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## 1. Policy on Anti-Retaliation

CCE is committed to supporting a culture in which legal and ethical concerns may be raised without fear of retaliation. CCE provides multiple channels for its employees and other stakeholders to report such concerns, and prohibits retaliation against employees and other stakeholders who, honestly and in good faith, raise such concerns.

This policy applies to CCE and all its affiliates, operating Groups, Divisions, joint ventures, and other operations globally (collectively, "CCE"). This policy also applies to all persons who act on CCE's behalf, including employees, officers, directors, consultants, and agents.

The principles of this policy also apply to CCE's suppliers, vendors, consultants, independent contractors, agents, or any other third party engaged to carry out any action on our behalf ("suppliers") as stated in CCE's Supplier Code of Conduct.

### Introduction

It is important that legal and ethical concerns be identified and resolved at the earliest possible opportunity. CCE therefore supports a work environment in which our employees and other stakeholders may report legal and ethical concerns without fear of retaliation (which includes being penalized, discharged, demoted, suspended, threatened, or harassed). CCE does not tolerate retaliation against those who report legal and ethical concerns honestly and in good faith.

### Standards

CCE encourages its employees and other stakeholders to report any credible concerns regarding legal and ethical issues. The prompt identification of such issues gives CCE the best opportunity to be proactive, confirm facts as soon as possible, and minimize any potential impact by addressing and mitigating concerns.

CCE will not tolerate retaliation against anyone who raises a legal or ethical concern honestly and in good faith. Efforts to discourage or prevent anyone from raising such concerns, or any act of retaliation against a person for raising such concerns will not be tolerated and will be treated as a serious matter and sanctioned with disciplinary action up to and including termination of employment.

This Policy applies to all legal and ethical concerns raised or reports made (anonymously or not), including those communicated anonymously to a supervisor or manager, or to a member of the Human Resources Department, Legal Counsel, or other appropriate methods (the "Reporting Channels").

### Examples of Retaliation

Retaliation can take many forms and can include subtle action. Suspected instances of retaliation should be reported (see section on "Reporting Concerns", below), including any of the examples listed below. Examples of retaliation may include:

- Reduction, addition or change of duties or hours without consent.
- Verbal abuse or conduct intended to embarrass or humiliate an employee.
- Physical abuse or threats
- Termination, demotion, or threats to terminate or demote.
- Denial of a promotion, increase in wages, assignment, transfer, or overtime opportunities without justification.
- Other actions adverse to CCE's Employee's Charter or CCE's Operational Principles.

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### **Personnel Decisions and Cooperation**

Nothing in this Policy should be interpreted as preventing CCE from making personnel decisions based on legitimate business reasons that are not retaliatory (for example, a personnel decision based on breach of contract).

Legal and ethical issues and investigations are often complex with many different facets. It is important that all employees and other stakeholders contacted with respect to such issues and investigations fully cooperate so that CCE can obtain the information needed to respond to these matters promptly and appropriately.

### **Governance**

According to the EU Whistleblowing Directive, CCE has appointed the following persons as the “most suitable” person to receive and follow up on reports internally: Compliance officer, Head of HR, Legal counsel, Chief Financial Officer (CFO), Executive board member or management.

### **Reporting Concerns**

Concerns about retaliation or other legal or ethical concerns may be reported via one of the Reporting Channels and will be reviewed in a timely manner.

At CCE, we expect our managers and supervisors to maintain an Open-Door process. Supervisors and managers at CCE must ensure that they are approachable, take legal and ethical concerns seriously, and are familiar with the process for referring such concerns for handling by Legal, Ethics & Legal Compliance, Human Resources, or Internal Audit, as appropriate. It is important that CCE employees and other stakeholders understand that their concerns will be addressed. It is also important that such concerns be raised, reviewed, and referred for handling promptly. After a concern is first raised, the opportunity to be proactive and promptly address the matter can disappear rapidly.

Employees and other stakeholders should also be aware that CCE’s reporting systems must be respected and not abused for any reason. Persons who are found to have filed reports dishonestly or with inappropriate intentions (for example, to punish or harass a fellow employee) will be sanctioned with disciplinary action up to and including termination of employment.

### **For further Information:**

For further information or advice, please contact your Group or Regional Legal Counsel, or Compliance Officer.