
Anti-Bribery and Corruption Policy

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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.

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, consultants, 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.

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 Disclosures form within the Focus policy page (see Appendix 2).

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.

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.

Related Documents

- Whistleblowing Policy – 'Speak Up' Guidance
- Conflict of Interest Policy
- Disciplinary Policy



Terms and Definitions

Appendix 1: Gifts and Corporate Hospitality Rules

Gifts



Hospitality



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 is 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 and size of the donor.
- ✗ 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 of 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. However...
 - If the same party gives you a number of gifts under the £50 limit, and the total value of all those gifts adds up to more than £200 in a single financial year, this must be recorded in Focus. Please disclose all the gifts received from the party during the financial year, and any further gifts received after that.
 - Likewise for hospitality, if you receive a number of hospitality offers from the same party that add up to more than £500 in a single financial year, all those items must be recorded in Focus.
 - You should always consider the appropriateness of accepting further gifts or hospitality in this situation (see Step 1 guidance).
- ✓ If a single 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 Focus.
- ✗ 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 a valid business justification (see Step 1 guidance),
 - It may be accepted and must be recorded as a Disclosure in Focus.
 - It may only be offered by Band F or above employees and must be recorded as a Disclosure in Focus.



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 Focus. 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: Focus Disclosures

You can access the Disclosures and Policies site from the Focus homepage or via the navigation menu under Help Hub. Once on the policies site, select the disclosures form button and then select the Gift and Hospitality form. The form will open up and ask you a number of simple questions to complete.





Search in Workspaces ...



<p>Performance & Development</p> <ul style="list-style-type: none"> > myPerformance > myMISSION: Learning & Development > Psychometric Assessments > myCareer > myRecognition 	<p>myLife</p> <ul style="list-style-type: none"> > myMoney > Time off & Holiday > Health & Lifestyle Benefits > myGiving > My info > Company Cars, Business Travel and Expenses 	<p>Manager zone</p> <ul style="list-style-type: none"> > Recruitment & Induction > My Teams info > My Teams' time off & Holiday > Managing Leavers > Managing Discipline & Grievance 	<p>Current Topics</p> <ul style="list-style-type: none"> > Q4 Check-in > Referral Scheme 	<p>Help Hub</p> <ul style="list-style-type: none"> > askHR > Corporate Affairs > Data Privacy > Disclosures & Policies > EIF > IT
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Focus | myMoney

It's so simple - all you need to do is open your mobile's App Store and search for 'Unify Mobile'. You'll be asked to enter a 6-digit code which is 301221.

Click [here](#) for assistance.

Grab a Pepsi Max at Caffè Nero
A new listing for the brand
3 days ago | 134 Views | 3 Reactions

What quenches your thirst?
Take our Aqua Libra Co poll
7 days ago | 120 Views | 1 Reaction

Jonathan Gatward visit to Brazil
Jonathan visited our colleagues in the the São...
9 days ago | 175 Views | 4 Reactions

[View All](#)

Introducing Tango Apple sugar free!
90% of our brands in the UK are now either no or low sugar...
2 days ago | 97 Views | 4 Reactions

Grab a Pepsi Max at Caffè Nero
A new listing for the brand
3 days ago | 134 Views | 3 Reactions

Teisseire Fruit Shoot - Back to School
Competition for colleagues in France only
4 days ago | 54 Views

[View All](#)



Upcoming Events

10 Oct

All-Employee Connect Call

Link TBC

14:00 - 15:30

23 Nov

Preliminary Results

Terms Meeting

07:00 - 17:00

[View All](#)



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