



myCompass

Our Code of Conduct

BRITVIČ

The way we do business is as important as the business we do

We have big ambitions, and to continue earning our great reputation in the market, we need to be the best we can by doing the right thing and by never compromising our integrity. We are not expected to do this alone or without support. myCompass is there to guide us and prompt the right questions.

myCompass, Britvic's Code of Conduct, maps our commitment to the highest standards of integrity, ethics, and behaviours across our People, Planet and Performance pillars. It is a straightforward way to access the resources and support we need to demonstrate personal integrity and live the Britvic values that underpin our work.

Regardless of our role, location, or seniority, we all share the same responsibility to comply with myCompass by following its policies and processes. It is important that we also undertake all mandatory training in good time.

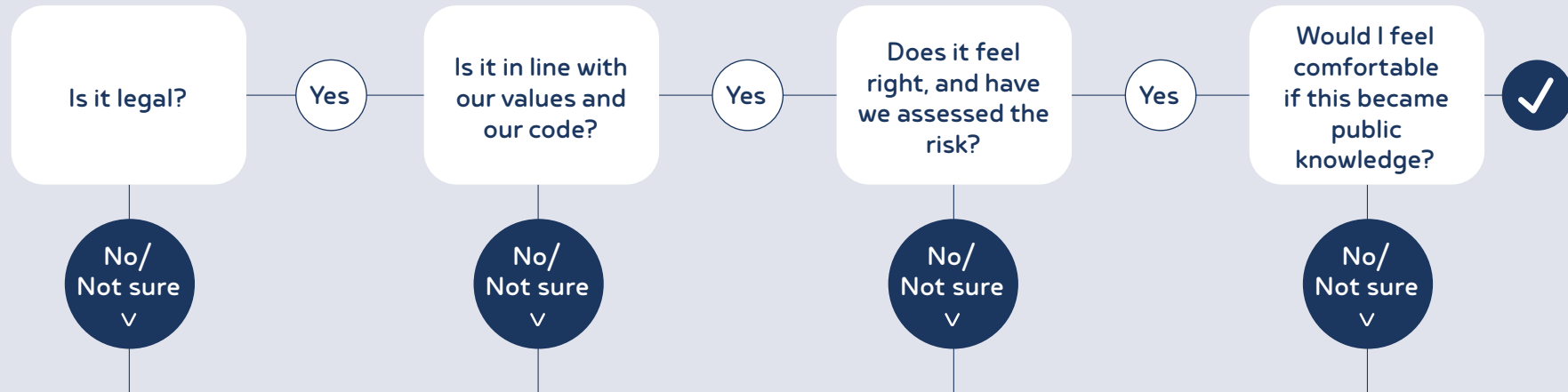
Remember, our reputation and business success depend on the decisions we make and the actions we each take.



myCompass



We can all do the right thing, everytime



Seek advice and guidance

If the answer to any of these questions is 'no' or 'not sure' speak to someone.

It's always better to ask a question than to guess an answer.

If you need advice speak to your line manager, contact mycompass@britvic.com, or use mySpeakUp.



Our purpose

Enjoying life's everyday moments

Our vision

The most dynamic soft drinks company, creating a better tomorrow

Our values

We care

Stronger together

Act with pace

We're courageous

Own it



Contents

A guide to our code	6	We are mindful of the use of natural resources	17
People	7	We promote responsible business practices with our supply chain partners	18
We respect and protect Human Rights	8	Performance	19
We do not tolerate fraud, bribery or corruption	9	We compete fairly and market our products responsibly	20
We do not tolerate harassment or bullying at work	10	We ensure that decisions are taken at the right level in the business	21
We play an active role in our communities	11	We drive food safety and quality	22
We foster a diverse and inclusive working environment	12	We respect and protect our reputation and intellectual property	23
We protect the safety and wellbeing of our people	13	We safeguard our company information	24
Planet	14	We prevent Insider Trading	25
No packaging should ever go to waste	15	MySpeakup	26
We strive to maximise energy efficiency and use renewable sources	16		

A guide to our code

We have an amazing business with formidable brands. It is therefore important that we maintain our great reputation by upholding the highest business standards.

Our Code of Conduct, which we call myCompass, sets out what we collectively stand for as a business. It is fuelled by our purpose, vision and values and provides us with the standards within which to operate freely and for every one of us to do the right thing. myCompass also links to our policies along with many other resources.

The content of our code is not optional nor is it negotiable. This is something that we are all responsible for, wherever we are in the world and whatever role we have at Britvic.

It is important that each of us take the responsibility to act when something does not feel right and speak up. It is our common duty and requirement to act on it. We should never ignore it, thinking that someone else will report it.



People

p 7

How we support each other and collaborate effectively at Britvic. Stronger together, open and inclusive.



Planet

p 14

How we make a difference to Britvic's sustainability ambitions, our role in society and our impact on the planet.



Performance

p 19

Helping Britvic perform successfully. Our integrity, the way we own it, how we work, show up and take accountability matters.



People

We respect and protect human rights >

We do not tolerate fraud, bribery or corruption >

We do not tolerate harassment or bullying at work >

We play an active role in our communities >

We foster a diverse and inclusive working environment >

We protect the safety and wellbeing of our people >

myCompass

We respect and protect Human Rights

What we stand for

We respect and protect human rights by ensuring that we and our suppliers work in a clean and safe environment, have proper standards of employment, comply with local laws and don't oppress or exploit anyone. These rights are based on shared values like dignity, fairness, equality, respect and independence.

We do not tolerate any abuses of human rights across our business. Our human rights focus spans both our direct operations and indirect inbound/downstream value chains, all the way from the farmer to the bottled drink and the consumer.

We take active steps, as part of Procurement's supplier onboarding and due diligence, to assess our suppliers on their risk to human rights. We also require all our suppliers to sign up to our Ethical Trading Policy which forms part of every supplier contract.

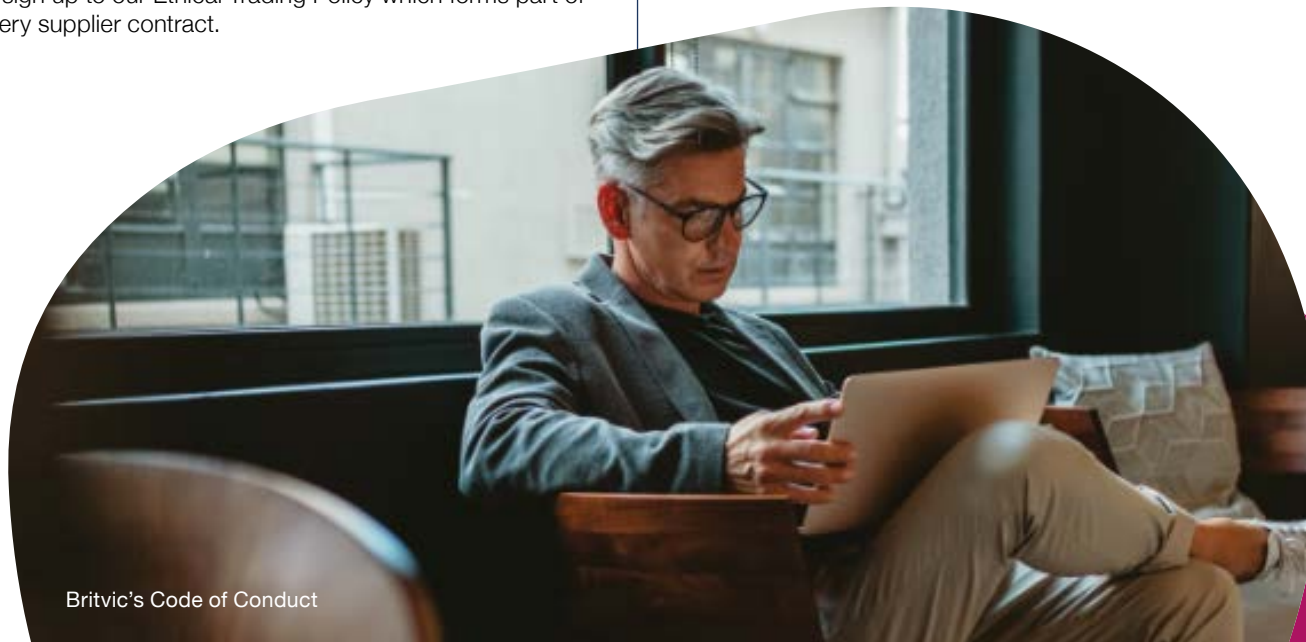
What we expect of our employees

Employees must:

- Respect human rights in the workplace and follow related policies, standards and practices such as the right to work and freedom of opinion and expression
- Engage with the local Procurement team when dealing with suppliers, to assess and understand potential human rights risks within their supply chain and ensure all our high-risk suppliers meet our minimum ethical standards and processes
- Use our **mySpeakUp** channels to report my concerns you see in our business and across our supply chain.

What is our policy on standards of employment?

Standards of employment at Britvic must comply with the UK Modern Slavery Act (2015) which forbids the employment of anyone under conditions of: 'forced labour', 'compulsory labour', 'slavery' or 'servitude' or the exploitation of any person by 'human trafficking'. Standards must also be in accordance with the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.



We do not tolerate fraud, bribery or corruption



What we stand for

We will never tolerate any type of fraud, bribery or corruption within our organisation. We take active measures to prevent and detect such activities, which includes avoiding conflicts of interest. We do not make donations to political organisations.

What we expect of our employees

Employees must:

- Never, directly or indirectly, engage in fraudulent or corrupt dealings with any other person or organisation
- Ensure that any gifts and/or hospitality, both received and offered, are approved and recorded in line with the Anti-Bribery and Corruption Policy
- Discuss potential conflicts of interest with a line manager. Where a conflict is confirmed, this will need to be disclosed
- Immediately report any suspected instances of fraud or conflicts of interest which you believe are not being adequately managed.

We do not tolerate harassment or bullying at work

What we stand for

We are dedicated to establishing an inclusive and diverse working environment where wellbeing is prioritised and our people feel empowered to be themselves, allowing them to thrive and grow in a highly dynamic workplace.

We want everyone who works for us or with us to experience an environment that does not tolerate bullying, harassment or any offensive behaviour.

We treat any concerns about harassment and bullying seriously. We will investigate all concerns in a sensitive, objective and factual way and look at what action needs to be taken, which can include disciplinary.

What we expect of our employees

Each one of us has an important role to play in creating and sustaining an inclusive and thriving working environment. We expect that our employees will treat everyone with dignity and respect, being mindful of their behaviour and how others may react to it.

Employees must:

- Not engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying
- Not engage in any indirect behaviour which could be construed as sexual or other harassment, or bullying (such as making offensive or sexually explicit jokes), or insults, or displaying, emailing, texting or otherwise distributing offensive material
- Speak up and raise concerns where you identify behaviour that doesn't meet the standards we expect. This could be with your manager, wider management team or the HR team. Do not be a bystander who allows inappropriate behaviour to continue in our workplace
- Take all reported concerns of bullying and harassment seriously and ensure that the correct process is followed to investigate and fully address the concern. Please see the Harassment and Bullying Policy for guidance.



We play an active role in our communities

What we stand for

We want to make a difference to the communities where we operate and to be trusted and respected for what we do.

We seek to improve the lives of our communities, always bringing a positive contribution and embracing our value of togetherness.

We support charities with our time, skills and product donations.

What we expect of our employees

Employees must:

- Consider supporting charities with your time, skills and product donations
- Make use of paid volunteering days, either with your team or individually
- Consider the impact of business decisions on local, national and global communities.



We foster a diverse and inclusive working environment



What we stand for

We want everyone to have personal dignity at work and to be empowered to be their best, true authentic self each and every day as part of an open, inclusive and energising environment.

We want our employees to mirror the richness of the markets we operate in and the communities we serve. We are committed to building a community that truly respects each other's differences and embraces diverse thinking and experiences.

We do not tolerate behaviour or attitudes that discriminate against anyone, or coerce, intimidate, bully or harass others, or threaten them with verbal or physical violence.

What we expect of our employees

Employees must:

- Treat everybody fairly, honestly, with respect and without discrimination
- Encourage and foster an open and inclusive environment where everyone has a voice and feels included
- Make sure you undertake any mandatory training required (such as unconscious bias for hiring managers)
- Raise any concerns with your line manager or wider management team.



We protect the safety and wellbeing of our people

What we stand for

Creating a healthier and happier environment for our employees is a vital part of our culture, delivered through our focus on Healthier People and living our We Care value. Our Zero Harm principles encourage all of us to actively engage everyone to identify safety issues and act with pace where we see opportunities for improvement. Reporting near misses is one really important way we can all do this. Doing the right thing is everyone's responsibility.

Beyond our physical safety, our mental health and personal wellbeing matters. We are dedicated to creating a healthy workplace where everyone feels supported and able to thrive.

What we expect of our employees

Employees must:

- Follow the rules and safe working procedures shared by your manager and your colleagues
- Participate in all job-specific training provided by your manager and any company mandated awareness training
- Use and maintain any personal protective equipment and tools your manager gives you to do your job safely
- Stop or ask others to stop any work you believe is unsafe and report to your manager any equipment defects, unsafe conditions or behaviours
- Report near misses so we can learn from what went wrong and prevent accidents happening again
- Be mindful of your wellbeing and the wellbeing of others.





Planet

No packaging should ever go to waste >

We strive to maximise energy efficiency and use renewable sources >

We are mindful of the use of natural resources >

We promote responsible business practices with our supply chain partners >

myCompass

No packaging should ever go to waste

What we stand for

With the growth in packaging has come an unintended consequence – packaging waste. More needs to be done about it and, as an industry leader, Britvic plays a crucial role in responding to the issue.

We are a trusted partner to our customers and through our engagement with them, we are committed to finding packaging solutions. We want to play our part in creating a world where great packaging never becomes waste, and we work towards creating a circular economy.

The Healthier Planet policy sets out our packaging goals and how we will reduce the impact of packaging waste at our manufacturing sites and beyond.

What we expect of our employees

Employees must:

- Take responsibility to reduce the amount of waste we are creating in our operations. If you have an idea to further reduce the amount of waste we are creating in our operations, discuss your idea with your line manager, local HSE representative, or contact the Sustainable Business team who can share your idea with a wider audience
- Consider the implications of your personal actions day-to-day with respect to waste and packaging
- Understand the impact of key choices and business decisions on packaging waste to provide a balanced assessment
- Undertake all relevant training.



We strive to maximise energy efficiency and use renewable sources

What we stand for

We have set ambitious targets accredited by the Science Based Targets initiative and are publicly committed to reducing our greenhouse gas emissions in our operations by 50% and our upstream and downstream emissions by 35% by 2025, aligned to the 1.5°C pathway. Britvic will be net zero by 2050.

We are fully committed to our science-based targets and we are exploring a range of opportunities to reduce our carbon emissions through three main activities:

- Improving energy efficiency in our operations
- Utilising low-carbon technology and/or energy sources; and
- Working in partnership with our key suppliers to reduce carbon emissions in our supply chain.

What we expect of our employees

Employees must:

- Not waste energy resources through our operations by ensuring you switch off lights and electrical equipment when not in use
- Raise any issues (lights staying on, equipment running when not required etc) or opportunities to drive energy efficiency as they arise with your line manager
- Understand the impact of key choices and business decisions on energy efficiency and carbon emissions to provide a balanced assessment
- Consider if you need to travel to a meeting or if it could be held virtually instead. If required, make sure you get the most from your journey and use lower carbon options (i.e. public transport, bike, walking) where possible
- Undertake all relevant training.



We are mindful of the use of natural resources

What we stand for

Water is vital to our business, and to every single one of our brands – from bottled water to Beyond the Bottle, flavouring billions of water occasions and everything in between.

We elevate the role of water, broadening our scope beyond our direct operations to consider our water catchments and the whole value chain.

What we expect of our employees

Employees must:

- Not waste water resources through our operations, raising any issues such as leaks, dripping taps, or opportunities to drive water efficiency, as they arise with your management team
- If you have an idea to reduce the amount of water we are using in our operations, discuss it with your line manager, local HSE representative or the Sustainable Business team who will share your idea with a wider audience
- Understand the impact of choices and business decisions on water consumption to provide a balanced assessment
- Undertake all relevant training.



We promote responsible business practices with our supply chain partners

What we stand for

We are committed to building strong relationships with our supply chain partners, working together to promote and realise socially and environmentally responsible business practices.

We work to continuously embed sustainability into our business decisions. We do this by certifying that the suppliers we work with are meeting certain standards and are committed to delivering on jointly agreed sustainability action plans. This forms part of their contractual relationship with us. All sourcing decisions are assessed across People, Planet and Performance and all sourcing strategies must meet key sustainability criteria.

What we expect of our employees

Employees must:

- Engage with your local Procurement team when dealing with suppliers, to assess and understand potential sustainability risks and opportunities within their supply chain
- Engage regularly with prioritised suppliers to deliver their performance against jointly agreed sustainability targets.





Performance

We compete fairly and market our products responsibly >

We ensure that decisions are taken at the right level in the business >

We drive food safety and quality >

We respect and protect our reputation and intellectual property >

We safeguard our company information >

We prevent insider trading >

myCompass

We compete fairly and market our products responsibly

What we stand for

We are committed to marketing our products responsibly within an established set of principles. We adhere to the letter and spirit of all relevant applicable national and local regulations, including any voluntary codes.

Competition law prevents harm to consumers by regulating the way businesses compete with each other and deal with their suppliers and customers. We are committed to competing vigorously but fairly and complying with competition law in each of our markets.

What we expect of our employees

Responsible Marketing

Employees must:

- Make sure you are aware of and understand the principles that are set out in our Responsible Marketing Code, in line with the scope of your current role
- Ensure all marketing activity follows both the letter and the spirit of legislation, regulation and all relevant codes
- Brief all external marketing and other partners you engage with on the terms of the Responsible Marketing Code, including with contracted terms and conditions in all activity/project briefs

Competition Law

Employees must:

- Complete relevant competition law training as required for your role at least once every two years
- Avoid all discussion of competition or competitive subjects with competitors and make it an obvious point to break off such discussion should it arise
- Check with the legal team if you are unsure whether what you are doing breaches competition law
- Report any breaches to the Legal team or via **mySpeakUp**.



We ensure that decisions are taken at the right level in the business



What we stand for

We are committed to making decisions in the right way, with simplicity, pace and avoiding duplication by adhering to process and governance to ensure consistency across our business and managing risks effectively.

When making decisions, we always consider the long term consequences and the impact on appropriate stakeholders, while maintaining high standards of integrity.

We have clear policies and processes that provide a single point of reference for all decision making across financial and non-financial transactions fundamental to Britvic and will help you navigate to the right individual or team in the business to approve and sign a contract.

What we expect of our employees

Employees must:

- Use the Statement of Authorities to ensure the correct approvals are made. If unclear, check with your line manager (or the Legal team) to understand where decisions should be made
- Use the Authorised Signatory Policy to ensure contracts are signed appropriately
- Take into account the following:
 - **People:** The interests of our employees, the impact on communities and how it fosters positive relationships with suppliers, customers and others
 - **Planet:** The impact on the environment and contribution to meeting our Healthier Planet objectives
 - **Performance:** The long-term consequences of the decision and its contribution to maintaining our high standards of integrity.

We drive food safety and quality

What we stand for

We are committed to promoting a culture where the food safety and quality of our products sit at the heart of what we do and is why our brands are trusted around the world. We strive to deliver high quality products and services that delight our consumers and customers.

Fundamental to Britvic's purpose of 'making life's everyday moments more enjoyable' is ensuring provision of consistently high-quality products and services that delight our customers and consumers. We are committed to sustaining an environment which promotes a food safety and quality culture within our operations to provide trusted brands across our markets.

What we expect of our employees

We all have a role to play in driving food safety and quality, from the design concept, to sourcing, manufacturing, and all the way through to point of consumption.

Employees must:

- Familiarise yourself with and understand the standards and requirements that are relevant to your role
- Undertake the relevant Food Safety & Quality training as required for your role
- Report any instance of product or process nonconformity, using either routine (line manager or site quality manager) or emergency (plc Quality or Risk) methods of communication as appropriate and in a timely manner
- Report any condition or practice that could cause or contribute to a quality or food safety issue
- Find out more under FAQs - What's my personal role in food safety?

Consumer loyalty and a strong brand reputation are only achievable through the highest standards of quality. If you see that our products are not showing up in markets as they should, inform the Consumer Engagement team.

Our Food Safety and Quality Commitments

- We will manufacture and deliver products that meet the highest food safety and quality standards
- Our decisions and actions are appropriately focused on the protection and satisfaction of our customers and consumers
- We will comply with all relevant legal and regulatory requirements relating to the Food Safety and Quality of our products and services across our business units
- All quality and food safety standards, procedures, audits and nonconformities are captured and managed using our Integrity Management System
- The Integrity Management System's effectiveness will be continually verified through certification to recognised international standards, such as ISO 9001, FSSC22000 and IFS
- We will foster a Food Safety and Quality culture by developing capability through structured training, communications and awareness for our employees
- We will continue to set challenging targets to drive excellence within our operations and implement appropriate management programmes to deliver them effectively
- We will regularly review and continually improve our Food Safety and Quality policy and standards in line with legislation, stakeholder requirements and identified risks and opportunities. A suitable network of Quality Forums will remain in place to support this
- We will ensure our suppliers and contractors comply with our Food Safety and Quality commitments. Their materials and services will be assessed and monitored through a Supplier Management programme



We respect and protect our reputation and intellectual property

What we stand for

Our great reputation as a business is founded on our history and heritage, our talented people and superb brands. It is important that we maintain this reputation future forward by upholding the highest business standards. As a consumer goods company, our brands, products and innovations need to be protected.

We take proactive and assertive steps to enforce our intellectual property whenever necessary and we respect the intellectual property of others.

We identify potential threats and opportunities to our business and our performance and actively manage these by minimising the loss and disruption caused by adverse events.

What we expect of our employees

Employees must:

- Ensure that all decisions and actions comply with relevant legislation and appropriate regulatory bodies and promote the company's reputation
- Respond quickly and effectively in the event of an incident. This must be raised with your line manager and the plc risk team should be informed at the earliest opportunity
- Report any suspicions of copyright infringement to the Legal team
- Behave as an ambassador for our business and be aware of your contribution to our collective reputation by making the right choices and demonstrating the highest standards of integrity and ethical behaviour
- Not engage on social platforms on the company's behalf unless you have prior authorisation to do so. Any potential association to Britvic should be cleared by a statement that you are posting your own views, not the views of Britvic.

Using a third party's IP

This is not allowed, not without permission (usually in the form of a licence agreement with a royalty fee attached). IP protection grants an exclusive right, to the exclusion of all others, therefore it is crucial that all organisations conduct 'freedom to use searches' before launching a new product.



We safeguard our company information

What we stand for

We are committed to safeguarding and protecting our commercially sensitive information and physical company assets.

We comply with all applicable data protection laws and ensure that we process personal data accordingly. We respect the personal data and data protection rights of all individuals.

We put in place strategies to protect important information from corruption, compromise or loss. We ensure that data remains accessible and useable for business purposes, without jeopardising the privacy of individuals or exposing commercially sensitive information.

This includes ensuring that:

- Data is used lawfully, fairly and transparently
- It is only used for the purpose it was collected
- Only the minimum amount of data necessary for the purpose is used
- Data is accurate, up to date, and not kept for longer than needed.

What we expect of our employees

Employees must:

- Ensure that you do not disclose any confidential information except where you are required to do so as part of your employment or duties. This means that you should not share personal information with family, friends or business acquaintances. If you are signed up to a confidential project, you must not discuss that work with anyone other than colleagues who are also signed up to that project
- Be responsible for handling confidential and personal data appropriately and ensure that you understand how data protection guidance applies to your role
- Report any suspected or actual personal data incidents to the Data Protection Officer (DPO) or your Data Privacy Steward as quickly as you can. If you're not sure, speak to your line manager, contact your function Data Privacy Steward, or go directly to the DPO
- Use IT equipment and tools responsibly and without bringing Britvic into disrepute, and protect confidential information from unauthorised disclosure by using appropriate security methods
- Respect and protect company assets, property, money and equipment that you are given access to for your job and use them properly and only for business purposes.



We prevent Insider Trading

What we stand for

We comply with our obligations under the rules relating to inside information and ensure that everyone is aware of them and follows the correct processes.

What we expect of our employees

Employees must:

- Be familiar with the rules on inside information and dealing in Britvic shares
- Not deal in (buy or sell) any Britvic shares if you are in possession of inside information about the Group. You must also not recommend or encourage someone else to deal in Britvic shares at that time – even if you will not profit from such dealing
- If you are on a Restricted List, get permission before you deal in Britvic shares, and don't deal in Britvic shares during a closed period

Having access to inside information

If you have access to inside information you will be added to an insider list which the Company is legally obliged to establish and maintain. If you have been notified that you are on an insider list then you should assume you have inside information.

half year results (interims) and full year results (prelims). PDMRs and people on insider and restricted lists may not deal (and will not be given clearance to deal) in Britvic shares during closed periods.



mySpeakup



What we stand for

We are committed to treating all disclosures consistently and fairly and to ensuring that anyone raising a concern in good faith is protected from retaliation.

We will take all concerns seriously and investigate as appropriate. All disclosures will be treated with absolute confidence and your details will not be disclosed unless there is a legal obligation to do so. If requested, your identity will be protected by our processes.

We will take corrective action as required and share the results of our investigation with you.

What we expect of our employees

It is important that each of us stands up for what we know is right and important. It is our responsibility to act when we see or feel that actions are in contradiction to our code. It is our personal duty to speak up. We should never ignore anything that doesn't feel right, perhaps thinking that someone else will report it. This is what 'owning it' is all about.

Employees must:

- Raise an issue or concern where something doesn't feel right, sharing as much information as possible to aid the investigation and action
- Act in good faith, and refrain from investigating any concerns yourself.

mySpeakup is an independent confidential hotline that you can use (toll free) 24 hours a day, 7 days a week from any location in the world to report any concern in confidence.

Go to www.britvic.com/myspeakup to report your concern via the website.

You can report your concern by phone. Numbers for our key locations are:

UK - 0808 189 1053

Ireland - 1800 904 177

France - 0805 080 339

Brazil - 0 800 892 2299

Netherlands - 0800 022 0441

USA - 800 461 9330

You can also email your concerns to speakup@britvic.com

Try to provide as much information as possible, including names, dates, places, and details of the events that took place, or that you believe are likely to take place.



BRITVIČ
