
Conflict of Interest Policy

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Policy Statement

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. A conflict of interest refers to any circumstance where an employee's personal interest might contradict the interest of the company.

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.

The Global Policy Owner is the General Counsel.

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.

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.



With our employee referral scheme, we'll always have people in our business that have close personal relationships, or relationships could develop at work. This can work well for your relationship and for us too but sometimes it can result in operational issues, conflicting loyalties, breaches of confidentiality and affect the trust and confidence of colleagues.

We don't want to get to a place where this happens so you must talk to your manager or someone more senior if you have or start a close personal relationship with someone in your team or work closely with. You should be open and think about any situations that might become more difficult to manage and what steps you can take to avoid difficult situations.

This can include changing aspects of your role (limiting decisions to work tasks only instead of decisions which impact individuals) or a complete change of your role or team. Any suggested changes must always be the right decision for the business so we may not always say yes to them, and we may decide to enforce a suitable change if a difficult situation arises.

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.

If you are in a personal relationship with someone working for one of our competitors, customers or suppliers you must talk to your manager or someone more senior. If necessary, appropriate measures will be taken to safeguard the working relationship and protect Britvic's business.

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 Focus using the Disclosure form (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.

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.

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.

Related Documents

Whistleblowing Policy
Working Well Policy (UK)
Anti-Bribery and Corruption Policy
Discliplinary Policy



Appendix 1 – How to record a Conflict of Interest

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 required form.

