

SUNTORY
BEVERAGE & FOOD EUROPE

CODE OF BUSINESS CONDUCT

Our proud commitment to *integrity,*
responsibility and transparency

CODE OF BUSINESS CONDUCT

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INTRODUCTION

LETTER FROM THE CEO

Dear Colleagues,

Suntory Beverage & Food Europe, a division of Suntory Beverage & Food, has a commitment to integrity and ethical conduct.

The Code sets out our core values and our commitment to lawful and ethical conduct. Our reputation is critical to our long term commercial success. How we choose to act can expose us to great risk, but it can also reflect positively on our brand and our business relationships worldwide. It is therefore our individual and collective responsibility and a matter of personal integrity to act in accordance with the Code.

Our brands and our products are trusted everywhere we operate. Our business is built on this trust and this reputation. It influences how consumers feel about our products, how bottlers and customers regard our work, and how our shareholders perceive us as an investment. Because our success is so closely related to our reputation, it is up to all of us to keep it strong. Acting with integrity is about more than our Organisation's image and reputation, or avoiding legal issues.

It is about sustaining a place where we all are proud to work; it is about who we are as a business. Ultimately, it is about each of us knowing that we have done the right thing, that we have acted honestly and treated each other and our customers, suppliers and consumers fairly.

This document sets out our Code of Business Conduct which is aimed at helping us unify and underline our business identity, culture and guidelines for conduct. It captures our commitment to honesty, integrity and responsibility, together with our sincere aspiration to contribute to the progress and wellbeing of the society in which we all live.

Please take the time to read this document and understand its implications for you and your colleagues. With your help, I am confident that we will continue to do the right thing, that we will continue to be an outstanding corporate citizen in every community we serve, and our reputation for integrity will endure. Thank you for joining me in this effort.

Peter Harding
Chief Executive Officer
Suntory Beverage & Food Europe

INTRODUCTION

WHY DO WE NEED A CODE OF BUSINESS CONDUCT?

This Code is designed to ensure consistency on how employees conduct themselves, engage with colleagues within the business, and set out our expectations on how each individual should behave.

Our Code aims to act as a guide and framework for internal relations between our employees and external ones between its personnel and its stakeholders.

Suntory Beverage & Food Europe also aims to promote the awareness and, where appropriate, adoption of the Code among its different stakeholders, particularly our suppliers, contractors and collaborators in general.

We are committed to honesty, integrity and responsibility. This means:

- We aspire to deliver quality and excellence in all that we do
- We value all our employees and foster an environment where people can contribute, innovate and excel
- We treat our partners with professionalism, dignity and respect
- We behave responsibly as good corporate citizens
- We conduct ourselves and our business affairs in accordance with the highest ethical standards
- We act in compliance with all applicable laws, striving always to be a respected corporate citizen worldwide

ACTING WITH INTEGRITY



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ACTING WITH INTEGRITY

1 What is expected from everyone?

Comply with the Code of Business Conduct, and with the Law

- **Compliance with the Suntory Beverage & Food Code is obligatory for all our directors, managers and employees, regardless of their contract type, the position they hold and where they work.**
- All employees are responsible for knowing and complying with the legislation, policies and procedures applicable to their duties, responsibilities and location.

Consider your actions and ask for guidance

- If ever in doubt about a course of conduct, ask yourself:
 - Is it consistent with the Code?
 - Is it legal?
 - Will it reflect well on me and the business?
 - Would I want to read about it in the newspaper?
 - Can I explain this to my family and friends?

- If the answer is 'NO' to any of these questions then, do not do it.
- If you are still uncertain, ask for guidance. This Code tries to capture many of the situations that employees will encounter, but cannot address every circumstance. You can seek help from any of the following:
 - Your Line Manager
 - Human Resources Director
 - Legal Team or Finance Director

2 *What is expected from managers, directors and officers?*

Promote a culture of Ethics and Compliance

- Managers should at all times model appropriate behaviour. As a manager, you should:
 - Ensure that the people you supervise understand their responsibilities with regard to the Code and other policies;
 - Take opportunities to discuss the Code and reinforce the importance of ethics and compliance with employees;
 - Create an environment where employees feel comfortable raising concerns;
 - Consider conduct in relation to the Code and other Company policies when evaluating employees;
 - Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code or the law;
 - Always act to stop violations of the Code or the law by those you supervise.

Respond to questions and concerns

- If approached with a question or concern related to the Code, listen carefully and give the employee your complete attention.
 - Ask for clarification and additional information.
 - Answer any questions if you can, but do not feel that you must give an immediate response.
 - Seek help if you need it.
- If an employee raises a concern that may require investigation under the Code, you can contact one of the following managers in the Organisation:
 - your Department Director;
 - General Counsel;
 - Finance Director;
 - Human Resources Director;
 - Compliance Officer;
 - Operations Director.

3 When is written approval required?

- Some of the actions referenced in the Code - specifically, those associated with the use of the Organisation's assets for purposes other than your job and certain potential conflict of interest situations - require prior written approval from your Human Resources Director. If such a situation persists in the longer term then such approval must be renewed on an annual basis.

- Written approvals for executive officers must come from the Chief Operating Officer; written approval for the Chief Operating Officer must come from the Board of Directors.

4 Raising concerns

- We all have an obligation to uphold the ethical standards of Suntory Beverage & Food. **If you observe behaviour that concerns you, or that may represent a violation of the Code, raise the issue promptly.**
- Doing so will allow us an opportunity to deal with the issue and correct it, ideally before it becomes a violation of the law or a risk to health, security or our reputation.
- You have several options for raising issues and concerns; you can contact any of the following:
 - Your Line Manager;
 - Human Resources Director;
 - Legal Team or Finance Director;
 - Compliance Officer; and/or
 - Local Whistleblowing Hotline (details of which are available in the Whistleblowing Policy).



- We value the help of employees who identify potential problems we need to address.
- You may raise concerns anonymously, but you are encouraged to identify yourself. If you make your identity known, we will take all reasonable precautions to keep your identity confidential, consistent with conducting a fair and rigorous investigation. To help maintain confidentiality please do not discuss such issues or any investigation with other employees. Because of the need to maintain confidentiality we may not be able to inform you of the outcome of any investigation.
- Any action against an employee who raises an issue honestly is a violation of the Code.
- That an employee has raised a concern honestly cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.
- If you work with someone who has raised a concern, you should continue to treat the person with courtesy and respect.
- If you believe someone had taken action against you because you raised a concern, report the matter to your Human Resources Director.



Making false accusations

- We will protect any employee who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation.
- Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.





INTEGRITY IN THE COMPANY



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INTEGRITY IN THE COMPANY

1 Business and financial records

- **For both internal and external purposes, it is essential that we maintain the integrity and accuracy of all business and financial records.**
- Consequently, if within the context of your professional duties you are responsible for maintaining such records, you have an obligation to do this in a factually accurate and timely fashion. These include not only financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefits claim forms and resumes.
- Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting reflects on our reputation and credibility, and ensures that we meet our legal and regulatory obligations.



Duties

- Always record and classify transactions in the proper accounting period and in the appropriate account and department.
- Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals.
- Estimates and accruals must be supported by appropriate documentation and be based on your best judgment.
- Ensure that all reports to regulatory authorities are full, fair, accurate, timely and understandable.
- Never falsify any document.
- Do not distort the true nature of any transaction.
- Never enable another person's efforts to evade taxes or subvert local currency laws. For this reason, payments generally should be made only to the person or firm that actually provided the goods or services. Payments should be made in the supplier's home country, where it does business, or where the goods were sold or services provided, unless the supplier legitimately has assigned payment or sold its accounts receivable to another entity. Exceptions must be approved by the Chief Financial Officer.
- Validate that all public and/or official communication, including reports to government authorities, are accurate, fair, understandable, complete and timely.
- Ensure that all actions and commitments are in accordance with our policies and Chart of Authority.



2 Organisation Assets

Protect the Organisation's assets, and use them properly

Subject to relevant local policies, do not use Organisation assets for your personal benefit or the benefit of anyone other than the Organisation.

- The Organisation's assets are intended for business use in accordance with our policies.
- Use common sense. For example, the occasional personal phone call or e-mail from your workplace or mobile phone is acceptable. Excessive personal calls or e-mail is a misuse of assets.
- Individual Business Unit policies may allow additional personal use of certain assets, such as a company car or wireless communication device. Always check relevant local policies to ensure that you are using Organisation assets as intended.
- Theft of Organisation assets - whether physical theft such as unauthorised removal of company product, equipment or information, or theft through intentional misreporting of time or expenses - could lead to sanctions, including summary dismissal. We treat workplace theft of assets belonging to other employees the same way we treat theft of Organisation assets.
- The use of Organisation assets outside of your responsibilities - such as using your work product in an outside venture, or using company materials or equipment to support personal interests - requires prior written approval from your Human Resources Director. You must have this approval renewed annually if you continue to use the asset outside of work.



Use of time, equipment, and other assets

- Do not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities.
- Do not use Organisation computers and equipment for outside businesses, promoting political views or for illegal or unethical activities such as gambling, pornography or other offensive subject matter.
- Do not take for yourself any opportunity for financial gain that you learn about because of your position, or through the use of Organisation property or information.
- Loans from any Group Company to executive officers are prohibited. Loans from any Group Company to other officers and employees must be approved in advance by the Board of Directors of the relevant BU.

Examples of Organisation Assets – including but not limited to:

- Organisation money; organisation products; computers, systems and software; telephones; wireless communication devices; photocopiers; concerts or sporting events tickets
- The period of activity during which you are at work belongs to the Company, as you are at the disposal of the employer; the result of your work; proprietary information; organisation trademarks.

3 Use of information

Non-public information

- **Safeguard any of our non-public information, which includes everything from contracts and pricing information to marketing plans, technical specifications and employee information.**
- As a rule of thumb, anything that is not publicly posted on our website or within our marketing material is considered non-public information and should be kept confidential.
- Do not disclose non-public information through any means of communication (including but not limited to oral communication, written communications, social networks) to anyone outside the Organisation, including to family and friends, except when disclosure is required for business and/or legal purposes. Even then, take appropriate steps, such as execution of a confidentiality agreement, to prevent misuse of the information.
- Do not disclose non-public information to others inside the Organisation unless they have a business reason to know, and the communication has been duly authorised by the appropriate level of management.
- Employees shall protect the Organisation's non-public information at all times, including outside of the workplace and working hours, and even after employment ends.

Examples of non-public information – including but not limited to:

- Employees; inventions; contracts; strategic and business plans; major management changes; new product launches.

Privacy

- **The Organisation respects the privacy of all of its employees, business partner, and consumers.**
- Respect the privacy of individuals and notably of our employees, customers and suppliers. Handle personal data responsibly. Personal data refers to any information collected or otherwise processed by us relating to an identified or identifiable individual, including but not limited to:
 - Any information that can be used to distinguish or trace an individual's identity, such as name, image, national insurance/social security number, date and place of birth, mother's maiden name, or biometric records
 - Any other information that provides information about an individual, such as medical, educational, financial, and employment information
- We must handle personal data responsibly, in compliance with all applicable privacy laws and relevant contractual obligations



- SBFE has implemented various policies (including, among others, the Document Retention Policy, Data Protection Impact Assessment Policy, Cloud Services Policy and Employment Privacy Notice), all of which are available on the [intranet](#), governing the handling and use of personal data by the Organisation and its employees. These policies are designed to ensure compliance with relevant data protection laws and must be complied with at all times.
- Employees who handle the personal data of others must notably:
 - Collect, use and process such information only for specified, explicit and legitimate business purposes
 - Only collect information that is adequate, relevant and not excessive in relation to these purposes
 - Limit access to the information to those who have a legitimate business purpose for seeing the information
 - Take care to prevent unauthorised disclosure
 - Be transparent with individuals about the way their data is processed
 - Inform your Legal Department about any creation, transfer or modification of a personal data processing
 - Limit disclosure of sensitive personal data (medical personal data, biometric data, financial account numbers, social security number, race, religion, sexual orientation, political affiliations and criminal convictions) to those who are under a professional obligation of confidentiality and who are trained in the proper handling of this kind of information
- A useful guideline is to **always act as if your own information were being used.**



INTEGRITY IN THE COMMUNITY



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INTEGRITY IN THE COMMUNITY

1 *Relations with public authorities*

- The global nature of our business often requires that we interact with officials of various governments around the world. **Transactions with governments are covered by special legal rules**, and are not the same as conducting business with private parties. Consult your Legal Team to be certain that you are aware of, understand and abide by these rules.
- In general, do not offer anything to or accept anything from an agent in public service - directly or indirectly - in return for favourable treatment:
 - Before providing or receiving anything of value to or from such an agent, you must obtain prior approval from your Legal Team or the Compliance Officer.
 - Ensure that any payments are properly recorded in the appropriate Company account.
 - The gifts or hospitality should be recorded in the relevant Gift and Hospitality Register as set out in the SBFE Anti-Bribery and Corruption Policy.

Bribery

- Many countries have passed legislations criminalising bribery. The sanctions for violating these laws can be severe, including significant individual and corporate fines, and even imprisonment.
- Bribes are prohibited. A bribe is giving or offering to give anything of value to influence a discretionary decision.
- Examples of bribes include, but are not limited to, payments to encourage a decision to award a contract or continue business relations, to influence the outcome of a government audit or inspection, or to influence tax or other legislation.
- If you have concerns, consult your Legal Team regarding local anti-bribery laws.
- **To comply with legislation, SBFE has a separate Anti-Bribery and Corruption Policy.** It can be found on the intranet or by clicking [here](#).



2 Trade restrictions

- We must comply with all applicable trade restrictions and boycotts imposed by the Japanese, United Kingdom and/or European Union governments. Such restrictions prohibit us from engaging in certain business activities in specified countries, and with specified individuals and entities.
- These restrictions include, for example, prohibitions on interaction with identified terrorist organisations or narcotics traffickers.
- Sanctions for non-compliance can be severe, including fines and imprisonment for responsible individuals, and we may be prohibited from further participation in certain trade or be excluded from operating in certain markets.

3 Relations with customers, suppliers and consumers

- We value our partnerships with customers, suppliers and consumers. Treat these partners in the same manner we expect to be treated.

- Always deal fairly with customers, suppliers and consumers, treating them honestly and with respect:
 - Do not engage in unfair, deceptive or misleading practices
 - Always present our products and services in an honest and forthright manner
- We expect that our business partners will take no actions which are contrary to or in violation of our Code. Accordingly, the owner/manager of each partner relationship should ensure adherence by each partner to the "**Code of Conduct for Business Partners**". This can be found on the [intranet](#).
- It is very important that you do not do anything to facilitate tax evasion or foreign tax evasion by a customer or supplier. You must report any suspicious activity as soon as possible to your line manager or to a member of the legal team. If in doubt, it is better you report it than turn a blind eye to it; turning a blind eye could constitute a criminal offence. Further information can be found in the "**Anti Tax Evasion Policy**", a copy of which can be found on the [intranet](#).

4 Relations with competitors

- Take care in dealing with competitors, and gathering information about competitors. Various laws govern these sensitive relationships.

Competition laws

- Suntory Beverage & Food competes fairly, and complies with all applicable competition laws around the world. These laws often are complex, and vary considerably from country to country, both in the scope of their coverage and their geographic reach. Conduct permissible in one country may be unlawful in another. Penalties for violation can be severe.
- In particular, you must not enter into agreements with competitors to:
 - Fix prices or conditions of sale for competing products
 - Divide customers, bids, markets or territories
 - Refuse to sell to particular buyers or buy from specified suppliers
 - Exchange non-public information with the effect of reducing competition
- If you have any concerns as to whether a proposed action may be anti-competitive, please speak to your Legal Team.

Competitive intelligence

- Employees are encouraged to collect, share and use information about our competitors, but only in a legal and ethical manner. Just as we value and protect our own non-public information, we respect the non-public information of other companies.
- Gather competitive intelligence ethically and protect others' proprietary information. For example, obtaining and analysing publicly available information about the markets in which we operate and our competitors is encouraged and expected. However, sourcing information from or paying an employee of a competitor for confidential information about a rival tender would be unlawful. Collect and use such information only for legitimate business purposes and prevent unauthorised disclosures.



5 Human rights responsibilities

SBFE is committed to protecting human rights within its business and within its supply chain. SBFE recognises this as part of its commitment to acting responsibly and with integrity to safeguard human rights.

Forced Labour

- Under relevant legislation SBFE is required to take steps to ensure that its operations and supply chain are free from any forms of modern slavery or human trafficking. SBFE is required to issue an annual statement regarding the steps that it has taken and will continue to take to combat this issue.
- SBFE employees must not perpetrate, be a part of or in any way condone human slavery, trafficking or involuntary or compulsory labour within the company or its supply chain. All employees must be free to join or to leave the company. Workers must work under contract according to local law and the ethical principles set out in this Code of Conduct.
- Working hours must comply with local legislation. Over time shall be voluntary and never be compulsory.

Duty to Report

- Employees should identify any suspicion of human slavery or trafficking within the business or the supply chain to the legal team immediately.

CONFLICT OF INTEREST



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CONFLICT OF INTEREST

- **A conflict of interest arises when your personal activities and relationships interfere, or appear to interfere, with your ability to act in the best interests of the Organisation.**
- Take particular care if you are responsible for selecting or dealing with a supplier on behalf of us. Your personal interests and relationships must not interfere, or appear to interfere, with your ability to make decisions in the best interests of the Organisation. When selecting suppliers, always follow applicable procurement guidelines.
- Any conflicts of interest should be notified to your local legal team using the Conflicts of Interest Declaration form (available on the Intranet or on request from your legal team) for approval. This approval should be renewed annually by the local Legal Director and CFO.

1 *Outside Investments*

- Avoid investments that could affect, or appear to affect, your decision-making on behalf of the Organisation. Specific guidelines apply to ownership of stock of a customer, supplier or competitor of ours (Note: Franchised bottlers of Suntory Beverage & Food trademarked products are defined as customers).

2 *Outside service as Officer or Director*

- In general, you may serve as an officer or member of the board of directors of another for-profit business only with prior written approval of your Human Resources Director. You must renew this approval annually.

3 *Relatives and Friends*

- You may have relatives or friends who are employed by, or have ownership interests in, customers or suppliers of the Organisation.
- If you deal with such a customer or supplier, take care to ensure that your relationship / friendship does not affect, or appear to affect, your ability to act in the best interests of the Organisation. If you are uncertain whether your friendship may create an issue, consult your Line Manager or Human Resources Director.
- In addition, personal relationships at work must not influence your ability to act in the best interest of the Company, and must not affect any employment relationship. Employment-related decisions should be based on qualifications, performance, skills and experience.

4 Gifts and Entertainment

- Do not accept gifts, meals or entertainment, or any other favour, from customers or suppliers if doing so might compromise, or appear to compromise, your ability to make objective business decisions in the best interests of the Company.
- Acceptance of gifts, meals or entertainment that are not within the guidance set out below must not be accepted. If you are not sure whether a gift is acceptable, you should refer to the Anti-Bribery and Corruption Policy or your Line Manager and local Legal Team for guidance. **The gifts or hospitality should be recorded in the relevant Gift and Hospitality Register according to the SBF E Anti-Bribery and Corruption Policy.**

Examples of gifts and entertainment that exceed acceptable limits

- Gifts:
 - Do not accept gifts in exchange for doing, or promising to do, anything for a customer or supplier.
 - Do not ask for gifts from a customer or supplier in exchange for doing, or promising to do, something.
 - Do not accept gifts of cash or cash equivalents, such as gift cards.
 - Do not accept gifts of more than modest value without seeking prior approval from your Line Manager. Examples of acceptable gifts include a logo pen or t-shirt, or a small gift basket at holiday time. Please also refer to the Anti-Bribery and Corruption Policy on the intranet (or by clicking [here](#)) for further guidance.

- Gifts of symbolic value, such as trophies and statues that are inscribed in recognition of a business relationship, may be accepted.
- Gifts or discounts offered to a large group of employees as part of an agreement between us and a customer or supplier may be accepted if used as intended by the customer or supplier.
- Entertainment:
 - Do not accept meals or entertainment in exchange for doing, or promising to do, anything for a customer or supplier.
 - Do not ask for meals or entertainment from a customer or supplier.
 - You may accept occasional meals and entertainment from customers and suppliers if the event is attended by the customer or supplier, and the costs involved are in line with local custom for business-related meals and entertainment. For example, ordinary business meals and attendance at local sporting events generally are acceptable.

Travel and premium events

- If you are invited by a customer or supplier to an event involving travel or an overnight stay, or to a premium event such as the Olympics or World Cup, seek permission from your Line Manager and the local Legal team.



Refusing gifts, meals and entertainment

- If you are offered a gift, meal or entertainment that is not in line with the guidance set out above, politely decline and explain our rules. Example wording declining gifts and hospitality is included in the SBF E Anti-Bribery and Corruption Policy.
- If returning a gift would offend the giver, or the circumstances under which it was given preclude its return, you may accept the gift, but should notify your Legal Team.
- The Legal Team will work with you either to donate the item to charity, or to distribute or raffle the item among a larger group of employees.

Gifts, meals and entertainment for customers and suppliers:

- Gifts, meals and entertainment for customers and suppliers must support the legitimate business interests of the Company and should be reasonable and appropriate under the circumstances.
- Always be sensitive to our customers' and suppliers' own rules on receiving gifts, meals and entertainment. Further guidance is to be found on the [intranet](#) in the Anti-Bribery and Corruption Policy.
- If you are still in doubt about whether to accept a gift after consulting your Line Manager, please contact your Legal Department.





WHEN IN DOUBT,
DON'T

ADMINISTRATION OF THE CODE



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ADMINISTRATION OF THE CODE

- **The Code of Business Conduct is designed to ensure consistency in how employees conduct themselves within the Organisation, and in their dealings outside of the Organisation.**
- The procedures for handling potential violations of the Code have been developed to ensure consistency in the process across the Organisation.
- No set of rules can cover all circumstances. These guidelines may be varied as necessary to conform to local law or contract.

1 Responsibility

- The responsibility for administering the business principles rests with the Suntory Beverage & Food Europe Executive Committee, with oversight provided by the relevant Ethics and Compliance Committee.

Investigation of potential business principles violations

- The Organisation takes all reports of potential Code violations very seriously and is committed to confidentiality and a full investigation of all allegations. The Organisation's Audit, Finance and Legal personnel may conduct or manage Code investigations. Employees who are being investigated for a potential Code violation will have an opportunity to be heard prior to any final determination. The Company follows local grievance procedures in locations where such procedures apply.

Decisions

- The Suntory Beverage & Food Europe Executive Committee issues recommendations about Code violations and Management may take disciplinary measures based on local laws and regulations and on the Organisation's internal rules and regulations.

2 *Breach of the Code of Business Conduct's principles*

- **Failure by any employee to comply with this or any policy will subject employees, including those who ignore prohibited conduct, or have knowledge of the conduct and fail to correct it, to disciplinary action up to and including summary dismissal.**

3 *Signature and Acknowledgement*

- All new employees must sign an acknowledgement form confirming that they have read and understand the Code of Business Conduct and agree to abide by its provisions.
- All employees will be required to make similar acknowledgements on a periodic basis.
- Failure to read the Code or sign the acknowledgement form does not excuse an employee from compliance with the Code.

4 *Policies and Guidelines*

- The Code of Business Conduct does not address all workplace conduct. The Organisation maintains additional policies and guidelines including but not limited to the Code of Conduct, Anti-Bribery and Corruption Policy, Compliance Guidelines, Data Protection Policies and Delegation of Authority, that may provide further guidance on matters in the Code or address conduct not covered by that same Code.

CONTACTS FOR HELP AND GUIDANCE

Your Human Resources Director is available to answer any question about the Code or our compliance policies, or to discuss any concern you may have about your obligations resulting from this Code.

You can also seek help from any of the following:

- Your Line Manager
- General Counsel
- Finance Director
- Local Legal team
- Compliance Officer