

AUSTRALIAN SPEAK UP POLICY GUIDANCE

Coca-Cola Europacific Partners

POLICY GUIDANCE INDEX

Contents

1	PART 1 - Speaking Up about a Matter Protected by the Whistleblower Protection Laws	4
1.1	Who is protected under the Whistleblower Protection Laws and Part 1 of this Policy Guidance?	4
1.2	Who is an Eligible Whistleblower?	5
1.3	What can be raised as an Eligible Disclosure?.....	5
1.4	Examples of Eligible Disclosures	6
1.5	Personal work-related grievance.....	7
1.6	Reasonable grounds to make the disclosure	7
1.7	Who may receive a Protected Disclosure?.....	7
1.8	How may a Protected Disclosure be made?.....	8
1.9	Protection for disclosers.....	9
1.10	Confidentiality and secure record keeping	9
1.11	Identity protections and exceptions	9
1.12	Provision of identity to a court or tribunal	10
1.13	Protection from detriment	10
1.14	Protection from civil, criminal, and administrative liability	11
1.15	Compensation and other remedies	11
1.16	How this Policy Guidance interacts with the Whistleblower Laws.....	11
1.17	Whistleblower Laws outside Australia	12
1.18	Investigations.....	12

1.19	Duration of investigation	13
1.20	CCEP Australia may require further information to investigate disclosures.....	14
1.21	Support and practical protections	14
2	PART 2 - Speaking Up on any other matter that does not amount to a disclosure under the Whistleblower Protection Laws	14
2.1	Speak Up	14
2.2	Whistleblowing	14
2.3	Who can make a report?	15
2.4	What can be reported?	15
2.5	When to report?.....	16
2.6	How to report?.....	16
2.7	Information to provide.....	16
2.8	Anonymous reporting	17
2.9	How do we handle your report?.....	17
2.10	No retaliation	18
2.11	Data protection & confidentiality	18
2.12	Concerns on reporting?	19
2.13	Policy Guidance compliance	19
3	Policy Guidance Overview	19
4	Approval of the Policy Guidance	20
4.1	Effective date and validity.....	20
4.2	Change control	20

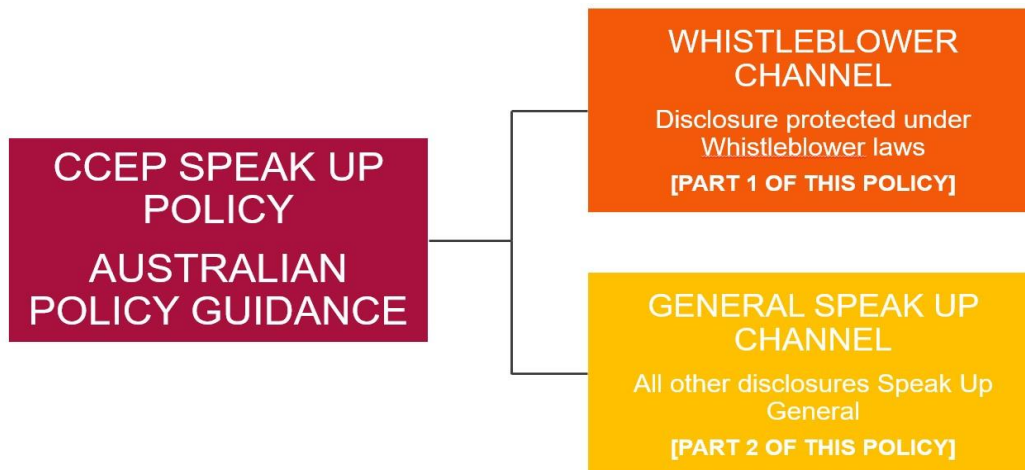
Introduction

This Australian Policy Guidance (**Policy Guidance**) applies to Coca-Cola Europacific Partners Australia (**CCEP Australia**) and reinforces our commitment to a safe, inclusive, and respectful culture, where people feel comfortable reporting concerns and speaking up. This Australian Speak Up Policy Guidance is in support of CCEP's Global Speak Up Policy and Australia's Whistleblower protection laws and includes details of how to make a report or seek guidance across both protected Whistleblower disclosures and all other disclosures.

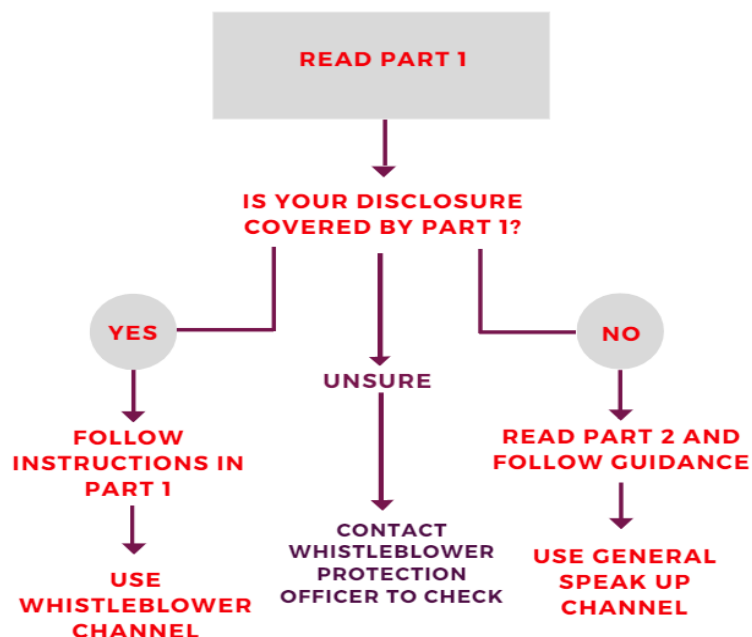
This Policy Guidance has two parts:

Part 1 - Speaking Up about a matter protected by **Australia's Whistleblower protection laws**

Part 2 - Speaking Up on any other matter not protected by Australia's Whistleblower protection laws



How to use this Policy Guidance



1 PART 1 - Speaking Up about a Matter Protected by the Whistleblower Protection Laws

Under Australian law, certain types of disclosures are protected under the Whistleblower protection regime contained in *the Corporations Act 2001 (Cth)* (**Whistleblower Protection Laws**). Part 1 of this Policy broadly sets out how this framework works and when you should raise a disclosure under this framework, rather than the general Speak Up channels described in Part 2.

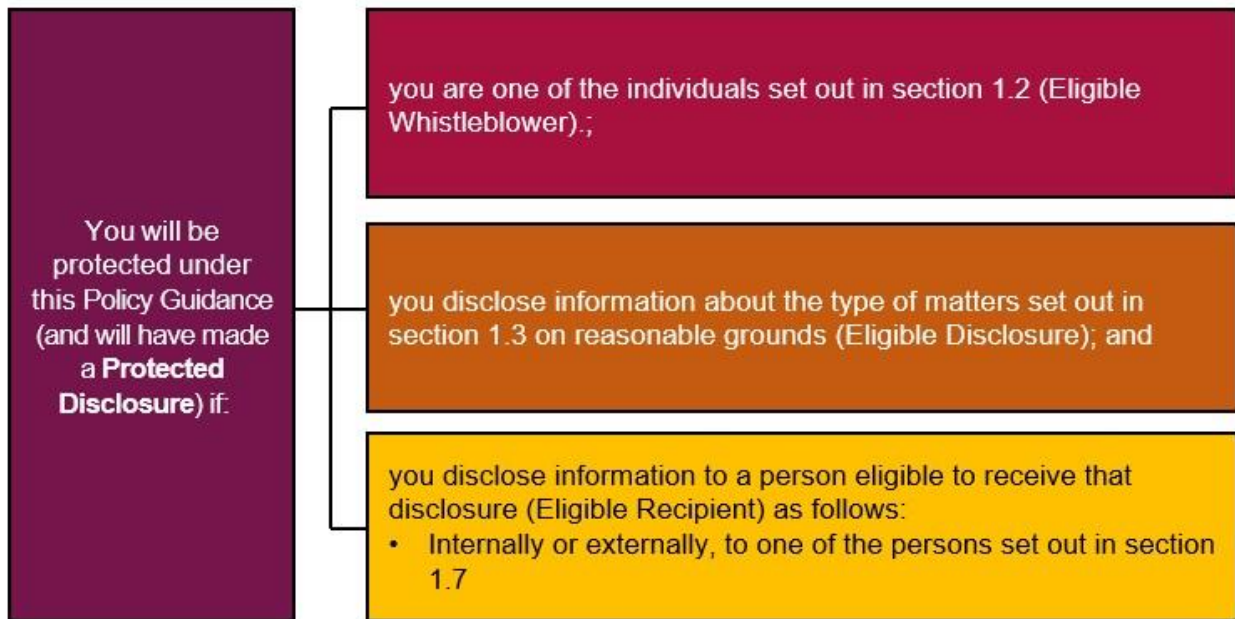
If you are unsure whether your disclosure should be treated under the Whistleblower protection framework (Part 1) or the general Speak Up Channels (Part 2), we encourage you to contact a Whistleblower Protection Officer for a confidential discussion (see below table) and they will help guide you on next steps.

Whistleblower Protection Officers (WPOs)*	Name	Email
General Counsel Australia	Michelle Monteleone	michelle.monteleone@ccep.com
API Corporate Integrity Lead	Hayden Nettle	hayden.nettle@ccep.com
Ethics and Compliance Lead – APS	Annette Beashel	abeashel@ccep.com
Group Audit Manager	Anthony Mangano	anthony.mangano@ccep.com
Group Manager Risk	Dean Devos	dean.devos@ccep.com

* WPOs may be updated from time to time

1.1 Who is protected under the Whistleblower Protection Laws and Part 1 of this Policy Guidance?

To be protected under the Whistleblower framework in this Policy Guidance, you must make a **Protected Disclosure**. See definition below.



1.2 Who is an Eligible Whistleblower?

An **Eligible Whistleblower** is a current or former:

- a) Employee of CCEP Australia or its related bodies corporate, including permanent, part-time, fixed term or temporary employees or interns and secondees.
- b) Officer (including a director or secretary) of CCEP Australia or its related bodies corporate.
- c) Supplier of goods or services to CCEP Australia or its related bodies corporate, whether paid or unpaid (for example contractors, employees of a contractor, consultants, service providers and business partners).
- d) Associate of CCEP Australia or its related bodies corporate.

Or a parent, grandparent, child, grandchild, sibling, spouse or dependent of any of the above people.

1.3 What can be raised as an Eligible Disclosure?

Your disclosure must be an **Eligible Disclosure** to receive protection, which requires the following:

- (a) Eligible Disclosures must be about misconduct or an improper state of affairs or circumstances in relation to CCEP Australia or a related entity (including conduct engaged in by one of their officers or employees of CCEP Australia or its related entity).
- (b) You must have reasonable grounds to suspect the reported conduct has occurred, will occur or is occurring.

Eligible Disclosures do not have to be about breaking the law.

Disclosures solely about a personal work-related grievance do not qualify for protection under the Whistleblower Protection Laws and are not Eligible Disclosures unless they also:

- a) relate to any detriment (or threat of detriment) by reason of you proposing/making/being suspected of making a Protected Disclosure; or
- b) constitute conduct that may indicate a systemic issue in relation to CCEP Australia or its related entity.

You should refer to Part 2 of this Policy Guidance for guidance on the appropriate channels to raise those disclosures that are not eligible for protection under the Whistleblower Protection Laws.

1.4 Examples of Eligible Disclosures

Some examples of Eligible Disclosures include:

- conduct that amounts to a criminal offence or contravention of the *Corporations Act 2001* (Cth) or *Australian Securities and Investments Commission Act 2001* (Cth);
- conduct that is a Commonwealth criminal offence punishable by more than 12 months imprisonment;
- illegal conduct, such as fraud, theft, corruption, bribery, criminal damage to property or breaches of work health and safety laws;
- fraud, money laundering or misappropriation of funds;
- negligence, default, breach of trust and breach of duty;
- improper, unethical, or dishonest conduct, such as misuse of company assets, conflicts of interest or abuses of authority;
- conduct that poses a significant risk to public safety or the stability of, or confidence in, the financial system;
- any conduct that may indicate a systemic issue in relation to CCEP Australia;
- any business behaviours and practices that may cause consumer harm;
- conduct that is damaging to CCEP Australia's financial position or reputation;
- misconduct in relation to CCEP Australia tax affairs;
- other misconduct concerning corporate governance, accounting, or audit matters;
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure; or
- unauthorised use of CCEP Australia's confidential information, including in terms of product pricing and product development.

1.5 Personal work-related grievance

A personal work-related grievance means a grievance about any matter in relation to your employment or former employment that has, or tends to have, implications only for you personally. Examples of a personal work-related grievance includes (but are not limited to):

- a) an interpersonal conflict between you and another employee.
- b) a decision that does not involve a breach of workplace laws.
- c) a decision about your engagement, transfer, or promotion.
- d) a decision about your terms and conditions of engagement, payroll, or remuneration.
- e) a decision to suspend or terminate your engagement, or otherwise discipline you.

If your disclosure is a solely personal work-related grievance, then you should raise it with your line manager and/or a member of People & Culture or if that is not appropriate, you can use one of the internal Speak Up resources listed at paragraph 2.6.

1.6 Reasonable grounds to make the disclosure

To receive the protections outlined in Part 1 of this Policy Guidance and under the Corporations Act, you must have reasonable grounds to make your Protected Disclosure. It is not necessary to produce evidence to demonstrate reasonable grounds. Reasonable grounds means that a reasonable person in your position would also suspect the information indicates misconduct or an improper state of affairs. Even if your disclosure turns out to be incorrect, you will still be protected if you had reasonable grounds to make it.

However, a disclosure made without reasonable grounds (including where you know the disclosure to be false) will not be eligible for protection and may amount to misconduct and be subject to disciplinary action.

1.7 Who may receive a Protected Disclosure?

The people listed in this section may receive disclosures that qualify for protection under the Whistleblower Protection Laws (**Eligible Recipients**). However, we encourage you to make your disclosure to one of our dedicated Whistleblower Protection Officers (**WPOs**) or our external Whistleblower hotline service, which is an independent and confidential 24/7 external service operated by KPMG on behalf of Coca-Cola Europacific Partners Australia.

Whistleblower Protection Officers (WPO's)	Name	Email
General Counsel Australia	Michelle Monteleone	michelle.monteleone@ccep.com
API Corporate Integrity Lead	Hayden Nettle	hayden.nettle@ccep.com

Ethics and Compliance Lead – APS	Annette Beashel	abeashel@ccep.com	
Group Audit Manager	Anthony Mangano	anthony.mangano@ccep.com	
Group Manager Risk	Dean Devos	dean.devos@ccep.com	
External hotline		Contact details	
External Whistleblower Hotline Service operated by KPMG		Webform	https://cca.kpmgfaircall.kpmg.com.au/frontpage
		Email	faircall@kpmg.com.au
		Mail	The FairCall Manager KPMG Forensic PO Box H67 Australia Square NSW 1213
		Phone	1800 500 965

* WPOs may be updated from time to time

If you prefer, you may also make a disclosure to the following Eligible Recipients:

- a) a member of our Australian Leadership Team.
- b) any other CCEP Australia or related entity officer (including a director or company secretary) or senior manager (i.e., a senior manager being anyone who has the capacity to significantly affect CCEP Australia’s financial standing).
- c) an internal or external auditor of CCEP including a member of an audit team conducting an audit on CCEP Australia. CCEP’s external auditor is Ernst & Young (EY) and can be contacted via the EY Ethics Hotline: 1-800-551-155 (at the prompt dial 877-3938442).
- d) if the disclosure concerns CCEP Australia’s tax affairs or the tax affairs of an associate of CCEP Australia, an employee or officer at CCEP Australia who has functions or duties relating to its tax affairs and who you consider may be assisted in their role by knowing that information.

1.8 How may a Protected Disclosure be made?

You may make a disclosure at any time to the people identified in section 1.7 in person, by phone, email, post, webform or by hand.

If you make a disclosure from or to a CCEP Australia email address or CCEP mobile device, your email or phone records may be accessed by certain people within our IT department in accordance with our policies. If you are concerned about those limited circumstances in which your email might be accessed, you may prefer to make your disclosure verbally, by post or by hand.

You may make your disclosure anonymously (and stay anonymous throughout and after any investigation) and still qualify for protection under the Whistleblower Protection Laws.

You may wish to obtain independent legal advice before making a disclosure. That communication with your legal adviser will also be protected under the Whistleblower Protection Laws.

We encourage you to contact any of CCEP Australia’s WPOs if you have any questions about making a disclosure or this Policy Guidance generally.

1.9 Protection for disclosers

CCEP Australia handles all Protected Disclosures made to it under Part 1 of this Policy Guidance in a way that protects the disclosers (refer to sections 1.10 to 1.14). If you have concerns about how your disclosure will be managed, you can contact one of CCEP Australia’s WPOs who will be able to explain the protections in place to protect confidentiality and ensure you do not suffer detriment for making a disclosure.

1.10 Confidentiality and secure record keeping

All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a discloser will be identified.

CCEP Australia will do this by:

- a) redacting your name and identifying features from any internal reporting about your disclosure (unless you agree for your identity to be known).
- b) referring to you in a gender-neutral context (unless you agree for your identity to be known).
- c) where possible, contacting you to help identify certain aspects of your disclosure that could inadvertently identify you.
- d) engaging qualified staff to handle and investigate disclosures.
- e) storing all material relating to disclosures securely.
- f) limiting access to all paper and electronic documents and materials to those directly involved in handling and investigating the disclosure; and
- g) ensuring that anyone who is involved in handling and investigating your disclosure is aware of the confidentiality requirements.

You may lodge a complaint to a regulatory body, such as the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulatory Authority (**APRA**); or the Australian Taxation Office (**ATO**), if you believe that your confidentiality has been breached.

1.11 Identity protections and exceptions

If you make a Protected Disclosure, it is illegal for anyone to identify you or disclose any information that is likely to lead to you being identified, unless:

- a) it is not possible to investigate the disclosure without disclosing information that might identify you (but all reasonable steps must be taken to protect your identity including that you will not be named).
- b) it is necessary to obtain legal advice about your disclosure and the Whistleblower Protection Laws, in which case, we can pass the information on to our lawyer.
- c) we are required to disclose the information to the Australian Federal Police; ASIC; APRA; or the ATO if the disclosure concerns CCEP Australia's tax affairs or the tax affairs of an associate of CCEP Australia; or
- d) you consent to that disclosure.

1.12 Provision of identity to a court or tribunal

No-one at CCEP Australia may disclose or produce to a court or tribunal any information or documents which disclose your identity (or information likely to lead to your identification) without seeking the advice of our General Counsel, Australia.

If you make a Protected Disclosure and become aware that a court or tribunal has requested disclosure of your identity or production of documents containing your identity (or information likely to lead to your identification), you may apply to the court or tribunal for an order protecting your identity.

1.13 Protection from detriment

CCEP Australia is committed to protecting people who make Protected Disclosures pursuant to Part 1 of this Policy Guidance.

It is against the law for anyone at CCEP Australia (including any officers, employees, or contractors) to cause or threaten any detriment to any person because that person:

- a) is or proposes to make a disclosure under Part 1 of this Policy Guidance or the Whistleblower Protection Laws; or
- b) is suspected or believed to have made a disclosure under Part 1 of this Policy.

Detriment includes (but is not limited to):

- a) Dismissal of an employee;
- b) Injury of an employee in their employment;
- c) Alteration of an employee's position or duties to their disadvantage;
- d) Discrimination, harassment, or intimidation;
- e) Harm or injury including psychological harm, damage to property, reputation, or financial position;
- f) Taking action against a person (including any disciplinary action or imposing a liability) for making a disclosure; or

- g) Threats of any of the above.

However, CCEP Australia is entitled to take steps that:

- a) are reasonably necessary to protect you from detriment (for example, moving you to another office to protect you from detriment if you have made a disclosure about your immediate work area); or
- b) relate to managing unsatisfactory work performance in line with CCEP Australia's performance management framework.

You may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if you believe you have suffered detriment because of your disclosure.

1.14 Protection from civil, criminal, and administrative liability

If you make a Protected Disclosure, you will also be protected from any of the following in relation to your disclosure:

- a) Civil liability – for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation.
- b) Criminal liability – for example, prosecution for unlawfully releasing information or otherwise using your disclosure against you in a prosecution (other than for making a deliberately false disclosure); and
- c) Administrative liability – for example, disciplinary action for making a disclosure.

However, you may be liable for any personal misconduct revealed by your disclosure (or revealed by an investigation following your disclosure).

1.15 Compensation and other remedies

You may seek compensation and other remedies through the courts if:

- a) you suffer loss, damage, or injury because of a Protected Disclosure; and
- b) CCEP Australia failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

We encourage you to seek independent legal advice if you wish to seek compensation or remedies in court.

1.16 How this Policy Guidance interacts with the Whistleblower Laws

In making a Protected Disclosure you will be protected under the Whistleblower Protection Laws.

While Part 1 of this Policy Guidance principally deals with internal disclosures, the protections afforded by the Whistleblower Protection Laws also include some types of disclosure made to external parties, such as:

- a) legal representatives, to obtain advice or representation about the Whistleblower Protection Laws;
- b) ASIC, APRA or the ATO; or
- c) MPs or journalists, where you have reasonable grounds to believe that making the further disclosure would be in the public interest or constitute an emergency disclosure (meaning that the information concerns a substantial and imminent danger to the health or safety to one or more persons or to the natural environment), but only if:
 - (i) you previously made a disclosure of that information to either ASIC, APRA or another Commonwealth body prescribed by regulation; and
 - (ii) you notified that body in writing of your intention to disclose to an MP or journalist (for public interest disclosures, at least 90 days must first have passed since your previous disclosure before this notice may be given).

It is important you understand strict criteria apply and you should obtain legal advice before making a disclosure to an MP or journalist.

For more information about the Whistleblower Protection Laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the ASIC website (including Information Sheet 239 How ASIC handles whistleblower reports) and the ATO website.

1.17 Whistleblower Laws outside Australia

You may make a report regardless of where you are or where the conduct is occurring. If your disclosure concerns the conduct of CCEP Australia, CCEP Australia people, or CCEP Australia operations outside of Australia, you may also have protections and obligations under the Whistleblower laws of that country.

1.18 Investigations

When you make a disclosure under Part 1 of this Policy, your disclosure will typically be investigated as set out in the table below. Confidentiality will be maintained in accordance with section 1.11 (subject to the exceptions allowed under that section or otherwise by law) both during and after the investigation (including in any reporting of the investigation or to any persons affected).

STEP 1	If the disclosure is made to an Eligible Recipient or the external Whistleblower hotline, the person who receives your disclosure will provide the information to a WPO, as soon as practicable, ensuring your identity is protected as required by Part 1 of this Policy Guidance unless you have consented otherwise.
STEP 2	The WPO will determine whether your disclosure is covered by Part 1 of this Policy Guidance and, whether a formal, in- depth investigation is required. If an investigation is required, the WPO will determine whether the investigation should be conducted internally or externally and appoint an investigator with no personal interest in the matter to conduct an investigation. The WPO may consider that an external investigation is appropriate to ensure fairness and independence or because specialist skills or expertise are required.
STEP 3	The investigator(s) will conduct the investigation in an objective and fair manner, ensuring that they give any employee who is mentioned in the disclosure an opportunity to respond to the allegations prior to any adverse findings being made against them. Those employees are also entitled to access the support services referred to in section 1.21. If you can be contacted (including through anonymous channels), the WPO will discuss the likely steps of the investigation with you (including whether you consent to your identity being disclosed). We will give you updates from time to time and where appropriate on the status of the investigation, with the frequency and timing of such updates depending on the nature of your disclosure.
STEP 4	The outcome of the investigation will be reported to those at CCEP who are responsible for oversight of the matters raised by the disclosure (protecting your identity, and any key identification information, if applicable) and may, if the WPO considers appropriate, be shared with you.

Appropriate records and documentation for each step in the process will be maintained by the investigator, which will only be accessible by those directly involved in investigating the issue.

We encourage you to raise any concerns you have about the investigation of your disclosure (including breach of confidentiality) with the WPO assigned to your disclosure or the person to whom you made your disclosure. If you are not comfortable doing so, you can raise any concern with any other WPO under Part 1 of this Policy Guidance.

1.19 Duration of investigation

CCEP Australia will aim to conclude the investigation as soon as possible, and within 6 months of receiving your disclosure if possible, and we will consider whether any further steps need to be taken. That time may vary depending on the nature of your disclosure.

1.20 CCEP Australia may require further information to investigate disclosures

We may not be able to undertake an investigation if we are not able to contact you or receive additional information to fully investigate your disclosure. If you have made your disclosure anonymously, we suggest you maintain ongoing two-way communication with CCEP Australia, so we may ask follow-up questions or provide feedback. You may refuse to answer questions that you feel may reveal your identity at any time.

1.21 Support and practical protections

CCEP Australia has in place processes for protecting, supporting, and monitoring the welfare of anyone who makes a disclosure. This includes risk assessment of any potential detriment, access to CCEP Australia's EAP (1800 730 931), work adjustment considerations and support services such as stress management strategies which may include counselling. If you require this type of support, please discuss with a WPO or the person you raised the issue with who will be able to direct you to appropriate services.

2 PART 2 - Speaking Up on any other matter that does not amount to a disclosure under the Whistleblower Protection Laws

The guidance set out in this Part 2 relates to reports or disclosures about all matters which do not meet the requirements of a Protected Disclosure made under Part 1 (relating to disclosures under the Whistleblower Protection Laws).

2.1 Speak Up

We encourage reports on any suspected, actual, or potential violations of the law, our Code of Conduct, CCEP Policies and other unacceptable conduct (to be referred to as "**potential violations**"), which may be related to CCEP, whether involving our people or third parties working for us or on our behalf.

2.2 Whistleblowing

When you want to report a protected matter under the Whistleblower Protection Laws, please refer to Part 1 of this Policy Guidance. **If you are unsure whether the matter you wish to report is a Protected Disclosure under the Whistleblower Protection Laws, we encourage you to contact any of CCEP Australia's Whistleblower Protection Officers (WPOs) referred to in section 1.7 of Part 1 in the first instance and before following the guidance set out in this Part 2.**

2.3 Who can make a report?

Our internal Speak Up Resources are open for any person connected with CCEP through a work-related or share context, who seeks to report a potential violation, including:

- a) CCEP workers, whether employed directly by CCEP, engaged through a staffing agency, or are self-employed.
- b) CCEP shareholders and persons belonging to our administrative, management or supervisory bodies, including non-executive members, as well as volunteers and paid or unpaid trainees.
- c) Any person who acquired information on suspected misconduct in a CCEP work-based relationship which has since ended, or who acquired the information during the CCEP recruitment process or other pre-contractual negotiations.
- d) Any person working under the supervision and direction of our contractors, subcontractors, and suppliers; and
- e) CCEP facilitators, relatives, and related entities.

2.4 What can be reported?

We encourage reports on any potential violations, which may be related to CCEP, whether involving our people or third parties working for us or on our behalf in accordance with Part 2 of this Policy Guidance.

Examples of types of potential violations to be reported using Part 2 of this Policy Guidance include:

- a) Violation of CCEP's Code of Conduct, or other policies.
- b) Discrimination, racism, bullying and harassment.
- c) Violation of health and safety procedures that are not a breach of work health and safety laws (if your disclosure relates to this, please refer to Part 1 of this Policy Guidance).
- d) Any act which may harm CCEP's vital interest or reputation (that is not otherwise covered under Part 1 of this Policy Guidance); and
- e) A personal workplace grievance,

Where the violation does not constitute misconduct or an improper state of affairs that qualifies for protection under the Whistleblower Protection Laws (see Part 1 of this Policy Guidance).

Note. If the matter relates to a workplace dispute or grievance, then you should raise it with your line manager and/or a member of People & Culture.

2.5 When to report?

We expect that you report as soon as possible after you became aware of the potential violation. This allows our company to deal with the issue in an early stage and minimise the adverse consequences that may otherwise occur.

When reporting urgent “potential violations”, which pose an immediate danger to our business, employees, consumers, or other persons please follow the guidance of the CCEP Incident Management and Crisis Resolution procedure and ensure to inform your line manager and your BU/Regional Legal VP/country lead as soon as practicably possible.

2.6 How to report?

You may seek advice or make a report relating to potential violations at CCEP, to your line manager, P&C or our other internal resources listed below:

- a) A member of your senior local company management.
- b) Your local people & culture representative or the people services team.
- c) A member of your local code of conduct committee.
- d) A member of the legal or ethics and compliance team.
- e) The chief compliance officer.
- f) The general counsel.

However, if your report relates to a matter protected under the Whistleblower Protection Laws, please follow the guidance set out in Part 1 of this Policy Guidance instead.

2.7 Information to provide

When reporting potential violations, we encourage you to share all information known to you in relation to the potential violation in a detailed manner, and to provide (or refer to) any evidence or supporting documents. This would allow us to handle your report as quickly and effectively as possible.

Please be as detailed and precise as possible. If the report is made orally, you shall have the right to check and rectify the contents of the notes.

When describing the issue, please think about the following questions:

- a) What happened or is about to happen?
- b) Who is involved?
- c) When did or will it happen?
- d) Where?
- e) What evidence exists to support it?
- f) Where can it be found?

- g) Who may be able to share relevant information on it?
- h) Would you agree that we contact you discreetly to discuss?
- i) How can we contact you?

2.8 Anonymous reporting

We believe in honest and open communications. Therefore, when making a report, we encourage you to identify yourself by providing your name, function, and contact details. This will allow the CCEP staff handling the report to contact you for follow-up if necessary, knowing your identity enables us to handle the report more effectively.

Please note that all our reports are handled in a safe and confidential manner as far as reasonably practicable. If you prefer to report anonymously, that is not a problem. We are here to handle your concern and will do our best to manage it efficiently, with confidentiality, sensitivity, and care.

2.9 How do we handle your report?

Once a report is made, the following steps will generally be taken:

- a) As soon as practicable, your report will be shared with our internal team authorised for handling reports.
- b) Our internal team will conduct an initial assessment and decide upon next steps. When needed, an investigating team will be assigned to review the matter further.
- c) Our internal team may ask additional questions or share feedback with you.
- d) Our internal team will monitor the handling of the report by the investigation team assigned to act on it.
- e) All matters are reviewed or investigated and concluded as quickly as possible however we expect that matters will be finalized within three months from the acknowledgement of receipt. We will provide you with feedback in relation to your report where this is reasonably practicable.
- f) When justified, we will take appropriate corrective actions.
- g) In certain limited circumstances, CCEP may need to disclose your identity. This may happen when certain obligations are imposed by law. In such cases, we will make sure to apply appropriate safeguards, and to share the disclosure with you in advance, explaining the reasons that justify it, unless this is not allowed or required by law and/or risks the investigation by national authorities or judicial proceedings.

Personal data will be kept if necessary to process and investigate the report, or, if applicable, if necessary to initiate sanctions or to meet any legal or financial requirement. In any case, if judicial or disciplinary proceedings are initiated, including the necessary time for those proceedings and appeal, the personal data provided will be kept until those proceedings are definitively closed; if not, they will be kept no longer than necessary in line with privacy legislation.

2.10 No retaliation

At CCEP we DO NOT tolerate any form of retaliation, including the threat or attempt of retaliation, against any reporting person or other connected persons for making a report in accordance with Part 2 of this Policy Guidance or for cooperating in an investigation.

What is Retaliation? Retaliation covers any direct or indirect act or omission, which may harm a reporting person due to their reporting of potential violations as a result of a genuine concern. Retaliation includes for instance, suspension, dismissal, demotion, transfer of duties, reduction in wage, coercion, unfair treatment, etc.

Who is protected? The protection applies to the reporting person, as well as to third persons connected with the reporting person (such as colleagues and relatives), anyone who assisted a reporting person in the reporting process, and any legal entity that the reporting person owns, works for, or is otherwise connected with in a work-related context.

The protection also applies when the report was made externally to competent authorities and under certain circumstances also when the concern was publicly disclosed.

Should any person at CCEP, contrary to Part 2 of this Policy Guidance, directly or indirectly engage in retaliation, CCEP will take the necessary measures to stop the retaliation as soon as possible and will, when appropriate, take disciplinary action against those responsible for the retaliation.

2.11 Data protection & confidentiality

CCEP is committed to complying with applicable data protection and privacy legislation, as detailed in our privacy and data retention policies.

Data privacy: At CCEP we are committed to maintaining stringent privacy, data security and retention controls as detailed in our privacy, security and data retention policies. These standards will also apply with respect to all records relating to the reports made in accordance with this Policy Guidance.

Confidentiality: Your identity and other non-public information you shared in relation to the report will be treated confidentially so far as reasonably practicable. Information in relation to your report will only be shared with persons authorised to handle the report subject to applicable legal requirements on a need-to-know basis. Non-authorised staff members will not have access to this information unless necessary.

In some cases, we may need to share the information relating to the report with competent authorities or as part of an internal, regulatory, or legal process. When appropriate, we will inform you about that in advance.

You can find more information on how CCEP may process your personal data in [CCEP Employee Privacy Notice](#) available for CCEP employees and other staff members and in the Privacy Notice available [here](#) (Ethics Point) and [here](#) (KPMG FairCall) (for other stakeholders).

2.12 Concerns on reporting?

When you have any concerns in relation to the application of Part 2 of this Policy Guidance or to the handling of your report, we encourage you to contact one of the Speak Up Resources listed in section 2.6 before considering reporting externally to competent authorities.

2.13 Policy Guidance compliance



As our policies and policy guidance are based on applicable legislation, please note that breach of or non-compliance with this Policy Guidance could lead to disciplinary action being taken – up to and including summary dismissal in accordance with applicable laws and/or internal policies.

Company policies are subject to change and may vary depending on location. If you are ever uncertain which rule or policy you should follow, or if you are concerned that there might be a conflict between applicable law and the Policy Guidance, please consult Employment Practices (P&C) employment.practices@CCEP.com. Unless otherwise stated all policies are discretionary and do not confer any entitlement.

3 Policy Guidance Overview

Risk	Risks relating to Whistleblowing
Title of the Policy Guidance	Speak Up Policy and Australian Speak Up Policy Guidance
Scope	Australia
Policy Owner	Chief Compliance Officer
Initial date of approval	5 th October 2022
Revision Date	5 th June 2024
Version	2

4 Approval of the Policy Guidance

Department	Name, Function	Date
Ethics & Compliance	Hayden Nettle National Investigations Manager	5 th October 2022
Legal	Michelle Monteleone General Counsel Australia	14 th October 2022
P&C	Sarah Burn Vice President People & Culture	18 th October 2022
Executive	Peter West Vice President & General Manager	20 th October 2022

4.1 Effective date and validity

This Policy Guidance supersedes those listed below, which shall cease to apply from the date on which it takes effect:

- Whistleblower Protection Policy - Australia

This Policy Guidance shall apply with immediate effect once it has been approved by the appropriate responsible person within CCEP on the date indicated at the beginning. The date of revision, from which this Policy Guidance is effective, is set out in the policy outline section above.

4.2 Change control

The Policy Guidance will be revised when appropriate as circumstances change. At minimum this Policy Guidance should be reviewed on an annual basis.

CCEP intends to notify employees of changes to its policies where possible. However, CCEP reserves the right to change, revise, withdraw or add to its policies, processes, procedures, or guidance at any time, without notice if necessary.