

# Modern Slavery Statement 2024



**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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# Message from

## Véronique Vuillod, Chief People & Culture Officer

Our purpose is to refresh Europe, Australia, Pacific and South East Asia (APS) 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.

That's why we are committed to fostering positive change within our communities and operations by upholding high human rights standards as a fundamental aspect of our business. Our vision is to ensure a fair and inclusive workplace, ensuring dignity and respect for everyone involved in our operations. That's why we actively engage with our stakeholders including employees, customers, suppliers, partners, NGOs, investors and local communities to ensure human rights are respected and protected across all aspects of our business. This means we can continue to support the communities in which we serve and operate.

We constantly refine our strategies to adapt to emerging challenges, remaining vigilant to new risks and opportunities for improvement. Our commitments are strong, and we have made even more progress this year to act on them.

In 2024 we continued to assess human rights risks within the countries we operate, completing two deep-dive human rights risk assessments in Germany and Bulgaria. These risk assessments provided valuable insights into the specific country risks for both countries. These assessments help us to better understand the unique challenges people may face. We are proud to share that no high risks related to human rights have been identified in these two countries, reinforcing our ongoing dedication to uphold human rights standards and promoting fair and responsible business practices.

We focus on identifying current and evolving human rights risks and developing proactive measures to address them before they arise. As part of this, we expect and support all 41,000 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 use advanced technology and strong partnerships to help us better understand and mitigate modern slavery risks. Our Responsible Sourcing Policy has played a key role, with 91% of our strategic suppliers now assessed on EcoVadis in 2024. This technology helps us pinpoint risks and take action before they can escalate.

This year we have updated and strengthened our CCEP 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.

We have developed a dedicated internal human rights homepage accessible to all CCEP employees. This is designed to empower everyone at CCEP to build on their knowledge of human rights. It provides information about our human rights risk assessments, human rights reports and how we engage with our suppliers. It also improves the access to our Speak Up channels for our employees to raise concerns.

Finally, we completed an ethics and human rights review of the key hotels we partner with across Europe. This analysis allowed us to assess the sustainability and ethical performance of each hotel, helping us to identify opportunities for improvement and mitigate any potential risks. As a result, we have strengthened our commitment to working with hotel partners who fully align with our ethical standards, ensuring that we continue to offer responsible and sustainable choices for our employees.

So, 2024 has been a strong year for progress. Looking ahead, we will continue to drive forward our human rights commitments. We are focused on expanding our human rights risk assessments into additional countries and strengthening our supplier compliance programs.

Véronique Vuillod





# INTRODUCTION

This is the fifth statement of CCEP under the Modern Slavery Act 2018 (Cth) and the eighth statement under the UK Modern Slavery Act.

At CCEP, we firmly uphold the principles of human and workplace rights, as outlined in the UN Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are dedicated to ensuring these rights are non-negotiable, recognizing that respect for human dignity and equality is essential to the sustainability of our business and the communities we serve. We actively champion the fair and respectful treatment of all individuals, regardless of where they live or work.

We support the 10 principles of the UN Global Compact and are committed to proactively safeguarding these rights across our workplace, supply chain, and the broader communities in which we operate. We continuously strive to create a safe and healthy environment for our employees, going above and beyond to meet and exceed applicable health, safety, and regulatory standards.

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. Our joint Modern Slavery Statement for Europe and Australia, Pacific and South East Asia (APS), sets out the steps we are taking to identify and manage those risks.

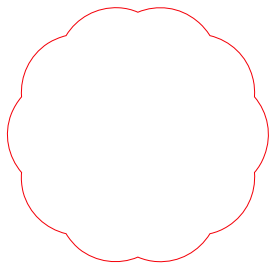
We have a zero-tolerance approach to modern slavery of any kind within our operations and supply chain and together with our brand partner The Coca-Cola Company (TCCC) we expressly prohibit all forms of modern slavery and human trafficking within our system or by any company that supplies or provides goods or services to our business. TCCC manages the development and marketing of the Coca-Cola portfolio of beverages. CCEP manufactures, distributes and sells these products (including products such as Coca-Cola Zero Sugar, Coca-Cola Original Taste, Fanta and Sprite) through its manufacturing and logistics network across our business territories in Europe and APS.

All disclosed metrics in this Modern Slavery Statement are reported at a Group level, including the Philippines, following the acquisition of Coca-Cola Beverages Philippines, Inc. (CCBPI), on 23 February 2024, unless otherwise indicated.

# Key areas of action in 2024

At CCEP we are committed to continually improving our operations, and those of our partners, by identifying, mitigating and preventing 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 them, 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 frameworks of TCCC, which includes very strong standards to prevent modern slavery. In 2024, 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

## Hotel ethics and human rights review

Hotels face a higher risk of human rights infringements and are more vulnerable to exploitation due to complex supply chains. Research shows the tourism and hospitality industries face significant challenges in managing labour exploitation and modern slavery risks which can impact vulnerable groups such as migrant workers. In 2024, CCEP completed an ethics and human rights review of more than 100 of the hotels that we partner with across Europe, with a focus on key hotel chains. Using the EcoVadis rating system we assessed the sustainability and ethical performance of each hotel. For our preferred hotels that did not have an EcoVadis scorecard, we distributed our own detailed questionnaire which aligns with the requirements of The German Act on Corporate Due Diligence in Supply Chains (hereafter referred to as the “German Act”). Our aim has been to ensure we continue to offer reasonable and sustainable choices for our employees during business travel. Through the combination of the EcoVadis scorecard rating and our detailed questionnaire we have been able to determine that the hotels respect human rights and freedom from modern slavery and have sufficient prevention measures in place to manage and mitigate human rights and modern slavery risks. Further information is contained in the case study on page 22.

2

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

Our Responsible Sourcing Policy (RSP) has been embedded across CCEP, and we have commenced the process of its implementation into our Philippines business following its acquisition in February 2024. The RSP incorporates all of CCEP's existing supplier policies, including our Supplier Guiding Principles (SGP), and Principles of Sustainable Agriculture (PSA) and has been updated to include CCEP's No-Deforestation Policy. It was also updated to provide greater clarity on how we classify strategic suppliers, who are required to have a higher level of compliance with the RSP.

In addition to our existing process for onboarding suppliers we have also piloted a new sustainability questionnaire to be included as part of CCEP's 7-step sourcing process.

### 3

## Increasing visibility of risks within the supply chain by using technology

Understanding what we buy and taking action when we encounter a risk is key to managing potential supply chain related impacts, including water and soil pollution. We recognise the growing importance of technology in increasing the visibility of risk with our supply chains. In 2024, we continued to work with our technology partners to increase supply chain visibility and supplement existing controls to proactively identify risks in our supply chains.

We assess suppliers across multiple criteria such as financial value, efficiency, innovation and risk. For our strategic suppliers, who make up 80% of CCEP's total spend, we proactively manage their sustainability performance and ethical, social and environmental-related risks in our supply chain using data gathered through EcoVadis. The assessment includes questions related to soil and water pollution management, including implementation of environmental management systems.

Our SGP framework involves a site audit of all our production facilities, co-filling manufacturing operations, ingredients, and primary packaging raw material suppliers. Each audit is undertaken on a routine three-year cycle covering the topics addressed by the SGPs. These audits generally include confidential interviews with employees and on-site contract workers. If a significant risk is identified, the supplier will be notified along with required remediation and/or mitigation measures required to be in place before a follow-up audit is performed to ensure compliance, and a required timeframe to implement the necessary remediation or mitigation measures. .

We continue to use Resilinc software, an AI tool which helps us to proactively identify potential risks in our supply chain. Having used the software to map our tier 1 (T1) suppliers in 2022, we now also use the platform to map our tier 2 (T2) suppliers, expanding our monitoring deeper into our global supply chain. Our monitoring scope increases each year. In 2024, we monitored approximately 1,000 suppliers, and an additional 1,200 sub-tier suppliers using the tool. In 2024, we continued using FRDM, a supply chain risk management tool, to monitor and mitigate human rights and climate-related risks in our supply chain.

### 4

## European Sustainability Reporting Standards - Double materiality assessment (DMA)

Our DMA focused on actual and potential impacts, risks and opportunities (IROs) associated with ESRS defined topics, as well as entity specific IROs. We considered IROs over the short (up to 1 year), medium (> 1 to 5 years), and long term (over 5 years). To complete the impact analysis, we engaged with internal and external stakeholders. The evaluation of financial risks and opportunities was informed by our broader ERM approach, though our ERM framework evaluates a wider range of topics and includes mitigation strategies. To assess risk, we took into account the current (inherent) state of how we do business, but excluded measures dependent on future actions or behavioural aspects, e.g. the execution of policies and procedures. Determination of materiality included the consideration of global factors down to regionally specific circumstances. Through stakeholder input, we included information from countries across our territories.

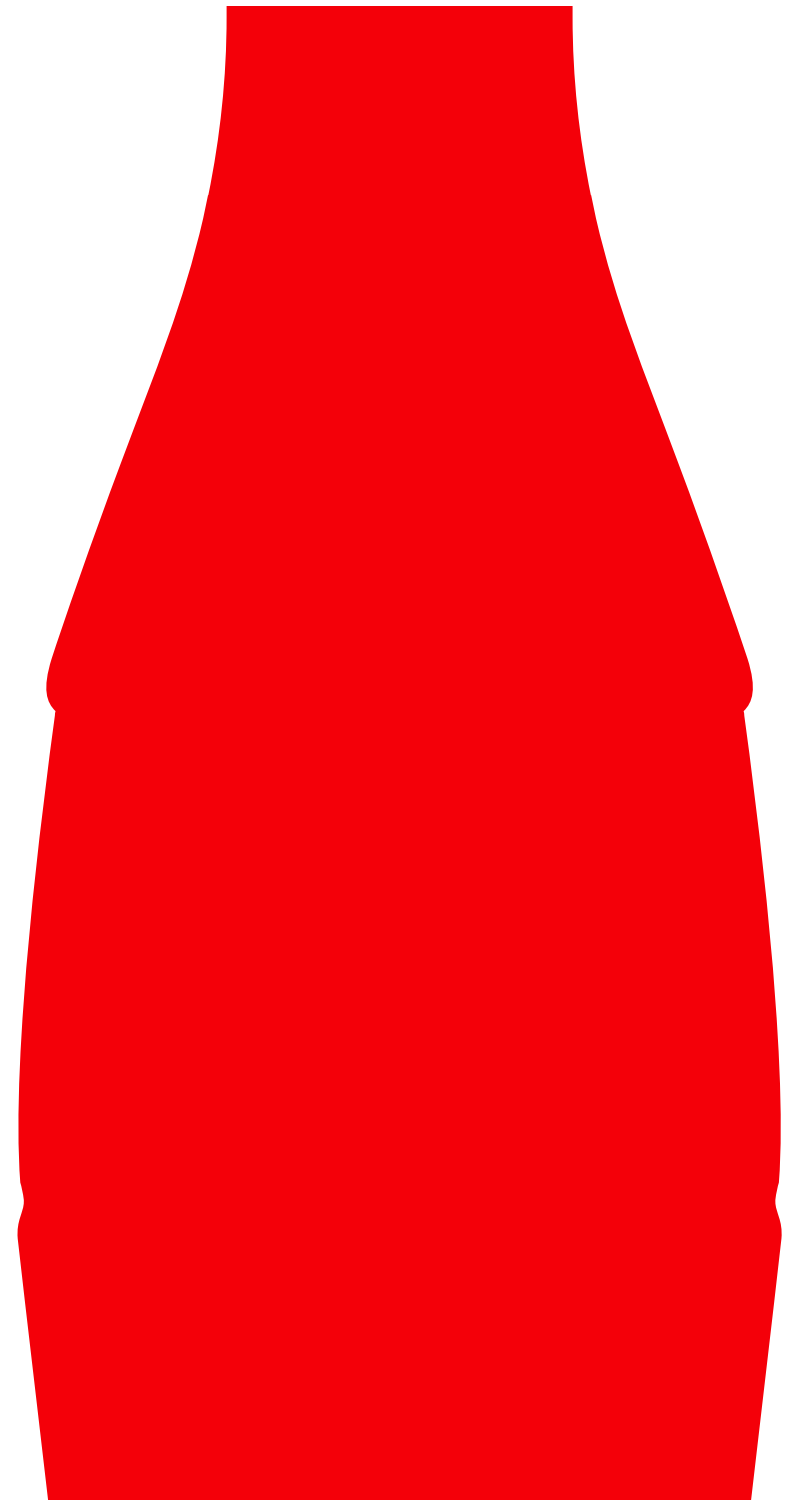




In 2022 the Ethics & Compliance (E&C) team rolled the “Is it COKE?” communication campaign. We asked people to Stand up, Seek advice and Speak Up. This was further promoted via a refresher campaign held in 2023.

As a next step we wanted to understand how this messaging resonated with colleagues. In 2024, the CCEP Ethics & Compliance (E&C) team conducted focus group research in seven CCEP countries (including Great Britain, Germany, Spain, Belgium, Bulgaria, Indonesia, and Papua New Guinea), with a total of 48 respondents. The research aimed to assess how the “Is it COKE?” messaging (which was used during the 2023 Speak Up communication campaign) and the CCEP Speak Up process resonated among CCEP employees.

The results revealed that while employees are generally aware of “Is it COKE?” messaging, there remained further opportunities to drive awareness and understanding about the Speak Up process. The research noted that one of the primary barriers to using the Speak Up resources and channels is the perceived personal risk, specifically relating to confidentiality and potential negative consequences. Cultural differences also influence the willingness to speak up, with hierarchical and economic factors playing a role in certain markets. Despite these challenges, many participants expressed a desire to learn more and appreciated the company's efforts to promote open communication. The focus group results highlighted some key action areas increasing awareness of the Speak Up process, improving transparency relating to how the initiative works, and helping employees navigate personal risks while considering cultural nuances. Based on these insights, the E&C team developed a refreshed global Speak Up Communication Campaign, launched in Q3 2024, in close collaboration with key stakeholders.



# 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 Procurement, Quality, Environment, Safety and Health (QESH), Sustainability, Legal, Workplace and Employee Relations, Ethics & Compliance, Enterprise Risk Management, and Manufacturing. 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 FY2024, 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.

## For more information

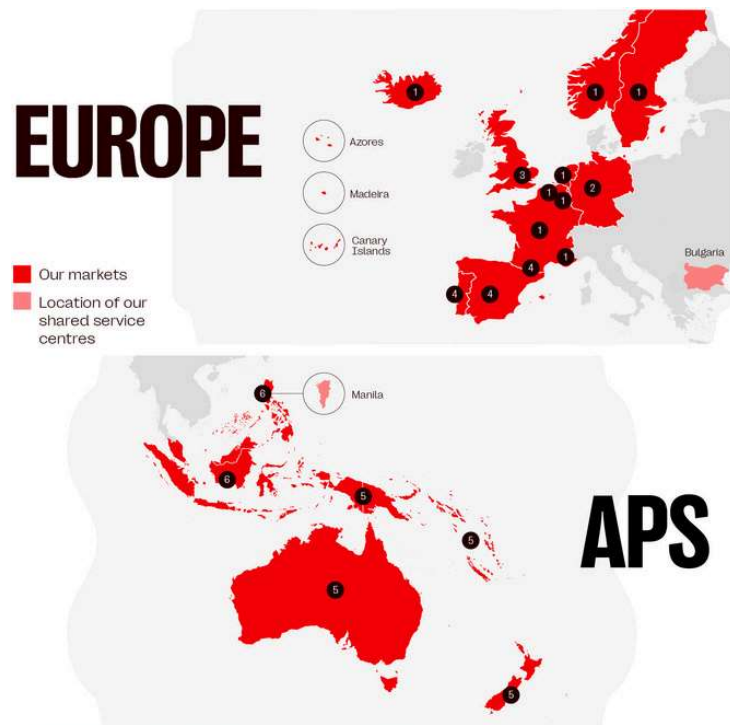
A complete list of the entities of CCEP as of 31 December 2024 (including ownership percentages) is set out in the 2024 Annual Report, which is available under Note 30, of the Consolidated Financial Statements found [here](#).

# Our structure, operations and supply chains

## Structure and operations

CCEP is a leading consumer goods group in Western Europe and the Asia Pacific region, making, selling and distributing an extensive range of primarily non-alcoholic ready to drink (NARTD) beverages. CCEP is the world's largest Coca-Cola bottler by revenue. We make, move and sell some of the world's most loved brands – serving nearly 600 million consumers and helping over four million customers across 31 countries grow. 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 listed on Euronext Amsterdam, NASDAQ Global Select Market, London Stock Exchange and 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, the Philippines, Portugal, Samoa, Spain and Sweden. We employ more than 41,000 people (22,500 APS and 18,500 Europe) across our territories, creating a welcoming environment where everyone can grow and make a difference.



A. Revenue shown is percentage of total reported revenue as at 31 December 2024.

Remaining close to our customers, communities and stakeholders gives us unique knowledge of our markets, enabling us to provide great execution and great brands, done sustainably.

Region	Revenue by geography <sup>(A)</sup>	Production facilities
<b>Europe</b>		
1 FBN (France, Monaco, Belgium, Luxembourg, the Netherlands, Norway, Sweden and Iceland)	24.8%	13
2 Germany	15.5%	16
3 Great Britain	16.3%	5
4 Iberia (Spain, Portugal and Andorra)	16.6%	11

Region	Revenue by geography <sup>(A)</sup>	Production facilities
<b>Australia, Pacific and Southeast Asia (APS)</b>		
5 Australia/Pacific (Australia, New Zealand, the Pacific Islands and Papua New Guinea)	16.7%	25
6 South East Asia (Indonesia and the Philippines)	10.1%	27

A. Revenue shown is percentage of total reported revenue as at 31 December 2024.



## 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 engage with suppliers across our value chain to address common challenges on human rights, water, biodiversity, pollution and decarbonisation. We source products from over 16,000 suppliers, and spend approximately €7 billion with our suppliers. Approximately 84% was spent with suppliers based in our countries of operation.

Our key procurement categories of packaging and ingredients represent approximately 50% of our procurable spend with the balance split across the indirect categories including energy, capital equipment, buildings and facilities, transportation, 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 direct and indirect inputs, including 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 that we face in our supply chain, including modern slavery, as a system.

Since acquiring Coca-Cola Beverages Philippines, Inc (CCBPI) the proportion of CCEP's packaging requirements manufactured within its territories has decreased slightly from approximately 75% to approximately 74%. Approximately 60% of these inputs are sourced from overseas, including countries such as Poland, the Czech Republic, China, Austria, and Taiwan. For ingredients (excluding concentrates and syrups), approximately 90% of the requirements are manufactured within CCEP territories as of 2024, with approximately 60% of inputs sourced from Bulgaria and Denmark.

CCEP continues to utilise tools such as EcoVadis, EcoVadis IQ, Resilinc and FRDM to improve its ability to identify and manage supply chain risks, including modern slavery risks and is currently in the process of onboarding suppliers from the Philippines' into these systems. This process is due to be completed throughout 2025.

The agricultural commodities of sugar and juice still represent the most significant modern slavery risk to CCEP. However, through our RSP, we continue to achieve high levels of compliance to our Principles of Sustainable Agriculture (PSA). In 2024, ~99.9% of CCEP's sugar was sourced via globally recognised accreditation schemes, including Bonsucro, Farm Sustainability Assessment (FSA), No Deforestation, No Peat and No Exploitation (NDPE) and Best Management Practice (BMP) Smartcane.



# 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)

## Policies

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. At the Executive Leadership level, 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 2024, we successfully integrated all countries, excluding the Philippines, onto the internal information policy platform "Genie". Following the acquisition of Coca-Cola Beverages Philippines, Inc. (CCBPI) we continue our focus to ensure everyone at CCEP has access to policies in the same way and in local languages. We also continued to improve and harmonise our Policy Hub. Firstly, we reduced the total number of policies, leading to a simplification of our policy landscape for our employees. Secondly, we ensured 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.

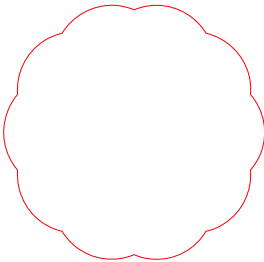
To enhance accessibility to information regarding CCEP's human rights strategy, due diligence processes and Speak Up resources and channels, we have established a dedicated human rights section within our Genie platform. This section allows employees to easily access comprehensive information on human rights, supplementing our existing human rights training programmes. Additionally, it supports internal communications by providing a reliable reference point within Genie.



## Our Code of Conduct

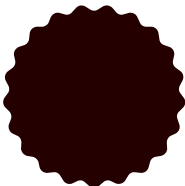
Our success is built on our great brands, great people and great execution. And we are committed to doing this sustainably. Everyone at CCEP has a role to play in helping us deliver on this purpose. We are ambitious about the future. We are focused on delivering sustainable growth, creating value and winning in the market with our customers. In order to do that, we need to do business in the right way.

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 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 RSP, which covers the mandatory guidelines that all suppliers, must comply with to be able to do business with CCEP. This includes obligations to our SGPs, PSA and expectations around modern slavery.

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 '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.  


Our CoC sets out 16 principles, one of which is 'Protecting human rights'. 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 set out in the United Nations' Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact. In the CoC '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. We provide managers with advice on how to respond when approached by colleagues with concerns.

All employees are required to undergo our mandatory CoC training every three years in our European business units and territories and annually in our APS business unit, 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.





## Our Human Rights Policy

Our CCEP wide Human Rights Policy is aligned with International Human Rights Principles encompassed by the Universal Declaration of Human Rights, the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the UN Declaration on Rights of Indigenous People and the CCEP 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 or if they occur, through human rights due diligence and mitigation processes.

In 2024, CCEP updated its Human Rights Policy. The changes to the policy have been made in line with changes to the Human Rights Policy of TCCC, best practices of industry peers and the requirements of the German Act. The changes to the policy focus on providing transparency on our human rights process and procedures. In February 2025, the updated policy was approved by the Board and published shortly after.

In addition to our Human Rights Policy, we have reviewed our Statement of Principles ("Grundsatzklärung") relating to human rights for Germany, which is required by the German Act. This statement builds on our existing CCEP wide 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. This statement is reviewed on an annual basis and reflects the most salient human rights risks for the German business.



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. <b>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 them.</b>
Work hours, wages and benefits and right to work	We compensate employees competitively relative to the industry and local labour market. <b>We operate in full compliance with applicable wage, work hours, overtime, and benefits laws.</b> 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 <b>respecting the human rights of all individuals regardless of gender, origin, colour, religion, age and ethnic and social group</b> , 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 <b>maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions</b> due to internal and external threats.



**For more information**

Further additional policies that assist CCEP in managing human rights include Anti- bribery and Corruption Policy, Health and Safety policy, Anti- Harassment and Inclusion, Diversity and Equity 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**



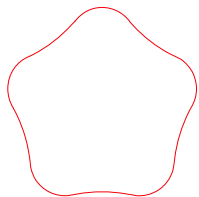
## Our sourcing guidelines

It is a requirement of TCCC and all bottlers within the Coca-Cola system to follow the SGPs and 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 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. We have also provided greater clarity on how we classify strategic suppliers, who are required to have a higher level of compliance. The RSP is underpinned by the TCCC standards, and we have communicated this to our strategic suppliers and the document is now publicly available on our [Corporate Website](#).

During 2024, we continued to evolve our capabilities on identifying and managing supply chain risks including modern slavery risks by utilising 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, including for example, the German Act.

In 2024, we continued to use EcoVadis IQ and have now uploaded our ~16,000\* suppliers into the system and are using the system to identify any potential labour and human rights risks of the relevant suppliers. Whilst we continue to refine the system, during 2024, the EcoVadis IQ system did identify 18 high risk and two very high risk suppliers. The two very high risk suppliers were classified as such as they were both based in Indonesia. After investigation we discovered that both the suppliers had completed a full EcoVadis assessment, which met CCEP minimum requirements. Further investigation revealed that the system had failed to identify the correct business entity, which therefore incorrectly identified the suppliers as very high risk. Of the 18 high risk suppliers; two suppliers were duplicates, four suppliers had EcoVadis Scores that weren't captured, CCEP had already ceased to engage with two suppliers, five suppliers had spend less than €50,000 but have acknowledged our SGP requirements, two suppliers are contracted and include specific clauses on compliance in our RSP, and the last three suppliers were indirectly used to provide postal and, waste services and a small amount of packaging, via third parties.







## 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:

- 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 suppliers 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 risk 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:

The 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 Key Performance Indicators (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.

Human Rights have 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
- 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 activities

### Our business

- Facilitation of easy-to-access training for all employees
- Follow internal reporting mechanisms that compliment policies

### Our supply chain

- Comprehensive third party supply assurance programme
- 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
Potential risks	<ul style="list-style-type: none"> <li>Risk assessments are a key method for CCEP to understand the different human rights risks to our own operations and within our supply chain</li> <li>Human rights risk assessments conducted in Germany and Bulgaria in 2024 identified low risks that CCEP employees may be exposed to modern slavery.</li> <li>We acknowledge, however, that we can be linked to modern slavery through poor contractual controls and monitoring processes of our own practices. CCEP has significant controls in place to manage these risks, including but not limited to: time recording systems, age verification, legal permission to work and written contracts.</li> <li>Very low income can be seen as a driver for modern slavery, however this risk is actively monitored and managed through measures such as collective tariff agreements (where applicable) and a diverse rewards and benefit programme.</li> </ul>	<ul style="list-style-type: none"> <li>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 2024.</li> </ul>
Common forms	<ul style="list-style-type: none"> <li>Exploitation</li> <li>Excessive (unpaid) overtime</li> <li>Underpayment</li> </ul>	<ul style="list-style-type: none"> <li>Forced, bonded, migrant labour</li> <li>Exploitation</li> <li>Excessive (unpaid) overtime</li> <li>Underpayment</li> </ul>
Categories	<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>
Countries	<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>
Management	<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> <li>Education and awareness materials made available to all employees via the Human Rights homepage in Genie</li> </ul>	<ul style="list-style-type: none"> <li>RSP</li> <li>Third party and online assessments</li> <li>Updated supplier onboarding process</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 which have been previously completed we have identified 12 areas as priority issues for CCEP, as summarised in the human rights risk assessment table to the right.

## Human Rights Playbook

In 2024, we developed and implemented a Human Rights Playbook across all jurisdictions. The purpose of the Playbook is to equip teams with the necessary tools and information to complete a local human rights risk assessment. The playbook not only offers detailed guidance but is also designed as a training resource for senior managers and above. The playbook can be tailored to the needs of different functions to ensure that everyone has the right resources to integrate human rights considerations into their work.

### Human Rights risk assessments: 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



## Australia

Human Rights and Modern Slavery risks are routinely monitored as part of the risk management framework in place in Australia. Responsibility for reviewing and managing these risks sits with a designated risk owner within the Australian Business Unit. A review of Human Rights and Modern Slavery Risks occurs on a quarterly basis, as part of Australia's broader risk review process. During this review process, the risks and corresponding mitigations are continuously reviewed and adapted to address any changes in the risk profile. The consistency of these reviews ensures that a proactive approach to identifying and preventing modern slavery risks within the Australian operations and Supply Chain is taken. There were no reports of Human Rights breaches or Modern Slavery in the Australian operations in 2024.

## Germany

In 2023, CCEP worked with an external agency to develop a risk assessment approach for CCEP Germany (CCEP DE). This approach was reviewed and refined and in 2024 conducted risk assessments of 1. our own operations; and 2. our Suppliers' operations based on this reviewed approach and in accordance with the German Act. The risk assessment of CCEP DE's own operations was conducted through a structured questionnaire with subject matter experts (SME) for each human rights or environmental risk. The results of the questionnaire formed the basis for determining probability and severity of these risks. 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 team.

In 2024, from a human rights perspective, discrimination, occupational safety, and excessive water consumption by CCEP DE have been identified as key focus risks. Human rights and environmental risks, if they were to occur, would generally have moderate to significant impacts.

However, at CCEP DE, these risks are considered unlikely within our own operations because prevention measures and action plans are developed by subject matter experts and monitored by the German Leadership team on an ongoing basis. In our 2024 risk assessment, modern slavery was evaluated but considered highly unlikely to occur within our operations. However, we recognise that human rights are interconnected, and violations in one area can increase the likelihood of others. For example, groups facing discrimination may also be at higher risk of experiencing modern slavery, as these issues can compound each other, therefore it is important for CCEP to monitor these risks from a broad perspective.

Regarding the supply chain of CCEP DE, the total number of suppliers declined from ~2,300 suppliers to ~2,200 suppliers in 2024. The rating system of the suppliers defines six risk categories, very low, low, medium low, medium high, high and very high risk suppliers. We identified no high or very high risk suppliers and ~190 suppliers with a medium high-risk level in the areas of environmental or human rights. Modern slavery was not identified as a risk within these suppliers.

## Bulgaria

In 2024 a human rights risk assessment took place in CCEP Bulgaria. A focus was placed on Bulgaria following the results of the 2023 CCEP-wide human rights risk research project which found some countries may experience a higher risk of human rights culturally as well as an increase in employee numbers in recent years. With a focus on the risks to people, a growing employee population provided a good opportunity to look at human rights risks from an employee perspective. A pre-interview questionnaire as well as interviews took place with a selected sample of employees to discuss specific human rights risks that the employees felt were more likely to occur at CCEP Bulgaria.

Overall, no high risks were identified for CCEP Bulgaria. Working time and discrimination were highlighted as risks which may be more likely to occur. These risk are well mitigated by a range of measures including competitive wages, effective time record management systems, positive culture around work-life balance and inclusivity and CCEP compliance policies.

An analysis of suppliers in Bulgaria also took place in 2024. Of the approximately 150 suppliers that were analysed, two high risk suppliers were identified. Following further investigation CCEP found it had no spend with either supplier who provided local transport services in 2024. The Human Rights team therefore suggested blocking both suppliers in SAP to prevent a new Purchase Order being raised or new orders processed.



## Case Study

### Hotel ethics and human rights review

According to a report by the Walk Free initiative, the hotel sector is particularly vulnerable to exploitation due to its complex supply chains and the high concentration of migrant workers. Additionally, research highlights that the tourism and hospitality industries face significant challenges in managing the risks of labour exploitation and modern slavery, largely due to the high number of migrant workers employed.

Based on these insights, in 2024 CCEP completed an ethics and human rights review of 103 of the hotels we partner with across Europe, with a focus on key hotel chains. Using the EcoVadis rating system, we assessed the sustainability and ethical performance of each hotel. For our preferred hotels that did not have an EcoVadis scorecard, we distributed our own detailed questionnaire which aligns with the requirements of the German Act.

Two hotels received lower scores than acceptable specifically in the human rights section, as they had advised that they retained passports of employees. CCEP conducted a deeper investigation through a dedicated follow-up conversation with these hotels, and it was uncovered that the hotels had misunderstood the question, and in fact only retained copies of the passports of employees. The original documents remained with employees at all times. This additional evaluation focused on key areas such as modern slavery, discrimination, and harassment. As a result, we were able to address and mitigate any potential risks, ensuring that all our preferred hotel partners in Europe are aligned with our ethical standards. Looking ahead, we plan to initiate a tender in 2025 for our APS region, with the goal of establishing a global preferred hotel programme for CCEP. The Ethics and Human Rights review of our hotel partners in those regions will be postponed until after the tender is completed.



# 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 92.1% and in APS 96.8% of our employees were employed on permanent contracts in 2024.

We understand the risks related to engaging team members 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, such as contractors, labourers, or security services, we follow a rigorous evaluation process. This includes an EcoVadis assessment, which requires our suppliers to have a minimum score of above 50 overall and above 35 on each criteria, including Labour and Human Rights. Furthermore, as part of our due diligence within the 7 Step Sourcing Process (7SSP), we ensure that third party labour providers adhere to working conditions that comply with all local labour laws and regulations. An essential element of this selection process is an Ethics & Human Rights assessment, which further strengthens our visibility into supplier practices and employee relationships.

## TCCC Audit

The SGP framework involves a site audit of all CCEP production facilities, 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 CCEP production facility and/or to the supplier of the site, along with required remediation and/or mitigation measures to be taken, before being followed up 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 2024, we continued to assess the risk of modern slavery within our operations and supply chains, including two targeted audits in Australia. No evidence of modern slavery was identified within the audit.

## Training

A key foundation of our internal management of modern slavery is to raise awareness across our employees through regular training on our Code of Conduct (CoC), policies and human rights, including modern slavery. There are two different training courses, one for employees in Europe and one for employees in APS, currently excluding the Philippines, due to the different training platforms in each region. We are in the process of integrating the Philippines, and the CoC training is expected to be rolled out in the Philippines in 2025. We require our employees to complete this training on a bi-annual basis.

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 APS, excluding Philippines, for those who cannot attend the live session. In 2024, content for this training was updated and focused on the Corporate Sustainability Due Diligence Directive (CSDDD), the associated risks and how CSDDD may impact Procurement teams. Additionally, we provided training on human rights to the Heads of our Labour Relation teams in Europe and (APS) on Freedom of Association and Collective Bargaining and CCEP's Human Rights Restructuring Guidelines.



## Raising concerns - Speaking up

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 CCEP Speak Up Policy supports the ability of employees to raise any concerns they may have, including those related to modern slavery. This policy is available to employees, former employees, customers, contractors, suppliers, joint ventures, friends/relatives of employees and others. This 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 will act promptly and appropriately on any concern addressed. CCEP is committed to take all reasonable measures to prevent any retaliation against any person reporting concerns.

The Speak Up Policy is also embedded within our company wide Speak Up communication campaigns. In September 2024, we launched the 'It takes courage to speak up' campaign. Diversified assets were provided to all employees and people managers. Such assets included our speak up video, a manager speak up conversation guide to facilitate sessions with the team, digital screens, printed posters to display on site and articles on our internal communication platform Redline. In some of our territories, speaking up was integrated in to townhall events. One important part of this campaign was to make third parties working on CCEP's behalf at our sites aware of our opportunities to speak up by displaying posters in the dedicated areas of their work.

On 26th March 2024, a case was submitted via CCEP's Speak Up system, which was classified as a potential human rights violation. The expected system acknowledgment of receipt was received. All speak-up cases reported through the various Speak Up Channels (web reporting, telephone reporting or mobile device reporting) will first go to specific job owners of four positions in CCEP (including Chief Compliance Officer, Vice President Corporate Audit Service, Director Ethics & Compliance and Associate Director Ethics & Compliance). These job owners then review the cases and share them with the stakeholders responsible for investigating the case in the relevant business units or countries. The report was forwarded on the same day to the chair of the German Code of Conduct Committee as well as the human rights coordinator with the reference "possible human rights case". The situation was investigated and finally assessed as non-substantiated. The reporting channel and internal processes were working in a process-compliant and good manner.

Our local external facing webpages dedicated to human rights provide information about human rights at CCEP, what CCEP does to protect human rights and how CCEP acts 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.

In all our Business Units, we have set up our external Speak Up channels. They are hosted externally and provide an additional way for CCEP workers and everyone else connected to CCEP through a work-related context to ask questions and voice concerns confidentially and anonymously, where allowed by local law. The external Speak Up channels are available 24 hours a day, 7 days a week and 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 human rights as a part of our broader corporate Enterprise Risk Management (ERM) framework, and responsibility for managing specific risks sits with a designated risk owner. These ERM risks are reviewed regularly by the Compliance and Risk Committee of the Executive Leadership Team (ELT) and shared annually with the Board.

# Our process for responding to a breach of human rights

The process and actions we take to respond to a breach of human rights internally and within the supply chain of both tier 1 (suppliers with a direct contract with CCEP) and tier 2 (suppliers of suppliers) are clearly detailed with clarified roles and responsibilities. These are aligned with internal stakeholders including Procurement, Ethics & Compliance, Enterprise Risk Management and Quality Environment Health & Safety (QESH).

Here is a high level description of our process for responding to a breach of human rights:

- 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;
  - Notification from other supplier monitoring programmes like FRDM or Resilinc,
  - 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, relevant internal stakeholders in the following functions will be informed: Employment Practices & Human Rights, Ethics & Compliance, Enterprise Risk Management, Legal, Public Affairs, 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. During this process, close contact with the human rights holder is maintained to ensure the effectiveness of our mitigations or remediations.

- 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. The effectiveness of our procedure will be reviewed, if we receive feedback related to our processes and procedures.
- 7 Report**  
Human rights cases will be included in CCEP's internal and external reporting where appropriate.





## Our supply chain

We continue to demonstrate strong compliance with our Responsible Sourcing Policy (RSP).

Ernst & Young LLP (EY) was engaged by CCEP to perform a limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), to report if the Sustainability Statement for the year ended 31 December 2024 as set out on pages 23 to 58 of the Annual Report, including the information incorporated in the Sustainability Statement by reference, is in all material respects in accordance with the ESRS as adopted by the European Commission) excluding references to Article 8 of Regulation (EU)2020/852 (Taxonomy Regulation).

## TCCC Audits

TCCC requires suppliers of primary packaging and ingredients to CCEP to complete physical audits of their sites to ensure compliance to the SGP framework. In 2024, CCEP had 217 suppliers of primary packaging and ingredients and 97.9% of these suppliers were compliant. For 2024, TCCC was scheduled to conduct SGPs audits on 73 supplier sites, 61 supplying into CCEP Europe and 12 supplying into APS. Audits we conducted on time for 71 suppliers, with two suppliers listed as overdue, which were both based in the EU and these have been rescheduled for the first half of 2025.

Our 2024 progress			
KPI	This is Forward target	Group	excl. the Philippines
Percentage of supplier spend covered by our SGPs	100%	98.6%	98.5%
Percentage of sugar sourced in compliance with our PSA		80.1%	99.9%
Percentage of pulp and paper sourced in compliance with our PSA		97.8%	99.9%



## Digitalisation of risk management

CCEP continues to recognise the growing importance of technology in increasing the visibility of risk within our supply chain. We continue 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 since 2022, we continued to map our tier 2 suppliers using Resilinc in 2024. We continue to use FRDM, a supply chain risk management tool, to monitor and mitigate human rights and climate-related risks in our supply chain.

**Resilinc\*** - During 2024, we continued to develop our Resilinc tool and now monitor 978 T1 suppliers and their operational locations covering over 3,921 sites. We have also now mapped the supply chains of 196 of these T1 suppliers, adding a further 1,255 T2 and below suppliers and 3,528 supplier locations to the monitoring. We also use the tool to monitor 128 CCEP sites and key logistics ports globally for potential risks and disruptions. The AI scanning now operates across 7,449 supply chain locations covering over 100 risk types, including ones that indicate an elevated risk of modern slavery.

**FRDM** - During 2024, 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 all German and Norwegian suppliers relating to specific legislation. FRDM is a start-up organisation that uses publicly available shipping records to map suppliers' points of supply.

\*not including Coca-Cola Beverages Philippines, Inc. (CCBPI)

**EcoVadis** - In 2024 the number of suppliers on EcoVadis increased to 91% (+16% versus 2023). In addition, compliance increased to 74% (+14% versus 2023) with an average score of 66.9. In 2025 we are prioritising improving compliance and the integration of the Philippines suppliers onto the EcoVadis system.\*

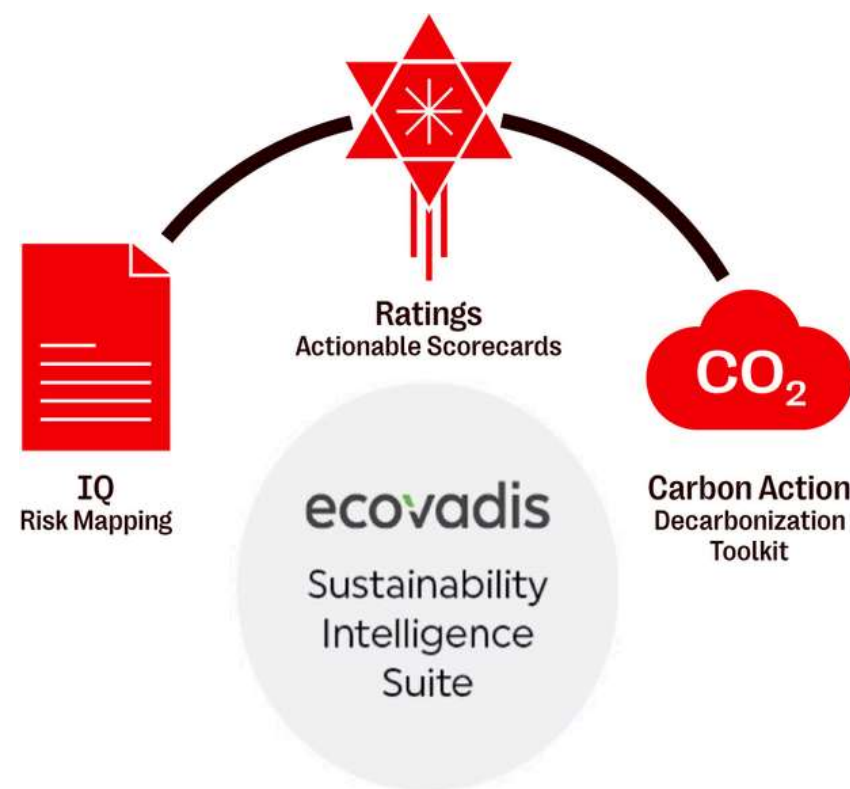
In 2024, Procurement continued to embed our sustainability tools; EcoVadis and EcoVadis IQ platform. These two platforms complement each other as CCEP utilise the EcoVadis platform to manage risks for our Strategic Suppliers, the top 80% of spend, while the EcoVadis IQ platform is used to identify risks associated with our ~16,000 non-strategic suppliers.\*

We have completed the integration of the supply bases across Europe and APS, excluding the Philippines, onto a common platform and have also updated our Responsible Sourcing Policy (RSP) to clarify the requirements 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. We also held Supplier Days across each of the regions to reiterate the requirements and by the end of 2024 we have seen an increase +16% versus 2023 of suppliers on EcoVadis, an increased in compliance to meet our minimum requirements of +14% versus 2023 and an average score of 66.9.\*

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. During 2024 we uploaded ~16,000\* suppliers to the platform and are now able to identify any potential labour and human rights risks for the business. Whilst we continue to refine the system it did identify 18 high risk and two very high-risk suppliers, which we actioned accordingly. The next step is to continue to refine the system and upload our Philippines suppliers onto the platform.

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 the business. We will continue to refine the data and better utilise the systems in 2025.

**Workers voice** - In 2024, we tested a worker's voice technology in Australia. The technology enables workers to articulate concerns and provide feedback to practices which can be linked to modern slavery. After the completion of the pilot, CCEP determined that the technology fell short of its expectations, as the support and materials provided for the technology were not appropriate to enable the technology to work effectively for its workers. In 2025, CCEP will continue to look for alternative technologies that can be utilised in this area.

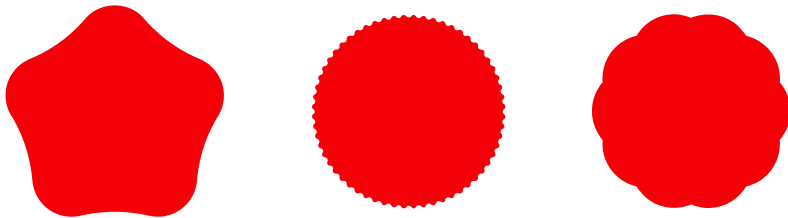




## Remediation

We review the findings of all our supplier audits 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 was the identification of a potential high risk tender in the “re-Packing” category in Iberia in 2024, which traditionally operates in low-cost labour market. Working with the category manager we proactively assessed the potential suppliers using FRDM, which highlighted a moderate risk in three suppliers’ Tier 2 & Tier 3 supply chains. As a result, we added specific questions to validate each supplier’s mitigation of this risk in the sourcing process. Ultimately, only one of the three vendors participated in the subsequent process, where further investigations were completed. These investigations confirmed that this supplier was in compliance with CCEP’s Human Rights Policy.



# 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 2024, CCEP assessed the effectiveness of its actions through different metrics, including:

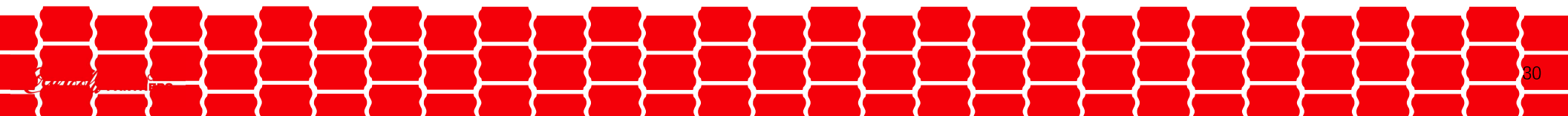
## 1 Supplier assessment

Where risks are identified either through The Coca-Cola Company Supplier Guiding Principles (TCCC SGP) physical audits, EcoVadis, EcoVadis IQ or FRDM, our Procurement function works with the supplier to agree a course of corrective action, and 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 Act we identified approximately 190 potential risks, predominately under the Labour and Human Rights risk pillar. Within this system risks are assessed based on the industry and the country that the suppliers operate. However, further investigation only identified approximately 190 medium high risk suppliers and no very high risk nor high risk suppliers.

## 2 EcoVadis assessment of CCEP

In 2024, we were awarded a EcoVadis Gold medal. This result places CCEP among the top 5% of companies assessed by EcoVadis in the past 12 months (97th percentile).



### 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 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 cover 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 conducts 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 2024, TCCC was scheduled to conduct SGP audits on 73 supplier sites, 61 supplying into CCEP Europe and 12 supplying into APS. Audits were conducted on time for 71 suppliers, with two suppliers listed as overdue, which were both based in the EU and these have been rescheduled.

There are a total of 217 TCCC suppliers, who are supplying Primary Packaging and Ingredients to CCEP. Each of these Suppliers is required to be compliant to SGP and are audited by TCCC. 158 are European based suppliers with 150 fully compliant with the SGPs requirements and eight are non-compliant. The non-compliances are due to issues are related to minor Health and Safety concerns (including no evacuation plans, no fire drills conducted, emergency exits unmarked), Wages and Benefits, and Work Hours and Overtime non-compliances.

Follow up audits have been scheduled to address these non-compliance issues. In APS there are 59 suppliers of which 55 are fully compliant and four are non-compliant. Of the four non-compliant audits in APS, two suppliers are based in Philippines and two in Indonesia. Similar to Europe the non-compliance is related to Health and Safety, Wages and Benefits and re-audits are scheduled for early 2025. If a supplier fails any aspect of the SGPs or a significant risk is identified, they are expected to implement corrective actions before a follow-up audit is performed.

### 4 Risk assessment of human rights

In 2024, we have continued to conduct country specific risk assessments based on legislative requirements and CCEP research to identify potential new or existing human rights risks. Two human rights risk assessments have been completed in Germany and Bulgaria.

For Germany, the aim of the risk assessment has been to identify and remediate potential human rights risks within our own operations and the supply chain. The risk for modern slavery was seen as a low risk within our own operations and across the tier 1 suppliers. The identified salient risks, still rated with a low likelihood to occur, have been related to discrimination, occupational health and extensive water consumption by the business. This outcome was cross checked with the results from the Code of Conduct case review, the results and comments of the employee engagement survey and the in deep insights from the relevant functions managing these risks.

For Bulgaria, the aim of the risk assessment has been to understand a) potential human rights risks within CCEP Bulgaria, b) if a specific group of people may be more likely to be negatively impacted, c) potential risks within tier 1 supplier and d) if the CCEP wide and local actions we take to prevent and mitigate human rights risks are effective. The results of the risk assessment identified no high risks within CCEP Bulgaria.

The methodology for the risk assessment in Bulgaria was developed following the completion of the recognised United Nations Global Compact Human Rights Accelerator. This course supports business moving from a commitment to action on human and labour rights, aligning with CCEPs aim to be a force for good in the communities in which we operate. We submitted an action plan to address two of the low risks identified during the human rights risk assessment, Discrimination and Working time. This was subsequently shared with the Bulgarian leadership team.

In 2025, based on upcoming legislative requirements and CCEP research, 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 Anti-Harassment and Inclusion Diversity and Equity 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 2024 we updated our CCEP Human Rights Policy in line with changes of the Human Rights Policy of TCCC, best practices of industry peers and the requirements of the German Act.

As procurement 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 APS, excluding Philippines. In 2024, content for this training was updated and focused on general information on the Corporate Sustainability Due Diligence Directive (CSDDD), the associated risks and how CSDDD may impact Procurement teams.

Additionally, we provided training on human rights to the Heads of our Labour Relation teams in EU and APS on Freedom of Association and Collective Bargaining and the CCEP's Human Rights Restructuring Guidelines.

In 2024, there were no issues raised relating to modern slavery. Overall, there were 392 Code of Conduct reports received and investigated, of which 133 were through the external Speak Up channels.

## 6 Employee training on CCEPs Human Rights Policy

In 2024, we continued to use different technologies for training in Europe and APS. The bi-annual mandatory training for human rights continues to be live for all employees in Europe. Employees are provided with an opportunity to rate the training out of maximum score of 5 points. For Europe, since its launch 22,372 employees have completed the training and the training received an average score of 4.6/5 indicating a high satisfaction rate. Employees in APS, excluding the Philippines, are encouraged to complete the existing human rights training.

## 7 2024 Code of Conduct cases, and effectiveness of 2024 Speak Up communication campaign

A refreshed global Speak Up Communication Campaign was rolled out in September 2024, focusing on clarifying the Speak Up process and how CCEP supports and protects those using the reporting channels, while highlighting real-life experiences to guide employees on the types of issues to report. The campaign was held in close collaboration with key stakeholders to ensure the most effective use of both global and local channels for best coverage of the different audiences and impact – to drive awareness, trust, transparency and encourage people to speak up. All visual and training materials created within this campaign are made continuously accessible in the CCEP learning platforms and local channels. We saw an increase of Code of Conduct cases reported in Q4 following this campaign.

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

Our employees company-wide learn about speaking up and whistleblowing in the mandatory Code of Conduct training where our internal Speak Up resources and external Speak Up channels are mentioned 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.

Training for people managers on how to respond when a concern is raised to them has been developed and was rolled out in our European territories per beginning of February 2024 as an annual e-learning. This e-learning has been adapted and tailored to be appropriate for our APS BU and was rolled-out in New Zealand, Pacific, Papua New Guinea, and Indonesia in 2024. It is planned to be rolled-out in the Philippines in the first half of 2025. In Australia, a different approach is required due to the strict local whistleblowing regime which exists. New e-learning was launched in 2024 for eligible recipients who are able to receive eligible disclosures from the Australian business, so that they understand what they need to do and live training for line managers will be rolled out in 2025, given the very specific local regulation.



9

## Employee survey

Since 2021, we have included questions in the bi-annual CCEP Inclusion Survey to assess how comfortable people feel to speak up without fear of retaliation, and to better understand the level to which everyone feels they are treated with dignity and respect.

We have a dedicated working group that has been in place since 2022 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 group has implemented refreshed anti-discrimination and harassment guidance, the launch of a global “is it COKE?” campaign (speaking up) to reinforce inclusive behaviours, and the rollout of “becoming a workplace ally” training.

We continue to monitor progress on the area of “being treated with dignity and respect”. In the 2023 Inclusion Survey, this area was ranked the highest positive experience across CCEP. In the area of feeling safe to speak up, scores had positively improved by eight percentage points.

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 2025, this includes further embedding the allyship training in Indonesia and The Philippines, and supporting managers to foster psychological safety within their teams.

10

## Germany: Human Rights questionnaire

In 2023, CCEP conducted a quiz across the entire organisation to evaluate the effectiveness of providing information on human rights and the grievance channel.

In 2024, a survey was sent to approximately 50 employees in Germany from various departments, using the same questions as in 2023. Participation was anonymous and voluntary.

This survey aimed to assess employees' understanding of human rights and our complaint mechanism in a playful manner. The results were satisfactory, indicating a strong awareness among employees regarding key aspects of our human rights policies and procedures. The survey covered various topics, including the correct identification of company policies, internal and external whistleblower channels, appropriate responses to observed misconduct, and the exclusion of non-relevant groups from Speak Up contacts.

11

## Human Rights homepage

In 2024 we launched the new internal CCEP Human Rights Homepage in Genie.

This homepage serves as a comprehensive resource designed to empower all employees to enhance their understanding of human rights, thereby fostering a culture of awareness and respect throughout our organisation. At CCEP, we see human rights as everybody's business.

The Human Rights Homepage includes essential information regarding CCEP's approach to human rights, details on conducting human rights impact assessments, the important relationship we have with our suppliers and guidance on how to Speak Up should you see something which doesn't seem right. The content related to Speak Up has been aligned with Ethics & Compliance.



## 12 Working with an external agency to review our Human Rights strategy and approach for Germany

In 2024, World Wildlife Fund (WWF) and Coca Cola Europacific Partners Deutschland GmbH (CCEP DE) jointly conducted the One Planet Assessment (light). The assessment was based on joint meetings, document reviews, and questionnaire analyses and covered various aspects including climate, biodiversity, freshwater, and human rights.

The assessment revealed that CCEP DE has a solid foundation for addressing human rights issues and is strongly committed to respecting internationally recognised human rights. Human rights management is primarily focused on compliance, with assessments conducted to ensure adherence to the German Act. While CCEP DE demonstrates good transparency regarding its own operations and direct suppliers, there is still room for improvement in transparency measures within the broader supply chain.

To enhance efforts, WWF recommended that CCEP DE improves the implementation of measures for direct suppliers through its Supplier Guiding Principles (SGPs) and establish specific supplier targets. Furthermore, CCEP DE could expand its ambition to advocate for public policy to address human rights-specific challenges. Lastly, WWF also noted that while CCEP DE's reporting on human rights impacts is focused on operational compliance, the information on the value chain could be improved.

Based on these suggestions, we will assess, how we can improve on the different identified opportunities in the future.

## 13 Reporting and review by the Compliance and Risk Committee of the ELT and the Environmental, Social and Governance (ESG) 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 2024, we shared our second report on our human rights investigations internally with the ELT. In total, 10 human rights investigations have taken place. At the time of the report, three cases have been substantiated. None of these substantiated cases have been related to modern slavery. The cases have been in the context of freedom of association, discrimination and wages. All of these substantiated cases have been closed with a successful remediation. Six cases have been unsubstantiated and dismissed, and one case is still under investigation. 50% of the cases in 2024 were within the value chain. Most of the cases are related to production and logistics. Seven different human rights areas were the subject of the investigations, led by cases related to freedom of association and discrimination.

# Future focused

**We are steadfast in our commitment 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. We continue to deep dive into higher risk supply throughout our supply chain.**

Recent developments of new regulations on human rights such as the ESRS and the CSDDD are reshaping the landscape for human rights and environmental rights. We closely monitor these developments and will adjust our human rights strategy accordingly. Our aim is to go beyond compliance and to be a force for good.

Therefore, 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 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 Bottling Company and Coca-Cola İçecek on a regular basis. In 2025, we will further strengthen our collaboration within the Coca-Cola system to address any human rights issues in the most effective way by working in partnership with TCCC and other bottlers.

We actively participate in different business forums dedicated to human rights such as the United Nations Forum on Business and Human Rights and TCCC Annual Engaging Business Forum to ensure we learn as well from peers, unions and NGOs. We are a member of the Global Industrial Relations Network (GIRN) of the International Organisation of Employers (IOE).

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 refreshed our human rights assessment strategy primarily focused on the countries where the highest human rights risks have been identified.

In 2025 we plan to continue to drive human rights for a better shared future and we are committed to understand human rights risks through risk assessments in different countries or commodities.



**For more information on CCEP's management of Modern Slavery within our business and our supply chains visit:**

- [cocacolaep.com](https://cocacolaep.com)
- [2024 Annual Report](#)

## 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 the 22nd May 2025 by Damian Gammell as the CEO of CCEP plc on behalf of all of the reporting entities.

A handwritten signature in black ink, appearing to read 'D Gammell', is positioned above a horizontal dashed line.

**Damian Gammell**  
CEO



# Glossary

Unless the context otherwise requires, the following terms have the meanings shown below.

the Acquisition	On 23 February 2024, the Group together with Aboitiz Equity Ventures Inc. (AEV) jointly acquired 100% of Coca-Cola Beverages Philippines, Inc. (CCBPI) (the Acquisition), a wholly owned subsidiary of The Coca-Cola Company (TCCC).
AI	Artificial intelligence
API	Australia, Pacific and Indonesia region incorporating Coca-Cola Amatil Limited and its subsidiaries and business unit
APS	Australia, Pacific and South East Asia region and renamed APS business unit following the Acquisition
Board	Board of Directors of Coca-Cola Europacific Partners plc
BU	a business unit of the Group
CCEPBI	Coca-Cola Beverages Philippines Inc.
CCEP DE	Coca-Cola Europacific Partners Deutschland GmbH
CCEP or the Group	Coca-Cola Europacific Partners plc (registered in England and Wales number 09717350) and its subsidiaries and subsidiary undertakings from time to time
CCL	Coca-Cola Amatil Limited
CEO	Chief Executive Officer (of Coca-Cola Europacific Partners plc)
CoC	Code of Conduct
Coca-Cola system	comprises The Coca-Cola Company and around 220 bottling partners worldwide
Committee(s)	the five Committees with delegated authority from the Board: the Audit, Remuneration, Nomination, Environmental, Social and Governance and Affiliated Transaction Committees

Company or Parent Company	Coca-Cola Europacific Partners plc
CSDDD	Corporate Sustainability Due Diligence Directive
Directors	a (the) Director(s) of Coca-Cola Europacific Partners plc
DMA	Double materiality assessment
EcoVadis	provider of business sustainability ratings
EFRAG	European Financial Reporting Advisory Group
ELT	Executive Leadership Team
ERM	enterprise risk management
ESG	Environmental, Social and Governance
ESRS	European Sustainability Reporting
EU	Standards European Union
Executive Leadership Team or ELT	the CEO and his senior leadership direct reports
EY	Ernest Young
GB	Great Britain
GIRN	Global Industrial Relations Network
Group or CCEP	Coca-Cola Europacific Partners plc and its subsidiaries subsidiary undertakings from time to time
ID&E	Inclusion, Diversity & Equity
IOE	International Organisation of Employers
IRO	Impact, Risk and Opportunities
ISAE	International Standard on Assurance Engagements

# Glossary

Unless the context otherwise requires, the following terms have the meanings shown below.

KPI	key performance indicator
NARTD	Non alcoholic and ready to drink beverages
NGO	non-governmental organisation
PACS	Public Affairs, and Communications & Sustainability
Parents Company or Company	Coca-Cola Europacific Partners plc
Partnership	the partnership agreement entered into between the Group, the GB Scheme and CCEP Scottish Limited Partnership to support a long-term funding arrangement
PET	polyethylene terephthalate
PSA	Principles of Sustainable Agriculture
QESH	Quality Environment Health & Safety
RSP	CCEP's Responsible Sourcing Policy, launched in 2022
SGP	Supplier Guiding Principles
TCCC	The Coca-Cola Company
WWF	World Wildlife Fund
UN	United Nations