



Conflict of Interest Policy

1. Policy Statement

A conflict of interest refers to any circumstance where an employee's personal interest might contradict the interest of the company. At Britvic, it is everyone's responsibility to avoid conflicts of interest as these could impact impartiality when making business decisions. This policy outlines the rules regarding conflicts of interest and the responsibilities of employees and the company in resolving any such discrepancies.

2. Policy Owner

The Global Policy Owner 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.

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

What is an employee conflict of interest?

A conflict of interest is any relationship (whether personal or professional), influence or activity that may impair or appear to impair the ability of any of the above listed people to make fair and objective decisions when performing their jobs or act in the best interests of the company.

These may include but are not limited to:

Outside employment and directorships

e.g. having a second job with, or being a director of, a Britvic supplier, customer or competitor, whether paid or voluntary.



Author: Clare Thomas Date: 2 September 2020

Ownership and financial interests

e.g. owning shares or any type of investment in a business that is a Britvic supplier, customer or competitor.

Personal workplace relationships

e.g. having a personal, family or business relationship with someone who works for Britvic whose career or performance rating you have influence over, or who has influence over your career or performance rating; or being in a position to influence a decision to hire someone you have such a relationship with. (Refer to the [Ways of Working Policy](#) for further information.)

Outside relationships

e.g. having a personal, family or business relationship with someone who works for or is a director of a Britvic supplier, customer or competitor, whether paid or voluntary. (Refer to the [Ways of Working Policy](#) for further information.)

Political activity

e.g. holding any elected, appointed or advisory position in any local or central government, or being a candidate for political office

Creation of or interest in competing intellectual property

e.g. creating, registering or owning trademarks, patents, registered designs or any other form of intellectual property rights which relate to a Britvic's business.

Legal proceedings

e.g. being involved in any legal proceedings which may lead to criminal convictions, bankruptcy, or any actions which relate to Britvic's business.

What do I need to do?

If you think you might have a conflict of interest, discuss this with your line manager. If your manager agrees that there is a conflict you must record this on the central register. For GB&I and International employees this must be recorded in the myCompass system using the Disclosure feature (see Appendix below). For any non-employees without access to MyCompass, please contact the global policy owner.

You must also take responsibility for ensuring that the conflict does not impact your impartiality with respect to related business decisions, by removing yourself from such situations as appropriate.

If you are a line manager and one of your direct reports has reported a potential conflict of interest to you, you are responsible for assessing the conflict and ensuring that no inappropriate activities take place as a result. You will either need to approve the conflict while, for example, removing the employee from situations where decisions are made in relation to the matter reported, such as supplier or customer negotiations or performance reviews, or requiring the employee to take action to remove the conflict. If you are in any doubt or require support, please raise a query on [askHR](#) or contact the policy owner for advice. You must also ensure that the conflict is properly recorded, regardless of the action taken to remove or manage it.



Author: Clare Thomas Date: 2 September 2020

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

If any person covered by this policy has a conflict of interest and does not declare it (or declares it and does not take any remedial action agreed with their line manager to resolve the conflict), regardless of whether any inappropriate outcomes have resulted, this may lead to disciplinary action. Action may also be taken if a line manager does not properly record, manage or monitor any conflicts that they are aware of.

Conflicts declared under this policy may be subject to audit, and evidence of line manager approval and any actions taken may be required by the legal and compliance teams.

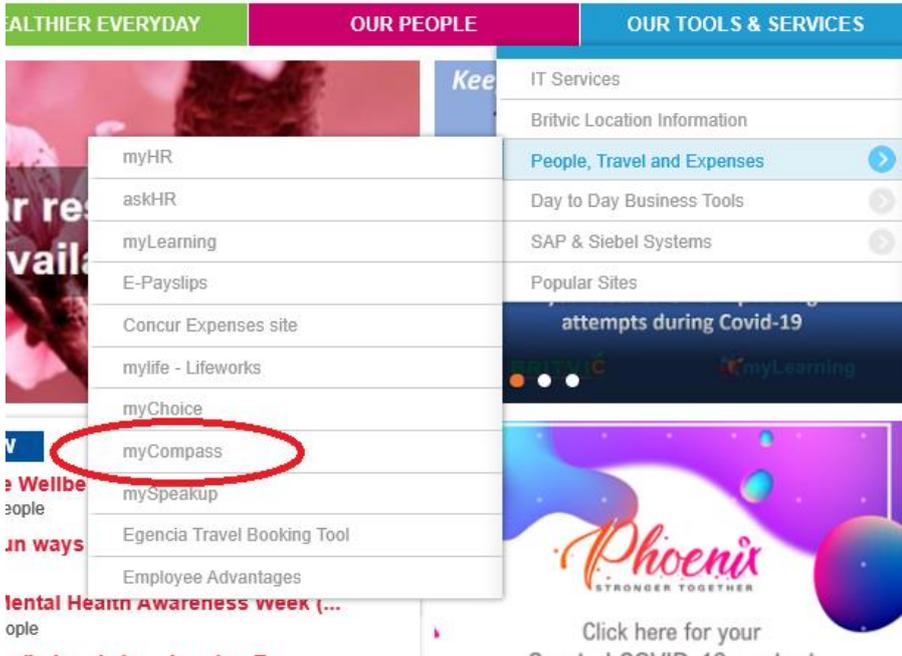
6. Related Documents

- [Ways of Working Policy](#)
- [Whistleblowing Policy – 'Speak Up' Guidance](#)
- [Anti-Bribery and Corruption Policy](#)
- [Disciplinary Policy](#)

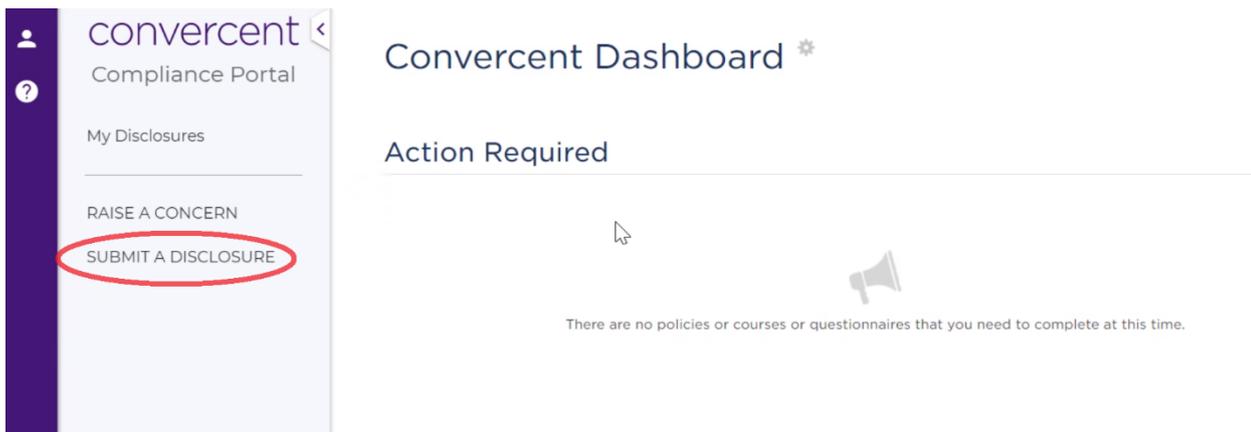


Appendix – myCompass Disclosures

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.



Author: Clare Thomas Date: 2 September 2020

In the “New Disclosure” pop-up screen, click on the relevant Conflict of Interest category. If you are not sure you can click on “Show more” for additional information, or select the category to review the questions, then click cancel to return to this screen to review other categories.

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](#)

Once you have selected the appropriate category, 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”.

Author: Clare Thomas Date: 2 September 2020

