

# Group Cyber Security Framework

## Responsible Artificial Intelligence Statement



---

## Our Commitment

Coca-Cola HBC is committed to using Artificial Intelligence (AI) responsibly to support business growth, innovation and operational excellence. We recognise AI's potential to improve decision-making, employee productivity and customer experiences, while also acknowledging the need for strong governance, human oversight, privacy, security and ethical safeguards. This statement sets out the principles and controls that guide our responsible use of AI across the Group.

At Coca-Cola HBC, we believe AI is a key enabler of innovation, operational excellence and sustainable business growth. As part of our broader investments in digital, data and technology, AI supports how we serve our customers, operate efficiently and empower our people.

This Responsible Artificial Intelligence Statement and Framework represent our formal public commitment to the responsible use of AI and defines the principles, governance and approach applied across Coca-Cola HBC. We use AI in a lawful, ethical, responsible and secure manner – grounded in internationally recognised principles such as fairness, transparency, human oversight and respect for fundamental rights – ensuring long-term value creation while safeguarding people, data and society. This Statement is operationalised through defined control frameworks, governance processes and risk management practices across Coca-Cola HBC and has been formally reviewed and approved by the Executive Leadership Team.

## Management Commitment and Governance

At Coca-Cola HBC, responsible AI is governed through established oversight structures, including the AI, Digital and Innovation Council (AIDIC), as the central governance body responsible for governing, coordinating, and accelerating AI and digital initiatives across the Group and countries.

AIDIC ensures that AI initiatives align with business objectives, growth priorities, risk appetite, and sustainability commitments while promoting lawful, ethical, responsible, and secure AI use. The AIDIC drives innovation, manages emerging AI-related risks, supports regulatory compliance, and enables scalable deployment of AI solutions across the enterprise.

The Council is chaired by the Chief Operating Officer and co-chaired by the Chief Digital and Technology Officer, supported by a cross-functional core team of approximately 20 Senior Leaders representing Commercial, Supply Chain, Finance, People & Culture, Legal, Digital and Technology Platforms and Business Unit General Managers, ensuring enterprise-wide accountability and decision-making.

Our mission is to accelerate impact with pervasive AI that is more integrated in business operations, scalable across products, valuable as a competitive advantage and responsible in design and use.

---

We assign clear accountability for AI use, outcomes and associated risks across business and technology functions. AI-related risks – including privacy, cybersecurity, fairness, transparency, ethical use and sustainability considerations – are managed as part of our broader risk and resilience frameworks.

This Statement is applied across relevant AI use cases, technology solutions and supported by CCHBC AI policy, internal standards, procedures, governance structures and oversight mechanisms.

## **Our Responsible AI Principles**

The following principles define the requirements of this Statement and guide the responsible use of AI across Coca-Cola HBC.

### **Human Agency and Oversight**

We ensure AI supports human decision-making, with appropriate oversight for critical decisions and the ability to intervene, override, escalate, review or challenge AI-driven outcomes where relevant.

### **Technical Robustness and Security**

We design and operate AI systems to be reliable, secure and resilient, with monitoring and cybersecurity safeguards to protect systems, data and users from misuse, threats or harmful outcomes.

### **Privacy and Data Governance**

We protect personal data throughout the AI lifecycle and apply data governance practices to ensure secure, compliant and ethical use of data.

### **Transparency**

We are transparent about our use of AI, including where users interact with AI-generated content or AI-enabled services, and provide clear, appropriate explanations of AI-driven outcomes, capabilities and limitations.

### **Diversity, Non-Discrimination and Fairness**

We actively identify and mitigate bias to promote fair, inclusive and responsible AI outcomes, including through appropriate testing and assessment where relevant.

### **Environmental and Societal Well-Being**

We consider the broader social and environmental impact of AI and aim to use AI in ways that support sustainable and responsible business practices.

### **Accountability and Oversight**

We assign clear accountability for AI systems, outcomes, risk decisions and compliance, and maintain processes to monitor impacts and address potential errors, harm or unintended consequences.

---

## Responsible AI Governance and Operational Framework

We operationalise this Statement through established controls, processes and governance mechanisms across Coca-Cola HBC. This includes among others:

- documented definition of intended purpose, approved use cases, operating boundaries and guardrails for AI systems to prevent misuse or operation outside approved parameters;
- controlled access and approval processes for the use of sensitive AI capabilities, supported by defined governance and oversight;
- clear identification of AI generated content and AI enabled interactions, where applicable;
- ongoing monitoring of AI systems to assess performance, reliability and potential model drift, with corrective actions applied where required;
- structured assessments of relevant AI use cases and models to evaluate fairness, bias and robustness and ensure compliance with our AI Policy and responsible AI principles;
- controls to identify, prevent and prohibit AI practices that are inconsistent with our values responsible AI principles or applicable legal and regulatory requirements;
- training, AI literacy and capability-building programmes that support responsible AI adoption through foundational education, role-specific learning pathways, executive awareness, hands-on experimentation and academies; mechanisms to enable review and challenge of AI driven outcomes where they may materially affect individuals; and
- engagement with third party providers and suppliers to ensure alignment with our responsible, secure and sustainable AI standards.

These controls and processes are integrated into our broader digital, risk and governance frameworks and are applied and monitored across the AI lifecycle.

## Continuous Improvement

This Statement, framework and our underlying AI Policy are subject to continuous improvement. Given the rapid pace of technological development in AI, our AI Policy is regularly reviewed to reflect evolving risks, technologies, regulations (i.e. EU AI Act, GDPR) and recognised standards (i.e. ISO 42001, NIST AI Risk Management Framework, EU Trustworthy AI Guidelines). We continuously enhance our governance, controls and practices to strengthen our responsible use of AI over time.