

THE BRITVIC WAY

OUR CODE OF CONDUCT



OUR VISION
**The most dynamic, creative and trusted
soft drinks company in the world**

Consumers
Building iconic brands loved by consumers

Customers
Being the most valued by our customers and partners

Employees
An inspiring place to be

Shareholders
Delivering consistently superior returns for shareholders

Communities
Trusted and respected in our communities



Introduction

Our vision is to be the most dynamic, creative and trusted soft drinks company in the world.

Sometimes it's clear what you should do but other times it isn't.

Wherever you work in the world and whatever you do at Britvic we want you to do the right thing! Our code of conduct helps us to do this.

This booklet explains our principles – our core values and how we work.

Our principles help us all understand how to think about what we do or don't do. **They're not just words on paper, we need you to act on them.** If you know it's right then do it. If you don't think it's right then challenge it. If you're not sure then ask.

Remember, our reputation and business success is down to the decisions we make and the actions we take. You'll talk about this with your manager in your Growth, Performance and Success (GPS) discussions and reviews.

To find out more about GPS and our policies go to:
www.britvic.com/myCompass



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Making life's everyday moments more enjoyable



Our values

Be proud

- We are **proud** of who we are and what we do
- We act with the highest **standards of integrity and responsibility** in everything we do
- We're **passionate** about our brands and we are all ambassadors for them
- We love seeing **consumers enjoying** our brands everywhere we go

Be bold

- We have the **freedom to dream** and the **tenacity** to make our dreams real
- We **think differently, challenging conventional thinking** to both create the future and overcome barriers
- We **empower** our people and encourage them to **take risks** in pursuit of our shared ambitions and their personal goals
- We sometimes make mistakes, we **always learn** from them

Be disciplined

- We are disciplined in our **thinking, decision making, action and follow through**
- We have a deep **personal accountability** to our shared and individual goals and we hold each other to account
- We take our commitments seriously and we **always do what we say we'll do**
- We set and follow our rules and standards to **keep things simple**, this frees up our time to be creative

Act with pace

- We have the freedom to **cut through** and do the right thing
- We're always **looking ahead**, we seize opportunities to adapt and grow quickly
- We cut to the heart of the problem and **get to solutions** with creativity and speed
- We're always **improving** and getting better

Be open

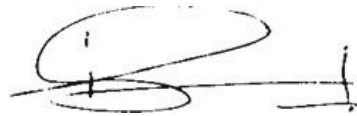
- We're open to **new ideas, each other and learning**. It helps us continually improve and grow
- We have open and authentic conversations, **we say it as it is**
- We're inspired by everyone's **individual genius** and the **difference in perspectives** from around the world
- We **value diversity and difference** for the benefit they bring

Win together

- We're in it **together** to beat the competition
- We enjoy **celebrating** our individual and collective successes
- Our relationships and partnerships are built on **openness, honesty and respect**
- We **help each other** to get better



Doing the right thing Simon Litherland, CEO



Every day, each and every one of us has a personal accountability to do the right thing, to act responsibly, follow the law and treat others with respect.

The way we do business is as important as the business we do to ensure we're trusted and respected in our communities.

Having a Britvic way of doing things that is shared in policies and processes protects us from fraud or costly issues and allows us to drive efficiency and economies in our operations.

This in turn helps us all to maximise the reward we get from achieving outstanding performance.

In order for us to become the most dynamic, creative and trusted soft drinks company in the world we need to ensure we continually guard against areas of weakness or risk.

Together we'll build a Britvic that's simple and easy to work in, and with. Accountability is clear and disciplined ways of working free us up to be dynamic and creative.

Whether we're at work or at home, we'll make life's everyday moments more enjoyable.

Together we will...





Personal & Business Integrity

Ask yourself...

- Is it legal?
- Is it in line with our values?
- Are you doing business the Britvic way?
- Do I need to discuss this with anyone else?
- Would I happily and confidently talk through why I've done something with my manager?
- Would I be concerned if someone else took this course of action?
- Would I be happy seeing it on the news?



Our health, safety and wellbeing

What it means	What we do	Why we do it
We all take responsibility for our own health, safety and wellbeing and those around us	<ul style="list-style-type: none"> • We understand that safety is the responsibility of each and everyone of us • We look after our own wellbeing and of those around us • We constantly seek to remove the causes of accidents and risks, learning from every incident so it can never happen again • We challenge and speak up about anything we believe is unsafe – we never walk past • We're always in a fit condition to do our job, free from the influence of alcohol or illegal drugs 	Health, safety and wellbeing is at the heart of who we are and how we work. We care about ourselves and those around us





Keeping communications open and responsible

What it means	What we do	Why we do it
We have open and authentic conversations, we say it as it is. We're respectful in the way we communicate	<ul style="list-style-type: none"> We communicate and use our systems in the right way We don't share information that's confidential We tell people what they need to know and don't mislead them We embrace social media in a way that builds our reputation not damages it 	Clear two-way communication is at the heart of us achieving our goals and vision



Building our brands

What it means	What we do	Why we do it
We build iconic brands loved by consumers	<ul style="list-style-type: none"> We show our passion for our brands and we're all ambassadors for them We make sure the quality, taste and experience of our brands always outperforms the competition 	We want life's everyday moments to be more enjoyable



Being compliant

What it means	What we do	Why we do it
We make sure we do things in the right way	<ul style="list-style-type: none"> We act honestly and responsibly in what we do We follow our policies, processes and ways of working, we find out if we don't know We do what we need to do when we need to do it We respond promptly to legal training and corporate requests We don't ignore something that isn't right and we speak up about it 	Things need to be done the right way for a reason. We don't want to miss out on opportunities or get into trouble for what we've done or haven't done



Anti-bribery and corruption

What it means	What we do	Why we do it
We always make sure we're free from bribery and corruption	<ul style="list-style-type: none"> We never offer or accept bribes or participate in any kind of fraudulent or corrupt practice We only work with suppliers who operate ethical businesses We complete corporate training when requested 	Bribery is illegal, even an allegation of it can seriously damage our reputation





Gifts and hospitality

What it means	What we do	Why we do it
Gifts and hospitality can be part of building positive business relationships, but there's a fine line. We never offer or accept them if they are inappropriate or may improperly influence a business decision or affect our judgement	<ul style="list-style-type: none"> We make sure gifts or hospitality at work are proper and reasonable and check if we're unsure We record significant gifts and hospitality given or received on a register 	We build our business relationships without damaging our reputation



Open and fair competition

What it means	What we do	Why we do it
We do business to the highest international standards so we can thrive and grow in the global market	<ul style="list-style-type: none"> We comply with local competition laws wherever we operate in the world We don't share information with competitors We report any possible anti-competitive behaviour or if we receive competitor information that we shouldn't have We complete corporate training when requested 	It's illegal and gaining an unfair competitive advantage is not worth losing everything that we've achieved



Use of company information, money and resources

What it means	What we do	Why we do it
We respect and protect our company information, money and resources	<ul style="list-style-type: none"> We always make the best use of our property, money and other resources and never use them for personal gain We protect confidential information, intellectual property and our brands from unauthorised disclosure and cyber threats We follow the right processes and ensure spend is authorised 	We maximise our asset value and protect what we've got so we've got them to use in the future



Insider trading

What it means	What we do	Why we do it
Significant business information must be kept absolutely secret and not be used to make money by trading shares, for our own or anyone else's benefit	<ul style="list-style-type: none"> We keep sensitive information within the 'insider list' group We don't deal in our shares or encourage others to do so if you know something which is price sensitive or it's a 'closed period' 	It's a serious crime and would damage our reputation and shareholder value



Our Working Relationships



Political and public policy activities

What it means	What we do	Why we do it
We play our part in things that are in our and the public's interest	<ul style="list-style-type: none"> We get involved in working groups, public consultations and work alongside relevant trade bodies on things that are important to us We don't use company resources to make political donations to parties, associated bodies or individuals 	We get involved in the right way to protect our right to operate



Working with colleagues

What it means	What we do	Why we do it
We care about each other and our communities; we all contribute beyond our daily role	<ul style="list-style-type: none"> We live our purpose and values every day, they are at the heart of us being dynamic, creative and trusted. Every day they guide us in our decisions and our actions 	We're in it together to be an inspiring place to be for our employees and to achieve our vision



Conflicts of interest

What it means	What we do	Why we do it
We don't get ourselves in situations where our personal interests or actions could conflict or look to conflict with our company interests	<ul style="list-style-type: none"> We all need to take the greatest care about what we say, do or support in the public or political domain If we think there is a potential conflict we raise it straight away and seek approval or guidance 	We can avoid difficult situations if we act with the highest standards of integrity and responsibility in everything we do



Developing our people

What it means	What we do	Why we do it
We believe we'll win together when each of us is inspired and we can see how individual contribution enables collective success	<ul style="list-style-type: none"> We invest in ourselves and create an environment where everyone continuously learns Coaching and development builds our individual genius 	Our people realising their ambitions means that we do too!





Equal opportunity and diversity

What it means	What we do	Why we do it
Everyone is empowered to be the best they can be. We can see how our individual contribution enables the vision	<ul style="list-style-type: none"> We provide equal opportunities for all We promote our talent on the basis of ability, skills, experience, behaviour, performance and potential for the job 	We value diversity and creative thinking as it's the right thing to do and also because bright ideas might become great products



Human rights

What it means	What we do	Why we do it
We respect and protect human rights	<ul style="list-style-type: none"> Wherever we work in the world we ensure that we work in a clean and safe environment We have proper standards of employment, comply with local laws and don't oppress or exploit anyone We only work with suppliers who adopt our ethical business standards We speak up about any concerns 	We won't be trusted and respected in our communities if we behave differently to what we value

Harassment, bullying and discrimination

What it means	What we do	Why we do it
Everyone who works for us or with us has personal dignity at work	<ul style="list-style-type: none"> We don't tolerate any behaviour or attitudes that discriminate against anyone, or coerce, intimidate, bully or harass others, or threaten them with verbal or physical violence We speak up and do something about harassment, bullying or discrimination 	How we treat each other is at the heart of what we do. Harassment, bullying and discrimination is the opposite to what we value



Relationships with customers, suppliers and other stakeholders

What it means	What we do	Why we do it
We have fantastic relations with our people, our customers and suppliers. Building trust, openness and long term partnership, creating and tailoring solutions together	<ul style="list-style-type: none"> We honour our commitments We work with them in an open, honest and prompt way 	We need our stakeholders to trust us. What we say and how we say it can build or destroy that trust





Our Place in the World



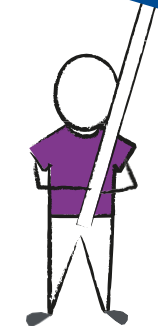
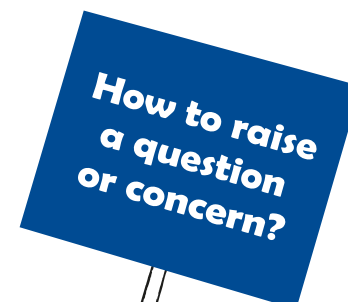
Supporting people in our communities

What it means	What we do	Why we do it
We make a positive contribution to our communities	<ul style="list-style-type: none"> We support our charity partners with financial contributions as well as our time, skills and product donations Our different locations have a variety of community initiatives such as paid volunteering time We run award winning education programmes and our brand campaigns encourage active and healthy lifestyles 	Our aim is to be trusted and respected in our communities, enhancing the lives of those we touch



Protecting our environment

What it means	What we do	Why we do it
We minimise our environmental impacts and conserve our natural resources	<ul style="list-style-type: none"> We work to reduce our impacts through resource conservation and deliver our environmental commitments We maintain the highest standards for responsible sourcing 	We want to ensure our future as a sustainable business and benefit our planet and the people who live on it



If you've got a question:

- Talk to your supervisor / manager
- Get in touch with the policy owner

If you've got a concern that any of our policies are being breached or anyone is acting improperly you should:

- Talk to your supervisor / manager
- Or you can raise your concern with Director of Audit and Risk or General Counsel by phone or e-mailing speakup@britvic.com
- At any point you can use our independent and confidential speak up hotline which can be used anonymously if you prefer

Report by Telephone

In the UK 0808-189-1053

In Ireland 1800-904-177

In France 0805-08-0339

In Brazil 0-800-892-2299

In U.S. 800-461-9330

Report Online
www.britvic.com/myspeakup

Report by Email
speakup@britvic.com



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