply with applicable laws. |
| Environment | Supplier will comply with applicable environmental laws. |
| Conflicts of Interest | Coca-Cola HBC employees and our suppliers should avoid situations where a conflict of interest may occur. |
| Business and Financial Records | Supplier will comply with all applicable laws concerning financial recordkeeping and reporting. |
| Bribery & Corruption | Supplier will comply with all applicable, anti-bribery and anti-corruption laws and will not use bribes or fraudulent practices. |
| Competition Laws | Supplier is expected to comply with all applicable competition and anti-trust laws which are relevant and apply to their business as well as to their collaboration with Coca-Cola HBC. |
| Protecting Information and Personal Data | Supplier will safeguard Coca-Cola Hellenic’s and other third-party non-public information disclosed to supplier. Supplier will comply with applicable Data Protection laws including EU GDPR. |
| Sanctions | Supplier will comply with applicable International Sanctions. |
| Biodiversity & Deforestation | Supplier shall comply with applicable law related to Biodiversity and the EU deforestation regulations. |

Demonstration of Compliance

Supplier must be able to demonstrate compliance with the Supplier Guiding Principles at the request and to the satisfaction of Coca-Cola HBC.

If the eight Core Convention of the International Labour Organisation establish higher standard than local law, the Supplier shall meet the ILO standards. These minimum requirements are part of all agreements between Coca-Cola Hellenic and its direct suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with these Supplier Guiding Principles. We collaborate with The Coca-Cola Company, which routinely utilize independent third parties to assess suppliers' compliance with the Supplier Guiding Principles; the assessments include confidential interviews with employees and on-site contract workers. If a supplier fails to uphold any aspect of the requirements of the Supplier Guiding Principles, the supplier is expected to implement corrective actions. Coca-Cola HBC reserves the right to terminate an agreement with any supplier that cannot demonstrate that they are upholding the requirements of these Supplier Guiding Principles.

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