

# Modern Slavery Statement

## 2023

**FURTHER**

**TOGETHER**

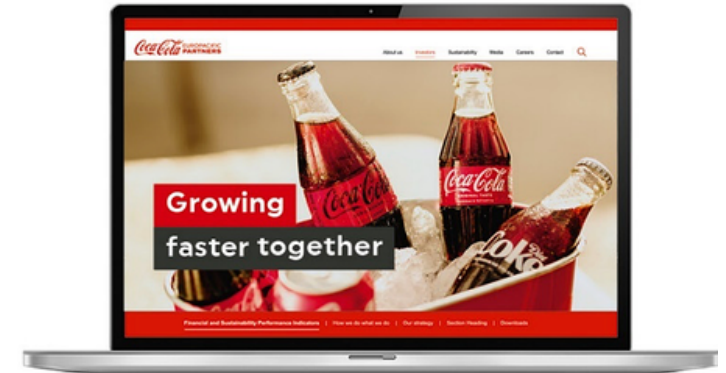
*Coca-Cola*  
EUROPACIFIC  
PARTNERS



We are Coca-Cola Europacific Partners, one of the world's leading consumer goods companies – making, moving and selling some of the world's most loved drinks to millions of consumers, customers and communities every day. Everything we do is built on three strategic pillars: **great brands, great people and great execution. Done sustainably.**

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### Revised Statement: 27.11.24

Reason for revision: The correction of a typographical error. The reference to "134" was incorrect and "13" is the correct figure. On page 32, CCEP noted that it has undertaken 134 Human Rights Investigations. The reference to 134 was a typographical error, the correct number is 13. This included four substantiated cases. 69% of the cases in 2023 were within the value chain. 46% of the cases are related to Logistics and Bottle sorting. This has now been rectified (27.11.2024).

# Message from **Véronique Vuillod, Chief People & Culture Officer**

The way we operate our business, day in, day out, starts with our clear purpose and commitments.

We exist to refresh Europe, Australia, the Pacific and Indonesia (API)\*, and make a difference. We want to deliver sustainable growth, create value for all our stakeholders and build a better future for our business, our communities and the planet.



This is why our sustainability action plan, This is Forward, is at the heart of our long-term business strategy and sets out our social and environmental commitments, where we know we can make a significant difference.

To us, human and workplace rights are inviolable and fundamental to our sustainability as a business. Everyone who works for and with Coca-Cola Europacific Partners plc (CCEP) deserves to be treated with dignity and respect. And as we continue to grow, this becomes ever more important.

Our approach is to identify current and evolving human rights risks, and to develop proactive measures to manage them before they occur. As part of this, we expect and support all 32,000 of our employees and all 16,000 of our supplier partners across our end-to-end value chain to share our commitments, and to recognise and address human rights risks and issues across our business.

We support the 10 principles of the United Nations (UN) Global Compact. We have a strong Human Rights Policy, which aligns with accepted international standards. We have a zero-tolerance approach to modern slavery of any kind, including forced labour, and any form of human trafficking within our operations, and by any company that directly supplies or provides services to our business.

Our commitments are strong, and we have made even more progress this year to act on them.

First, we did even more to build on the ways we support, develop and engage our employees to play their part. We reviewed our Human Rights Policy, amongst others, and made it accessible to everyone on the same platform, helping ensure equal treatment and access to important information. As required in Germany, we published our first Statement of Principles (“Grundsatzklärung”), building on our company-wide Human Rights Policy with specific details of the actions we have taken to address risks locally.

\*On 26th February 2024, Coca-Cola Europacific Partners plc acquired Coca-Cola Beverages Philippines Inc. (CCBPI) which has prompted the renaming of the Australia, Pacific and Indonesia (API) region to the Australia, Pacific and South East Asia (APS) region.

We also continued to deliver mandatory human rights training for all our employees, to develop their knowledge and capabilities to follow our commitments in their work. 79,5% in Europe and 80,15% in API have completed the training. And, for the second time, we invited employees to participate in our inclusion survey and give feedback on their inclusion experience. Over 13,000 employees took part, ranking “being treated with dignity and respect” as their most positive experience and scoring “feeling safe to speak up” eight points higher than previously.

We also ran our first online human rights quiz for all employees across CCEP, which was completed by approximately 850 employees, and showed a strong understanding of key human rights topics, and that the support we provide is effective.

Additionally, we made changes to further support the compliance of our supplier partners. All suppliers now go through the same evaluation to make sure they are compliant with our policies at the time they onboard with us. This includes our Responsible Sourcing Policy which is included in all new contracts and sets out the mandatory guidelines that our direct and indirect suppliers must comply with, and a supplier questionnaire on modern slavery, which we’ve extended in API.

We also introduced new technologies to help us identify and address modern slavery risks in our supply chain.

Finally, we carried out a human rights risk research project in each of our countries, which will help us to focus primarily where the highest risks have been identified. In Norway and Germany, we also carried out risk assessments following new legislation, which will help us develop proactive measures to manage risks locally and in Australia we undertook an internal Australian business unit risk assessment on the legal, regulatory and tax risk which included a deep dive into the human rights and modern slavery risks.

So, 2023 has been a strong year for progress. As we look to the future, we will continue to take firm action on our human rights commitments ●

**Véronique Vuillod**





# INTRODUCTION

**This is the fourth statement of CCEP under the Modern Slavery Act 2018 (Cth) and the seventh statement under the UK Modern Slavery Act.**

We consider human and workplace rights – as articulated in the UN’s Universal Declaration of Human Rights, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work – to be inviolable.

Respect for human rights is fundamental to the sustainability of CCEP and the communities in which we operate. We are committed to ensuring that all people are treated with dignity and respect wherever they work or live.

We support the 10 principles of the UN Global Compact and take a proactive approach to respecting these rights in our workplace, in our supply chain, and in the communities in which we operate. We strive to provide a safe and healthy workplace and comply with applicable health and safety laws, regulations and internal requirements.

We recognise the importance of our obligation to observe and promote internationally recognised human rights in the way we conduct our business. We acknowledge that the risk of modern slavery may exist throughout our operations and supply chains and our joint Modern Slavery Statement for Europe and API, sets out the steps we are taking to identify and manage those risks.

We have a zero-tolerance approach to modern slavery of any kind within our operations and supply chain and together with our brand partner The Coca-Cola Company (TCCC), we expressly prohibit any form of all forms of modern slavery and human trafficking within our system or by any company that supplies or provides services to our business.

TCCC manages the development and marketing aspects associated with Coca-Cola beverages. CCEP prepares, distributes and sells TCCC branded products such as Coca-Cola Zero Sugar, Coca-Cola Classic, Fanta and Sprite through its manufacturing and logistics network across our business territories in Europe and API

# Key areas of action in 2023

At CCEP we are committed to continually improving our operations, and those of our partners, by identifying, preventing and mitigating against modern slavery risks. This is a journey and each year we strive to make progress through continuing to enhance and implement the policies, frameworks and practices which underpin both, across every aspect of our business and supply chains.

Every employee and supply partner plays a role in making that a reality. We've come from a strong foundation across CCEP, underpinned by the framework of The Coca-Cola Company, which includes very strong standards to prevent modern slavery. In 2023, as CCEP continues its journey, we have sought to learn more about the potential risks of modern slavery that exist in our operations and critically within our supply chains.

## 1 Human rights risk research project

Identifying and addressing actual and potential human rights risks continues to be a priority for CCEP. In 2023, we conducted human rights research for all countries in which CCEP operates. This research included reviewing and assessing local laws and legislation in force that aim to protect people and human rights, including those related to the environment, together with media reports from each jurisdiction related to human rights. Our research will be used to inform and prioritise future country based human rights risk assessments, which will enable us to continue to address actual and potential human rights risks.

## 2 Responsible Sourcing Policy (RSP) Modern Slavery Questionnaire (MSQ)

We launched one aligned Responsible Sourcing Policy (RSP) across CCEP, which incorporates all of the existing supplier policies; Supplier Guiding Principles, and Principles of Sustainable Agriculture and included a new supplier questionnaire on Modern Slavery in Australia, the Pacific and Indonesia (API).

All new CCEP suppliers must go through an onboarding process, which includes an evaluation of their organisation and processes to ensure their compliance with CCEP policies. Since 2022, CCEP has been rolling out a MSQ to all new suppliers to all new suppliers in API, which aims to collect information about potential modern slavery risks in the supplier's organisation and/or practices. Whilst Australia implemented the MSQ in 2022, Indonesia implemented the process in mid-June 2023, with a local version that is translated into local language. In 2023, approximately 700 new suppliers were onboarded across API, of which approximately 600 were Australian suppliers.



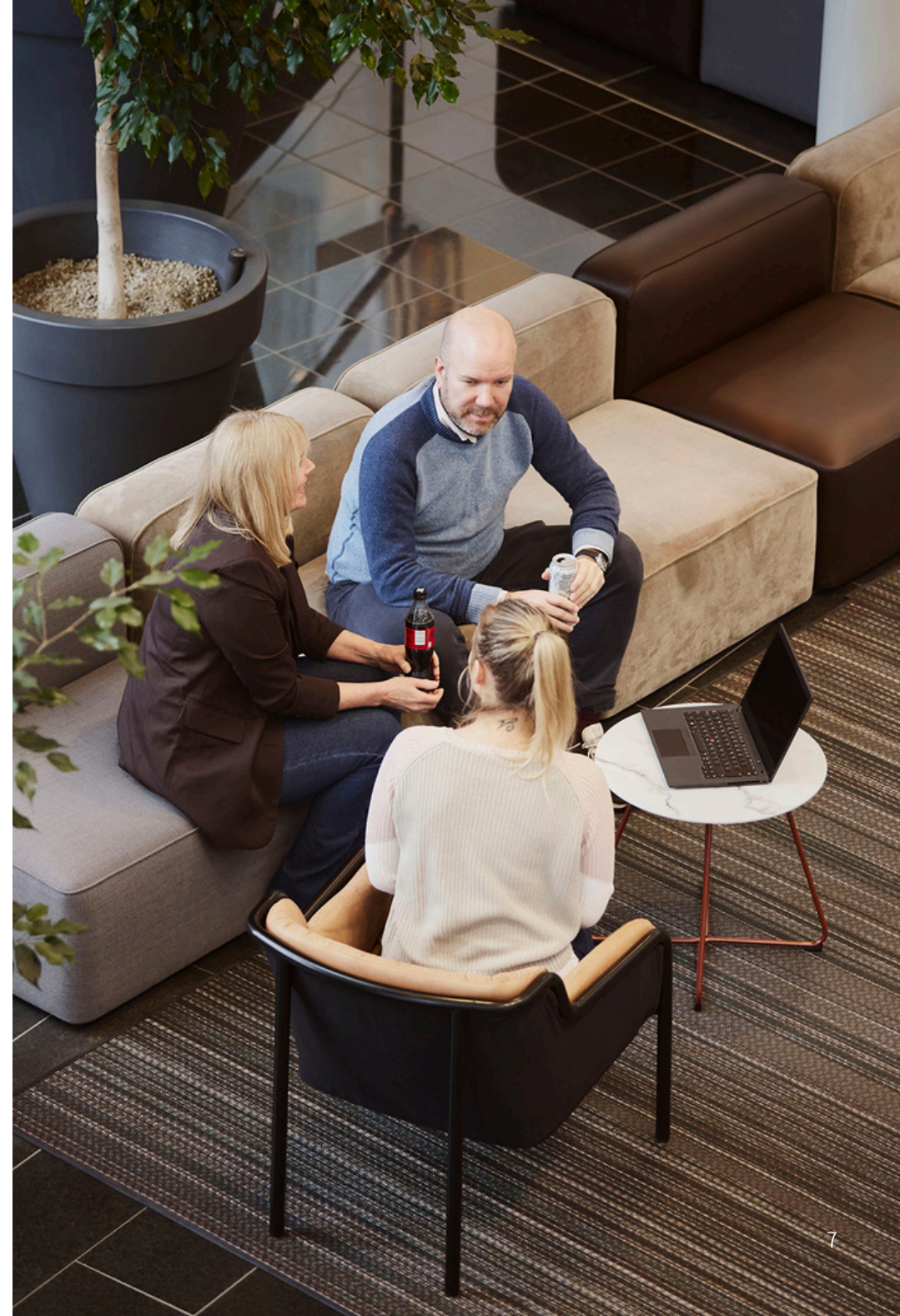


### 3 Published a webpage dedicated to human rights in Great Britain and Australia

CCEP published 10 new local external facing webpages dedicated to human rights, including our local Great Britain and Australian websites, to increase accessibility to information. These pages provide insights about human rights at CCEP and outline how CCEP works to protect human rights and prevent human rights breaches. In addition, our dedicated external Speak up channels are easily accessible from the pages and can be used to raise any concern, including those related to human rights, modern slavery or human trafficking. CCEP's Speak Up channels allow for the anonymous reporting of incidents or concerns, so employees, suppliers or other interested parties can feel safe and comfortable raising their concerns.

### 4 Expanding visibility of risks within the supply chain by using technology

In 2023, our Procurement function continued to broaden the coverage of the EcoVadis IQ platform. It is a supply chain and vendor screening solution focusing on ethical, social and environmental aspects. EcoVadis IQ covers the non-strategic suppliers within the CCEP network. This complements the existing EcoVadis platform which is used to management the risks for our strategic suppliers. Combining the Ecovadis core functionality with the monitoring functionality provided by the EcoVadis IQ platform across our entire supplier base significantly increases the supply chain and vendor screening capabilities within the ethical, social, and environmental dimensions for CCEP.



# Our structure, operations and supply chains

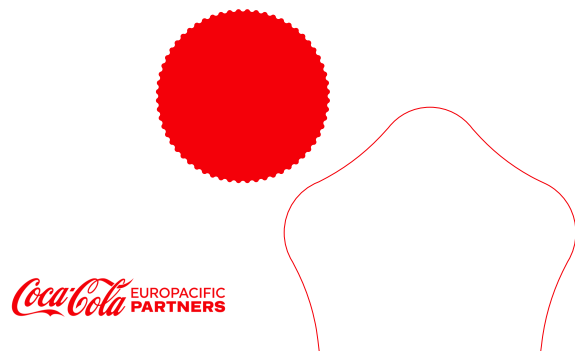
## Structure and operations

CCEP is the world's largest Coca-Cola bottler by revenue. We make, move and sell some of the world's most iconic brands – serving 600 million consumers and helping over two million customers across 31 countries. We combine the strength and scale of a large, multinational business with an expert, local knowledge of the customers we serve and communities we support. The company is currently listed on Euronext Amsterdam, the NASDAQ Global Select Market, London Stock Exchange and on the Spanish Stock Exchanges, trading under the symbol CCEP.

CCEP has operations across Andorra, Australia, Belgium, continental France, Fiji, Germany, Great Britain, Iceland, Indonesia, Luxembourg, Monaco, the Netherlands, New Zealand, Norway, Papua New Guinea, Portugal, Samoa, Spain and Sweden. We employ more than 32,000 people (10,000 API and 22,000 Europe) and support thousands more jobs in the communities in which we operate. Across our teams we work as one, united by a shared purpose and common values.

As a brand owner and partner to a range of iconic businesses, CCEP manufactures, packages, distributes and sells drinks including sparkling beverages, water, sports and energy drinks, fruit juices, iced tea, flavoured milk, coffee, beer, cider and spirits. We support the growth of our two million customers through the quality of the service we provide, our understanding of their businesses, the strength of our sales force and the value our products create.

Country	Employees	Production facilities
Belgium	2,096	3
Bulgaria	1,196	Working in shared service centre
Continental France	2,623	5
Germany	6,473	16
Great Britain	3,487	5
Iceland	166	2
Luxembourg	69	0
The Netherlands	803	1
Norway	568	1
Portugal	373	1
Spain	3,591	10
Sweden	725	1
Australia	3,652	14
Fiji	576	0
Indonesia	4,145	9
New Zealand and Pacific Islands	1,211	13
Papua New Guinea	561	2
Samoa	54	0





## Our supply chain

**At CCEP we seek to create genuine, shared value with our supplier partners built on collaboration and innovation whilst putting sustainability at the heart of everything we do. We recognise the importance of our suppliers in ensuring our supply chains are sustainable. We source products from over 16,000 suppliers and had a procurable spend of ~ €7 billion with them in 2023.**

In 2023, 84% of our supplier spend was with suppliers based in our countries of operation in Europe and API.

Our key supply categories include commodities and services such as ingredients, packaging, energy, capital equipment, buildings and facilities, fleet and logistics, sales and marketing, IT, telecoms, general administration and professional services.

How we source is critically important to CCEP, and we are committed to sustainably sourcing our ingredients, raw materials and packaging. Our largest spend category is concentrates and syrups, which are supplied by our brand partners and other third parties with the entire requirement of our concentrates and syrups for Coca-Cola trademark beverages sourced from TCCC. Many of the purchases of our priority agricultural ingredients and primary packaging, such as sugar and juices, aluminium cans, glass bottles, PET resin, closures and secondary packaging are made in partnership with TCCC and other Coca-Cola Bottlers. As a result, we address many of the issues we face in our supply chain, including modern slavery, as a system.

Currently ~75% of CCEP's packaging requirements are manufactured within CCEP territories with approximately ~45% of inputs sourced overseas from countries including Poland, Czech Republic and Taiwan. Unlike 2022, where we experienced significant supply challenges across many categories, both domestically and for inputs sourced from overseas, in 2023 we returned to pre-pandemic supply continuity levels. CCEP continues to improve its ability to identify and manage supply chain risks, including modern slavery risks, by implementing systems and processes such as EcoVadis, EcoVadis IQ, Resilinc and FRDM. These are technology partners to increase supply chain visibility and supplement existing controls to proactively identify risks in our suppliers and their supply chains. This assists us with ensuring that all goods and services are evaluated and approved in line with CCEP's policies and guidelines.

The agricultural commodities of sugar and juice still represent the most significant modern slavery risk to CCEP. However, through our Responsible Sourcing Policy CCEP continues to achieve high levels of compliance to our Principles of Sustainable Agriculture (PSA). In 2023, 99.4% of CCEP's sugar was sourced via globally recognised accreditation schemes, including Bonsucro, Farm Sustainability Assessment (FSA) and Best Management Practice (BMP) Smartcane and 100% of CCEP's orange and lemon juice was sustainably sourced.



# Our governance and framework

## Accountable

All CCEP Employees & Supply Chain Partners

## Governance

Board | Environmental, Social and Governance (ESG) Committee (Board Committee) | Compliance & Risk Committee of the Executive Leadership Team (Management Committee)

## Policy

Code of Conduct | Human Rights | Supplier Guiding Principles | Principles for Sustainable Agriculture | Responsible Sourcing Policy | Speak up Policy

**At CCEP, our Code of Conduct, policies and guidelines have an important role in ensuring respect for human rights throughout our business and supply chains. These policies reflect our values, underpin our ways of working and form the basis of the governance framework we have in place to enable CCEP to monitor and remediate against modern slavery.**

CCEP has a strong governance framework. The Board of Directors oversees the interests of all stakeholders. Five committees support the Board. These include the Environmental, Social and Governance (ESG) Committee, which is responsible for overseeing CCEP's sustainability strategy and all related policy issues and risks, including human rights. CCEP has also established a Compliance and Risk Committee, which among other things, advises the ethics and compliance function of our business and provides management oversight regarding the ethics and compliance programme.

CCEP is committed to an aligned policy approach across the organisation. In 2023, we started to integrate API countries onto our internal policy platform, meaning everyone at CCEP has access all policies in the same way and in local languages. We also took the opportunity to improve and harmonise our Policy Hub. As a result, we reduced the total number of policies by ensuring global policies, such as the Human Rights Policy and Code of Conduct, are the same across all territories. Policies are a crucial element to ensure everyone at CCEP is treated equally and one platform enables us to do so.







## Our Code of Conduct

Our Code of Conduct (CoC) seeks to ensure that we act with integrity and accountability in all our business dealings and relationships, and in compliance with all applicable laws, regulations and policies. We expect everyone working at CCEP to adhere to our harmonised CoC and all third parties who work on our behalf to act in an ethical manner consistent with our CoC and to comply with our Responsible Sourcing Policy (RSP). The RSP was implemented in October 2022, covering the mandatory guidelines that suppliers, directly or indirectly, must comply with to be able to do business with CCEP. This includes obligations to Supplier Guiding Principles (SGPs), Principles of Sustainable Agriculture (PSA) and expectations around modern slavery.

The CoC applies to all our employees in all our territories, as well as our shared service centres in Bulgaria. We're part of a great business that's growing and we all want this growth to continue in a sustainable and inclusive way. To do that, we all need to trust each other to do the right thing. Our CoC sets out what we expect of everyone, what's OK and what's not OK. It is essential to creating a safe, respectful, and inclusive workplace. If something doesn't feel right, we want everyone to feel confident enough to stand up and speak up, just by asking ourselves a simple question: **'Is it COKE?'**

**Stand up** – it's OK to challenge, to ask questions, and to support your colleagues

**Seek advice** – speak to your line manager or the People and Culture team

**Speak up** – if things still don't work out, use one of our Speak Up Resources or Channels.

**'Is it COKE?'** is there to help us all understand the key messages from our CoC and remind us of the additional support that is available.

Our CoC sets out 16 principles under three categories, one of which is 'Creating shared and sustainable value in our communities'. The principle 'Protecting human rights' sits under this category and calls out that respect for human rights is fundamental to the sustainability of CCEP and the communities in which we operate. We are committed to protecting human and workplace rights as articulated in the United Nations' Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact. In the 'The way we work' guidelines, we highlight that we have a zero-tolerance approach to Modern Slavery of any kind within our operations. This includes human trafficking, and the use of child, forced, indentured or involuntary labour. We also hold our supply chain to the same standards and prohibit any form of forced labour and human trafficking within our system or by any company that directly supplies or provides services to our business.

Additionally, we ask people managers to lead by example and help raise awareness with their teams and colleagues and run a briefing session with them. We provided the managers with handy tips how to react when approached by colleagues with concerns.

All employees are required to undergo our mandatory CoC training every three years, which is also a part of the induction process for new employees. Training on specific topics related to employees' roles is also provided where needed. Our CoC specifically calls out manager responsibilities and includes a matrix to help with decision making.

Any employee who wishes to raise a concern about wrongdoing at CCEP is encouraged to seek advice from their line manager or speak up through our internal Speak Up resources or our external Speak Up channels. The 'Is it COKE?' campaign encourages employees to feel confident enough to stand up and speak up if something doesn't feel right, just by asking a simple question: "Is it COKE?" The campaign sets out the support available to all colleagues by driving awareness in standing up, seeking advice and speaking up.

When any employee raises a concern through our specified channels in relation to the CoC, CCEP will act promptly and appropriately.

In addition, we use any appropriate opportunity to reinforce the 'Is it COKE?' messaging such as: refreshing our internally developed new CoC training in May 2023, launching our harmonised Conflicts of Interest policy in July 2023, our Gifts and Entertainment communication campaign before the festive season at the end of 2023, internal functional townhalls, and also in communications from other business functions such as allyship training, data privacy, record management, and security.





## Our Human Rights policy

Our CCEP Human Rights policy has been in place since December 2021 and was created on the basis of the European and API Human Rights policies including relevant parts of the TCCC Human Rights policy. Since then, we have reviewed our joined policy. In addition to our Human Rights policy, in December 2023, we published our first Statement of Principles (“Grundsatzerklärung”) relating to human rights for Germany, which is required by the German Supply Chain Act. This statement builds on our existing CCEP Human Rights policy and includes details of the actions we have taken to address human rights risks in our operations and our supply chain for Germany. Our CCEP Human Rights policy is aligned with international human rights principles encompassed by the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the UN Declaration on Rights of Indigenous People and the CoC.

Our Human Rights policy further outlines our commitment to supporting human rights and provides a consistent approach to ensuring our workplace, our supply chain and our communities are safe, lawful, and diverse – respectful and responsible everywhere, every day. We are committed to identifying, preventing, and mitigating adverse human rights impacts caused or contributed to by our business activities, before they occur, through human rights due diligence and mitigation processes.



### For more information

Further additional policies that assist CCEP in managing human rights include Anti-bribery and Corruption policy, Health and Safety policy, Inclusion and Diversity Policy, Procurement and Buying policy, Flexible Work Options policy, Working Together policy and our Speak-Up policy, which can be found in our [Policy Hub](#)

Our policies and our expectation of external supply chains has a focus on the following key priority areas:

Forced labour, child labour and human trafficking	We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. We are committed to ensuring that our operations and supply chains are free from modern slavery practices. Retention of personal identity documents, recruitment fees or excessive loan terms are prohibited. We set clear expectations for our employees, contractors, business partners and suppliers to encourage the disclosure of potential human rights breaches and are prepared to take steps to prevent and address it.
Work hours, wages and benefits and right to work	We compensate employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws. We verify that all employees have the right to work in the jurisdictions in which they are employed.
Vulnerable individuals and communities	We are committed to respecting the human rights of all individuals regardless of gender, origin, colour, religion, age and ethnic and social group, who may be at heightened risk of becoming vulnerable or marginalised if adversely impacted by our activities or business relationships.
Workplace security	We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

## Our sourcing guidelines

**It is a requirement of The Coca-Cola Company (TCCC) and all bottlers within the Coca-Cola system to follow the Supplier Guiding Principles (SGPs) and Principles of sustainable Agriculture (PSA). TCCC commissions independent audits to monitor how CCEP's ingredient and primary packaging suppliers comply with SGPs. PSA compliance is verified through adherence to global third party sustainable agriculture standards approved by TCCC. These sourcing guidelines set out the minimum requirements we expect of our suppliers in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity and set out our expectations of suppliers in relation to human rights.**

The SGPs and PSA are incorporated into CCEP's Responsible Sourcing Policy (RSP) which expressly prohibits the use of all forms of child labour and forced labour – including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The PSA also now specifically prohibit retention of personal identity documents, recruitment fees or excessive loan terms. Additionally, all children under 15 living on farms must have access to schooling. The RSP is underpinned by the TCCC standards to respect human rights, and we have communicated this to our strategic suppliers and the document is now publicly available on our Corporate Website.

During 2023, CCEP continued to evolve its capabilities on identifying and managing supply chain risks including modern slavery by implementing new systems and processes such as EcoVadis IQ and FRDM, which are databases specifically focused on identifying and tracking modern slavery.

We will continue to improve our transparency as new legislation and regulations come into force in several countries and regions, specifically around human rights, which will require compliance by CCEP, such as The German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichten.gesetz, LkSG). In API, along with the implementation of these systems, we continue to refine our Modern Slavery Questionnaire as part of the supplier onboarding process. This questionnaire requires all new suppliers to provide CCEP with visibility of their supply chains, reporting requirements, policies, training, risk management and governance procedures within their organisation. CCEP uses this information to evaluate the level and types of risks present in a supplier's organisation, and any additional steps that need to be taken to alleviate this risk. Where additional risks are identified we work with our suppliers to develop a plan to mitigate this risk.





In 2023, approximately 700 new suppliers were onboarded across API, of which approximately 600 were Australian suppliers. In reviewing the responses from suppliers, we identified potential modern slavery risks with two new suppliers. These risks were due to the supplier either not conducting due diligence for modern slavery risks or not undertaking checks and/or audits to ensure that modern slavery is not being used by their suppliers. Following a thorough investigation by CCEP, it was found that owing to the structure of the businesses (sole traders with no employees) and the nature of the services they were providing, the potential risks were not applicable, and thus were dismissed.

## Supply contract

CCEP's standard supplier contracts include a general requirement to comply with all applicable laws and regulations and specifically call out a requirement for compliance with modern slavery and anti-bribery legislation as well as compliance with the RSP. Specifically, CCEP's standard contracts oblige suppliers to: identified, it may result in supply suspension or termination.

## Supply contract requirements

1

comply with modern slavery laws

2

thoroughly investigate their labour practices to ensure there is not modern slavery in their organisations

3

ensure that products or services provided by the supplier, or the supplier's supplier are not the product of modern slavery practices; and

4

implement necessary procedures, processes, investigations and compliance systems to ensure compliance with modern slavery laws.

Our RSP processes enable CCEP to evaluate a supplier's compliance with their contractual commitments. Where we find evidence of modern slavery or have cause for concern, we take action to remediate with our supply partner. Where a supplier fails to take appropriate action to address issues identified, it may result in supply suspension or termination.

## Our risks of modern slavery

We recognise the risk of modern slavery existing within our own business operations and throughout our supply chain. At CCEP, we have zero tolerance for work practices or other activities which:

- contravene the human or other legal rights of any person we employ, contract or who is otherwise connected with our supply chain; and
- are not representative of “doing business the right way” in accordance with our CoC.

CCEP recognises that the responsibility for identification and management of human rights risks sits throughout our organisation and is an ongoing process.

The risks of modern slavery practices mean (as per the UN Guiding Principles) there is potential for an entity to “cause, contribute to or be directly linked to” modern slavery through operations and supply chains.

Hypothetical examples relevant to operations and supply chains of a consumer goods manufacturer could be:

A consumer goods manufacturer

- may cause modern slavery if it used exploited labour in a manufacturing site
- may contribute to modern slavery if it required an upgrade to a site to be constructed, and the KPIs for such construction were related to the quickest and cheapest provision of services which meant that forced labour and exploitation of workers would be highly probable
- may be directly linked to modern slavery if it worked together with a logistics provider which used recruiting fees and/or passport retention to exploit its workers.

Modern slavery has been assessed as a part of our corporate Enterprise Risk Management framework, and responsibility for managing its risk sits with a designated risk owner. In addition, we have a human rights risk assessment which covers detailed risks. The risk assessment is shared annually within our Modern Slavery Statement.

### Our people

**Awareness and education of modern slavery principles by completion of training, and compliance with relevant policies and procedures**

**Follow policies and report non-compliance using the frameworks and processes available**

**Participate in awareness raising activities**

### Our business

**Appropriate engagement with direct and indirect third party labour**

**Facilitation of easy-to-access training for all employees**

**Follow internal reporting mechanisms that compliment policies**

### Our supply chain

**Comprehensive third party supply assurance program**

**Physical audits of strategic suppliers and additional ad hoc audits on high risk categories, usually conducted by TCCC on behalf of CCEP**

**Online third party audits for medium value suppliers**

**Self-assurance of tactical suppliers through the onboarding process**

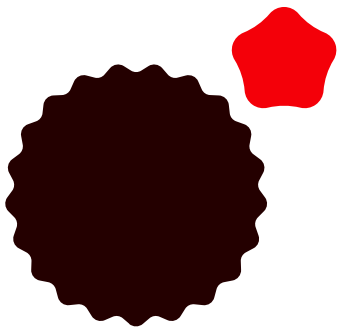


## Overview of our risks of modern slavery

	Our operations	Our supply chain
<b>Potential risks</b>	<p>A CCEP wide Human Rights research project, which included both Australia and Great Britain, identified country specific risks. Deep dive risk assessments conducted in Norway and Germany in 2023 identified a low risk that CCEP employees may be exposed to modern slavery.</p> <p>CCEP conducted an internal Australian business unit risk assessment on the enterprise legal, regulatory and tax risk which included a deep dive into the human rights and modern slavery risk.</p> <p>However, we acknowledge we can be directly linked to modern slavery through poor contractual controls and monitoring processes of our own practices. Very low income can be seen as a driver for modern slavery.</p>	<p>For our strategic suppliers, managed by the Procurement function, there has been no change to the assessed risk level of 'moderate' for the risk of modern slavery in our suppliers' supply chains based on the SGP audits conducted by TCCC and on the assessment completed by the suppliers in EcoVadis in 2023. This is consistent across direct and indirect suppliers to CCEP.</p> <p>For our non-strategic suppliers, whilst we have only completed risk assessments for our European suppliers, via EcoVadis IQ, this risk of modern slavery in our suppliers' supply chains was also assessed as 'moderate'.</p>
<b>Common forms</b>	<ul style="list-style-type: none"> <li>• Exploitation</li> <li>• Excessive overtime</li> <li>• Underpayment</li> </ul>	<p>Forced, bonded and migrant labour</p> <ul style="list-style-type: none"> <li>• Exploitation</li> <li>• Excessive overtime</li> <li>• Underpayment</li> </ul>
<b>Categories</b>	<ul style="list-style-type: none"> <li>• Employment contracts, especially third party labour and contingent workforce.</li> </ul>	<ul style="list-style-type: none"> <li>• Raw materials – juice and sugar</li> <li>• Packaging – plastic resin and films, aluminium, pulp and paper</li> <li>• Services related to a high number of workforces – e.g., facilities services, cleaning, security, haulage using third party drivers, third party labour</li> </ul>
<b>Countries</b>	<ul style="list-style-type: none"> <li>• All countries in which CCEP operates</li> </ul>	<ul style="list-style-type: none"> <li>• China, Taiwan, Vietnam, Indonesia, Papua New Guinea, and Thailand</li> </ul>
<b>Management</b>	<ul style="list-style-type: none"> <li>• Internal policy framework</li> <li>• Regular training and information</li> <li>• Close monitoring of legislative changes across our markets of operation</li> <li>• Enterprise risk management framework</li> <li>• Country based risk assessments</li> </ul>	<ul style="list-style-type: none"> <li>• RSP third party and online assessments</li> <li>• Updated supplier onboarding processes</li> <li>• Formalised contract templates</li> <li>• Enterprise risk management framework</li> <li>• Ecovadis IQ</li> </ul>

## Risk management

**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. The effective tracking and management of these risks also ensures compliance with relevant legislation.**



As a result of human rights risks assessments that have been completed in Europe and API, we have identified 12 areas as priority issues for CCEP, as summarised in the human rights risk assessment table to the right.

In 2023, we conducted a CCEP wide human rights risk research project, an internal Australian business unit risk assessment on the enterprise legal, regulatory and tax risk, including a deep dive into the human rights and modern slavery risk and two deep dive human rights risk assessments in Germany and Norway. Based on the results of the 2022 risk assessment in Indonesia we plan to conduct a second level risk assessment in 2024 which will focus on the risks at local level, for example at waste sites and sugar plantations. By analysing the risks at ground level and through conversations with employees at site level we will identify potential high-risk suppliers. Defending human rights and protecting against modern slavery continues to be a key priority. These assessments provide valuable insights into the specific risks in Germany and Norway, and the research project has supported our identification of the countries where we will focus our next risk assessments.

## Human Rights risk research project

In 2023, a human rights risk research project was undertaken. We have mapped human rights-related laws, regulatory requirements and risks identified in human rights reports in each of our countries, to identify potential human rights risks. Based on this, in 2024, we will refresh our human rights assessment strategy primarily focused on the countries where the highest human rights risks have been identified. Overall, of the risks included in the risk assessment, none of these have been identified as high risk in either Australia or Great Britain. In 2024, we intend to use our research as a guide to prepare future internal risk assessments to continue to address actual and potential human rights risks.

### Human Rights risk assessment: Priority issues

- Migrant and temporary workers
- Data protection  
Right to privacy
- Wages
- Equality and non-discrimination
- Forced labour
- Health, safety and security
- Freedom of association
- Working hours
- Freedom from bribery and corruption
- Cultural rights of minorities
- Children and young people's protection from exploitation



## Australia

In 2023, CCEP conducted an internal Australian business unit risk assessment on the enterprise legal, regulatory and tax risk which included a deep dive into the human rights and modern slavery risk. The deep dive identified and assessed the key sources of risk, the effectiveness of the existing mitigations at the local level and the management actions required to address any gaps. The results of the deep dive were presented to the General Counsel in Australia. Further work is underway in 2024 to improve the information and data used to inform the risk assessment, identify potential steps that can be taken to remove or reduce any gaps and to present the results of the assessment to the Australian leadership team.



## Norway

Based on the requirements of the Norwegian Transparency Act, CCEP conducted its second human rights risk assessment on the likelihood and severity of human rights breaches within its own operations and within its supply chain. An anonymous survey was used within CCEP Norway (CCEPN) to collect results combined with Ecovadis IQ which supported the analysis of the level of risk within the supply chain. Overall, no high risks were identified and CCEPN did not work with any high risk suppliers in 2023. In 2024, CCEP intends to identify actions to strengthen its due diligence and management of the identified risks.

We analysed more than 840 suppliers for CCEPN with EcoVadisIQ. No suppliers have been identified as very high risk. Modern slavery was not identified as a risk within these suppliers. We plan to conduct specific round tables to discuss and address identified risks together with the suppliers in 2024. A dedicated report will be published according to the legislation in mid 2024.

## Germany

In 2023, CCEP worked with an external agency to develop our risk assessment approach for Germany. CCEP Germany (CCEP DE) conducted risk assessments of its own facilities and suppliers in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichten-gesetz, LkSG). The risk assessment in CCEP DE's own facilities was conducted through structured interviews with subject matter experts (SME) for each human rights or environmental risk. These interviews formed the basis for determining probability and severity. In addition, the SMEs assessed the maturity of risk management, which was validated based on other available information (e.g., assessments of downtime incidents). The results of the risk assessment were presented to the German management.

Three salient topics were identified. CCEP DE had already identified these fields of action before the risk analysis. Against this background, the specialist departments reviewed the existing action plans to ensure that they already cover the results of the risk analysis.

For the more than 2,300 suppliers analysed for the German business, we identified 179 suppliers with a high or medium high risk level in the areas of environmental or human rights. Of these 32 were classified as high or medium high risk level in both areas. No suppliers have been identified with a very high risk level. Modern slavery was not identified as a risk within these suppliers.

We conducted specific round tables to discuss and address identified risks together with the suppliers.

## Indonesia

During 2023, we also analysed the results of the human rights risk assessment conducted in Indonesia in 2022, and developed measures to improve our social dialogue and the conditions for women in our workforce.

- Social dialogue: Fostering a spirit of constructive social dialogue, the 2023 collective bargaining agreement negotiation preliminary meeting achieved comprehensive union representation, including affiliates of international unions for the first time.
- Conditions for women: We conducted specific listening sessions with women and implemented several programs to strengthen the position of women in the workforce.

In 2024 we plan to conduct a second level risk assessment focusing on modern slavery and child labour in our value chain.

# Our actions to assess and address modern slavery risk

## Our performance

**Human rights are fundamental to how we run our business and the communities in which we operate. We are committed to ensuring everyone who works at CCEP and in our supply chain is treated with dignity and respect.**



## Our business

### Employment

At CCEP, in Europe 91.5% and in API 95.9% of our team members were employed directly and on permanent contracts in 2023. We understand the human rights risks related to those team members operating through a third party labour provider, and we are committed to ensuring our work environments are safe and compliant.

When selecting third party labour providers, for example, for contractors, labourers, or security services, we evaluate a range of factors including their organisational structure, labour structure (i.e., permanent), employment tenure and require that each supplier undertakes a third party assessment (TCCC SGP). Each of these steps provide greater visibility of the culture and relationship between an organisation and employee. In addition, as part of the due diligence conducted through our 7 Step Sourcing Process (7SSP) we also ensure workforce that is utilised by the 3rd party labour providers are employed in conditions that are compliant with all local labour laws and regulations.

## TCCC Audit

The TCCC SGP framework involves a site audit of all CCEP manufacturing sites, co-filling manufacturing operations, ingredients and primary packaging raw material suppliers. Each audit is undertaken on a routine three-year cycle. If a significant risk is identified, it will be notified to the supplier, along with required remediation and/or mitigation measures to be taken, before being followed up with to ensure compliance with such required activities.

Audits against the SGPs generally include confidential interviews with employees and on-site contract workers. These audits include checks to ensure suppliers are not using child labour, forced labour, or any form of modern slavery, along with checks under other areas addressed in the SGPs. During 2023, CCEP continued to assess the risk of modern slavery both within our operations and supply chains and no evidence of modern slavery was identified within the audit. However, we have resolved a case related to modern slavery within our supply chain. Details of this can be found in the case study on page 21.

## Training

A key foundation of our internal management of modern slavery is to raise awareness across our employees through regular training on our CoC, policies and modern slavery. There are two different training courses for employees in Europe and API, due to the different training platforms in each region. Following a refresh of our human rights training for all employees in Europe in December 2022, we continue to require our employees to complete this training on an annual basis.

In 2023, 79.7% of CCEP employees completed their human rights training.

As our Procurement function plays a crucial role in respecting human rights, we provide additional human rights training to all Procurement employees in Europe, which is recorded and shared with the Procurement employees in API for those who could not attend the live session. In 2023, content for this training was updated and focused on general information on human rights, human rights risks, prevention, the German Act on Corporate Due Diligence Obligations in Supply Chains and the Norwegian Transparency Act.



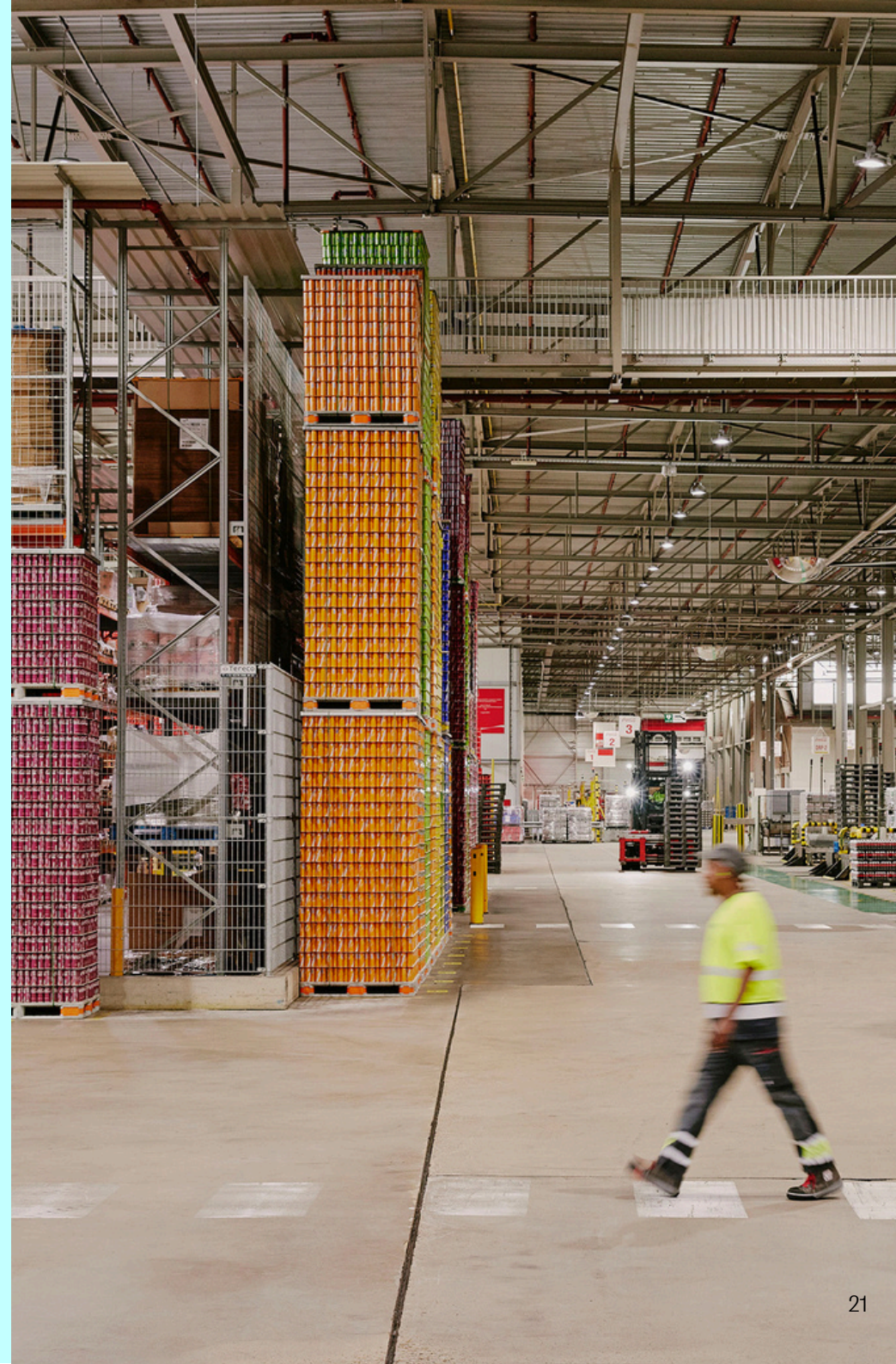
## CASE STUDY

### Addressing human rights together

In 2023, CCEP learned of a human rights violation in the logistics supply chain in Germany. As part of a police investigation, an indirect service provider was accused of gang and commercial people smuggling, human trafficking, labour exploitation and the withholding and embezzlement of wages. During the investigation, the case was substantiated. Discussions with the direct service providers revealed that they had already terminated their business relationship with the perpetrator at that time. Nevertheless, CCEP took this as an opportunity to take a closer look at the risks in the logistics sector. The result of this analysis showed that a joint approach to addressing the problems in logistics was the only way to achieve the objective to improve the human rights situation in this area sustainably.

CCEP has identified a business initiative that addresses specific problems in logistics. This initiative works together with a specialised due diligence company that can uncover grievances through confidential interviews with truck drivers. A first pilot with this due diligence company in Germany is planned for 2024, as well as joining the logistics company initiative. We plan to establish contacts with other large fast moving consumer goods (FMCG) companies in the future to discuss best practices and learnings to close the gaps in the protection of human rights and to work together to sustainably improve the overall situation of human rights violations in logistics in Europe.

At CCEP we are committed to continually improving our operations, and those of our partners by identifying, preventing and mitigating human rights risks. In 2023, CCEP has further developed best practice for managing and reducing risks related to human rights and modern slavery in line with European legislation. The actions developed now provide best practice for Australia and API more broadly.



## Reporting concerns

The CCEP Speak Up policy supports the ability of employees to raise concerns related to modern slavery. This policy is available to employees, former employees, customers, contractors, suppliers, joint ventures, friends/relatives of employees and others. The harmonised and updated Speak Up policy is embedded within the 'Is it COKE?' companywide communication campaign. This policy reinforces that CCEP provides a safe and confidential environment where concerns regarding misconduct, impropriety, or wrongdoing may be raised without fear of retaliation or detrimental treatment. CCEP is committed to take all reasonable measures to prevent any retaliation against any person reporting concerns.

The Directive of the European Parliament and of the Council on the protection of persons who report breaches of Union law (2019/1937), commonly called 'EU Whistleblowing Directive', needed to be transposed into EU member country legislation which also affected all CCEP territories in Europe except Great Britain. In order to stay compliant in each country, CCEP made consistent effort to reflect the local legislation in its Speak Up Policy by adding local annexes or amendments to provide employees a safe and reliable environment to report potential violations of our CoC and to make clear when they may benefit from legal protection as whistleblowers.

To comply with the German Supply Chain Act, a test of the Speak up process was required. We reported the test case in December 2023 via online reporting. The case was received and forwarded to the relevant functions, i.e., the CCEP responsible person for human rights (Associate Director Employee Practices) and the German Code of Conduct Committee chair the day after submission with the reference of a 'potential human rights case'.

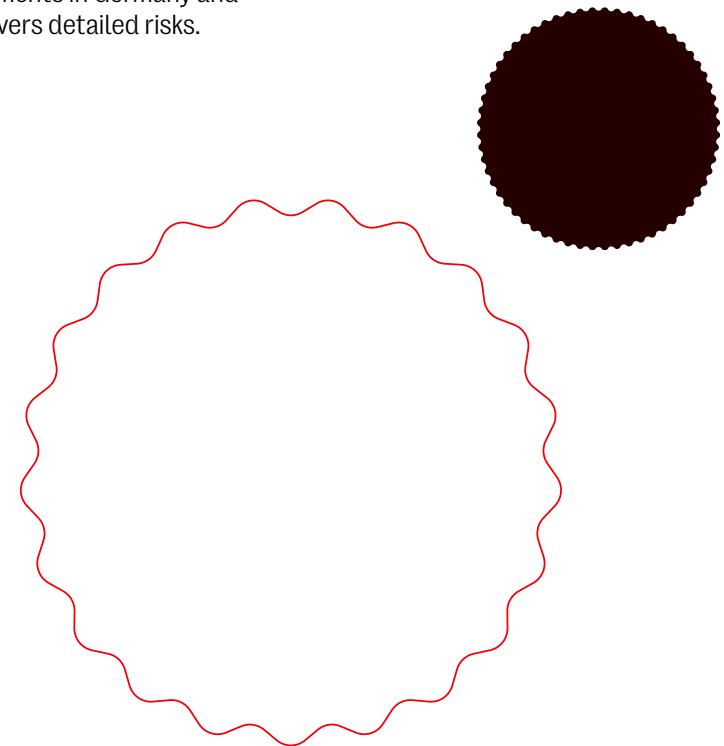
In 2023, we published 10 new local external facing webpages dedicated to human rights, including in Great Britain and Australia. The webpages provide information about human rights at CCEP, how CCEP works to protect human rights and how to prevent human rights breaches. The webpages increase accessibility to core information and directly link to our dedicated Speak Up channels which can be used to raise or report any concern related to human rights, modern slavery or discrimination.

We have set up various internal Speak Up resources and different ways to reach our external Speak Up channels to facilitate secure and confidential as well as anonymous – where allowed by local law - reporting. Our external Speak Up channels are available 24 hours a day, 7 days a week in multiple languages.

## Enterprise risk management

CCEP recognises that review and management of human rights risks across our organisation and within our supply chain is an ongoing process. We assess our risk of modern slavery as a part of our corporate Enterprise Risk Management framework, and responsibility for managing its risk sits with a designated risk owner. The risks we have identified are reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team (ELT) and shared annually with the Board.

In addition, we have conducted human rights risk assessments in Germany and Norway, which covers detailed risks.





# Our process for responding to a breach of human rights

In 2023, we reviewed our actions to respond to a breach of human rights internally and within the supply chain both for suppliers with a direct contract with CCEP and suppliers of suppliers. From this we developed a detailed description which provides clarity for roles and responsibilities. These have been aligned with internal stakeholders including the functions Procurement, Ethics & Compliance, Enterprise Risk Management and Quality Environment Health & Safety.

Below you can see a high level process description of our process for responding to a breach of human rights.

The following procedure is in place, for implementation, if a breach of human rights is found in our own operations or in our value chain.

## 1 Notification

CCEP can be made aware of a potential breach of human rights through different channels including:

- Speak Up channels set out in our CoC and in our Speak Up policy, enabling individuals to raise concerns anonymously if allowed under local law;
- Assessment reports from desktop supplier audits provided by our external provider EcoVadis;
- Results of audits of supplier and CCEP's sites and production facilities carried out by TCCC against SGPs;
- Media

Each notification will be treated with the same level of seriousness, irrespective of how it was raised.

## 2 Internal information

Once a human rights breach has been identified, internal stakeholders in the following functions will be informed: Employment Practices & Human Rights, Ethics & Compliance, Enterprise Risk Management, Legal, Public Affairs, and Communications & Sustainability (PACS). Additional relevant internal or external stakeholders will be informed and involved in the process as appropriate.

## 3 Investigation

The Employment Practices & Human Rights team will start an investigation immediately with the relevant internal and external stakeholders to understand the nature and location of the potential breach; the circumstances which led to the potential breach; the number of impacted people; whether the potential breach can be substantiated and the potential impact of the case.

## 4 Remediation or mitigation

In cooperation with the involved persons, suppliers or communities, a remediation or mitigation plan will be established and implemented.

## 5 Monitoring

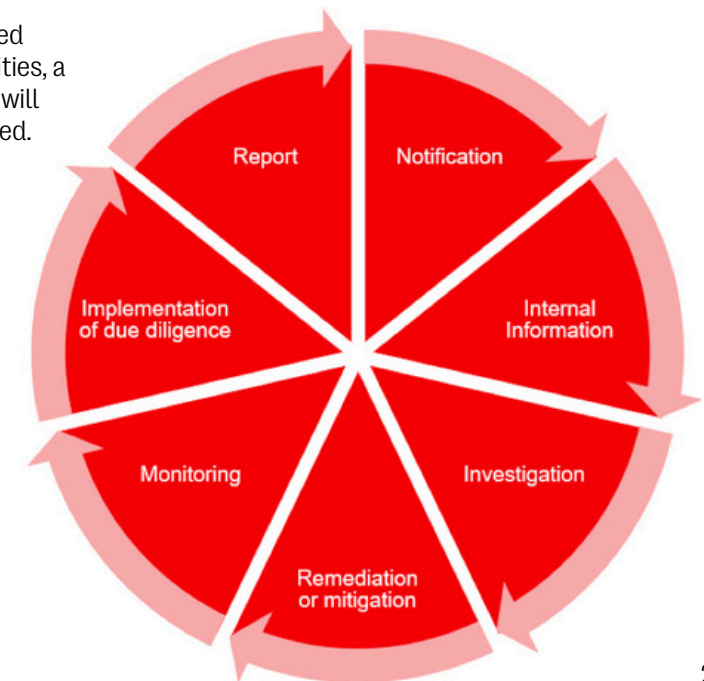
Depending on the nature of the case, the agreed remediation or mitigation can take some time. The remediation or mitigation plan is monitored on an ongoing basis to ensure it is implemented correctly.

## 6 Due Diligence

Single events can be an indication of a risk of further human rights violations. The due diligence process will be adjusted to prevent similar cases in the future when appropriate.

## 7 Report

Human rights cases will be included in CCEP's internal and external reporting where appropriate.



## CASE STUDY

### Bound labour

**At the end of October 2023, CCEP became aware that an IT consultancy company it engaged with was charging its employees excessive exit fees. The consulting company provided consultants to work with CCEP on specific projects. Based in Great Britain, the company hires graduates and pays an annual salary of £30k. However, if employees choose to leave the company within the first two years of their contract, they are required to pay an exit fee of up to £15k. Additionally, if the graduate loses a contract with their customer their salary decreases significantly.**

After becoming aware of this practice, CCEP established a task force which included representatives from IT, Procurement and Legal functions. The task force entered discussions with the IT consultancy company directly. Following an investigation into the fees, the IT consulting company explained that the costs were for their investment into graduate training. CCEP became aware that six individuals working with CCEP had this provision contained in their contract. From a human rights perspective, this practice has been seen as a sign for bonded labour. CCEP's intention was to influence the consulting company to reconsider their practice and approach for employee retention. CCEP suggested the removal of the exit fees may be beneficial in terms of increased motivation of employees and customer perspective. High levels of trust and open and honest communication was key during the investigation and case management.

In December 2023, CCEP received notification that the exit fees tied to the graduate scheme would be removed, and in addition there would be a restructuring of the graduate bonus scheme and an increase of the amount implemented from January 2024. Through follow up meetings, CCEP ensured the exit fees have been removed for the associates working for CCEP.

At CCEP we are committed to continually improving our operations, and those of our partners by identifying, preventing and mitigating human rights risks. In 2023, CCEP has further developed best practise for managing and reducing risks related to human rights and modern slavery in line with European legislation. The actions developed now provide best practise for Australia and API more broadly.



## Our supply chain

We continue to demonstrate strong compliance with our RSP. CCEP appointed Ernst & Young LLP (EY) to provide limited assurance over selected sustainability metrics for the year ended 31 December 2023, including compliance with our SGPs and PSA. The assurance engagement was planned and performed in accordance with the International Federation of Accountants' International Standard for Assurance Engagements Other than Audits or reviews of Historical Financial Information (ISAE 3000 (Revised)). The EY assurance statement and our 2023 Methodology document is available on [coccolaep.com/sustainability/download-centre](https://coccolaep.com/sustainability/download-centre).

### TCCC Audits

Of the CCEP supplier sites applicable for audit under the SGPs framework, 97.9% of them were compliant. There were 21 supplier sites identified as non-compliant. These non-compliances were due to delays in completing the physical audit as per the SGP process. 15 of these audits were rescheduled and completed in late 2023, with the balance to be completed in H1 2024. If upon completion of these physical audits any issues are identified then CCEP will work with the relevant suppliers to ensure the proposed corrective actions are implemented.

Detailed information can be found in the 2023 Integrated Report.







## Digitisation of risk management

CCEP continues to recognise the growing importance of technology in increasing the visibility of risk with our supply chains. We continued to work with our technology partners to increase supply chain visibility and supplement existing controls to proactively identify risks in our suppliers and their supply chains.

We proactively manage sustainability risks in our supply chain using data gathered through EcoVadis for strategic suppliers and EcoVadis IQ for non-strategic suppliers. In addition, we continue to use Resilinc software, an artificial intelligence (AI) tool, which helps us to proactively identify potential risks in our supply chain. Having used the software to map our tier 1 suppliers in 2022, we started a project to map our tier 2 suppliers using Resilinc in 2023. In 2023, we also started using FRDM, a supply chain risk management tool, to monitor and mitigate human rights and climate-related risks in our supply chain.

**Resilinc** - During 2023, we continued to develop our Resilinc tool and now monitor 745 T1 suppliers and their operational locations covering over 4,000 supplier sites. We have also now mapped the supply chains of 173 of these T1 suppliers, adding a further 1,407 T2 and below suppliers and 3,497 supplier locations to the monitoring. The artificial intelligence scanning now operates across 7,500 CCEP supply chain locations covering over 100 risk types, including ones that indicate an elevated risk of modern slavery.

**FRDM** - During 2023, we continued to develop the FRDM platform which specialises in the mapping, monitoring and risk assessment of suppliers and their supply chains from a modern slavery perspective. We now have over 4,000 suppliers monitored and this includes over 900 API suppliers. FRDM is a startup organisation that uses publicly available shipping records to map suppliers' points of supply.

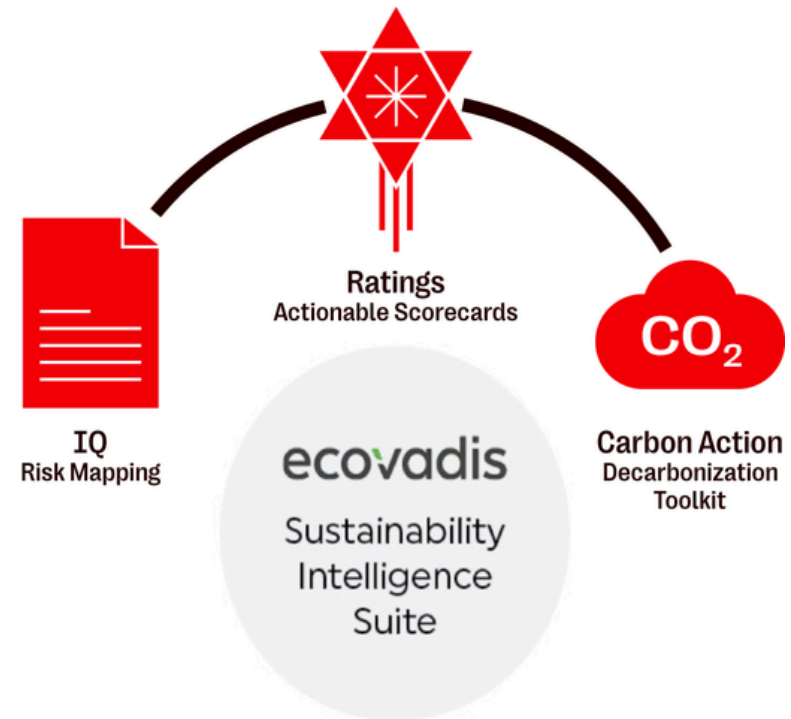
**EcoVadis** - In 2023 CCEP remained focused on our partnership with EcoVadis, an independent evaluation company to rate the sustainability performance of our suppliers, including environment, carbon management, human rights and fair business practices.

In 2023, our Procurement function continued to broaden the coverage of the EcoVadis IQ platform. It covers the non-strategic suppliers within the CCEP network. The EcoVadis IQ platform complements the existing EcoVadis platform which is used to manage the risks for our strategic suppliers. Combining the EcoVadis core functionality with the monitoring functionality provided by the EcoVadis IQ platform across our entire supplier base significantly increases the supply chain and vendor screening capabilities within the ethical, social, and environmental dimensions for CCEP.

This process for merging the supply bases across Europe and API onto a common platform was completed in 2023 to increase visibility across CCEP. We have built the expectation of suppliers to achieve a minimum EcoVadis score of 50 into our responsible sourcing guidelines with the ambition to get to an average EcoVadis score of 65. By the end of 2023, 67% of our strategic suppliers in Europe, 64% of our strategic suppliers in API and 70% of our global strategic suppliers had undertaken an assessment via the EcoVadis platform and are sharing an updated scorecard with us and work is ongoing to increase the coverage of suppliers assessed.

The **EcoVadis IQ** platform is a supply chain and vendor screening solution, being used to assess the supplier risk landscape across ethical, social, and environmental dimensions for our non-strategic suppliers, which equate to ~20,000 suppliers. The EcoVadis IQ system profiles and screens these suppliers by using a range of data sources, including:

- EcoVadis scorecards: these provide insights into supplier performance.
- Inherent risk data: covering 160 countries and 200 industries.
- Compliance information: ensuring adherence to regulations.
- An organisation's own procurement data.



Additionally, EcoVadis IQ Plus enhances this predictive intelligence by leveraging intelligence from the world's largest sustainability performance database, direct supplier inputs, and screening of supplier-specific documents and risk factors to allow CCEP to map and monitor risks across these suppliers. This platform was used to identify any potential supplier risks to ensure CCEP is compliant with The German Supply Chain Due Diligence Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichten-gesetz, LkSG).

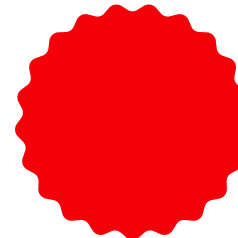
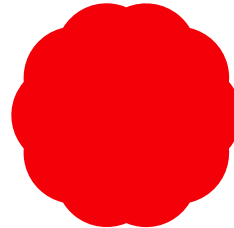
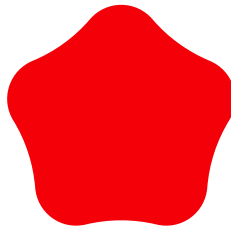
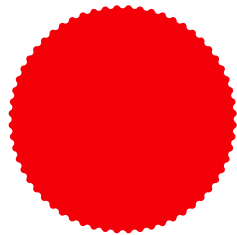
We are intending to implement this platform across other CCEP businesses in 2024 to identify other potential supplier risks across our supply chain.

Combined, these new technologies are a powerful addition to the capabilities of CCEP to proactively assess supplier risk, monitor and take corrective action in the area of modern slavery and human rights across CCEP. Whilst we have made progress, we recognise there are still more opportunities to fully leverage the data we have available and will continue to evolve our use of data in 2024.

## Remediation

**We review the findings of all our supplier audits including from both physical and online platforms. Where concerns are identified we work with the supplier to agree a course of corrective action to address the findings. This includes both an action plan with specific timings and scheduling a follow up audit.**

A good example of this approach in 2023, was the identification of a potential risk highlighted in the tender process for Salesforce workwear for Iberia. We used our FRDM tool, which identified a potential risk for the source of supply for the cotton used in the workwear. The FRDM analysis was able to trace the potential factory of origin in China. We shared this data with the supplier and asked them for validation of their supply chain. In response we received supplier and site audit certifications, and this enabled us to validate the supply chain via FRDM and close the case.





# Assessing the effectiveness of our actions

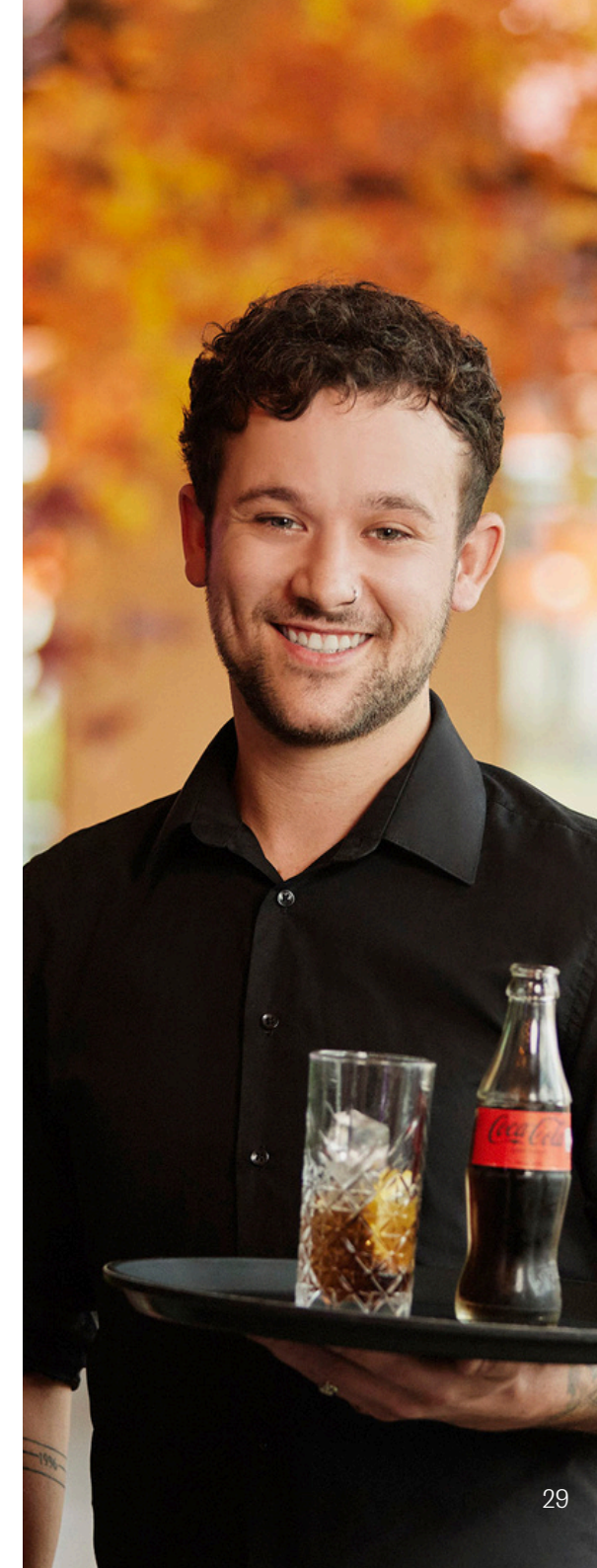
To ensure we continue to understand the effectiveness of our actions and grow our culture of continuous improvement, identification and remediation of modern slavery we measure our progress. During the reporting period of 2023, CCEP assessed the effectiveness of its actions through different metrics, including:

## 1 Supplier assessment

Where risks are identified either through the Supplier Guiding Principles (SGP) physical audits, EcoVadis, EcoVadis SpendIQ or FRDM, CCEP's Procurement function work with the supplier to agree a course of corrective action, we assess the effectiveness of this by undertaking a follow up audit to assess compliance. For example, using the EcoVadis IQ risk assessment platform for compliance to the German Due Diligence Act – Lieferkettensorgfaltspflichten-gesetz (LKSG) we identified ~208 potential risks, predominately under the Environmental pillar – which is assessed based on the industry and the country in which the suppliers operate. However, further investigation only identified 3 suppliers as high risk on the environmental pillar which were regraded to a medium risk based on the products they were supplying to CCEP. None of the suppliers run through the EcoVadis IQ platform identified any high risk in the pillar of Labor & Human Rights. It is our intent to use the EcoVadis IQ platform to do a complete risk assessment for all of our suppliers in 2024.

## 2 EcoVadis assessment of CCEP

We have also undertaken our own assessment by EcoVadis and have been proudly awarded platinum status which means we are in the top 1% of compliant companies.



### 3 Third party risk assessment of modern slavery framework

We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the Responsible Sourcing Policy (RSP). Together with The Coca-Cola Company (TCCC), we routinely verify and assess suppliers' compliance with our SGPs by using independent third parties. As part of the Coca-Cola system, we have relied on independent audits commissioned by TCCC to monitor supplier compliance with our SGPs for ingredients and primary packaging purchased by CCEP and for juices and concentrates purchased from TCCC. These audits include checks to ensure suppliers are not using child labour, forced labour, or any form of modern slavery.

These audits covered 100% of our suppliers of our ingredients and primary packaging. These audits generally include confidential interviews with employees and on-site contract workers. TCCC guidelines require auditors to select employees from different percentages of revenue and duties within the facility, including those of different genders, ethnic or religious backgrounds, employees who are pregnant, union representatives if available, and contingent workers. If a supplier fails in any aspect of the SGPs, they are expected to implement corrective actions. TCCC conduct unannounced audits at their discretion and reserve the right to terminate an agreement with any supplier that cannot demonstrate that it is upholding the SGP's requirements.

For more information on the audit guidelines of TCCC, please see its Human Rights Report.

TCCC is a member of the AIM-PROGRESS forum, a global forum promoting responsible sourcing practices and the harmonisation of supplier audits as a way of reducing duplication and costs for suppliers. The SGPs have been benchmarked against other members' protocols and are recognised by AIM-PROGRESS members through a framework called Mutual Recognition.

In 2023, of the 363 suppliers required to be compliant to SGP for CCEP, TCCC was scheduled to conduct SGPs audits on 107 supplier sites, 92 supplying into CCEP Europe and 15 supplying into API. However, only a total of 94 supplier sites were conducted, 82 at sites supplying CCEP Europe and 12 sites supplying API. 309 sites are fully compliant with the SGPs requirements in Europe and 33 are fully compliant in API. In API, there are 5 non-compliant audits of which 3 suppliers are based in Australia and 2 in Indonesia. They are only non-compliant as there have been delays in completing the physical audit as per the SGP audit process. This is also the case for the 10 non-compliant suppliers in Europe.

In total some of the 21 physical audits should have been completed in early 2023 but were delayed due to the supplier and audit agency being unable to meet at the scheduled time. 15 of these audits were rescheduled and completed in late 2023, with the balance either having been rescheduled for completion in H1 2024 or the results of which are waiting to be published in H1 2024.

### 4 Risk assessment of human rights

In 2023, we have continued to conduct country specific risk assessments based on legislative requirements to identify potential new or existing human rights risks. Two human rights risk assessments have been completed in Germany and Norway.

For Germany the aim of the risk assessment has been to identify and remediate potential human rights risk within our own operations and the supply chain. With support from an external agency, we have grown our capability through learning and continue to follow a structured action plan supported by professional recommendations.

For Norway, the aim of the risk assessment has been to understand (a) if the identified risks highlighted in prior assessment are still valid, (b) if any new risks are to be identified (c) if the actions taken or planned need to be reviewed.

Our risk assessments have identified the same salient risks. No high risks have been reported. Beyond this, the results from the human rights research project will be used to inform and prioritise future country based human rights risk assessments, which will enable us to continue to address actual and potential human rights risks.

In 2024, based on upcoming legislative requirements, we plan to continue to conduct country specific risk assessments to identify new or existing risks to human rights as well as work to align a framework across all CCEP markets to support the growth of a culture of continuous improvement.

### 5 CCEP policy framework in place

Our policy management process includes an annual policy review (including review of our Human Rights policy, Speak Up policy and Inclusion and Diversion policy) led by CCEP's Employment Practices & Human Rights team. In this annual review, relevant policy owners review their policies and include any required changes, with regard to new legislative requirements and/or changes to related policies. In 2023, we harmonised the policy landscape across Europe and API. All policies are now situated on one singular platform, the Policy Hub, which can be accessed by all employees in Europe, New Zealand, Papua New Guinea and the Pacific region.

## 6 Employee training on Human Rights policy

In 2023, we used different technologies for training in Europe and API. We continued our human rights training for all employees in Europe throughout 2023. In September, a dedicated communication was shared in the People & Culture (P&C) people manager bulletin and direct reminders were sent to employees in the CCEP online training system ("Academy") to encourage employees to complete the training. These engagement boosters were effective to increase the total number of employees who complete their annual training totalling 79.5% of employees by the end of 2023 in Europe.

Employees in API are encouraged to repeat the existing human rights training. In 2023, in API, 80.15% of our employees had completed training on the commitments and requirements, of the Human Rights policy.

As our Procurement function plays a crucial role in respecting human rights, we provide additional human rights training to all Procurement employees in Europe, which is recorded and shared with Procurement employees in API. In 2023, content for this training was updated and focused on general information on human rights, human rights risks, prevention, The German Act on Corporate Due Diligence in Supply Chains and Norwegian Transparency Act.

## 7 Harmonised Speak Up policy updated in EU territories reflecting the requirements of the EU Whistleblowing Directive and again supported by the "Is it COKE?" communication campaign

CCEP upholds a safe environment for employees to speak up in complete confidence, with no fear of retaliation about any concerns they may have, no matter how big or small they may seem.

In 2023, there were no issues raised relating to modern slavery. Overall, there were 335 Code of Conduct reports received and investigated, of which 47 were through the external Speak Up channels.

Based on the "Is it COKE?" communication campaign launched in October 2022 in all our markets, we re-visited the campaign in August/September 2023. The campaign focussed on improving the confidence of employees to 'Stand Up' in the moment when they see something that doesn't feel right, 'Seek Advice' if they are unsure and to 'Speak Up' via our internal resources or external channels to report an issue. This year's focus was also on people managers – their role in setting an example, bringing the messages to their teams and in being a first point of contact for employees in raising a concern.

Handy tips for handling the situation were issued to them. We saw an increase of Code of Conduct cases reported in October and November, during and following this campaign.

## 8 Employee training on Speak Up policy transposed into national law

Our employees' learn about Speaking Up and whistleblowing in the mandatory Code of Conduct training where our Speak Up channels are described as per our Speak Up policy, enabling individuals to raise concerns anonymously if allowed under local law. To make an eligible disclosure and be protected by whistleblower laws, regulations or policy applicable to the relevant territory, we refer employees to their local Speak Up policy guidance for processes and options available to them.

We trained the members of our Corporate and local CoC Committees in our EU and API territories on the legal requirements and Speak Up policy. Further functions, like People & Culture or Public Affairs Communications and Sustainability, have been trained according to local needs and opportunities. Training for People Managers on how to respond when a concern is raised to them has been developed and is rolled-out as per 1st February 2024 in all EU territories as an annual e-learning.

## 9 Employee survey

In 2021, we included two questions in the CCEP Inclusion Survey to assess the effectiveness and acceptance of our Speak Up channels and to help us understand the levels to which everyone felt they were treated with dignity and respect. We set up a working group to further progress fair, safe and harassment free workplaces and to identify actions linked to the outcomes of the survey and Speak Up channels. This included refreshing our anti-discrimination and harassment guidance, the launch of a global "is it COKE?" campaign to reinforce inclusive behaviours, and a rollout of "being an effective ally" training.

In October 2023, we repeated the Inclusion Survey for all European countries, Australia, New Zealand, and Indonesia. The results indicated that "being treated with dignity and respect" was ranked the highest positive experience across CCEP. In the area of feeling safe to speak up, scores had positively improved by 8 percentage points. We also introduced a new question to assess how comfortable people feel voicing ideas and opinions.

CCEP is committed to fostering a safe and inclusive workplace where every employee feels comfortable to speak up and share ideas. The working group will continue to take actions from the survey outcomes and Speak Up channels. In 2024, this includes integrating allyship and inclusivity training into leadership programmes and embedding our inclusion principles into employee experience touchpoints.



## 10 Global human rights quiz

In 2023, we launched our first online global human rights quiz. The first objective of the quiz was to better understand employee's knowledge of key topics related to human rights including different types of risk, how to prevent risks and how to raise concerns. The second objective was to assess the effectiveness of our own actions such as our online training, communications and policy content related to human rights. To encourage employees to take part, Workplace & Employee Relations provided an engaging prize for the winner. Shared in 10 languages, more than 850 employees took part in the quiz with communication materials shared online and on-site. Responses to the quiz were strong with an average 80% success rate in Europe and 74% in API both reflecting a strong understanding of human rights, policy across CCEP.

## 11 Working with an external agency to review our human rights strategy and approach for Germany

In 2023, we reviewed our human rights strategy and practises undertaking a gap analysis of our full human rights strategy, agenda and approach. To do this, we undertook external consultation with an agency specialized in human rights to analyse and review our processes, risk assessment approach and supplier management strategy for CCEP based on the requirements of the German Act on Corporate Due Diligence in Supply Chains.

We understand from the external assessment where our strengths lie, such as with our policies, guidance and governance and areas which could be strengthened.

Following the guidance from the external agency we have improved the way we undertake risk assessments and clarified in depth the roles and responsibilities in our human rights processes. In addition, these processes have been aligned with our Procurement, Ethics & Compliance, Enterprise Risk Management and Quality Environment Health & Safety functions. We now have a strong roadmap of actions and how our human rights risk assessments take place, including but not limited to risk assessments and case management within our own operations and supply chain.

## 12 CDP's Supplier Engagement Rating (SER)

We have been recognised for our leadership in supplier engagement on climate change for the sixth year running. We received the highest score, an A rating, on CDP's Supplier Engagement Rating (SER), which evaluates corporate supply chain engagement on climate issues. Companies with the highest ratings are recognised as Supplier Engagement Leaders.

\*On 22nd May 2023, CCEP noted that it has undertaken 134 Human Rights Investigations. The reference to 134 was incorrect, and the correct number is 13. This included four substantiated cases. 69% of the cases in 2023 were within the value chain. 46% of the cases are related to Logistics and Bottle sorting. This has now been rectified (27.11.2024).

## 13 Reporting and review by the Compliance and Risk Committee of the ELT and the Audit Committee of the Board

CCEP Enterprise Risk Management owns the responsibility for CCEP's risk management framework including the risk taxonomy for Enterprise Risks. Human Rights is included in the Enterprise Risk "People and Wellbeing". The risks are shared and reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team (ELT) and annually with our Board of Directors. In 2023, our first report on our human rights investigations was shared internally with the ELT. In total, 13\* human rights investigations have taken place. At the time of the report, four cases have been substantiated, two of which related to modern slavery (see case studies at page 21 and page 24 for further details), four cases have been unsubstantiated and dismissed, and five cases are still being investigated. 69% of the cases in 2023 were within the value chain. Most of the cases are related to Logistics and Bottle sorting (they are together 46% of all invested cases). Six different human rights were the subject of the investigations, led by cases related to wages and working time.

Two cases of modern slavery and one case of human trafficking have been investigated. The two substantiated cases of modern slavery are described in the case studies within this statement. The case related to human trafficking was not substantiated nor related to CCEP's value chain.

If cases have been substantiated, immediate actions have been taken to mitigate or remediate these cases. The four closed, substantiated cases have resulted in either state intervention, termination of contract with the responsible supplier in Tier 3, or mutual agreements with unions.



# Future focused

We are committed to continually improving the identification and management of human rights and modern slavery risk across all our operations, and to evaluate risk by spend and category and continue to deep dive into higher risk supply throughout our supply chain.

We use the experiences and learnings from all our business areas on human rights and modern slavery in a holistic way. To deliver an overarching strategy and approach this will require an:

- understanding of the different situations across the countries we are operating in; and
- identification of best practices.

In addition, since 2022 we have established best practice exchanges within the Coca-Cola system including TCCC and other bottlers like Coca-Cola Hellenic and Coca-Cola İçecek on a regular basis. In 2024, we will further strengthen our collaboration within the Coca-Cola system as human rights issues can be addressed best by working in partnership with TCCC and other bottlers. We engage in different business forums dedicated to human rights to ensure we learn as well from peers and NGOs.

With our human rights research project conducted in 2023, we have mapped human rights-related laws, regulatory requirements and risks identified in human rights reports in each of our countries. Based on this, in 2024, we will refresh our human rights assessment strategy primarily focused on the countries where the highest human rights risks have been identified.

In 2024, we will test an innovative workers voice technology in Australia. It will enable workers to articulate concerns and to provide feedback to practices, which can be linked to modern slavery.



For more information on CCEP's management of modern slavery within our business and our supply chains visit:

[cocacolaep.com](https://cocacolaep.com)

2023 Integrated Report

# Reporting entities covered by this statement

**This statement is being made in accordance with the UK Modern Slavery Act 2015 (UK Act) and the Modern Slavery Act 2018 (Cth) (Australian Act). It sets out the steps taken by Coca-Cola Europacific Partners plc and its group companies (CCEP) to prevent, identify, and address modern slavery risks across its business and supply chain.**

The reporting entities under the UK Act are Coca-Cola Europacific Partners Great Britain Limited, Coca-Cola Europacific Partners Services Europe Limited and CCEP Group Services Limited. For the purposes of the Australian Act, the reporting entity is Coca-Cola Europacific Partners Australia Pty Ltd, and this statement is being made under s.14(1) of the Australian Act by Coca-Cola Europacific Partners plc.

## Consultation with controlled entities

The development of this statement was led by a dedicated modern slavery working group comprising representatives from each reporting entity. It was prepared in consultation with stakeholders from relevant functions across both the reporting entities and the broader CCEP group, including stakeholders from the Procurement, QESH (Quality, Environment, Safety and Health), Sustainability, Legal, Workplace and Employee Relations, Ethics & Compliance, Enterprise Risk Management, Finance, and Manufacturing functions. Before being approved by the Board of Directors of Coca-Cola Europacific Partners plc the statement underwent thorough review and approval by senior representatives from each reporting entity, ensuring alignment and approval at all levels.

Where CCEP holds a “controlling interest” in an entity, the appropriate organisational representatives of each entity have been made aware of CCEP’s policy framework and are actively engaged in taking the appropriate steps to mitigate modern slavery risks within its business and supply chains. During FY2023, we worked to ensure we have similar processes in place with entities where CCEP holds a minority equitable interest. This includes communicating our expectations and providing policy documentation outlining our standards and expectations and offering support as required.

## Approval of statement

This statement was approved by the Board of Directors of Coca-Cola Europacific Partners plc, Coca-Cola Europacific Partners Great Britain Limited, Coca-Cola Europacific Partners Services Europe Limited, CCEP Group Services Limited and Coca-Cola Europacific Partners API Pty Ltd and is signed on 22nd May 2024 by Damian Gammell as the CEO of Coca-Cola Europacific Partners plc on behalf of all of the reporting entities.

On 27th November 2024, CCEP corrected a reference on page 32, and the revised statement has been subsequently approved and signed on 12th December 2024.



## For more information

A complete list of the entities of CCEP as of 31 December 2023 (including ownership percentages) is set out in the 2023 Integrated Report, which is available under Note 28, of the Consolidated Financial Statements found [here](#).

