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## 1. Introduction

CCE Holding (CCE) is committed to operating its activities in a sustainable manner, taking long-term environmental, social and governance consequences into consideration in our activities. The suppliers of CCE play a key role for CCE in its effort to live up to this commitment.

Therefore, CCE is committed to ensure a responsible supply chain management to operate its activities in a sustainable manner throughout the value chain. Fairness, inclusivity, safety, and sustainability are values we hold dear at CCE and which we strive to achieve in our operations. We expect the same of our suppliers.

Read more about CCE's sustainability commitments in CCE's Sustainability Policy, which can be found online or will be sent on request.

### Scope

CCE's suppliers, vendors, consultants, independent contractors, agents, or any other third party engaged to carry out any action on our behalf ("suppliers") must always act with integrity by obeying the letter and spirit of laws, regulations, standards (together, "laws") and CCE policies that apply to them, wherever they do business. The Supplier Code of Conduct (hereinafter referred to as the "Code") applies to all CCE suppliers. CCE requires its suppliers to respect and comply with this Code when conducting business. They should, in turn, also require that their suppliers abide by the requirements of this Code.

The requirements of this Code are in addition to the requirements set out in any agreement or other set of terms and conditions that apply to your relationship with CCE.

### Compliance

CCE prefers dialogue and is committed to support its suppliers in mitigating identified risks. We may decide to conduct an audit if we detect or reasonably suspect that a supplier is not complying with this Code. If suppliers are not meeting our expectations, we will work together with the supplier to agree on a corrective action plan. Depending on the circumstances, CCE may take a range of actions to remediate a failure by a supplier to comply with this Code, for example by suspending business with the supplier until corrective measures have been implemented or by terminating the relationship with the supplier.

### Reporting Concerns

We require our suppliers to take steps and ensure that their employees understand this Code and comply with its requirements. We expect our suppliers, and its employees or contractors, to speak up promptly if they learn of a violation of the law or this Code, either by the supplier itself or by CCE employees. We expect the supplier will contact the CCE employee who is the primary contact either via phone or e-mail. No retaliatory actions will be taken against any employee who makes such a report or cooperates in an investigation of such a violation reported by someone else.

Read more about CCE's Policy on Anti Retaliation, which can be found online or will be sent on request.

## 2. Integrity in the workplace

As part of CCE's commitment to operating in a sustainable manner, we demand the same commitment from our suppliers by following these principles:

- Suppliers must respect the rights of their employees. They shall not use forced and child labour or any form of modern slavery.
- Suppliers are expected to prohibit workplace harassment as well as improper discrimination.
- Suppliers must maintain a safe and healthy workplace for their employees.
- We expect suppliers to follow environmental laws and to regularly monitor their environmental impact.

### **Respect for Human Rights and Labour Standards**

CCE is committed to complying with all applicable labour, employment, and human rights laws, and we demand the same commitment from our suppliers.

Our suppliers must therefore as a minimum follow local laws on minimum wages, benefits, and working conditions. We require the supplier ensures working hours fall within the limits set by law or by applicable collective agreements.

Our suppliers are never permitted to use forced, compulsory labour, or any form of modern slavery. Suppliers are also prohibited from using underage labour, as defined by local labour law, unless it is part of a government-approved training or apprenticeship program that clearly benefits the participants.

Suppliers should also respect employee freedom of association and choice with respect to the issue of unions or works council affiliation, consistent with local laws.

Suppliers must respect the rights of Indigenous Peoples to decent living conditions, education, employment and social activities.

### **Diversity and Inclusion**

We believe a diverse and inclusive workplace is a source of strength. That is why we expect our suppliers to prohibit workplace harassment and discrimination based on sex, race, ethnic background, religion, disability, or any other personal characteristic protected by law.

### **Health and Safety**

We expect our suppliers ensure the physical integrity of their employees and contractors by having policies and procedures in place for example conducting training in health and safety measures, monitoring and reporting of accidents, external review of health and safety practices etc.

Read more about CCE's approach to health and safety management in CCE's Health and Safety Policy, which can be found online or will be sent on request.

### **Environmental Responsibility**

We expect our suppliers to meet or exceed applicable environmental laws, and to be committed to minimizing the impact of their operations on the environment.

Suppliers should also seek to regularly evaluate and monitor the impact of their business activities on the environment. The activity assesses availability of and, where feasible, uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish.

Read more about CCE's approach to environmental management in CCE's Environmental Policy, which can be found online or will be sent on request.

### 3. Integrity of business dealings

CCE's suppliers must always act with integrity by obeying the letter and spirit of laws and CCE policies that apply to them, wherever they do business.

While the laws that apply to our suppliers are numerous and vary by jurisdiction, some important principles that must be followed include:

#### Antitrust and Competition Laws

We compete vigorously while respecting free and fair competition. We expect the same of our suppliers.

Suppliers must comply with all applicable antitrust and competition laws and cannot engage in any act that improperly reduces competition. Examples of such prohibited acts include agreeing with competitors to fix prices, set discounts or terms of sale, limit production, divide markets, allocate customers, coordinate bidding activities, boycott customers and suppliers, fix employee compensation, or refrain from hiring each other's employees. In some jurisdictions, the mere exchange of sensitive commercial information is illegal.

CCE's Antitrust and Competition Policy states:

- Suppliers should know the laws that apply to them and follow the letter and spirit of such laws.
- Suppliers must not collude with competitors to limit competition.
- Suppliers are strictly prohibited from offering bribes to government officials.
- Suppliers must not violate sanctions and export control laws.
- Suppliers must cooperate with CCE in identifying the source of certain minerals used.

Read more about CCE's Antitrust and Competition Policy, which can be found online or will be sent on request.

#### Anti-Corruption and Anti-Bribery Laws

Our suppliers must follow all applicable laws that prohibit the giving of anything of value to any person or entity to obtain an improper business advantage, as well as laws that require keeping accurate books and records.

Suppliers must follow anti-corruption and anti-bribery laws in all cases and must be particularly cautious when interacting with government officials.

CCE strictly prohibits our suppliers, and anyone acting on our behalf, from giving or accepting bribes or making facilitation payments.

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Bribes are money, gifts, or anything of value offered to influence someone to get an unfair advantage, either for personal or professional gain. Facilitation payments are often small sums to public officials to obtain routine services to which a person or company would otherwise be legally entitled. Examples include a payment to expedite a telephone or utilities connection.

Read more about CCE's Policy on Bribery and Improper Payments, which can be found online or will be sent on request.

### **Anti-money laundering**

CCE expects that suppliers comply with all applicable anti-money laundering laws.

### **Gifts and Entertainment**

Any gift or entertainment offered to a CCE employee to induce or unduly influence a business decision (e.g., awarding business to the supplier, offering favorable terms) is strictly prohibited. If suppliers wish to provide a CCE employee with a gift or entertainment, it must be reasonable, given only occasionally, and of modest value.

In turn, we prohibit CCE employees from soliciting gifts and entertainment from suppliers. If a supplier is solicited by a CCE employee for a gift or entertainment, this should be reported promptly.

Read more about CCE's Policy on Gifts and Entertainment, which can be found online or will be sent on request.

### **Sanctions and Export Control Laws**

We expect our suppliers to comply with all applicable export control laws, as well as laws that prohibit or restrict business relationships with sanctioned countries, entities, persons, or industry sectors.

Read more about CCE's Sanctions and Trade Embargoes Policy, which can be found online or will be sent on request.

### **Sourcing Materials from Areas of Conflict**

We expect suppliers do not source minerals and metals that contribute to ongoing conflicts.

We are required by European Union law to track and disclose our use of minerals such as gold, tin, tungsten and tantalum originating in a number of designated countries.

When requested, our suppliers are required to provide data and reports using a defined reporting tool and structure, in the form we request, regarding their use of such minerals in their products. Furthermore, suppliers may be required to request similar information of their suppliers to establish the origin of such minerals, and to provide their findings to us.

As such, we expect of our suppliers that they:

- Exercise due diligence on the source and chain of custody of conflict minerals and metals in their supply chain.
- Make available upon request all documentation and supporting evidence that demonstrate their due diligence measures.

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### 4. Integrity through actions

#### Conflicts of Interest

To ensure that relationships with our business partners are based on integrity and sound business judgment, we require our employees to promptly disclose conflicts of interest. Similarly, we expect any supplier to inform us promptly if it has a family or close personal relationship with the CCE employee making or influencing a business decision that may benefit the supplier or is a former CCE employee becoming a CCE supplier.

#### Protection of Information and Intellectual Property

CCE or its business partners may provide or give suppliers access to intellectual property or confidential or personal information ("Information"). We require suppliers will maintain and enforce appropriate safety and physical security procedures with respect to the access and maintenance of such Information that are:

- at least equal to industry standards for such types of Information; and
- which provide reasonably appropriate technical and organizational safeguards against accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access of Information.

This includes cybersecurity events or threats, and our suppliers should always act truthfully and provide complete and accurate information to CCE. We believe a supplier is key player in securing and acting as a safeguard against digital threats in our supply chain.

Additionally, suppliers will never sell such information, never disclose it without CCE's consent, ensure use of Information only for the purposes of the provision of products and/or services to CCE, and promptly return or destroy such information at the end of our relationship (or when it is no longer needed). For more information, refer to the Terms and Conditions of the agreement with CCE, and to any non-disclosure agreement the supplier may have signed.

If the supplier becomes aware that confidential or personal information of CCE's, its employees, or business partners has been disclosed or that CCE's intellectual property rights have been violated, the supplier must notify the primary CCE point of contact immediately.

#### Data Privacy

We expect suppliers to protect the data privacy its employees and suppliers when collecting and processing personal data including information regarding CCE's employees. We require suppliers adhere to all applicable data privacy laws when collecting, storing, using, processing, and sharing personal data.

#### Integrity with good communication

We expect that suppliers of CCE uphold the values of honesty and integrity embedded in this Code. In particular, we note that violating certain elements of this Code is a violation of the law in the jurisdictions in which we operate. CCE does not tolerate any violations of the law by its suppliers.

### **Requests from Vendor Risk Management**

From time to time, suppliers may be asked for information about its business from CCE's Vendor Risk Management team, that is part of the Strategic Commodity Management and Purchasing team. We require suppliers to respond promptly and fully to such requests.

### **5. Implementation of this Policy**

The management of CCE is responsible for maintaining and updating this Policy as required by changes to market practice, regulation, voluntary standards or as otherwise deemed necessary.

The adoption and implementation of this Policy is the responsibility of the Management Board.

It is the responsibility of the suppliers to comply with the requirements set forth in this Code.

### **Conflict with Other Requirements**

If any requirement in this document conflicts with the requirements of the CCE Global Purchasing Requirements or any other requirements of CCE suppliers (e.g., under any agreement in place between you and CCE), the requirements of this document shall prevail.

- Employees of suppliers must be familiar with this Code and comply with its terms.
- Suppliers must speak up if they learn of a violation of this Code or the law.
- Suppliers are prohibited from retaliating against any employee who raises a good-faith compliance concern.