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# Ethical Business Policy

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## Policy Statement

**“The way we do business is as important as the business we do.”**

*Simon Litherland, Britvic Code of Conduct*

Britvic plc is committed to ensuring a high standard of ethical business practices. The appropriate ethical and legal behaviour that is expected of employees, suppliers and anyone conducting business on behalf of Britvic is set out in a series of internal policies that detail how we do business, and these align with our corporate values and principles that are set out in our Code of Conduct. It is essential that all those acting on behalf of Britvic are familiar with the principles and standards of ethical business that should be adopted when performing their duties and communicating both internally and externally.

The aims of the Ethical Business Policy are:

- To support Britvic’s commitment to be an ethical and responsible business.
- To identify those areas of business that have particular ethical obligations and set out the related internal policies linked to them.
- To provide a single point of reference both internally and externally to communicate Britvic’s approach to ethical business.

## Who does it apply to?

This policy applies to all Britvic employees operating in any country across the world. It also applies to all third parties acting on behalf of Britvic including secondees, advisors, agency workers and contractors. All these people are collectively referred to as Britvic workers in this policy.

## Policy Detail - What do I need to know or do?

### Part 1: Britvic’s commitments

#### Human Rights

Britvic respects and protects 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.



Our approach is guided by international conventions and standards, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the UN Sustainable Development Goal 8 on Decent Work and Economic Growth.

## 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 and is an internationally recognised code of labour practice.

Further information can be found here: [www.ethicaltrade.org/eti-base-code](http://www.ethicaltrade.org/eti-base-code).

### **Related Britvic policies:**

Recruitment and Resourcing Policy  
Working Well Policy - UK  
Disciplinary Policy  
Global Diversity and Inclusion Policy  
Dignity and Respect at Work (ROI)  
Harassment and Bullying Policy (GB)

## Health and Safety Management

At Britvic, everyone has a right to work safely, whatever their role. Every Britvic employee, supplier, contractor or visitor is expected to work in a manner which at all times ensures their own safety and that of others. We therefore maintain a strong set of health and safety management systems that everyone adheres to.

### **Related Britvic policies:**

Health Safety and Wellbeing Policy  
Britvic Quality and Food Safety Policy  
Lone Working Policy  
Safe Driving Policy



## Environmental Management

Britvic is committed to conducting our business activities responsibly with due regard to the environmental impact. Environmental management systems and standards are in place and apply to all our locations globally.

### Related Britvic policies:

Healthier Planet Policy

## Suppliers and Partners

Britvic requires all direct\* suppliers and any significant\* indirect suppliers to provide us with ethical business standards information using the 'SEDEX' (Supplier Ethical Data Exchange) website. Each site a supplier operates from may be required to report using the SEDEX system. Where a SEDEX response from a goods supplier identifies a potential risk the supplier agrees Britvic will have the right to request relevant audits and Britvic will work with the supplier to develop appropriate remediation plans.

As part of the onboarding of new suppliers we ask suppliers to adhere to our **Britvic Supplier Ethical Trading Policy**, which holds them to the same standards set out in our commitments above. It also sets out supplier responsibilities related to the UK Bribery Act (2010), and includes information about Britvic's Speak Up reporting channels

## Part 2: Britvic workers' ethical business practices

The Britvic Code of Conduct sets out what the right thing to do is in a number of circumstances. This policy provides additional information about how to do the right thing and directs you to relevant policies where appropriate.

## Bribery and corruption

Britvic will never tolerate instances of bribery and/or corruption. All Britvic workers must comply with the UK Bribery Act (2010) and the **Anti-Bribery and Corruption Policy**. Any gifts or hospitality given or received must be properly recorded, as set out in the policy.

Bribery is the offering, promising, giving, accepting or requesting an inducement for an action which is improper or a breach of trust. Corruption is the use of a position or authority in a dishonest or fraudulent way. Corruption often involves bribery.



## Conflicts of interest

All Britvic workers must comply with the **Conflicts of Interest Policy** and avoid circumstances where their own interests conflict with their professional role at Britvic, which could impact impartiality when making business decisions. If a conflict of interest does occur, these should be managed by reporting the conflict to your line manager and recording it in the Conflicts of Interest Register as set out in the policy.

Examples of a conflict of interest are as follows:

- Personal workplace relationships, for instance, hiring or supervising a closely related person, such as a family member.
- Outside employment, for example, having a second job with a Britvic customer or competitor.
- Promoting personal financial interests, for instance, owning a substantial share of a Britvic supplier whilst in a position to steer Britvic business towards it.

You may have political views or religious beliefs, and this doesn't mean that you can't take part personally in any political or other activity; if you want to do so, you must not give the impression in any way that you represent Britvic. You can only make donations to politically oriented groups using Britvic's resources if you have the written approval of the Company Secretary, which is only granted in exceptional circumstances.

## Confidentiality, data privacy and inside information

You must 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 confidential information with family, friends or business acquaintances. If you are working on a confidential project, you must not discuss that work within anyone other than colleagues who are also working on that project.

If your work requires you to process personal data you must understand and comply with the relevant data privacy laws and policies.

You must be familiar with the rules on inside information and dealing in Britvic shares. Always seek guidance from the Company Secretary if you are not sure.

### Related Britvic policies:

Data Privacy and Personal Information Policy  
Document Retention Policy



## Britvic Share Dealing Code

### Use of assets

As part of your job at Britvic you will be given access to company's assets, property, money, equipment, software, intellectual property and information. You must respect and protect these and use them properly and only for business purposes. If you have a company credit card or something else that allows you to make purchases on Britvic's behalf, you must not use them to buy personal items or services.

We provide you with free drinks on our sites, these are intended for your personal consumption only or for visitors. Our staff shop is for personal or charity use. You can't sell what you buy.

#### Related Britvic policies:

Staff Shop Policy (GB)

Mobile and Smart Device Guidance (GB&I / International)

### Fair competition

Adherence to competition law is fundamental to Britvic's business. Competition law prevents companies undertaking certain activities which would have the effect of harming the ultimate consumer.

All Britvic workers must comply with the **Competition Law Policy** and the appropriate **Competition Law Compliance Programme** relevant to their roles.

### Speaking up

At Britvic we have a culture of honesty and openness. If you encounter or suspect improper conduct within Britvic, no matter how senior the individual might be, you should report it. Britvic is committed to treating all disclosures consistently and fairly and to ensuring that whistle blowers are not victimised.

You can find information on how to report a concern in the **Whistleblowing Policy – “Speak Up” Guidance**.

## What happens if I don't follow this policy?

It is our personal responsibility to do the right thing for ourselves, for each other, and for Britvic. This behaviour is the beating heart of our “We Own It” value. Not doing the right thing or asking for support, could impact your myPerformance end of year rating, and any potential breach may lead to disciplinary action being taken.”



In some instances, failure to follow this policy will be a criminal offence attracting a fine and/or custodial sentence. In addition, failing to comply with this policy could also mean a substantial fine, invalid contracts, damages claims, negative press and wasted management time for Britvic. For contractors and other Britvic workers: breaches of this policy could lead to your contract not being renewed, or an existing contract being terminated.

## Related Documents

Links to related Britvic policies are embedded in the sections above. Not all policies apply across different business units so check individual policies for further information.

## Terms and Definitions

**Direct suppliers** are those who supply raw materials, defined as any items that end up in the completed products on sale. This includes ingredients and packaging.

**Indirect suppliers** supply all other goods and services required to run the business, including recruitment agents, IT, machinery and office goods suppliers and other consumables.

A **significant indirect supplier** is one that represents over a specified percentage of the spend in their category of goods or services, or one with which over a set amount is spent per year. The percentage or amount is set by the procurement team as appropriate and may vary from one category to another.

