

2024 SLAVERY AND HUMAN TRAFFICKING STATEMENT



Introduction

This is the Group's ninth Slavery and Human Trafficking Statement. Our eighth statement was published in May 2024.

We recognise that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global issue that is as, and more, important than ever amidst various global challenges.

As a Group, Coca-Cola HBC has a zero-tolerance approach to Modern Slavery of any kind within its operations and supply chains, and we are taking steps to ensure that our employees, contractors, and suppliers understand the Group's commitment to human rights and their own rights and responsibilities. Our commitment is to operate our business responsibly and sustainably, and this includes fair treatment of all people in our business and in the Group's supply chain.

Coca-Cola HBC 2024 Slavery and Human Trafficking Statement

This statement is made by Coca-Cola HBC Northern Ireland Limited (the Company), which is subject to the obligations under section 54 of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2024.

This statement also comprises voluntary information provided by Coca-Cola HBC AG. The Company, Coca-Cola HBC AG and its other subsidiaries are hereinafter referred to as Coca-Cola HBC or the Group. The statement outlines the approach of the whole of Coca-Cola HBC.



Our business and supply chains

Coca-Cola HBC is a growth-focused consumer packaged goods business and strategic bottling partner of The Coca-Cola Company. We open up moments that refresh us all, by creating value for our stakeholders and supporting the socio-economic development of the communities in which we operate.

With a vision to be the leading 24/7 beverage partner, we offer drinks for all occasions around the clock and work together with our customers to serve **750 million consumers** across a broad geographic footprint of **29 countries**. Our portfolio is one of the strongest, broadest and most flexible in the beverage industry, with consumer-leading beverage brands in the sparkling, adult sparkling, juice, water, sport, energy, ready-to-drink tea, coffee, and premium spirits categories. These include Coca-Cola, Coca-Cola Zero Sugar, Fanta, Sprite, Schweppes, Kinley, Costa Coffee, Caffè Vergnano, Valser, FuzeTea, Powerade, Cappy, Monster Energy, Finlandia Vodka, The Macallan, Jack Daniel's and Grey Goose. We foster an open and inclusive work environment amongst our **33,000 employees** and believe that building a more positive environmental impact is integral to our future growth. We are global industry leaders in sustainability, with leading scores and rankings in ten of the most-recognised ESG ratings including the 2024 Dow Jones Best-in-Class Indices.

At Coca-Cola HBC, we are committed to high standards of performance related to human rights and labour practices, minimising environmental impact, ensuring health and safety, ethical business and unsurpassed quality in our value chain, from sourcing raw materials to manufacturing the final product and distributing it to our customers. Our supplier partners play a critical role in ensuring that we deliver against these standards.

Total supplier spend for Direct, Indirect and Cold Drink Equipment Categories reached **€ 5.4 billion** in 2024 (data compiled during 12 month rolling period from December 2023 to November 2024). Including Concentrate supplies from The Coca-Cola Company, the spend is **€ 7.1 billion**. Our practice is to source

locally, provided that goods and services meet our requirements and quality standards in an economically viable way. As of 2015, we have a formal Procurement KPI of over **95%** of local spend in our countries of operation or from within the European Union, which is considered local for EU countries. In 2024, this percentage was **97.73%**.

Under a unified procurement framework, we segment our supply base universe of approximately 15,478 active supplier codes (approximately 14,092 parent level supplier organisations) into Direct, Indirect spend and Concentrate.

- Direct spend suppliers include those that supply ingredients and packaging for our products.
- Indirect spend suppliers include those that supply products and services such as IT, production equipment, spare parts, secondary packaging, maintenance services, logistics providers, fleet vehicles, utilities, and professional services.

Coca-Cola HBC also segments suppliers into the following categories based on criticality and potential opportunities:


- **Group Critical Suppliers** are those that fulfil any of the following criteria: high percentage of spend, critical components (including but limited to Sweeteners, Juices, Resin, Cans, Glass, Preforms, Closures, Aseptic Packaging, Secondary Packaging, Cold Drink Equipment etc.), limited alternatives and partnership supporting our business strategies.
- **Country Strategic Suppliers** are those which have strategic importance at a local or regional level. Both Group Critical & Country Strategic

suppliers are considered Critical to the overall competitiveness and success of Coca-Cola HBC.

- **Tactical Suppliers** represent low-volume and/or low-spend suppliers, supplying goods or services where there are many alternative sources available, enabling a flexible supply base.
- **Both Group Critical & Country Strategic Suppliers** as well as The Coca-Cola Company (TCCC) Concentrate supply, have significant business relevance to the Company and are considered to be of great substance in terms of potential ESG or financial impact. These suppliers are defined as Significant Suppliers to the overall competitiveness and success of Coca-Cola HBC. TCCC Concentrate supply is not considered to be procurement addressable spend. However, TCCC and Coca-Cola HBC share the same ESG standards and policies and as members of The Coca-Cola System we share to a great extent common supply base that we jointly manage, negotiate, innovate and support improvements in their ESG performance. Finished Goods suppliers are considered essential to the financial success of our business.

All our suppliers are required to uphold our high sourcing standards. Segmenting our suppliers as outlined above helps us manage risk in our supply chain and ensure compliance with our standards.

You may find more information about our supply base and supplier segmentation under section "OUR SUPPLIERS" in our corporate web page:

 [Read about Our Suppliers](#)

million consumers
750

countries

29

suppliers

15.478

employees

33.000




Policies and controls

The Social Responsibility Committee of the Board of Directors of Coca-Cola HBC is responsible for the development and supervision of procedures and systems to ensure the pursuit of the Group's social and environmental goals, which apply to all companies of the Group.

Code of Business Conduct

At the core of our system of internal control is the Group's Code of Business Conduct. The Code communicates the Group's standards of employee conduct and clearly sets expectations that all employees are to maintain the highest standard of ethical business conduct. Our Code of Business Conduct applies to everyone working for any Group company worldwide regardless of location, role, or level of seniority. We expect temporary employees, agency staff, contractors, distributors, suppliers, consultants, agents and any other third parties who act in the name of any Group company to act in accordance with the principles of the Code. The Audit and Risk Committee of the Board of Directors of Coca-Cola HBC AG has oversight of compliance with the Code.

 [Read about Code of Business Conduct](#)

Human Rights Policy

Our commitment to prohibiting Modern Slavery is clearly set out in our Human Rights Policy, which is committed to international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. It applies to Coca-Cola HBC AG, the entities it owns, the entities in which it has a majority interest, and the facilities it manages.

The policy expressly states that the Group is committed to identifying and preventing any adverse human rights impacts in relation to its business activities through human rights due diligence and preventive compliance processes. The policy prohibits forced labour, child labour and human trafficking. Regular reviews ensure that we adhere to all applicable laws and regulations, that processes are well implemented, that targets are set and reached, and that reporting is timely and accurate.

 [Read about Human Rights Policy](#)

Supplier Guiding Principles (SGPs)

Our SGPs, which apply to all our suppliers, are aligned with the expectations and commitments of our Human Rights Policy. They are part of issued tenders and clearly referenced in purchase orders sent to suppliers and are part of our Coca-Cola HBC standard vendor creation process. If a supplier fails to uphold any aspect of the requirements, the supplier is expected to implement corrective actions. Coca-Cola HBC reserves the right to audit and to terminate any agreement with a supplier that cannot demonstrate that they are upholding the requirements of the SGPs.

Our SGPs include express reference to the obligation of suppliers to be able to demonstrate, as a minimum, their compliance with our SGPs and with the eight Core Conventions of the International Labour Organization if these set higher standards than local law. They also include a clear prohibition of slavery, forced labour, child labour, and human trafficking. In 2020, we made an update to the SGPs, adding a provision that creates an explicit prohibition of any form of recruitment fees. Moreover in 2023, we further enhanced our SGPs to include more specific rules around equal remuneration, physical demands of the workplace, updates in freedom of association, competition law and biodiversity. Our SGPs are communicated to our entire supply base, and all suppliers are contractually required to comply with them.

We registered around 2,329 new suppliers in 2024. 100% of our suppliers have agreed to adhere to our SGPs, as it has been the case with new suppliers since 2015.

 [Read about Supplier Guiding Principles](#)

Principles for Sustainable Agriculture (PSA)

In close collaboration with TCCC, we are committed to working together with our suppliers to ensure that we source our key agricultural ingredients sustainably. Our suppliers are expected to ensure compliance with TCCC's PSA, which communicate our values and expectations of compliance with all applicable laws, with emphasis on the importance of responsible workplace practices that respect human rights.

Our 2025 commitment is to achieve 100% certification of our key ingredients using sustainable agricultural standards. In 2024, 96% of the key commodities we purchased for use as ingredients were sustainably certified, an increase compared to 2023. All new suppliers have been introduced into the PSA programme, and we have plans in place to support them as they progress towards certification in the near future. More information on the Coca-Cola System Principles for Sustainable Agriculture and, specifically for Coca-Cola HBC, can be found at:

 [Read about Principles for Sustainable Agriculture](#)

Supply chain due diligence and steps taken to manage slavery and human trafficking risk

The Group has developed, and Group companies are implementing, a due diligence process that includes the identification of potential human rights issues, the identification of vulnerable groups, and the mitigation actions and monitoring in relation to our own operations and critical suppliers.

Modern Slavery and human rights risks are evaluated within the Group's overarching Enterprise Risk Management (ERM) framework, which is top down and bottom up. The process ensures that we identify, review and manage any risks arising from our business activities.

Our risk management process includes:

- Monthly risk assessments in all our BU to evaluate current and emerging risks and progress against our risk management strategies. Operational and strategic risks are reviewed with corporate functions bi-annually against broader regional and macro environments. These regular reviews are supported by bi-annual sessions facilitated by the Chief Risk Officer, and drive the quarterly feedback meetings, ensuring that BUs focus on all risk categories including the areas of human rights, modern slavery, sustainability and climate change.
- Risks are aggregated to the group which provides a snapshot of our internal and external risk environment. They are analysed and significant operational, strategic and emerging risks and actions are reviewed with the Region Directors.
- Review and strategic analysis of identified risks is undertaken by the Group Risk and Compliance Committee. The Committee is our strategic think-tank, comprising senior leaders in the business who independently review our risk exposures, and presents issues relating to critical risk exposure to the Executive Leadership Team.
- The Chief Risk Officer reviews key operational, strategic and emerging risks with the Executive Leadership Team and the Audit & Risk Committee of our Board bi-annually.

In 2024, we continued our review of the ERM framework and identified opportunities to enhance cross-functional collaboration and share best practices in risk mitigation across the business.

Further details on the management of risk can be found in our Integrated Annual Report.

 [Read 2024 Integrated Annual Report](#)



Suppliers

We maintain transparency throughout our supply base. Sustainability is at the core of all our sourcing activities, and we consider our suppliers as critical partners and contributors to the ongoing and sustainable success of our business.

We monitor the performance of our significant suppliers through TCCC's Supplier Guiding Principles, compliance audits, 3rd party certification against the Principles of Sustainable Agriculture, our internal supply base assessments and the EcoVadis platform. As a System, together with TCCC, we audit facilities of raw materials and primary packaging providers that participate in our Group tenders, leveraging third parties engaged through TCCC. These audits assess compliance with our Supplier Guiding Principles (SGPs), at least once every three years. The TCCC audit results are communicated to our Group Procurement and Group Quality, Safety and Environment teams, and corrective actions, where required, are taken in a timely manner. In the case that any supplier with a Corrective Action Plan, fails to pass subsequent audits, they are given final warning and are prohibited from further contracting until issues are rectified.

In the year to 31 December 2024, we conducted 124 SGP audits. Thirteen suppliers across 19 plants were identified through third-party audits; these suppliers received orange or red audit scores and have received corrective actions. The suppliers are located in Nigeria, the Czech Republic, France, Germany, Poland, Spain, Switzerland, Serbia, and the UK. The audits covered Health & Environment, Wages & Benefits, Discrimination, Regulations, Work Hours, and Overtime. Remediation actions are in place, and the suppliers will be re-audited within 12 months to ensure the proper implementation of agreed actions.

Findings from all remaining audits were minor. All matters identified by our audit process are subject to corrective action and verification of the action taken, either by desktop re-assessment or follow up by the third-party independent audit body.

We disclose more details regarding findings and corrective actions identified as part of SGP audits for our Suppliers under the GRI Content Index, that we make available annually.

 [Read the GRI Content Index](#)

(specifically for Human Rights please refer to sections 407-1, 408-1, 409-1, 414-1, 414-2). EcoVadis helps us monitor a range of risks using 21 criteria from international standards, including the UN Global Compact, ISO 26000, the Global Reporting Initiative, and the International Labour Organization.

In 2019, we introduced a new recommendation to our countries that suppliers who participate in initiatives with spend of over 100,000 Euros on an annual basis are registered and assessed by EcoVadis or a similar assessment body. In 2020, we re-trained our countries' Procurement Teams on these requirements and re-iterated the importance of proper sustainability risk assessment. In all strategic tenders, sustainability is a separate criterion implemented as part of the selection process. Moreover, in 2022, we introduced a new generic risk assessment methodology with EcoVadis, namely EcoVadis IQ, that is supporting our teams to perform faster scanning of suppliers' ESG risks leveraging AI technology and supporting the prioritisation of further assessment requirements according to Risk Levels identified. In May 2023, we further enhanced of our SGPs to include more specific rules around competition law, equal remuneration principles, physical demands of workplace, freedom of association and biodiversity. In 2024, we introduced for 30 suppliers and completed ESG performance debrief sessions which were carried out between EcoVadis specialists and the responsible vendor teams to secure that our suppliers develop in

depth understanding on how they can improve and accelerate on their ESG journey and increase their performance/scoring.

In 2024, over 1,900 of our critical suppliers (on parent level) have been assessed using EcoVadis, an increase of 17% versus 2023. Our plan is to expand the use of these assessments for better, more objective supplier monitoring going forward and leverage our EcoVadis partnership across The Coca-Cola System to exchange intelligence and experience across Bottlers. We are also investigating how to extend further the assessment of the risks in our supply base leveraging new tools, Artificial Intelligence, and customised alerts, giving our Strategic Procurement Team faster access to critical events and information affecting our supply chain.

We also recognise supplier certifications as per international standards including ISO 9001, 14001, 45001 and FSSC 22000. For agricultural commodities, we are aligning with the wider industry to recognise the Rain Forest Alliance, Fair Trade, Bonsucro and the Sustainable Agriculture Initiative Platform (SAI- FSA), Global GAP+GRASP, VIVE etc. Through our Workplace accountability audits within a 3-year audit cycle, all long-term contractors and contracted services on-site are assessed for human rights. Moreover, we are working on EU deforestation regulation readiness to end of 2025 and are currently developing our targets for a deforestation-free supply chain across all our key agricultural commodities.

In 2023, we redesigned entirely our Coca-Cola HBC Procurement Guidelines adding specific focus on how buyers should leverage all these ESG tools to assess suppliers on ESG criteria as part of our Strategic Tendering process, in a consistent and uniform manner across our territories. This is further supported by annual training for the entire buyer community. Moreover, we

have developed a selected team of buyers that act as Sustainability Coordinators in each BU. The main role of this team is to act as 1st level support to each BU, Procurement team for ESG tools and practices, support suppliers and cascade the sustainability agenda to countries. In 2024, we continued educating our buyers through training by leveraging our BU coordinators/champions and specialist external organisations such as EcoVadis.

In total, in 2024, we assessed 2,069 Suppliers through EcoVadis and SGP 3rd party physical audits, which is an increase of 274 Suppliers compared to 2023.

By 31st December 2024, we will have assessed a total of 1,945 suppliers through EcoVadis. The average overall score for our suppliers is 50.9 (+1.8 ppt vs 2023) and it is above the average score of 47.5 of EcoVadis universe. In the areas of Labour and Human Rights, the percentage of our suppliers in scope reached 53.1% (+1.6 percentage points compared to 2023), compared to an average of 50.3% for EcoVadis' panel. Through EcoVadis, we have detected 67 suppliers with low ratings on sustainability issues that scored ≤24 in the assessment for Social risks (supplier locations in Nigeria, Russia, Belarus, Egypt). These suppliers are subject to focused engagement to help them improve through trainings and targeted debrief sessions delivered by EcoVadis. Results of supplier evaluations enable us to have a clearer mapping of human rights risks by category and country and contribute to the ongoing development of our supplier CSR strategy.

 [Read about Supply Chain](#)

Our Operational sites

Audits of Coca-Cola HBC's operations, called Workplace Accountability Audits, are conducted every three years in Coca-Cola HBC's plants by an independent third-party international organisation.

The scope of these audits includes human rights and covers contractors and others who are not employees, such as staff of third-party service providers. 95% of all Coca-Cola HBC plants have been audited within the three years cycle by an independent organisation. People & Culture policies are also in scope of CAD audits covering 100% of HBC plants.

Coca-Cola HBC's sites that do not pass their first audit to an acceptable standard are subject to follow-up audits and are required to report on corrective actions to the third-party audit bodies.



Capacity building and collaboration

We build our strategic suppliers' capacity to manage sustainability issues, including human rights aspects, through joint value creation initiatives and sustainability events, industry associations, workshops on sustainable supply, an Annual Stakeholder Forum, materiality survey and CSR platform for ethical and sustainable supply chains.

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Staying committed to our capability building strategy, we delivered trainings to both buyers and our significant suppliers covering topics such as ESG requirements, EcoVadis Assessments and Action Plans, Ethics & Compliance, Human Rights, GHG Emissions & Modern Slavery webinars etc.

We aspire to recruit all Strategic Suppliers under the EcoVadis Assessment Platform to track ESG overall performance and, with the support of the EcoVadis Team, we promote the use of the EcoVadis Academy to help vendors build better knowledge of important ESG elements.

We place specific focus on developing GHG performance tracking for our supply base, starting with a pilot programme for the development of supplier-specific emission factors (SSEFs) with our most sustainably

mature suppliers that is now planned to be expanded within 2025 to a much broader supply base. For less mature suppliers, since 2022 we have been working with Guidehouse on capacity building programmes, offering training through the Supplier Leadership on Climate Transition programme (SLoCT) annually. This initiative helps our less mature suppliers build a strong foundation to start reducing GHG emissions.

In November 2023, we held our second Virtual Supplier Sustainability Event "**Opening up a more sustainable future together**", where we invited all our Group Critical suppliers to talk about emissions reduction, biodiversity and deforestation. More than 400 representatives from almost 200 suppliers, Coca-Cola System colleagues, and trade partners joined our virtual Supplier Day conference. Following this initiative, in 2024, we conducted a deep dive into specific pilot suppliers such as Sweeteners and Aluminium Cans with specific emphasis to ESG management and emissions glidepath development. This programme will continue and expand to cover all Group Critical Raw Materials and Packaging Suppliers in 2025.

We have initiated specific discussions with Sweeteners suppliers in Egypt to recruit them under our ESG assessment tools such as EcoVadis and SEDEX and also help them start their journey into emissions management and sustainable agriculture practices, an initiative that has received a warm welcome and strong engagement of the supplier teams in this long journey.

Last but not least, starting in 2017, we have run annual local workshops with key suppliers, where we exchange views on sustainability and explored how we can work together to achieve climate neutrality. The input from these targeted discussions has been collected and we assess these ideas further to create joint actions that promote sustainability aspects in respective countries.

Reporting grievances

We have a Whistleblowing Policy, including a Speak Up ethics and compliance line. The Speak Up line, managed by an independent third party, is available across the Coca-Cola HBC Group in 26 languages. It is accessible 24 hours a day, 7 days a week, via phone or internet. The Speak Up line is available to all employees, contractors, customers and suppliers and gives our employees and partners a secure and confidential method to report concerns or ask questions regarding our Code of Business Conduct, Anti-Bribery Policy and other Group compliance policies, including the Human Rights Policy, if they believe that a human rights impact has or might occur.

In 2024, we held our annual awareness campaign on "Speak Up!" including communication about the "Speak Up!" line to employees and contractor workers.

Our Whistleblowing Policy is complemented by local grievance procedures that set out the process by which employees can raise any concerns to the appropriate level within the Company.

In 2025, we will continue with our annual communications on the "Speak Up!" line to all employees and contractors, as well as through our onboarding process for new employees.

Measuring effectiveness

To assess the effectiveness of the measures taken by Coca-Cola HBC in ensuring that modern slavery and human trafficking is not taking place in Group businesses or supply chains, we shall continue to review and report on our activities in every subsequent Modern Slavery Act Statement.

In regard to our supply chain, we shall continue to report on the following key performance indicators:

1. Acceptance of our Supplier Guiding Principles by our suppliers;
2. More than 90% of spend internally evaluated annually; and
3. Percentage of spend locally procured.

We introduced in 2023 two new performance indicators as below.




4. Percentage of Tier 1 (T1) suppliers screened for ESG risks.
5. Percentage of significant T1 & Tier 2 (T2) suppliers assessed for ESG performance.

Additionally, we provide the following information, which is available on our corporate website:

6. Percentage of significant Tier 1 (T1) suppliers assessed for sustainability risks, including human rights risk in any reference year;
7. Number of significant non-tier 1 (T2) suppliers assessed for sustainability risks, including human rights risk in any reference year; and
8. Percentage of the total T1 & T2 significant suppliers where high risk is identified.
9. Percentage of T1 & T2 significant suppliers participating in capacity building programmes.

We ensure 100% of our suppliers have accepted our Supplier Guiding Principles by using our 'SGP Coverage Triangle' with three checkpoints throughout the procure-to-pay process.

For more information please visit:

-  Read about Corporate website
-  Read about Mission 2025
-  Read about Supply Chain



Training and development

All new Coca-Cola HBC employees, including national security leaders and managers, receive Code of Business Conduct (COBC) and anti-bribery training. All new employees are also required to acknowledge and commit to comply with the Code and related policies, including the Human Rights policy.

In April 2021, a new consolidated e-learning programme on our Code and Anti-Bribery Policy was launched to all employees. The course comprises a preliminary questionnaire on COBC and Anti-Bribery Policy as a knowledge test for our employees and acknowledgement and re-commitment to compliance with the Code and its related policies, including the Human Rights Policy. In December 2024, 95.8% of the total population had passed the course and we continue to train every newly hired employee. As in the past, this training will be a regular requirement for all employees.

Most on-site security personnel are employees of contracted partners, who are also required to abide by Coca-Cola HBC's Supplier Guiding Principles and all other applicable Company policies as per their contract. They receive relevant information as part of their induction.

We have a guide to the Human Rights Policy for managers, and in 2024 we relaunched an e-learning module to help all employees understand their role in ensuring compliance with the Policy; by end of 2024, 499 employees had completed it resulting in 58% completion rate against the target.

 [Read about Human Rights Policy](#)

As to training for our staff, see also the initiatives described under Capacity Building and Collaboration above.



Board Approval

This statement has been approved by the Coca-Cola HBC Northern Ireland Limited's board of directors and signed by one director, who will ensure it is reviewed and updated annually.

Simon Fitzpatrick

Managing Director

Coca-Cola HBC Northern Ireland Limited



Dated: 14th May 2025