

## Whistleblowing Policy

### 1. Our Commitment

Coca-Cola HBC AG (with all its subsidiaries, the “Company”) is committed to conducting our business with honesty and integrity. We expect all employees (including temporary and contract employees), officers, as well as consultants, interns, secondees and agents acting in the Company’s name to maintain high standards and to uphold the values and behaviours in accordance with our Code of Business Conduct.

### 2. Purpose

The purpose of this Policy is to:

- encourage the reporting of any form of inappropriate behaviour described in section 6 of this policy.
- provide guidance on how to raise concerns.
- confirm that confidentiality will be maintained and that genuine concerns reported honestly can be raised without fear of retaliation, even if they turn out to be mistaken.

### 3. Scope

This policy applies to the Company and its subsidiaries and covers all employees (including temporary and contract employees), officers, consultants, interns, secondees and agents acting in the Company’s name.

This policy does not form part of the terms of your contract with the Company which is provided to you separately.

### 4. Definition of Whistleblower

A whistleblower is defined as an employee, officer, consultant, intern, seconded or agent of the Company who reports or publicly discloses information on breaches set out in section 6 below, acquired in the context of his or her work-related activities. Further, they perceive a need to avail themselves of protection against retaliation for having made the report. A whistleblower may elect to remain anonymous, but the Company encourages the whistleblower to report on a named, confidential basis.

### 5. What to Report

Whistleblowing is when an individual raises concerns about malpractice or any other suspected wrongdoing or dangers at work which affect others. The following are considered to be examples of concerns which can be raised (it is not exhaustive): any suspected fraudulent conduct, corrupt conduct, violation of any applicable antitrust and competition law rules, violation of personal data protection and company system security rules, endangerment of an individual’s or individuals’ health and safety, endangerment of the environment, commission of a criminal offence, failure to comply with any legal or regulatory obligation, and concealment of any information pertaining to any of the above.

If you are uncertain whether something is within the scope of this policy, you should seek advice from your Ethics and Compliance Officer, who can also inform you where you can obtain comprehensive and independent information and advice on procedures and remedies and protection available under your local whistleblowing legislation.

This policy does not apply in respect of concerns you have about your own employment situation. To address these concerns you should instead use your Grievance Policy (as applicable) and your People and Culture Director can provide you with guidance and assistance.

## **6. How to Report Issues**

As a first step, you are encouraged to raise concerns internally. Reports of concerns under this policy may be submitted through an independently operated whistleblower line (online at [www.coca-colahellenic.ethicspoint.com](http://www.coca-colahellenic.ethicspoint.com) and/or by telephone). This service is available in all languages of the territories where the Company operates.

You also have the option of reporting concerns directly to your Ethics and Compliance Officer, General Manager, Function Head, the Senior Audit Manager- COBC & Compliance, the Head of Corporate Audit, the General Counsel or the Audit and Risk Committee Chair. Concerns can be raised in writing or orally (by telephone or by voice messaging system) and, upon request by the person raising the report, by means of a physical meeting within a reasonable timeframe.

The Senior Audit Manager - COBC & Compliance is responsible for maintaining records of reports of potential violations and the actions taken through the case management system. The Head of Corporate Audit is responsible for reporting to the Audit and Risk Committee, on a quarterly basis, the number, nature and status of complaints received.

We encourage you to use internal reporting lines to ensure timely investigation, however individuals may also report concerns to applicable external authorities as permitted within local jurisdiction. The Company advises you to seek advice before reporting a concern to anyone external. You should ask your Ethics and Compliance Officer as to where you can seek independent advice. Your local legislation may set out the bodies to which qualifying disclosures may be made.

## **7. Confidentiality**

The Company will take every reasonable precaution to keep the identity of anyone raising a concern confidential, consistent with conducting a thorough and fair investigation and in compliance with applicable laws. Access to any report will only be permitted to any staff members who necessarily must be aware of the report. The identity of the individual making the report will not be disclosed without explicit consent to anyone beyond the staff members who receive and follow up on the report. Personal data should be handled

in accordance with the Data Privacy Policy, with those involved in the investigation aware of the data protection requirements.

## **8. Training**

Training on the Whistleblowing Policy will be conducted on a regular basis. If you have any questions concerning your training curriculum, please contact your Ethics and Compliance Officer. It is the responsibility of every employee to undergo the mandatory training and to do so in a responsible and engaged manner.

## **9. Procedures of Investigation**

All reports of concerns falling under this policy will be acknowledged no later than 7 days after receipt. Complaints will be investigated promptly, impartially and appropriately in line with the Company's approved investigation guidelines.

Determination of findings will be reviewed by the relevant disciplinary committee and appropriate action will be taken as required. The detailed description of the investigation process, as well as information on what may be potential disciplinary actions for breach of conduct may be found in the COBC Investigation Process Guidelines.

## **10. Protection**

The Company is committed to ensuring that an individual is not disadvantaged in any way by honestly and in good faith raising concerns about suspected reportable behavior provided that they had reasonable grounds to believe that the information was true and accurate at the time of reporting, and they reported in accordance with this policy. Whistleblowing legislation may also give statutory protection from retaliation to certain individuals depending on what they are disclosing and in which jurisdiction they are based. Those protected will be entitled not to suffer detriment as a result of making their disclosure e.g. not be disadvantaged by dismissal, demotion, loss of benefits, threats, harassment, discrimination or bias. If there are concerns surrounding the safety of the whistleblower, he or she may request a leave of absence or a temporary change of workplace, and such requests will be given appropriate consideration. A breach of this section by any employee, officer, consultant or contractor, will be considered a breach of the Company's Code of Business Conduct and dealt with as such. If you believe that you have suffered any detrimental treatment of the kind described above, you can appeal through any one of the officers identified in the appendix to this policy.

If, at any time, it is discovered that you have knowingly raised a false accusation, you will lose the protection granted under this procedure and will be subject to disciplinary action under the Code of Business Conduct.

Any term contained in a contract or agreement purporting to prevent you raising concerns under this policy will not be valid.

## **11. Feedback**

Where appropriate, and the identity of the individual raising a concern is known, the Company will keep him/her informed of the progress of the investigation and of any likely timescale. While we cannot always guarantee the outcome you are seeking, we will deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

A note of the decision will be provided to you. Where required under local whistleblowing legislation, or where possible, we will provide feedback within three months of the concern being reported (or six months in duly justified cases). However, because the Company strives to maintain confidentiality in all investigations it may not be able to inform the individual raising a concern of specific details of the investigation and any disciplinary actions taken as a result.

You should treat any information received about the investigation and/or outcome as strictly confidential.

## **12. Penalties for Breach of this Policy**

Where any employee (including any temporary or contract employee), officer, consultant or agent of the Company breaches this policy, this will be considered a breach of the Code of Business Conduct and dealt with accordingly.

## **13. Process Visibility**

Information about the Company's procedures for the treatment of whistleblowing complaints are available on the Company's Intranet and referenced in the Company's Code of Business Conduct.

## **14. Responsibility**

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on the policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to your Ethics & Compliance Officer.

This policy is regularly reviewed and the Company reserves the right to amend and revise the contents of this policy at any time. Amendments may be required where there is a change in the way in which the Company operates due to market conditions or a change in employment law or other legislation which requires a policy to be amended. The latest version of this Policy is available on the Company's Intranet and website [www.coca-colahellenic.com](http://www.coca-colahellenic.com).

Everyone should ensure that they act in accordance with the aims and objectives included in this policy. You must ensure that you are familiar with and comply with its terms.



## **APPENDIX**

The authorized officers at the Group level with whom individuals can disclose their concerns related to potential violations of this policy are:

- Audit & Risk Committee Chair
- General Counsel
- Head of Corporate Audit