



Anti-Bribery and Corruption Policy

1. Policy Statement

Britvic plc (“**Britvic**”) is committed to doing business lawfully, ethically and with integrity, no matter who we deal with or where we operate. This means that Britvic will never tolerate instances of bribery and/corruption within our organisation and that, as an employee of Britvic, you must never, directly or indirectly, engage in corrupt dealings with any other person or organisation.

This policy explains what you need to know and what you need to do to ensure that, in all of your dealings as a representative of Britvic, you are compliant with applicable laws on anti-bribery and corruption.

2. Policy Owner

The Group Policy owner for this policy is the General Counsel.

3. 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, contractors and other companies.

This policy has been applied to Britvic’s Brazilian and French business units and is available for those business units in Portuguese and French.

4. Policy Detail - What do I need to know or do?

This policy explains how to avoid bribery and corruption by explaining what it is and by giving you information and practical examples of what you can or cannot do.

What is a bribe and what is corruption?

A bribe is intended to get a person to do or not to something they wouldn’t otherwise do or to do something differently e.g. more quickly, than they would otherwise have done. Bribery can be



done by you, by Britvic or by getting someone else to do it. Equally, bribery can be committed by a third party trying to influence you in the same way.

Corruption is when you use your role or power to pay, or give a gift or offer hospitality, to an employee or third party, including public officials, to get them to do (or not do), to delay (or to expedite) or to do differently, something for you or Britvic. Again, corruption can equally occur when a third party attempts to influence you in the same way.

Bribery and corruption are against the law. You are committing bribery when you:

- promise, offer or give a bribe (financial or otherwise), or
- request or agree to receive, or actually receive, a bribe (financial or otherwise).

What counts as a gift and what constitutes corporate hospitality?

A gift is anything of any value which is offered, promised or given and includes any present or token of gratitude such as food, flowers, clothes, electronic items or alcohol. Gifts also include benefits in kind such as goods or use of services or facilities provided to you free of charge or at a reduced rate (car hire, holiday home, interest free loan, credit, discounted goods or services etc).

Corporate hospitality includes any party, drinks, services, meal, tickets or access to a sporting, music or entertainment event and includes payment for travel and accommodation expenses.

This policy covers all gifts and hospitality given or received from customers, suppliers, public officials in the UK and overseas or anyone else.

How do I know what I can give or receive?

Britvic does not permit you to accept any bribe however you may give or accept certain reasonable gifts and offers of corporate hospitality. The giving and receiving of small gifts and the offering of, and participation in, corporate hospitality is part of building positive business relationships. You must however, be aware of the boundaries between positive interaction between businesses and the risk of bribery and personal gain.

You should carefully consider any offer of gifts or corporate hospitality from any person or organisation with whom Britvic has, or may have, dealings. Anything you're offered, or promised, may be, or may be seen, as an attempt to improperly influence your judgment. Any gift or hospitality accepted must not create the expectation of special treatment toward the donor. You should not accept hospitality or gifts frequently from one source as this could appear to influence your business impartiality.

It's important to assess the value and appropriateness of a gift or the hospitality offered. The circumstances and timing of the giving or receiving and its appropriateness to the business relationship in question and the value of the gift or hospitality will determine whether or not it is acceptable.

Don't be embarrassed to turn down any inappropriate gift or corporate hospitality. **The 'Gifts and Hospitality Rules' set out in Appendix 1 below provide details and examples of what you should and shouldn't do including the financial value of gifts and hospitality that you are allowed to accept and when line manager approval is required. You must familiarise yourself with and abide by these rules.**



What do I do if I suspect a bribe has been given or received?

If you are offered any money, hospitality or gift which you suspect may be a bribe or you are in any doubt as to the appropriateness of any gift or an offer of corporate hospitality that you wish to give you must speak to your line manager or to the General Counsel before giving or receiving any such incentive.

If you suspect that bribery or corruption is occurring or has occurred at Britvic, you must immediately report it to the Director of Audit and Risk or the General Counsel or, if you prefer to remain anonymous, via Britvic's whistle blowing hotline, mySpeakup at:

www.britvic.com/myspeakup.

How do I record gifts and corporate hospitality?

It's your responsibility to make sure gifts and corporate hospitality given or received are properly recorded. **The 'Gifts and Hospitality Rules' set out in Appendix 1 detail when the donation or receipt of gifts and hospitality must be recorded.**

For GB&I and International employees, gifts and hospitality given and received must be recorded in the MyCompass system using the Disclosures feature (see Appendix 2). For any non-employees without access to MyCompass, please contact the policy owner.

Registers will be collated centrally by 30 September every year and will be reviewed periodically throughout the year. Spot checks will also take place.

If you are a line manager and you are not sure whether you should approve the giving or receiving of gifts and/or hospitality, please contact a member of Britvic's legal team or the General Counsel.

Can I still offer trading incentives and prizes?

This policy does not prevent you from offering promotional incentives, free products, discounts, rebates, promotional credits and other sales incentives where these are a business to business arrangement and agreed with a customer (including promotions and offers to sole traders). You may also offer prizes to third parties, including consumers, where there is an element of competition. Please note that you may need separate departmental approval to offer such incentives or prizes.

What do I need to know about public officials?

You must never attempt to bribe a public official whether in Britvic's home territories or overseas. You should not offer any gifts to public officials whether in Britvic's home territories or overseas.

You may be able to offer reasonable hospitality to public officials in Britvic's home territories and overseas in accordance with this Policy, but you should speak to a member of Britvic's legal team or the General Counsel before taking any steps to offer such hospitality.

You may not make 'facilitation payments' (payments which are made to bypass or speed up official processes or for officials to show favour to Britvic) to any third parties or public bodies to assist Britvic's overseas development or otherwise. No such payments should ever be made by third parties on Britvic's behalf and this is a contractual requirement for all contracts with contractors, agents and other Britvic representatives.



5. Policy breach and consequences - What happens if I don't follow it?

If you don't follow this policy, you will not be 'compliant' for the purposes of the compliance rating on Growth, Performance, Success (GPS) and it may become a disciplinary matter. 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.

6. Related Documents

- [Whistleblowing Policy – 'Speak Up' Guidance](#)
- [Conflict of Interest Policy](#)
- [Disciplinary Policy](#)



Appendix 1: Gifts and Corporate Hospitality Rules

Note: all references to currency are in GBP – please use the appropriate conversion rate at the relevant time if other currency is used. Any reference to hospitality values includes travel and expenses.

The rules on giving and receiving gifts and hospitality depend on:

- The circumstances of the gift or hospitality
- The value of the gift or hospitality
- The Band of the employee giving or receiving the gift or hospitality

Step 1 – check – are the circumstances appropriate?

- ✓ Britvic has an existing relationship with the third party
- ✓ You are comfortable that there are 'no strings attached' and nothing is expected in return
- ✓ There a bona fide reason for the gift e.g. wedding, work related celebration
- ✓ The hospitality
 - is related to building a business relationship, and is appropriate to the circumstances and timing of the relationship; or
 - forms part of a conference, trade event or professional seminar or development workshop
- ✓ A host from the donating party will be present at a hospitality event
- ✓ If you are offering reasonable hospitality to a public official, you have cleared this with the Britvic legal team

DO NOT

- ✗ Accept gifts or hospitality from a particular business contact so often that they become an accepted perk of doing business. Consider carefully whether the cumulative total accepted from a single donor over a year is appropriate to the relationship.
- ✗ Accept or offer gifts in the form of cash or cash equivalent such as vouchers, of any value
- ✗ Offer any gifts or 'facilitation payments' to public officials whether in Britvic's home territories or overseas.

If you think that a gift or hospitality has been offered to you that may constitute a bribe, decline it and report it to your line manager, the Director or Audit and Risk, the General Counsel, or use the mySpeakup hotline at www.britvic.com/myspeakup.

Step 2 – check – is the value within the allowed limits?

Provided the circumstances are appropriate:

- ✓ If the gift or hospitality is worth less than £50, it can be freely offered or accepted, and does not have to be recorded.
- ✓ If the gift is worth between £50 and £150, or the hospitality is worth between £50 and £250, it can be offered or accepted, and must be **recorded** as a Disclosure in myCompass.
- ✗ If the gift is worth more than £150 it may not be offered or accepted.



- ✓ If the hospitality is worth more than £250, and there is an exceptional business justification,
 - ✓ It may be accepted and must be recorded as a Disclosure in myCompass.
 - ✓ It may only be offered by Band F or above employees and must be recorded as a Disclosure in myCompass.

Step 3 – check – do you need line manager approval?

If you are a Band E or below, you must obtain line manager approval before accepting or offering any gift of hospitality required to be recorded in MyCompass. You must keep a written record of the approval and be prepared to share it as evidence in the case of spot checks.

Rules for prizes, promotions and incentives

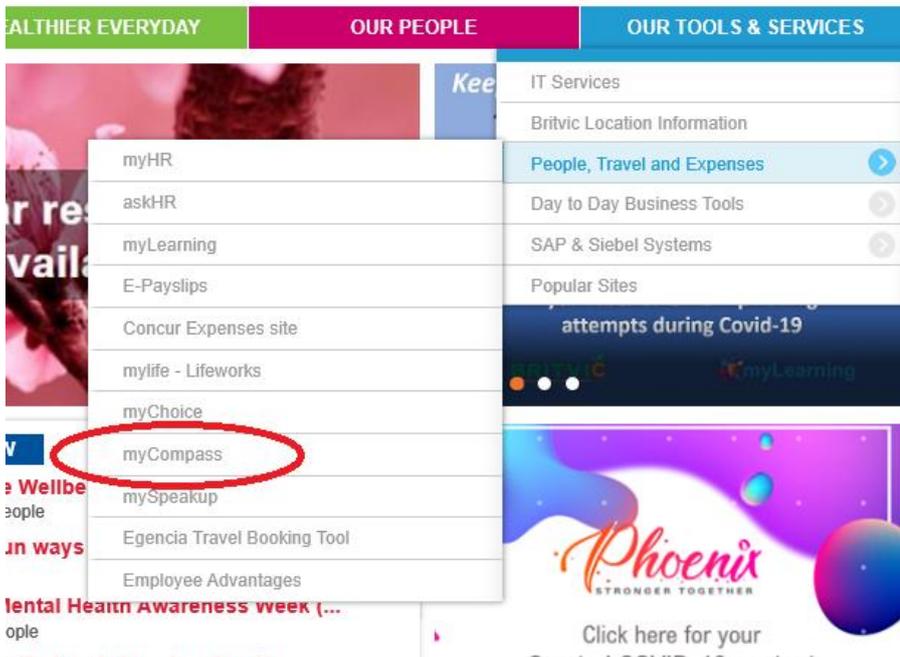
You can offer prizes, branded freebies and other items to our **customers and consumers** to promote Britvic products, provided that these are within your departmental approval levels and adequate terms and conditions are in place – please see the legal team for help with these if needed.

You can also offer promotional incentives, free products, discounts, rebates and credits to our **business customers** as part of the trading relationship, provided that these are within your departmental approval levels and adequate terms and conditions are in place with the customer. Please share those terms and conditions with the legal team so that they can support you to ensure that they are documented appropriately.

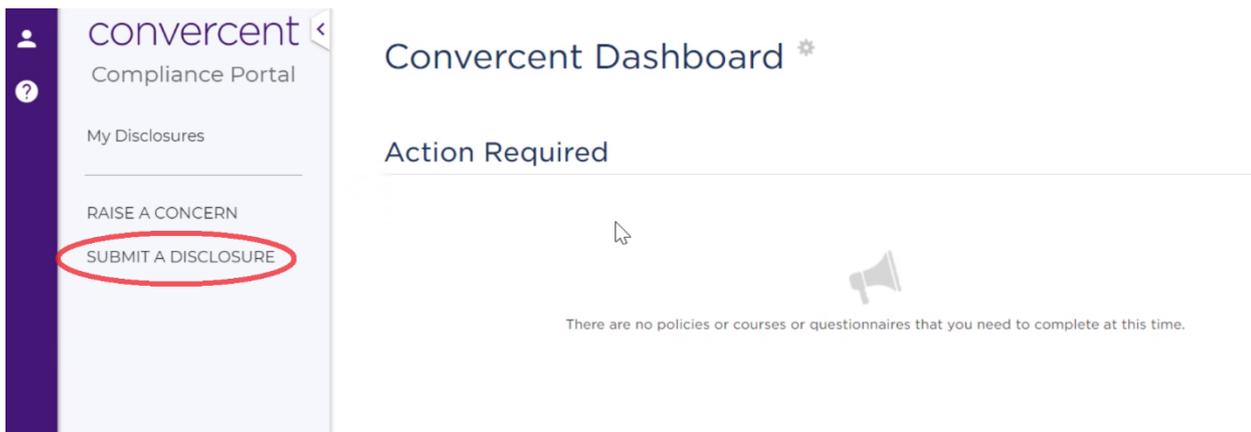


Appendix 2 – myCompass Disclosures

MyCompass can be accessed from the Our Tools and Services drop down menu on the Our Britvic homepage or at www.britvic.com/mycompass.



From the myCompass home screen, select Submit A Disclosure.



In the “New Disclosure” pop-up screen, click on Gifts and Hospitality.

New Disclosure



Please select a category for your disclosure:

Gifts and Hospitality

Complete the questions if you have (either personally or in your role in our organization) accepted or given:

- gift(s) worth between £50 and £150, or
- corporate hospitality worth between £50 and £250 with the host is present, or
- corporate ho... [SHOW MORE](#)

Conflict of interest - outside employment, activities or financial interest

Complete the questions if you

- are a director, officer, partner, employee, contractor, board member or agent of any entity that conducts business with and/or competes with our organization; or
- have a second job, side business, or an arrangemen... [SHOW MORE](#)

Conflict of interest - family or close personal relationships

Complete the questions if

- You have a personal, family, social, or business relationship with a person inside our business such as a manager, a trustee, an officer, a board member, or a senior employee of our organization; or
- someone in your i... [SHOW MORE](#)

Conflict of interest - other

Complete the questions below if you have an actual or potential conflict of interest not covered by other categories. This could include ownership of intellectual property, participation in legal proceedings or political activity such as holding an e... [SHOW MORE](#)

Complete all the questions on the next screen and click Save.

If you want to view or amend previously submitted disclosures, go to the MyCompass home screen and click on “My Disclosures”.

