

We are proud to continue opening up moments that refresh us all, both now and in the future, with the long-term needs of all our stakeholders at the heart of our decision making.

Anastassis G. David, Chairman of the Board, CCH Integrated Annual Report 2022 OCA: O

TAX TRANSPARENCY REPORT

ABBREVIATIONS

- CbCR Country-by-Country Reporting
- CCH Coca-Cola Hellenic Bottling Company
- **CFO** Chief Financial Officer
- **CPG** Consumer Packaged Goods
- **DAC6** Fifth amendment of the Directive on Administrative Cooperation in the field of taxation
- DJSI Dow Jones Sustainability Index
- **EBTF** European Business Tax Forum
- EFTA European Free Trade Association
- EU European Union
- EUR Euro
- **GM** General Manager
- **GRI** Global Reporting Initiative
- Group Coca-Cola Hellenic Bottling Company
- MNE Multinational Enterprise
- NGO Non-Governmental Organisation
- **OECD** Organisation for Economic Co-operation and Development
- **SDGs** UN Sustainable Development Goals
- S&P Standard and Poor's
- **UN** United Nations
- VAT Value-added tax





Scope of our Tax Transparency report

This document contains Coca-Cola HBC's (CCH or Group) non-financial tax disclosures and provides clarity and transparency to our stakeholders with regard to our approach to tax treatment and payment. Further analysis about CCH's financial tax disclosures can be found in our 2022 Integrated Annual Report¹.

Who we are

CCHBC is a growth-focused Consumer Packaged Goods (CPG) business and strategic bottling partner of The Coca-Cola Company. Together, we and our customers serve more than **740 million consumers** across a broad geographic footprint of **29 countries** on **3 continents**. Our portfolio is one of the strongest, broadest and most flexible in the beverage industry, offering consumer-leading partner brands in the sparkling, juice, water, sport, energy, plant-based, ready-to-drink tea, coffee, adult sparkling and premium spirits categories.

2022 was a challenging year for many businesses, and CCHBC was no exception. From the very early days of the war in Ukraine, we have focused on the health and safety of our affected people. We are providing aid to both our colleagues and communities and will continue to do so. The conflict between Russia and Ukraine has affected our business in both countries and beyond, as commodity prices increased and inflation rose. As geopolitical turmoil and macroeconomic uncertainty continue, it is more important than ever that we inspire and empower our people to act with speed and agility, keeping customers at the heart of what they do.

"Maintaining the trust of stakeholders is essential to our business. Our most valuable human connections and relationships including those with The Coca-Cola Company, our people and the communities we operate in, and our customers, suppliers, governments, investors and regulators."

We believe that the only way to create long-term value for all our stakeholders is through sustainable growth. We create socio-economic value for the societies in which we operate by creating jobs, training people, building physical infrastructure, procuring raw materials, transferring technology, paying taxes, expanding access to products and services, and creating growth opportunities for our customers, distributors, retailers and suppliers. In 2022, CCHBC entities employed **26,812 full time employees** across all our jurisdictions and - along with our trading partners and suppliers - have created **€10.8bn** in added value via our value chain.

As regards our approach to tax, this is simple: we believe our tax contribution is a key pillar in our social commitment to be a value-adding partner for every community in which we operate. We pay all taxes transparently where they arise. We do not utilize tax havens or offshore frameworks as a means to avoid tax.

https://www.coca-colahellenic.com/en/investor-relations/results-reports-presentations **2** - (i) Number of employees per market segment can be found in pg. 88-91 of 2022 Integrated Annual Report (ii) Measuring and managing these contributions through the sustainable growth of our business is an important part of our purpose. Since 2010 we have conducted socioeconomic impact studies in our markets to better understand the range and extent of the value we create in our ecosystem – see also 2022 Integrated Annual Report, pg.15 & 258

^{1 - 2022} Integrated Annual report,



WE ARE CCHBC



Introduction by CCHBC Chief Financial Officer



Dear Stakeholder,

I am pleased to introduce the third installment of Coca-Cola HBC's Tax Transparency Report. It presents our commitment to be a value-adding partner for every community and jurisdiction in which we operate. This philosophy is at the core of our growth strategy under the pillar 'Earn our License to Operate' and our tax contributions are key elements to deliver on that commitment.

Our company attributes the outmost importance of earning societal trust in all tax matters. Specifically, we stand firmly behind the principle of continuing paying taxes in the countries where value is created. Thus, ensuring that **we are fully compliant not only with the letter of tax laws and regulations across all jurisdictions we operate in, but with the spirit as well**. In addition, we commit to being open and transparent with tax authorities about the Group's tax affairs and to disclose relevant information to enable tax authorities to carry out their reviews effectively, efficiently and without unwarranted delays. We support the communities in the countries where we operate directly, by creating economic wealth, and also indirectly, by paying our fair share of taxes.

Whilst in the past, companies could conduct their business solely focusing increasing near-term shareholder returns, today and even more in the future, companies must balance the interests of a broader stakeholder base. The impact of businesses on the environment and society are equally important factors driving the preferences of customers and consumers, and in turn, the long-term health of the enterprise. To meet our sustainability ambition, we prioritize the Environmental, Social and Governance (ESG) aspects of running our business. Like various key stakeholder groups (e.g., investors, governments, civil society, employees, NGOs and corporate rating agencies), we consider tax as an important part of ESG.



Considering these developments, we have seen several voluntary initiatives emerging as the leading forces of change in sustainability reporting. In 2021, the EU Parliament voted on and adopted the amendments in the EU Accounting Directive that will require multinational enterprises headquartered in EU or not, with operations in EU Member States to disclose certain financial and tax related information publicly (Directive on public Country-by-Country reporting which came in force on 21 December 2021). EU member States had until 22nd June 2023 to transpose the directive into domestic legislation The rule will apply for the first financial year starting on or after 22nd June 2024 at the latest.

Moreover, in December 2022, the E.U. directive on Pillar 2 Minimum Tax was inally adopted. The main Wilestare due to be transposed into local law in 2023 and implemented as of Woonuary 2024. In December 2022, the OECD also issued some "safe har operrules" to simplify compliance during the 3 year transitional period Country-by-Country report (CDCR). Since then, the OECD has provide the full of the March 2022 Componentary, a revision of thick

At CCH, we believe in changing before we are compelled to do so. adhere to the upcoming changes in the tax reporting area. Nevertheless, we believe there is more we can do to increase our transparency and ensure we always act as responsible taxpayers For this reason, we work in partnership with our tax advisors, statutory auditors, and tax authorities to ensure that the right amount of taxes is being paid in the right place at the right time and we endorse best practice initiatives that aim to deliver a fairer and more transparent tax environment.

The taxes we disclose include corporate income tax calculated on each country's taxable profit, payroll taxes and social security contributions, irrecoverable VAT, environmental taxes, product taxes and other categories of taxes including also taxes realized in specific jurisdictions based on local regulations applying. In 2022 we administered a total of **EUR 1.814 billion** in taxes across all our jurisdictions. Out of that amount, **EUR 664 million** reflect taxes borne by CCHBC operations (see also below '2022 CCHBC Tax contributions highlights' section).

Despite our continuous effort to enhance and further develop our non-financial tax disclosures, we recognize that there will be areas where our disclosures can be further improved. Therefore, we welcome constructive feedback from our stakeholders and are happy to address any questions that you may have.

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A . Tax Strategy and Governance Framework

a. Tax Policy and Commitments

Our commitment to be a value-adding partner for every community and jurisdiction in which we operate is at the core of our growth strategy and our tax contributions are a key element in our ability to deliver that commitment.

"In CCHBC we commit to comply with the spirit as well as the letter of all applicable laws, rules, and regulations in meeting the group's tax compliance and reporting responsibilities in all jurisdictions where the business operates"

CCHBC's overall approach to tax is outlined and interpreted in our Tax Policy. The Tax Policy defines our strategic goals and objectives and specifies the governance role played by the CCHBC Group tax team in their delivery. It also sets out the principles that define how we deliver these goals and objectives and defines tax accountabilities, responsibilities, and delegations of authority.

Our tax policy is based around a series of core commitments to:

- observe all applicable laws, rules and regulations in meeting our tax compliance and reporting responsibilities and comply with the spirit as well as the letter of all applicable laws, rules, and regulations everywhere we operate,
- comply with the OECD transfer pricing guidelines and ensure that the arm's length principle is always observed in transactions between Group companies,
- ensure that tax strategy is aligned with business and commercial strategy and tax planning opportunities are evaluated within clear risk parameters,
- pay taxes on our activities in the country where the value is created,
- avoid any tax structure or tax planning initiative that would potentially exploit gaps in the architecture of the international tax system to artificially shift profits to places where there is low or no taxation and are so-called tax havens,
- work positively, pro-actively and transparently with tax authorities,
- apply diligent professional care and judgement to ensure all decisions are well-considered and documented,
- ensure that due consideration is given to the Group's corporate and social responsibilities and the value it places on earning community trust.





Tax Governance principles

Our Tax Policy is underpinned by our **Tax Governance** principles. Tax governance principles define how tax accountabilities, responsibilities and delegations of authority are allocated within the Group:

- The tax organizational model for CCHBC is global. This ensures that tax activities and behaviors are globally consistent and standardized wherever possible.
- Accountability for all taxes lies with Group Tax, unless accountability is clearly devolved and accepted elsewhere.
- All tax reporting lines for members of the CCHBC Tax Team are reflected in the Group Tax structure.

The Group Tax Director is responsible for the implementation of the Tax Policy, which is relevant to all entities and employees within CCHBC.

"Tax Policy is subject to approval by CCHBC Audit Committee, Group Chief Financial Officer (CFO), and the Group Tax Director. Upon approval, the Tax Policy document is then distributed to the Operating Committee, the country General Managers (GMs) and Country CFOs."

All delegations and segregation of authorities set out in Tax Policy, align with the CCHBC Chart of Authority. As regards specific accountabilities and responsibilities for tax activities, these are allocated to all stakeholders (Group Tax, Local tax, Group Finance, Country CFO, Business units, external stakeholders) following the Group and Country Chart of Authority as applied periodically.

b. Tax risk management

The CCHBC Tax Team supports the business in creating, building and protecting shareholder value within the tax risk parameters set out and accepted by the Group. In this respect, our Tax strategy is aligned with business and commercial strategy and tax decisions are evaluated within clear risk parameters.

CCHBC Tax Team is accountable for all tax risks and has developed a risk management process to ensure that tax risk is identified, assessed and controlled on a global basis. Responsibility for the management of tax risk lies as closely as possible to the sources of risk. Country finance teams and country tax leads are responsible for identifying, assessing and communicating tax risks to CCHBC Group Tax Team. Clear guidelines regarding the identification, assessment and controlling of tax risks as well as the tax risk evaluation criteria over tax planning are provided by CCHBC's Group Tax Policy. Specifically on the latter, CCHBC Group Tax Team has developed a Tax Risk Evaluation Criteria methodology to evaluate tax risks whenever risk judgements are made in relation to planning opportunities and commercial transactions.





We avoid any tax structure or tax planning initiative that would potentially exploit gaps in the architecture of the international tax system to artificially shift profits to places where there is low or no taxation and are so called tax heavens. Therefore, our commitment to pay taxes in the countries where the value is created is combined with a strong commitment not to proceed with any transactions or enter into arrangements where the primary purpose appears in our view to be the avoidance of tax or tax disclosure requirements, especially involving 'tax haven' jurisdictions.

"CCHBC Group strong commitment is not to proceed with any transactions or enter into arrangements where the primary purpose appears in our view to be the avoidance of tax or tax disclosure requirements, especially involving 'tax haven' jurisdictions as these are defined by the respective EU directives"

We recognize that the volume and complexity of transactions, coupled with recent developments in the external environment, have resulted in an increased level of scrutiny from tax authorities and other stakeholders. In our effort to address these challenges, Group Tax continuously evaluates tax capabilities at a country level and ensures that all personnel with tax responsibilities, or whose business activities may have a tax impact, have a consistent understanding of how tax risk is identified, assessed, reported, and managed.

c. Relationship with tax authorities

We consider tax authorities as one of our main stakeholders. Our approach towards tax authorities is shaped by the following principles:

- Ensure compliance with all relevant legal disclosure requirements.
- Full transparency in all dealings with tax authorities in relation to the Group's tax affairs and disclosure of all relevant information to enable tax authorities to carry out their review.
- Work pro-actively with tax authorities to minimize the extent of disputes, to achieve early agreement on disputed issues when they arise and achieve certainty, wherever possible.

"Compliance, transparency and proactiveness are in the core of our approach towards tax authorities"

Group Tax is ultimately accountable for how relationships with tax authorities are managed. Local Finance teams and country tax leads adhere to the principles outlined above.

3 - "Tax havens" jurisdictions are defined following reference to international standards (e.g. EU list of non-cooperative jurisdictions for tax purposes - Consilium (europa.eu))





B. Sustainability Policy

We are committed to creating value for all our stakeholders by supporting the socio-economic development of the communities in which we operate. Our contribution is both direct, by creating economic wealth and indirect through our effect in the supply chain and by paying our fair share of taxes. It is our belief that this approach is fundamental to our future growth.

We support hundreds of thousands of jobs in our markets via direct and indirect employment. We have a wide ecosystem of suppliers and our demand helps to sustain their businesses whilst in parallel, we work with them to improve the sustainability of their supply chains. We invest in the markets in which we operate, and we work with our customers to create shared value.



Source: https://www.coca-colahellenic.com/en/a-more-sustainable-future/performance/ socio-economic-impact-study

Furthermore, maintaining our reputation and the trust of our stakeholders is essential to the growth and successful operation of our business. We integrate sustainability into every aspect of our strategy and operations in order to deliver our commitments and to make a more positive environmental impact.



At CCHBC, we are proud of our strong track record in sustainability, which is demonstrated by our leading scores in eight of the most recognized external ESG benchmarks. These results show that we are committed to growing in the right way, for the long term. Throughout the year we remained focused on delivering our sustainability commitments (Mission 2025) and our goal to achieve net zero emissions across our value chain by 2040. The year culminated with our twelfth consecutive ranking in the top three beverage companies globally by the Dow Jones Sustainability Index, and this year we were ranked world number one for a sixth time. We are honored that our score positioned us top among **7,822 companies** across **61 industries** according to the recently issued S&P Global Sustainability Yearbook 2023. We were also recognised as an 'Industry Mover'5 as, with a seven-point increase, we were the most improved in the beverage industry since last year.

In addition, we joined the Science Based Targets Network (SBTN) Corporate Engagement Programme and we will work to implement their guidelines in 2023. We also issued our first green bond to support and further advance our investments towards sustainability targets. We are working to expand our partnerships and looking for new collaboration networks, since we believe that ambitious goals and commitments can only be achieved through collective action.

As a reflection of our commitment to financial transparency, we are signatories to the (as yet voluntary) UK based Task Force on Climate-related Financial Disclosures (TCFD) and report our response in our Annual Report. In 2022 we participated for the third time to the Total Tax Contribution survey developed by European Business Tax Forum (EBTF). EBTF is a not-for-profit initiative of some of the largest European based MNEs and was formed in 2017 in response to the public debate around taxes paid by large companies. Member companies are based in the European Union (EU) and the European Free Trade Association (EFTA) and share a common belief in responsible tax practices and tax transparency. The aim of this survey is to foster the public tax debate around how and how much companies contribute to the societies in which they operate through taxes.







C. 2022 CCHBC Tax Contributions Highlights

In the countries where we operate, CCHBC is both a taxpayer and a tax collector. In 2022, we administered taxes of **EUR 1.814 billion**. This amount includes taxes borne by CCHBC (as a taxpayer) and taxes collected by CCHBC that are remitted to local tax authorities specifically for our employees or service providers.

The taxes borne by CCHBC operations have a direct impact on our financials and considered to be a direct contribution to tax revenues. We also collect taxes on behalf of the respective governments and management of those taxes is considered to be CCHBC's indirect contribution to the tax revenues. The main categories of taxes borne or collected by CCHBC, are presented below:

(5P's taxes - the list is not exhaustive / present main taxes and does not include fines and penalties)

- People Taxes Wage taxes include income taxes and social security contributions (employer share - taxes borne) as well as wage taxes that are collected on behalf of our employees and which we are required to withhold from wages (employee share taxes collected).
- **Planet Taxes** Environmental Taxes & Production Taxes mainly related to materials used for the production i.e. Packaging Tax, Waste Tax, Energy Tax, Carbon Tax etc.
- **Product Taxes** Value Added Tax (net VAT which reflects the sum of output VAT less the input VAT), Sugar/Soft Drink Taxes, Customs Duty & Excise Taxes paid on importations and to specific goods due to its ingredients.
- **Profit Taxes** mainly corporate income taxes paid in all countries where CCHBC operations generate business profits.
- Property Taxes Taxes on ownership and use of property, transfer taxes on the acquisition of assets, net wealth and financial and capital transactions.

In all the jurisdictions where CCHBC is active in, our Group entities paid a total of **EUR 664 million** of taxes borne. In addition, CCHBC entities collected an amount of **EUR 1,149 million** in taxes that were then remitted to local governments.

These payments are analyzed as follows:

Total	1,814
Taxes collected	1,149
Taxes borne	664
(amounts in EUR mil)	



Analysis per 5Ps						
(as % of total)	Total	Taxes borne	Taxes collected			
Profit	11%	28%	2%			
Property	0%	1%	0%			
People	21%	28%	18%			
Product	63%	37%	78%			
Planet	4%	6%	3%			
Other	0%	1%	O%			
Total taxes	100%	100%	100%			

Notes to the Tables:

(1) Numbers might not add up due to rounding

(2) 'Other' reflects Grants, subsidies, rebates, and other contributions received from the respective Governments

Below we provide an analysis of the tax administered in 2022 by segment⁴. More specifically, CCHBC is divided into three segments, as follows:

Established:	Austria, Cyprus, Greece, Italy, Northern Ireland, Republic of Ireland, Switzerland
Developing:	Croatia, Czech, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia
Emerging:	Armenia, Belarus, Bosnia and Herzegovina, Bulgaria, Egypt Moldova, Montenegro, Nigeria, North Macedonia, Romania, Russia, Serbia (including the Republic of Kosovo) and Ukraine

Notes to the Tables:

4 - Market segments are defined as per CCH Annual report, https://www.coca-colahellenic.com/en/investor-relations/2022-integrated-annual-report

Analysis by market segment

(taxes borne)	Total	Profit	Property	People	Product	Planet	Other
Established	198	66	2	93	30	6	1
Developing	109	19	2	31	33	25	0
Emerging	340	98	3	58	169	6	6
Corporate ⁽¹⁾	16	0	0	1	15	0	0
Total taxes borne ⁽²⁾	664	183	7	184	247	37	7

Analysis by market segment							
(taxes collected)	Total	Profit	Property	People	Product	Planet	Other ⁽³⁾
Established	376	1	0	102	261	13	0
Developing	389	0	0	30	342	17	0
Emerging	384	21	0	74	292	0	-3
Corporate ⁽¹⁾	0	0	0	0	0	0	0
Total taxes collected	²⁾ 1,149	21	0	206	895	30	-3

Notes to the Tables:

(1) Corporate refers to holding, finance and other non-operating subsidiaries of the Group

(2) Numbers might not add up due to rounding

(3) In 'Other' we record other taxes or levies that do not correspond to the group of taxes reflected in 5Ps as well as grants, subsidies, rebates, and other contributions received from the respective Governments and that is why they are presented as additions to taxes borne and deductions to the taxes collected



Basis of preparation for the reported Total Tax Contribution

We outline below the basic rules applying in calculating CCHBC annual tax contributions:

 The amounts of tax contributions, represent the total of the taxes borne or collected in all jurisdictions where CCHBC entities operate. For our investments in joint ventures and associates that are equity accounted by CCHBC, no amounts have been included⁵. 17

- All tax contributions are presented on a cash paid basis for the financial year ended 31 December 2022.
- All payments have been reported in EUR, using the average exchange rates applied for CCHBC FY2022 financial statements⁶.

5 - Fines and penalties that were realized in the financial year ended 31 December 2022 are not included in tax contributions presented
6 - Foreign currencies and translation pg.171,

https://www.coca-colahellenic.com/en/investor-relations/2022-integrated-annual-report



Independent auditor's report

To the management of Coca-Cola HBC

We have undertaken an independent limited assurance engagement on the quantitative disclosures in section "C. 2022 CCH Tax Contributions Highlights ("section C") of Coca Cola HBC (further "Group") Tax Transparency Report for the financial year ended on 31 December 2022 ("the TTR").

It was not part of our engagement to provide any assurance on the other sections of the TTR.

Management's Responsibility for the Report

The management of the Group is responsible for the preparation of the TTR in accordance with the "Basis of preparation for the reported Total Tax Contribution" (further the "Basis of preparation"), which is included in section C of the TTR.

The responsibility of the management includes the selection and application of appropriate methods to prepare the TTR and the use of assumptions and estimates for selected quantitative disclosures which are reasonable under the given circumstances. Furthermore, this responsibility includes designing, implementing, and maintaining systems and processes relevant for the preparation of the TTR in a way that is free of – intended or unintended – material misstatements.

Inherent limitations

The quantitative disclosures need to be read and understood together with the Basis of Preparation of the TTR for which the Group is solely responsible for selecting and applying. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measurement techniques and can affect comparability between entities and over time.

Auditor's Responsibility

Our responsibility is to express a limited assurance conclusion on the quantitative disclosures included in section C, based on the procedures we have performed and the evidence we have obtained. We conducted our work in the form of a limited assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000: "Assurance Engagements other than Audits or Reviews of Historical Financial Information", published by the International Auditing and Assurance Standards Board (IAASB). This standard requires that we plan and perform this engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the quantitative disclosures in section C of the TTR for the financial year ended on 31 December 2022 have not been prepared, in all material respects, in accordance with the Basis of preparation.

Our responsibility is limited to the issuance of this Report, based on the procedures we have performed, as described below in the "Scope of Work" paragraph, stating the conclusion resulting from this and providing limited assurance. The nature, timing and extent of our planned procedures were based on our professional judgment, including our assessment of the risks of material misstatement, whether due to fraud or error. The work carried out and any findings relate to the compliance of the TTR with the Basis of preparation prepared by the management of the Group.



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Independence and Quality management

We remained independent of the Company in accordance with the ethical requirements that are relevant to this engagement, which include the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants ('IESBA Code'), the Greek ethical requirements and the FRC's Ethical Standard, as applicable to listed public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Our firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Scope of work

Within the scope of our engagement, we performed, amongst others, the following procedures:

- Obtained an understanding of the subject matter considering the specific characteristics of the Group.
- Evaluated the appropriateness of the Basis of preparation used and its consistent application.
- Inquiries of Group management, including those with responsibility for the quantitative disclosures, to understand the processes performed at the group level for the preparation of the instructions, review of the data submitted by local teams and the consolidation process.
- Inquiries with local teams to understand the processes and related controls in place during the data collection and submission phases.
- Traced, on a sample basis, internal and external documents (e.g. tax returns and bank statements) supporting the information included in the TTR.
- Verified that the information in the TTR reconciles with the underlying data submitted.
- Tested the mathematical accuracy of the quantitative disclosures included in section C.

Our assurance does not extend to any other information in the TTR. We have neither reviewed and do not provide any assurance over any other information disclosed in the TTR.

In our opinion, we obtained sufficient and appropriate evidence for reaching a conclusion for the assurance engagement.

Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the quantitative disclosures included in section C of the TTR, have not been prepared, in all material respects, in accordance with the Basis of preparation.

Restriction on Use

This Assurance Report is issued solely for the purposes stated in the introductory paragraph hereof and should not be used or distributed for any other purpose.

Athens, 9 August 2023, Pricewaterhousecoppers SA, Greece

Note:

The maintenance and integrity of the Company's website is the responsibility of the directors; the work carried out by the auditors does not involve consideration of these matters and, accordingly, the auditors accept no responsibility for any changes that may have occurred to the interim financial statements since they were initially presented on the website.



THANK YOU



Coca Cola