

Modern Slavery Act Transparency Statement 2023

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 2023 (2023) 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 on pages 176–177 of the 2023 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 (MSPG), 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 MSPG are monitored by the Environment, Social and Governance Committee, which is chaired by the Chief Financial Officer.



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 38 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.

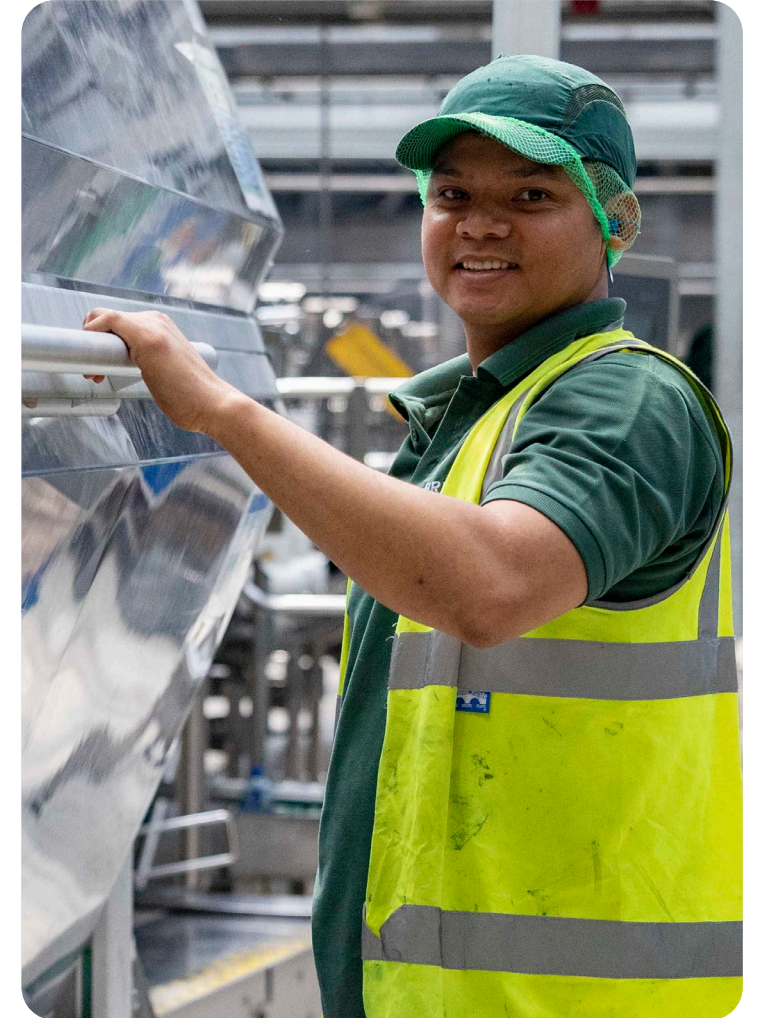
Headquartered in the UK, we have manufacturing operations in Great Britain, Ireland, France and Brazil where we produce our iconic brands, including Robinsons, Tango, J2O, MiWadi, Ballygowan, Teisseire, Maguary and Dafruta. In addition, in Great Britain and Ireland, we produce and sell a number of PepsiCo's soft drink brands, including Pepsi, 7UP, Lipton Iced Tea and Rockstar Energy, under exclusive agreements with PepsiCo.

We directly employ over 4,400 people and have a diverse supply chain of approximately 5,600 supplier organisations, sourcing ingredients, packaging materials and other goods and services from over 50 countries. 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. These suppliers range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain.

Some of our product is manufactured using select co-packing partners. Our co-packers meet the high safety and ethical standards required by all our suppliers and therefore they must successfully pass site assessments before we are able to approve them for manufacturing our product. This ensures we retain the same labour standards and working conditions within our own factories as we do with contracted third-party manufacturing.

As we operate with a multi-tiered, global supply chain it is important we continue to improve our transparency. We collaborate closely with suppliers to encourage commitment to ethical practices and identifying human rights risks (see page 9 – Supplier Sustainability Summit).

We divide our supply chain into tiers to differentiate the various suppliers in the supply chain that deliver our ingredients and packaging from their origins to our factories. We currently assess the modern slavery risk within the first tier (our immediate suppliers). We are aware that ingredients or packaging from certain countries, such as India and Brazil, tend to have a higher modern slavery risk associated with them. The type of industry involved also has its own inherent risks. Greater risks of modern slavery are associated with juice agriculture, juice manufacture and packaging manufacture.



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 the behaviours that we expect of employees, to ensure that we meet regulatory and ethical standards, and live our values day to day. 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 2023 a comprehensive revision of our Code of Conduct was launched. The new Code, called myCompass, is hosted on our intranet and available to all employees in the UK, Ireland and Europe, including a translated French version. Hosting myCompass on the company intranet means that searches for any related issues will bring up relevant content, without having to specifically look for the policy. Each section

includes 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.

Work is underway to produce a condensed printable version, which will be available on britvic.com in 2024, in English, French and Portuguese.

Britvic's approaches to human rights and standards of employment are set out in myCompass as follows:

We respect and protect 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. Standards must also be in accordance with the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is founded on the conventions of the International Labour Organization and is an internationally recognised code of labour practice.



The image shows a screenshot of the 'myCompass' website. The header features the 'myCompass' logo and the tagline 'We respect and protect human rights' next to a photograph of a man in a suit sitting at a desk. Below the header, the page is divided into sections: 'What we stand for', 'What we expect of you', and a list of requirements. The 'What we stand for' section includes text about ensuring clean and safe environments and not tolerating human rights abuses. The 'What we expect of you' section lists three key expectations: respecting human rights in the workplace, engaging with the local Procurement team, and using mySpeakup channels to report concerns.

Policies in relation to safeguarding people

SpeakUp Policy

This policy 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 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 2023.

Find the SpeakUp Policy here:

britvic.com/policies

Recruitment & Resourcing Policy

At Britvic, we look for signs of modern slavery across the entire life cycle of an individual's employment. In Great Britain and Ireland, we ensure that right to work checks are completed for all employees on or before their first day of employment, in line with UK and Irish legislation.

In cases where evidence of a new starter's right to work cannot be provided or validated on or before their first day of employment, they will be unable to undertake any work for Britvic until they can produce satisfactory evidence. Where appropriate, Britvic will help support the new starter with obtaining their right to work document or share code so that they can commence their employment with Britvic.

Right to work checks are vital in helping to eliminate illegal migration in Great Britain and Ireland. Britvic has robust right to work checks in place to prevent any persons working illegally within the organisation, and subsequently reduces the risk of individuals becoming vulnerable to exploitation and slavery. As part of our commitment to this, we are working to make this standard practice at all our global sites.

Ethical Trading Policy

All suppliers are required to sign up to our Ethical Trading Policy as part of the supplier onboarding process. The policy covers standards of employment, health and safety management, environmental management, bribery and corruption and how to report concerns. Failing to meet our ethical standards will result in the vendor not being accepted as a supplier to Britvic.

Other policies relating to modern slavery

Britvic has policies in place which contain terms relating to the principles of ethical business, including the Global Diversity & Inclusion Policy and the Harassment & Bullying Policy.

In 2023, Britvic published a human rights positioning statement, setting out what we stand for, how we work and our focus going forward on key areas including collaboration with partners. The issues we face in our extended supply chains are by no means unique to Britvic and we cannot solve them alone.

[human-rights-position.pdf](#)

Policies in relation to safeguarding people

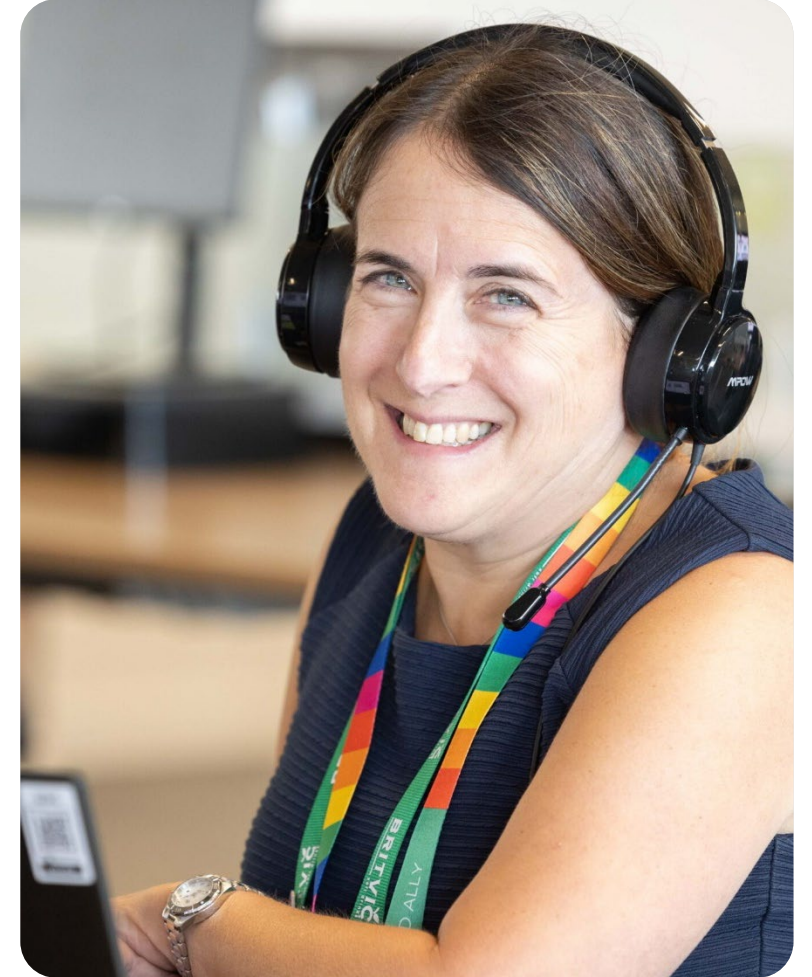
Policy implementation, compliance and training

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, addressed and communicated in a way that is clear and understood by our employees. We have continued to improve the ease of engagement with policies with the roll-out of new templates, and updating access for all employees, as well as reducing the number of individual policies published.

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 tailored 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 SpeakUp Policy. This year, we have continued with our reinvigorated training programme for all employees in Great Britain and Ireland and international employees outside of Brazil and France, with e-learning on the topics of cyber security and financial controls covered this year. In addition, there was significant engagement and communication with employees on the relaunch of the Britvic Code of Conduct, which includes content related to all key policies.

Local training programmes are continuing in France and Brazil, with support from the Group compliance team in specific areas such as data protection in Brazil (see Training section on page 12).



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 (see page 8), 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 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)
- 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 (see Risk Assessment on page 11).

Our continued partnership with EcoVadis (see page 8) enables us to collaborate with our priority direct and indirect suppliers*, to assess sustainability performance using a common platform and scorecard. Since launching EcoVadis in the Great Britain and Ireland businesses, a significant proportion of our priority suppliers have completed the EcoVadis self-assessment and shared their ratings with us over the last 12 months. EcoVadis will be used in all our supplier development conversations across all Britvic business units to encourage continuous improvement in sustainable sourcing and to ensure a responsible supply chain. This increases our visibility of ethical and environmental risks, and the transparency of continuous improvement across our supply base.

Our partnership with the SAI Agricultural Platform enables us to become part of a wider cross-industry network to share learnings and join responsible sourcing initiatives for key agro-commodities (such as sugar and juice). 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 to ensure we continue to source key agro-commodities in a sustainable way.

* Direct suppliers are those which 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.



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. We exchange views and share learnings with other AIM-PROGRESS members that help us to develop best practice and continually enhance our ethical processes.

Further information can be found at:

www.aim-progress.com



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 75,000 members in over 180 countries (as reported in October 2023). 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.

Further information can be found at:

www.sedex.com



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.

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.

Further information can be found at:

www.ecovadis.com

* Direct suppliers are those which 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.

Suppliers and supply chain



Supplier Sustainability Summit 2023

In October 2022 we welcomed over 50 of our priority suppliers to our first ever Supplier Sustainability Summit. The key objectives were to educate and increase awareness of our sustainability goals, drive collaboration and put sustainability and ethical sourcing at the heart of our supplier partnerships.

The summit was used to announce an increased focus on commitments to important topics such as supply chain transparency to help mitigate human rights risks in the supply chain. The event was also used to announce the new partnership with Everstream Analytics (see page 11). Over the last 12 months we have rolled out sustainability contractual requirements to all our priority suppliers, including signing up to sustainability platforms Sedex and EcoVadis, setting science-based targets, commitments to renewable energy usage and aligning with sustainability verifications and certifications such as the Sustainable Agricultural Initiative Platform's Farm Sustainability Assessment.

We plan to run a repeat summit in 2024, to review progress and continue to support our suppliers in meeting their commitments.

Sustainable Supply Chain Finance

To reinforce the importance that we place on meeting our Healthier People, Healthier Planet commitments, as described on page 35 of the 2023 Annual Report and Accounts, we are delighted to announce the recent launch of the new Britvic Sustainable Supply Chain Finance programme. This programme has been developed to recognise and reward those suppliers which progress on their sustainability performance, commitment and disclosure and will result in a phased reduction of the supplier financing rates. Together with ING and Rabobank, Britvic identified the rating on EcoVadis and setting of science-based carbon reduction targets as a key indicator of good performance and continued progress in sustainability and responsible sourcing.

Our operations and employees

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 in Great Britain and Ireland 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
- creating a supportive and inclusive culture showing that we care

In Great Britain and Ireland, we have trained employees who have volunteered as Wellbeing Warriors and Mental Health First Aiders and have been raising awareness of all the tools and support that are available to our employees to help them gain a better understanding of their own mental health. Our HR and reward teams visited all our sites in Great Britain and Ireland to help our employees gain a better understanding of what benefits are available to them and how to make their money go a little further.

We also offer an app called myLife which includes an employee assistance programme in Great Britain, Ireland and France. This allows employees and their families to find professional and confidential advice, work-life support and referrals to counselling 24/7.



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 risks related to supply chain and legal and regulatory, which are reviewed throughout the year by our leadership teams and Board (see the description of principal risks and uncertainties on pages 72–80 of the 2023 Annual Report and Accounts).

We aim to understand the potential risks to human rights such as forced labour within our supply chain by using tools such as the Sedex platform and audits where high risks are identified (SMETAs) (see pages 7–8).

Certain industries such as agriculture, construction and apparel manufacturing are more prevalent for forced labour, as are certain countries. Examples of forced labour indicators detected by the SMETAs include practices like the retention of identity documents, excessive overtime, and withholding of wages.

Britvic uses SMETAs to ensure company-wide awareness of the more common risks associated with our supply chain to help select good suppliers with responsible practice.

We recently partnered with Everstream Analytics to further develop our risk monitoring of our tier 1 suppliers including reputational and climate risk. Going

forward we plan to utilise this technology to help us map our supply chain and identify risks further up the supply chain for high-risk materials.

everstream
ANALYTICS

Everstream

Britvic is working with Everstream Analytics to identify human slavery, forced labour and child labour. Through Everstream we can identify if endemic regional risk exists in our supplier base and even in the onboarding process of new suppliers. Through active monitoring for misconduct, we are able to react to occurring events in real time and help mitigate effects. Everstream Analytics is a validated modern slavery and forced labour risk management solution through the organisation Slave-Free Alliance.

More information can be found at:
www.everstream.ai



Training

Britvic has created a modern slavery e-learning module which is being rolled out across the business. It is designed to raise awareness of the different types of modern slavery, including red flags to look for, and covers how to report concerns. Targeted training has also been delivered to our Great Britain and Ireland procurement teams. This focused on the use and continued roll-out of our sustainable sourcing platform EcoVadis, covering responsible sourcing requirements.

Leader-led training and engagement on the revised Code of Conduct was undertaken across the organisation in the year, to support the understanding and awareness of the Code, key policies and how to report concerns (see page 4).

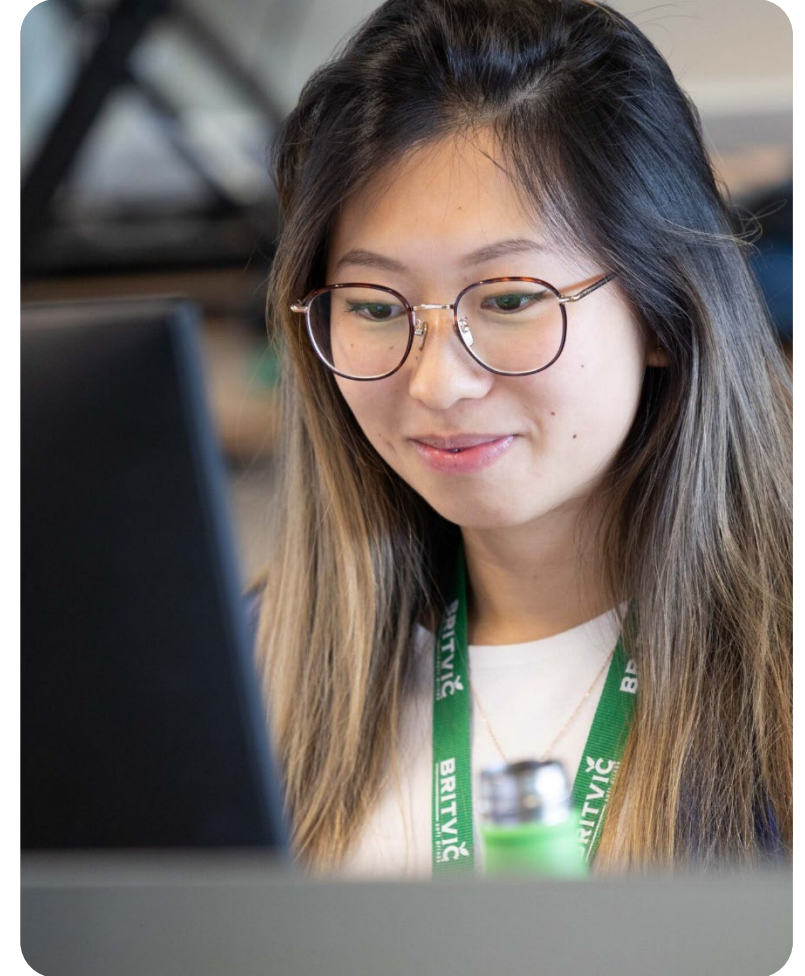
Alongside this a sustainable supply chain e-learning module is available to employees to help them understand the wider context of our supply chain and the impacts it can have on both people and planet.

Measuring progress

Britvic is committed to delivering the highest standards of employment, supporting our employees to be happy, healthy and safe in their working environment.

We regularly seek feedback from our employees across the business through our engagement survey, to understand how individuals feel about the company and why. The anonymous feedback is reviewed and used to identify areas for positive change across the organisation. There are also a number of other, both formal and informal, channels in place for employees to share their voice or raise concerns.

We are committed to making continued progress each year on our journey of responsible sourcing across our supply chains. Using key forums such as AIM-PROGRESS (see page 8) to learn about industry best practice helps Britvic promote better practices within our own business and among our suppliers. We use platforms such as EcoVadis, Everstream and Sedex to monitor risk in the supply chain. We then carefully select which key suppliers to collaborate with in their improvement of practices and, in some cases, attaining certification.



Focus areas going forward

At Britvic, we take our responsibility for preventing modern slavery seriously. 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.

In 2024 we will be focusing on the following areas:

- Promoting the reporting of ethical concerns in the Britvic supply chain. We will raise awareness of the types of concerns to report and improve accessibility to whistleblowing routes including our independent whistleblowing platform – SpeakUp – with our highest risk suppliers, to provide an additional resource for workers within our supply chains
- Expanding our supplier risk mapping using the Everstream tool for tier 1 suppliers and drilling down to tier 2 high-risk suppliers. We will use this information in conjunction with Sedex and EcoVadis audit reports to identify what level of modern slavery risk exists.

If no audit reports exist for that supplier, we will request audits are completed and take appropriate action as needed

- Conducting risk assessments of all our priority agricultural commodities. We will implement an action plan to mitigate risks within these commodities, including gaining certification of the highest risk commodities to ensure their sources are free of practices related to modern slavery

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



Simon Litherland
Chief Executive Officer
21 November 2023

