

BRITVIC

Modern Slavery Act Transparency Statement 2022

This statement is made in accordance with obligations under the UK Modern Slavery Act 2015 and sets out the actions Britvic has taken during the year ended 30 September 2022 (2022) to understand potential modern slavery risks and prevent modern slavery and human trafficking in its business and supply chain. This statement covers the activities of all relevant companies in the Britvic plc group, as listed pages 176–177 of the 2022 Annual Report and Accounts.

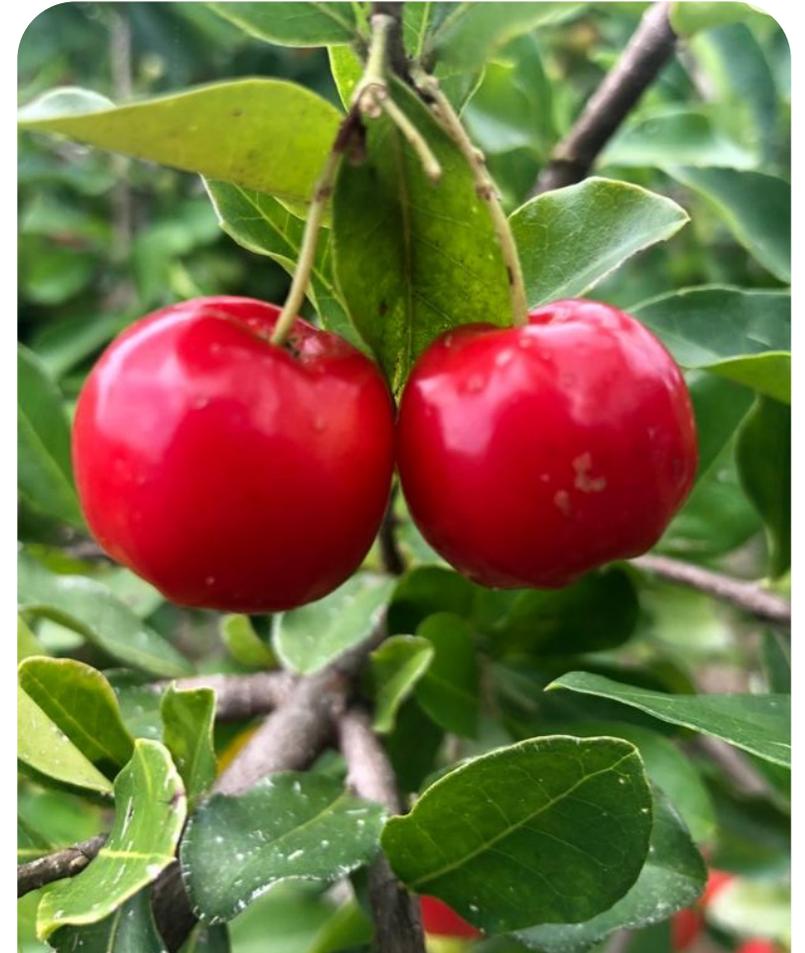
Our commitment

As a business with a complex global supply chain we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking. Britvic is committed to ensuring all our businesses and partners are free from slavery and human trafficking.

Governance

We recognise that having the right governance framework to address human rights and ethical behaviours is fundamental to managing the risk of modern slavery in our business and supply chains.

Responsibility for overseeing Britvic's approach to preventing modern slavery is held by our Modern Slavery Prevention Group (the Group), which is made up of representatives from across the relevant business functions including risk, supply chain, procurement, HR and sustainability. It is sponsored by the Chief Procurement Officer and chaired by the Deputy Company Secretary. The activities of the Group are monitored by the Environment, Social and Governance (ESG) Committee, which reports directly to the Board.



Operations and supply chain

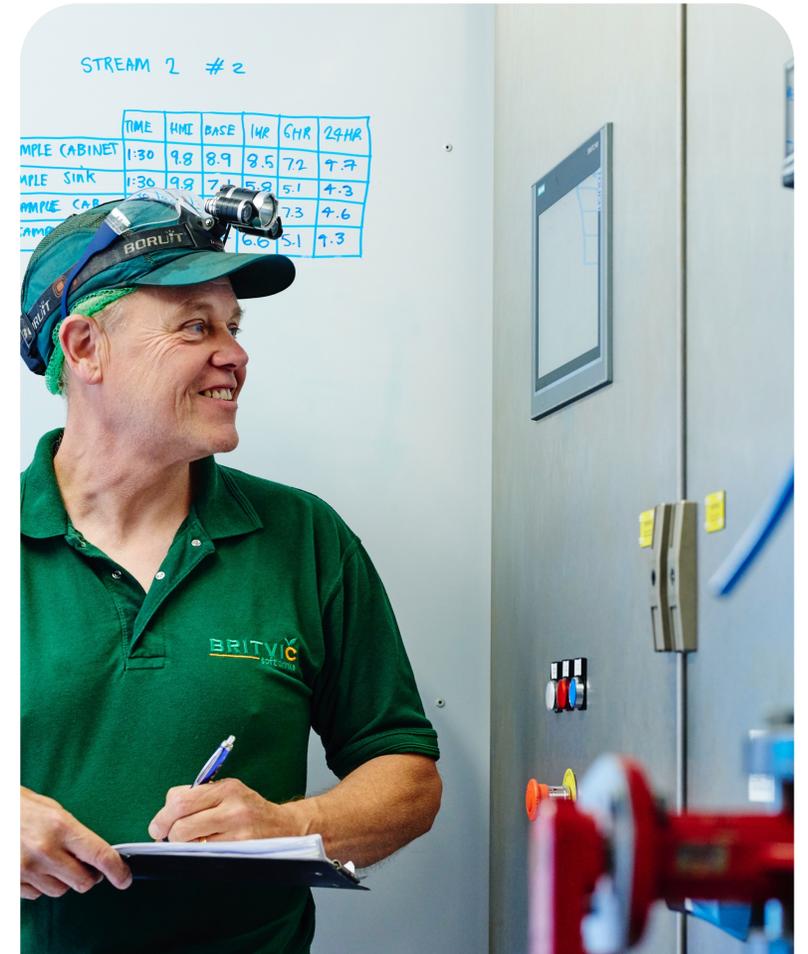
Britvic is an international soft drinks business rich in history and heritage. Founded in England in the 1930s, we have grown into a global organisation with more than 37 much-loved soft drink brands sold in over 100 countries. Britvic is the largest supplier of branded still soft drinks and the number two supplier of branded carbonated soft drinks in Great Britain, and it is an industry leader in Brazil, Ireland and France.

Headquartered in the UK, we have manufacturing operations in Britain, Ireland, France and Brazil where we produce our iconic brands, including Robinsons, Tango, J20, MiWadi, Ballygowan, Teisseire, Maguary and Dafruta. In addition, in Britain and Ireland, we produce and sell a number of PepsiCo's soft drinks brands, including Pepsi, 7UP, Lipton Ice Tea and Rockstar Energy, under exclusive agreements with PepsiCo.

We directly employ over 4,300 people and have a diverse supply chain of approximately 1,700 supplier organisations, sourcing ingredients, packaging materials and other goods and services from over 50 countries. These suppliers range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain.

Sustainability sits at the heart of everything we do, and our suppliers are central to our ability to make, market and sell soft drinks in a truly sustainable way. They are integral to our Healthier People, Healthier Planet sustainability strategy, which sets out a clear ambition to be net zero by 2050, to offer our consumers healthier choices, and to support our employees' wellbeing.

To deliver against our Healthier People, Healthier Planet ambitions, our procurement team has established a clear vision to be the industry leader in our market for sustainable procurement. This means thoroughly evaluating our supply chains to ensure we are sourcing from ethically and environmentally responsible suppliers. To achieve this, Britvic has developed a sustainable procurement strategy which aligns with 13 of the UN Sustainable Development Goals and focuses on four core overarching priorities: low carbon supply chain, sustainable packaging, regenerative agriculture and ethical sourcing.



Policies in relation to safeguarding people

Britvic has developed a suite of policies to ensure ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Ethical Trading Initiative (ETI) Base Code.

Code of Conduct

The Britvic Code of Conduct sets out Britvic's core values and how we work. It explains what 'doing the right thing' means for Britvic, including with respect to human rights and speaking up about concerns. The Code applies to Britvic's worldwide workforce regardless of their role or seniority.

During 2022, a team has been working on an update to the Code of Conduct which will be launched internally early in 2023. An online version will be available to employees via the company intranet, enabling them to search for relevant content and find detailed FAQs and case studies. This aims to increase the profile of the Code of Conduct and make it easier to clearly understand what Britvic stands for across a broad range of ethical topics.

Ethical Business Policy

The Ethical Business Policy sets out the appropriate ethical and legal behaviour that an individual is expected to adopt when doing business on behalf of Britvic, along with a set of ethical business standards expected of both Britvic operations and our suppliers.

It includes the following statements:

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.

Standards of employment 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.

This policy applies to the whole Britvic workforce and to all third parties acting on behalf of Britvic including secondees, advisors, agency workers, contractors and other companies. All our suppliers, as part of the onboarding process, are required to meet our ethical standard. Failing to do so will result in the vendor not being accepted as a supplier to Britvic.

SpeakUp Code

This code sets out various methods by which employees, suppliers and third parties can raise concerns about working practices that they believe breach any Britvic policies or the law. Britvic provides a confidential hotline via both phone and web, which is available globally 24/7 and 365 days a year. The hotline is operated by an independent external organisation.

Any concerns reported via the hotline or through line management are referred to the Company Secretary and the Director of Audit and Risk, and all matters are treated in the strictest confidence. Concerns can be reported anonymously and are investigated as quickly and thoroughly as possible, and the identity of the person reporting the concern is protected, regardless of the outcome of the investigation. The Board receives reports on all concerns raised and progress towards resolving them at every Board meeting.

No concerns related to modern slavery were raised in 2022.

Find the Britvic policies here:
britvic.com/policies

Policies in relation to safeguarding people

Other policies relating to modern slavery

Britvic has policies in place which contain terms relating to the principles of ethical business, including the Work Experience and Young People Manager Guidance, the Diversity & Inclusion Policy and the Harassment & Bullying Policy.

Britvic is aligning with international human rights standards such as the UN Guiding Principles and International Labour Organization standards to form the basis of a human rights policy and processes for monitoring human rights throughout the Britvic supply chain. Our membership of AIM-PROGRESS and partnership with Sedex will help develop and align the policy with relevant regulatory requirements such as the potential new EU human rights due diligence legislation.

Policy implementation, compliance and training

Britvic has a Compliance function responsible for overseeing the compliance agenda, including working with policy owners to ensure that individual policies form a coherent framework across the business. One of the objectives of this function is to ensure that policies remain relevant and new policy areas are identified and addressed and communicated in a way that is clear and understood by our employees.

We have made this process easier this year by putting all our policies onto our intranet to make it simpler to find and read them.

Each policy is assigned to a policy owner who is responsible for ensuring the policy is kept up to date and is properly implemented. Local compliance teams in different countries are responsible for ensuring that policies are amended in line with requirements of local regulation and translated into local languages as required. Each market has its own approach to implementing, communicating and training on our global policies.

On joining the business, new starters are required to read key Britvic policies, which include the Code of Conduct and the Ethical Business Policy. This year we have reinvigorated our training programme for all employees in Britain and Ireland and international colleagues outside of Brazil and France and established an e-learning calendar with topics such as Data Protection, Whistleblowing and Anti-Bribery and Corruption all covered this year. We are working on introducing this for France and Brazil in 2023 (see Training section on page 11).



Due diligence and assessment of suppliers and supply chain

Our suppliers

Britvic continually assesses the ethical risks in our supply chains by asking all our direct suppliers* to join Sedex, complete the Sedex self-assessment ethical questionnaire and permit us access to their data through the online database. We assess each supplier's risk using the platform risk assessment tool which identifies the likelihood of an issue occurring. The risk score is calculated using Sedex's new inbuilt risk assessment tool. It calculates a supplier risk rating based upon inherent risk and the management proficiency by capturing the risk associated with a supplier's country and the inherent risk associated with the sector.

Britvic requires all direct suppliers* identified as high-risk to have a SMETA 4 Pillar audit (Sedex Members Ethical Trade Audit), which assesses and verifies compliance against:

- labour standards (including absence of forced labour);
- environmental standards;
- business ethics (including absence of bribery and corruption); and
- health and safety.

These audits also include confidential interviews with a percentage of the workforce and are carried out by independent auditors from internationally recognised audit bodies. If any issues or non-compliances with the audit standard are identified during an audit, the supplier is required to prepare a corrective action plan and remediate them within an agreed period.

Following on from last year's supplier engagement activity and supplier sustainability roadmaps, this year we committed to rolling out our sustainable business ratings platform, EcoVadis, to our priority suppliers. Priority suppliers are identified by a variety of criteria including spend, criticality to the business and associated geography or industry risk for ethical and environmental factors.

So far, more than 80 of Britvic's priority supply partners have connected with Britvic on EcoVadis and completed their sustainability assessment. This will increase our visibility of ethical and environmental risks, and increase the transparency of continuous improvement across our supply base.

In the last 12 months we have partnered with the SAI Agricultural Platform to become part of a wider cross-industry network to share learnings and join responsible sourcing initiatives for key agro-commodities. Going forward we will be using the SAI Agricultural Platform to collaborate more with our suppliers, increase our transparency and align with its FSA verification standard for key agro-commodities.

* 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 cover everything else including temporary labour, office supplies, machinery and technology.

Due diligence and assessment of suppliers and supply chain

Our own business

As part of our commitment to meet the same standards that we are asking of our supply chain, all our manufacturing sites are required to complete Sedex self-assessment questionnaires. All Britvic manufacturing sites have been successfully audited against the SMETA 4 Pillar audit standard; this is completed on a three-yearly rotation. For transparency, these audit reports are published on the Sedex platform, so that our customers can view with whom we have been requested to link and share our data. We have also aligned our own requirements for EcoVadis with those of our suppliers and have undertaken the same assessment to allow us to develop plans to improve our score.

We regularly carry out audits of the human resources data within our own business to search for indicators of forced labour. The audits check for warning signs, such as multiple unrelated employees living at a single address or paying into the same bank account. When the audit shows warning signs, follow-up checks are conducted.

Employee wellbeing

At Britvic, we take positive actions to maximise the wellbeing of our employees.

Britvic's wellbeing framework is made up of the following interconnected elements:

- promoting good health, energy and physical wellbeing;
- building emotional health, resilience and mindfulness; and
- promoting dynamic working.

In Britain and Ireland we have trained employees who have volunteered as Wellbeing Warriors and Mental Health First Aiders and have been running wellbeing roadshows to help employees better understand their own mental health and what tools are available to them when needed.

Following successful launches elsewhere, the myLife app was launched in France. This is an employee assistance programme that allows employees and their dependants to find additional advice on how to deal with complex work, health or life situations. It is confidential and offers tailored support with an experienced advisor available 24/7.



Due diligence and assessment of suppliers and supply chain



AIM-PROGRESS

Britvic is one of the founding members of AIM-PROGRESS which started in 2007. AIM-PROGRESS is a global fast-moving consumer goods manufacturer and supplier forum whose goal is to positively impact people's lives through combined leadership of robust responsible sourcing practices throughout our supply chains. AIM-PROGRESS members exchange views and share learnings that help us to develop best practice and continually enhance our ethical processes.

Further information can be found at: www.aim-progress.com

We are a part of the Mutual Recognition working group whose aim is to enable the social and ethical audits conducted by AIM-PROGRESS members to be recognised and accepted by other fellow members.



Sedex

Sedex is a not-for-profit organisation and the largest collaborative platform for sharing ethical supply chain data.

It is dedicated to driving improvements in ethical and responsible business practices in global supply chains and has more than 66,000 members in over 170 countries (as reported on www.sedexglobal.com in October 2022).

It has a secure, online database which allows members to store, share and report information about labour standards, health and safety, the environment and business ethics.

We continue to proactively contribute to the Sedex data platform and its continuous improvement. Britvic has been a member of Sedex since 2005 and we contribute to the development of the SMETA 4 Pillar audit (see page [5]) at the Sedex Stakeholder Forum.



EcoVadis

EcoVadis is an online platform which provides assessments of a company's sustainability performance across four pillars: environment, ethics, labour and human rights, and sustainable procurement. EcoVadis works with over 100,000 companies, across more than 175 countries and over 200 industries.

Further information can be found at: www.ecovadis.com

We have partnered with EcoVadis to collaborate with our priority direct and indirect suppliers*, to assess sustainability performance using a common platform and scorecard. This will be monitored regularly and benchmarked to encourage continued improvement in the relevant areas across our supply base. We will require all our priority suppliers to complete the EcoVadis self-assessment and to share their ratings with us over the next 12 months. This will be used in our supplier development conversations to encourage continuous improvement in sustainable sourcing and to ensure a responsible supply chain.

* 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 cover everything else including temporary labour, office supplies, machinery and technology.

Risk assessment

We have an established risk management framework to identify, assess, mitigate and monitor the risks we face as a business. Modern slavery issues are considered during risk assessments at all levels throughout the business and are covered in principal risk reviews of supply chain and legal and regulatory, which are reviewed twice a year by our leadership teams and Board. (See the description of principal risks and uncertainties on pages 73–75 of the 2022 Annual Report and Accounts at britvic.com/annualreport.)

We aim to understand the potential risks to human rights such as forced labour within our supply chain by using tools such as Sedex. We use the Sedex platform to review the modern slavery risk in our supply chain. The online database enables its members to share their ethical data about their businesses. This requires Britvic to encourage a collaborative approach with our suppliers to share their business data.

Each Sedex member's risk is calculated by using the inherent risk profile which includes the nature of the industry and the country of origin. This risk rating then determines the requirement for a Sedex Member's Ethical Trade Audit (SMETA).

The SMETA assesses manufacturing sites and highlights any signs of forced labour. This is a requirement for all direct suppliers to complete before being fully onboarded as a new supplier to Britvic. Certain industries such as agriculture, construction and apparel manufacturing are more prevalent to forced labour, as are certain countries. Examples of forced labour indicators detected by the SMETA include practices like the retention of identity documents, excessive overtime, and withholding of wages. Britvic uses SMETA to ensure company-wide awareness of the more common risks associated with our supply chain to help select good suppliers with responsible practice.



Measuring progress

Britvic is committed to making measurable progress each year on our journey of responsible sourcing.

The ESG Committee reviews human rights strategy in depth as part of its ongoing agenda, evaluating the progress made by various functions across the business including Human Resources, Procurement and Risk. The Committee supports the need for accountability at senior levels, a coordinated cross-functional plan, and the integration of human rights strategy with Britvic's overall Healthier People, Healthier Planet approach.

During 2022, Britvic connected with 86% of our direct suppliers* on Sedex and ensured 100% of our active suppliers identified as high-risk have been ethically audited.

* 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 cover everything else including temporary labour, office supplies, machinery and technology.

Training

Britvic is introducing a Modern Slavery e-learning module, which we plan to roll out across the business in 2023. Targeted training is planned for Procurement teams, covering responsible sourcing through EcoVadis.

During 2022, as part of our annual compliance training programme, we launched a whistleblowing awareness e-learning module for our colleagues in Britain and Ireland and certain international business units. We are planning on rolling out a similar programme for France and Brazil in 2023. In the six weeks they had to complete this training, we achieved a 93% completion rate among 2,300 employees. We have also conducted in-person awareness sessions at one of our sites and will roll this out to our other major sites in Britain and Ireland.

Alongside this, a Sustainable Supply Chain e-learning module has been released to employees to help them understand the wider context of our supply chain and the impacts it can have on both people and planet, and a compulsory Anti-Bribery and Corruption e-learning module was launched in September 2022 in Britain and Ireland and some international businesses.



2023 goals



Raise awareness within the business on modern slavery and responsible sourcing through training and launch of a human rights policy.



Promote SpeakUp hotline awareness into our wider supply chain.



Introduce a mapping solution for high-risk supply chains to increase the visibility of ethical and environmental risks and opportunities beyond partners we conduct business with directly.

Next steps

At Britvic, we take our responsibility for preventing modern slavery seriously. Our international operations are supplied by a broad global supply chain. Therefore, our focus for the next 12 months will be to continue to raise awareness of modern slavery through training, and to increase our visibility of our end-to-end supply chain through mapping technology.

Britvic is committed to all aspects of sustainable business practices and will continue to drive progress and provide assurance that our practices and those of our suppliers are conducted ethically.

This statement has been approved by the Board of Directors of Britvic plc.



Simon Litherland

22 November 2022