

Coca-Cola HBC 2025

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Coca-Cola HBC 2025 Slavery and Human Trafficking Statement

This statement is made by Coca-Cola HBC Northern Ireland Limited (the Company), which is subject to the obligations under section 54 of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2025.

This statement also comprises voluntary information provided by Coca-Cola HBC AG. The Company, Coca-Cola HBC AG and its other subsidiaries are hereinafter referred to as Coca-Cola HBC or the Group. The statement outlines the approach of the whole of Coca-Cola HBC.

Introduction

This is the Group's tenth Slavery and Human Trafficking Statement. Our ninth statement was published in May 2025.

We recognise that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global issue that is as, and more, important than ever amidst various global challenges.

As a Group, Coca-Cola HBC has a zero-tolerance approach to Modern Slavery of any kind within its operations and supply chains, and we are taking steps to ensure that our employees, contractors, and suppliers understand the Group's commitment to human rights and their own rights and responsibilities. Our commitment is to operate our business responsibly and sustainably, and this includes fair treatment of all people in our business and in the Group's supply chain.

Our business and supply chains

Coca-Cola HBC is a growth-focused consumer packaged goods business and strategic bottling partner of The Coca-Cola Company. We open up moments that refresh us all, by creating value for our stakeholders and supporting the socio-economic development of the communities in which we operate.

With a vision to be the leading 24/7 beverage partner, we offer drinks for all occasions around the clock and work together with our customers to serve **760 million consumers** across a broad geographic footprint of **29 countries**. Our portfolio is one of the strongest, broadest and most flexible in the beverage industry, with consumer-leading beverage brands in the sparkling, adult sparkling, juice, water, sport, energy, ready-to-drink tea, coffee, and premium spirits categories. These include Coca-Cola, Coca-Cola Zero Sugar, Fanta, Sprite, Schweppes, Kinley, Costa Coffee, Caffè Vergnano, Valsler, FuzeTea, Powerade, Cappy, Monster Energy, Finlandia Vodka, The Macallan, Jack Daniel's and Grey Goose. We foster an open and inclusive work environment amongst our **33,000 employees**. Our sustainability achievements are recognised externally: for the ninth time we were ranked as the world's most sustainable beverage company in the Dow Jones Best-in-Class Indices. We are among the leaders of the global beverage industry across major benchmarks, including CDP's A list for Climate and Water, ISS ESG, MSCI ESG, Morningstar Sustainability's ESG and FTSE ESG.

At Coca-Cola HBC, we are committed to high standards of performance related to human rights and labour practices, minimising environmental impact, ensuring health and safety, ethical business and unsurpassed quality in our value chain, from sourcing raw materials to manufacturing the final product and distributing it to our customers. Our supplier partners play a critical role in ensuring that we deliver against these standards.

Total supplier spend for Direct, Indirect and Cold Drink Equipment Categories reached **€ 5.6 billion** in 2025 (data compiled during 12 month rolling period from December 2024 to November 2025). Including Concentrate supplies from The Coca-Cola Company, the spend is **€ 7.3 billion**. Our practice is to source locally, provided that goods and services meet our requirements and quality standards in an economically viable way. As of 2015, we have a

formal Procurement KBI of over **95%** of local spend in our countries of operation or from within the European Union, which is considered local for EU countries. In 2025 this percentage was **97.6%** (around €5.4 billion excluding concentrate supplies).

Under a unified procurement framework, we segment our supply base universe of approximately 15,000 active supplier codes (approximately 13,566 parent level supplier organisations) into Direct, Indirect spend and Concentrate.

- Direct spend suppliers include those that supply ingredients and packaging for our products.
- Indirect spend suppliers include those that supply products and services such as IT, production equipment, spare parts, maintenance services, logistics providers, fleet vehicles, utilities, and professional services.

Coca-Cola HBC also segments suppliers into the following categories based on criticality and potential opportunities:

- **Group Critical Suppliers** are those that fulfil any of the following criteria: high percentage of spend, critical components (including but limited to Sweeteners, Juices, Resin, Cans, Glass, Preforms, Closures, Aseptic Packaging, Secondary Packaging, Cold Drink Equipment etc.), limited alternatives and partnership supporting our business strategies.
- **Country Strategic Suppliers** are those which have strategic importance at a local or regional level. Both Group Critical & Country Strategic suppliers are considered Critical to the overall competitiveness and success of Coca Cola HBC.
- **Tactical Suppliers** represent low-volume and/or low-spend suppliers, supplying goods or services where there are many alternative sources available, enabling a flexible supply base.
- Both **Group Critical & Country Strategic**

suppliers as well as The Coca-Cola Company (TCCC) Concentrate supply, have significant business relevance to the Company and are considered to be of great substance in terms of potential ESG or financial impact. These suppliers are defined as Significant Suppliers to the overall competitiveness and success of Coca-Cola HBC. TCCC Concentrate supply is not considered to be procurement addressable spend. However, TCCC and Coca-Cola HBC we share the same ESG standards and policies and as members of The Coca-Cola System we share to a great extent common supply base that we jointly manage, negotiate, innovate and support improvements in their ESG performance. Finished Goods suppliers are considered essential to the financial success of our business.

All our suppliers are required to uphold our high sourcing standards. Segmenting our suppliers as outlined above helps us manage risk in our supply chain and ensure compliance with our standards.

Given the scale, complexity and geographic reach of our supply chains, particularly beyond Tier 1 suppliers, we will continue to improve our visibility over entities involved in the production and services supporting our business.

We are transparent about the need to focus our efforts on improving visibility where the risk of adverse labour and human rights impacts is highest. We continue to enhance our supply chain mapping by prioritising critical suppliers, leveraging digital risk screening tools such as EcoVadis IQ and engaging directly with suppliers to improve disclosure across lower tiers over time.

You may find more information about our supply base and supplier segmentation under section "OUR SUPPLIERS" in our corporate web page:

 [Read about Our Suppliers](#)

million consumers

760

countries

29

suppliers

~15.000

employees

33.000



Policies and controls

The Social Responsibility Committee of the Board of Directors of Coca-Cola HBC is responsible for the development and supervision of procedures and systems to ensure the pursuit of the Group's social and environmental goals, which apply to all companies of the Group.

Code of Business Conduct

At the core of our system of internal control is the Group's **Code of Business Conduct**. The Code communicates the Group's standards of employee conduct and clearly sets expectations that all employees are to maintain the highest standard of ethical business conduct. Our Code of Business Conduct applies to everyone working for any Group company worldwide regardless of location, role, or level of seniority. We expect temporary employees, agency staff, contractors, distributors, suppliers, consultants, agents and any other third parties who act in the name of any Group company to act in accordance with the principles of the Code. The Audit and Risk Committee of the Board of Directors of Coca-Cola HBC AG has oversight of compliance with the Code.

 [Read about Code of Business Conduct](#)

Human Rights Policy

Our commitment to prohibiting Modern Slavery is clearly set out in our **Human Rights Policy**, which is committed to international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. It applies to Coca-Cola HBC AG, the entities it owns, the entities in which it has a majority interest, and the facilities it manages.

The policy expressly states that the Group is committed to identifying and preventing any adverse human rights impacts in relation to its business activities through human rights due diligence and preventive compliance processes. The policy prohibits forced labour, child labour and human trafficking. Regular reviews ensure that we adhere to all applicable laws and regulations, that processes are well implemented, that targets are set and reached, and that reporting is timely and accurate.


 [Read about Human Rights Policy](#)

Supplier Guiding Principles (SGPs)

Our **Supplier Guiding Principles (SGPs)**, which apply to all our suppliers, are aligned with the expectations and commitments of our Human Rights Policy. They are part of issued tenders and clearly referenced in purchase orders sent to suppliers and are part our Coca-Cola HBC standard vendor creation process. If a supplier fails to uphold any aspect of the requirements, the supplier is expected to implement corrective actions. Coca-Cola HBC reserves the right to audit and to terminate any agreement with a supplier that cannot demonstrate that they are upholding the requirements of the SGPs.

Our SGPs include express reference to the obligation of suppliers to be able to demonstrate, as a minimum, their compliance with our SGPs and with the eight Core Conventions of the International Labour Organization if these set higher standards than local law. They also include a clear prohibition of slavery, forced labour, child labour, and human trafficking. In 2020, we made an update to the SGPs, adding a provision that creates an explicit prohibition of any form of recruitment fees. Moreover in 2023, we further enhanced our SGPs to include more specific rules around equal remuneration, physical demands of the workplace, updates in freedom of association, competition law and biodiversity. Our SGPs are communicated to our entire supply base, and all suppliers are contractually required to comply with them.

We registered around 2,735 new suppliers in 2025. 100% of our suppliers have agreed to adhere to our Supplier Guiding Principles, as it has been the case with new suppliers since 2015.

 [Read about Supplier Guiding Principles](#)

Principles for Sustainable Agriculture (PSA)

In close collaboration with TCCC, we are committed to working together with our suppliers to ensure that we source our key agricultural ingredients sustainably. Our suppliers are expected to ensure compliance with TCCC's **Principles for Sustainable Agriculture (PSA)**, which communicate our values and expectations of compliance with all applicable laws, with emphasis on the importance of responsible workplace practices that respect human rights.

Our 2025 commitment is to achieve 100% certification of our key ingredients using sustainable agricultural standards. In 2025, 95% of the key commodities we purchased for use as ingredients were sustainably certified. All new suppliers have been introduced into the PSA program, and we have plans in place to support them as they progress towards certification in the near future. More information on the Coca-Cola System Principles for Sustainable Agriculture and, specifically for CCH, can be found at:

 [Read about Principles for Sustainable Agriculture](#)

Supply chain due diligence and steps taken to manage slavery and human trafficking risk

The Group has developed, and Group companies are implementing, a due diligence process that includes the identification of potential human rights issues, the identification of vulnerable groups, and the mitigation actions and monitoring in relation to our own operations and critical suppliers.

Remediation and corrective action

Where our due diligence processes have identified non-compliances or heightened risks related to labour standards or human rights, where possible we prioritise remediation over disengagement. Suppliers are required to develop and implement corrective action plans within defined timelines, and progress is monitored through follow-up assessments or re-audits.

We avoid making assumptions regarding the absence of findings equating to the absence of risk. Furthermore, using insights from audits, assessments and supplier engagement, we refine our risk prioritisation and strengthen our preventive controls.

In situations where remediation is not progressing to the extent required, escalation measures may include intensified engagement, suspension of new business or, as a last resort, termination of the commercial relationship. Our approach seeks to mitigate harm to affected workers and avoid abrupt actions that could increase vulnerability.

Modern Slavery and human rights risks are evaluated within the Group's overarching Risk Management Guidelines within integrated Business Resilience Framework, which is top-down and bottom-up. The process ensures that we identify, review and manage any risks arising from our business activities.

Our risk management process includes:

- Monthly risk assessments in all our business units to evaluate current and emerging risks and progress against our risk management strategies. Operational and strategic risks are reviewed with corporate functions bi-annually against broader regional and macro environments. These regular reviews are supported by bi-annual sessions facilitated by the Chief Risk Officer, and drive the quarterly feedback meetings, ensuring that business units focus on all risk categories including the areas of human rights, modern slavery, sustainability and climate change.
- Risks are aggregated to the group which provides a snapshot of our internal and external risk environment. They are analysed and significant operational, strategic and emerging risks and actions are reviewed with the Region Directors.
- Review and strategic analysis of identified risks is undertaken by the Group Risk and Compliance Committee. The Committee is our strategic think-tank, comprising senior leaders in the business who independently review our risk exposures, and presents issues relating to critical risk exposure to the Executive Leadership Team.
- The Chief Risk Officer reviews key operational, strategic and emerging risks with the Executive Leadership Team and the Audit & Risk Committee of our Board bi-annually.

In 2025, we launched an integrated Business Resilience Framework, with Risk Management as its foundation. We have continued to identify opportunities to further enhance and strengthen risk mitigation across the business.



Priority risk areas

Our assessment of modern slavery and human rights risks considers sector specific, geographic and labour related risk factors. Based on these indicators, we prioritise enhanced due diligence for suppliers operating in regions where labour rights risks are generally recognised as higher, including Egypt, Nigeria, Eastern Europe and Asia, and for activities involving labour intensive production, agricultural sourcing and contracted services.

These risk assessments inform the allocation of resources, depth of supplier engagement and frequency of monitoring activities.

Risks are prioritised using a combination of country level risk indicators, sectoral exposure, supplier criticality and results from sustainability and human rights assessments. Suppliers assessed as presenting higher inherent or residual risk are subject to enhanced monitoring, targeted audits and focused capacity building initiatives.

Further details on the management of risk can be found in our Integrated Annual Report

 [Read 2025 Integrated Annual Report](#)



Suppliers

We maintain transparency throughout our supply base. Sustainability is at the core of all our sourcing activities, and we consider our suppliers as critical partners and contributors to the ongoing and sustainable success of our business.

We monitor the performance of our significant suppliers through TCCC's Supplier Guiding Principles, compliance audits, 3rd party certification against the Principles of Sustainable Agriculture, our internal supply base assessments and the EcoVadis platform. As a System, together with TCCC, we audit facilities of raw materials and primary packaging providers that participate in our Group tenders, leveraging third parties engaged through TCCC. These audits assess compliance with our Supplier Guiding Principles (SGPs), at least once every three years. The TCCC audit results are communicated to our Group Procurement and Group Quality, Safety and Environment teams, and corrective actions, where required, are taken in a timely manner. In the case that any supplier with a Corrective Action Plan, fails to pass subsequent audits, they are given final warning and are prohibited from further contracting until issues are rectified.

In the year to 31 December 2025, we concluded 113 SGP audits. 11 Suppliers identified by 3rd party audit: these suppliers have received orange or red audit scores and have received corrective actions. (Suppliers' locations: Denmark, France, Germany, Poland, Switzerland & the UK) over Health & Safety, Wage & Benefits, Laws & regulations, Demonstration of compliance, Work hours & Overtime and workplace Security. Remediation actions are in place and suppliers to be re-audited within 12 months to ensure proper implementation of agreed actions.

Findings from all remaining audits were minor. All matters identified by our audit process are subject to corrective action and verification of the action taken, either by desktop re-assessment or follow up by the third-party independent audit body. We disclose more details regarding findings and corrective actions identified as part of SGP audits for our Suppliers under the GRI Content Index, that we make available annually on our corporate website

 [Read the GRI Content Index](#)

(specifically for Human Rights please refer to sections 407-1, 408-1, 409-1, 414-1, 414-2). EcoVadis helps us monitor a range of risks using 21 criteria from international standards, including the UN Global Compact, ISO 26000, the Global Reporting Initiative, and the International Labour Organization.

In 2019, we introduced a new recommendation to our countries that suppliers who participate in initiatives with spend of over 100,000 Euros on an annual basis are registered and assessed by EcoVadis or a similar assessment body. In 2020 we re-trained our countries' Procurement Teams on these requirements and re-iterated the importance of proper sustainability risk assessment. In all strategic tenders, sustainability is a separate criterion implemented as part of the selection process. Moreover, in 2022, we have introduced a new generic risk assessment methodology with EcoVadis, namely EcoVadis IQ, that is supporting our teams to perform faster scanning of suppliers' ESG risks leveraging AI technology and supporting the prioritisation of further assessment requirements according to Risk Levels identified. In May 2023, we have further enhanced of our SGPs to include more specific rules around competition law, equal remuneration principles, physical demands of workplace, freedom of association and biodiversity. In 2024, we prioritized our critical supply base to join EcoVadis and we offer "**ESG performance debrief sessions**" conducted by EcoVadis specialists in collaboration with the responsible teams of the selected vendors. Additionally in 2025 we introduced the EcoVadis IQ plus vitals tool to facilitate suppliers' initial assessment at tendering process.

In 2025, over 2,370 of our critical suppliers (on parent level) have been assessed using EcoVadis, an increase of 22% versus 2024. Our plan is to expand the use of these assessments for better, more objective supplier monitoring going forward and leverage our EcoVadis partnership across The Coca-Cola System to exchange intelligence and experience across Bottlers. We also recognize supplier certifications as per international standards including ISO 9001, 14001,

45001 and FSSC 22000. For agricultural commodities, we are aligning with the wider industry to recognize the Bonsucro, Rain Forest Alliance, Fair Trade, and the Sustainable Agriculture Initiative Platform (SAI- FSA), Global GAP+GRASP, VIVE etc. Through our Workplace accountability audits within 3-years audit cycle, all the long-term contractors and contracted services on-site are assessed in human rights. Moreover in 2025 we worked on EU deforestation regulation readiness and we are now expecting the new guidance to readjust as necessary.

In 2024, we redesigned entirely our Coca-Cola HBC Procurement Guidelines adding specific focus on how buyers should leverage all these ESG tools to assess suppliers on ESG criteria as part of our Strategic Tendering process, in a consistent and uniform manner across our territories. This is further supported by annual training for the entire buyer community. Moreover, we have developed a selected team of buyers that act as Sustainability Coordinators in each BU. The main role of this team is to act as 1st level support to each BU Procurement team for ESG tools and practices, support suppliers and cascade the sustainability agenda to countries. In 2025 we continued educating our buyers through training by leveraging our BU coordinators/champions and specialist external organizations such as EcoVadis.

Moreover, in line with our ESG ambitions, Coca-Cola HBC is strengthening the role of Sustainability within its Strategic Sourcing framework. As part of this commitment, the weighting of Sustainability in the overall evaluation criteria for all Strategic Tenders across Indirect Spend categories has been increased from 5% to 15% in 2025. For Direct categories Sustainability requirements are embedded into the tender scope as we need to secure the suppliers have a long term ESG Strategy in place.

In total in 2025, we assessed **2,483** Suppliers through EcoVadis and SGP 3rd party physical audits is **(+414)** suppliers compared to 2024). By 31st December 2025, we have overall 2,370 suppliers assessed with EcoVadis.

The average overall score for our suppliers is 53.2 (+ 2.3 ppt vs 2024) and it is above the average score of 49.5 of EcoVadis universe. In the area of Labour and Human Rights, our suppliers in scope reached 55.1 (+2.0 ppt vs 2024) vs. average of 52.2 for EcoVadis' panel. Through EcoVadis we have detected 70 suppliers with low ratings on sustainability issues that scored ≤ 24 in the assessment for Social risks (supplier locations in Nigeria, Russia, Belarus, China, Egypt). These suppliers are subject to focused engagement to help them improve through trainings and targeted debrief sessions delivered by EcoVadis. Results of supplier evaluations enable us to have a clearer mapping of human rights risks by category and country and contribute to the ongoing development of our supplier CSR strategy.

The EcoVadis assessment covers a range of sustainability issues based on international standards, including the Ten Principles of the UN Global Compact, the International Labour Organization conventions, the Global Reporting Initiatives standards, the ISO 26000 standard, the CERES Roadmap, and the UN Guiding Principles on Business and Human Rights. For more information, please refer to the [EcoVadis website](#).

You may refer on our corporate webpage:

 [Read about Supply Chain](#)

Our Operational sites

Audits of Coca-Cola HBC's operations, called Workplace Accountability Audits, are conducted every three years in Coca-Cola HBC's plants by an independent third-party international organization. The scope of these audits includes human rights and covers contractors and others who are not employees, such as staff of third-party service providers.

95% of all Coca-Cola HBC plants have been audited within the three-year cycle by an independent organization. People & Culture policies are also in scope of CAD audits covering 100% of HBC plants.

Coca-Cola HBC's sites that do not pass their first audit to an acceptable standard are subject to follow-up audits and are required to report on corrective actions to the third-party audit bodies.



Capacity building and collaboration

We build our strategic suppliers' capacity to manage sustainability issues, including human rights aspects, through joint value creation initiatives and sustainability events, industry associations, workshops on sustainable supply, an Annual Stakeholder Forum, materiality survey and CSR platform for ethical and sustainable supply chains.

In 2023 we have redesigned entirely our Coca-Cola HBC Procurement Guidelines adding specific focus on how Buyers should leverage all these ESG tools to assess suppliers on ESG criteria as part of our Strategic Tendering process in a consistent and uniform manner across our territories. This is further supported by annual training for the entire Buyers community. Moreover, we have developed a selected team of buyers that are acting as Sustainability Coordinators in each BU. The main role of this team is to act as 1st level support to each BU Procurement team for ESG tools and practices, support suppliers and cascade the sustainability agenda to countries.

Staying committed to our capability building strategy, we delivered trainings to both Buyers and our Significant suppliers covering topics such as ESG requirements, EcoVadis Assessments and Action Plans, Ethics & Compliance, Human Rights, Labor Practices & Modern Slavery, GHG Emissions webinars etc. These trainings have received considerable attention, with the session on Labor Practices & Human Rights reaching over 600 participants.

In addition, we offer **"ESG performance debrief sessions"** conducted by EcoVadis specialists in collaboration with the responsible vendor teams. These sessions support our suppliers in understanding their assessment results and identifying practical steps to enhance their ESG performance. Since its launch in 2024, the initiative has grown each year, engaging more than 50 suppliers to date.

We aspire to recruit all Strategic Suppliers under the EcoVadis Assessment Platform to track ESG overall performance and, with the support of the EcoVadis Team, we promote the use of the EcoVadis Academy to help vendors build better knowledge of important ESG elements.

We place specific focus on developing GHG performance tracking for our supply base, starting with a pilot program for the development of supplier-specific emission factors (SSEFs) with our most sustainably mature suppliers that is now planned to be further expanded within 2026 to a much broader supply base. For less mature suppliers, since 2022 we have been working with Guidehouse on capacity building programmes, offering training through the Supplier Leadership on Climate Transition programme (SLoCT) annually. This initiative helps our less mature suppliers build a strong foundation to start reducing GHG emissions.

In November 2023, we held our 2nd Virtual Supplier Sustainability Event "Opening up a more sustainable future together" where we invited all our Group Critical suppliers to talk about emissions reduction, biodiversity and deforestation. More than 400 representatives from almost 200 suppliers, Coca-Cola System colleagues, and trade partners joined our virtual Supplier Day conference. Following this initiative, we decided to take our discussions with critical suppliers to a deeper level of ESG practices and triggered deep-dive sessions on how to create an aligned ESG journey. On group level we established annual meetings on GHG glidepaths and sustainable agriculture practices across our Sweeteners, Cans and plastic suppliers. This program is ongoing and will continue to expand to include additional Group Critical Raw Materials and Packaging Suppliers.

We have initiated specific discussions with Sweeteners suppliers in Egypt to recruit them under our ESG assessment tools such as EcoVadis and SEDEX and also help them start their journey into emissions management and sustainable

agriculture practices, an initiative that has received a warm welcome and strong engagement of the supplier teams in this long journey. In 2025, we continued working with the same suppliers in Egypt, where we have seen significant progress across all the above areas, strong commitment to the sustainability agenda and steady year-over-year improvement. In this context, suppliers in Egypt have begun supplying sustainably sourced sugar and HFSS (corn), with clear commitments to further increase these volumes. Additionally, many of them have undergone EcoVadis assessments, reinforcing their sustainability performance and transparency into their ESG practices.

Moreover, we continued to leverage the ESG expertise of our suppliers in Nigeria. Our key sugar supplier in Nigeria has been accepted as a Bonsucro member and has secured 100% sustainably sourced sugar for our local operations since 2024. At the same time, an additional sugar supplier has committed to advancing its sustainable sourcing practices and is currently delivering sustainably sourced sugar for at least 50% of the crops purchased, with a clear roadmap to achieve 100% coverage by end of 2026.

For more information on our capability building programs please check also our website:

 [Read about Capacity building and collaboration](#)

Last but not least, starting in 2017, we run on annual basis local workshops with key suppliers, where we exchanged views on sustainability and explored how we can work together to achieve climate neutrality. The input from these targeted discussions has been collected and we assess these ideas further to create joint actions that promote sustainability aspects in respective countries.

Reporting grievances

We have a Whistleblowing Policy, including a Speak Up ethics and compliance line.

The Speak Up! line, managed by an independent third party, is available across the Coca-Cola HBC Group in 26 languages. It is accessible 24 hours a day, 7 days a week, via phone or internet. The Speak Up! line is available to all employees, contractors, customers and suppliers and gives our employees and partners a secure and confidential method to report concerns or ask questions regarding our Code of Business Conduct, Anti-Bribery Policy and other Group compliance policies, including the Human Rights Policy, if they believe that a human rights impact has or might occur.

In 2025, we held our annual awareness campaign on Speak Up including communication about the Speak Up! line to employees and contractor workers.

Our Whistleblowing Policy is complemented by local grievance procedures that set out the process by which employees can raise any concerns to the appropriate level within the Company.

In 2025, we will continue with our annual communications on the Speak Up! line to all employees and contractors, as well as through our onboarding process for new employees.

Measuring effectiveness

To assess the effectiveness of the measures taken by Coca-Cola HBC in ensuring that modern slavery and human trafficking is not taking place in Group businesses or supply chains, we shall continue to review and report on our activities in every subsequent Modern Slavery Act Statement.

Our key performance indicators enable us to track progress year-on-year and identify areas requiring further attention. While overall supplier ESG and labour-rights performance has continued to improve, our assessments highlight ongoing challenges in specific geographies and categories.

These insights inform our supplier engagement strategy, including targeted training, corrective actions and deeper collaboration with suppliers facing higher risks, ensuring that our effectiveness measures translate into meaningful improvements in practice.

In regard to our supply chain, we shall continue to report on the following key performance indicators:

1. Acceptance of our Supplier Guiding Principles by our suppliers;
2. More than 90% of spend internally evaluated annually; and
3. Percentage of spend locally procured.

We have introduced in 2023 two new performance indicators as below.

4. Percentage of Tier 1 (T1) suppliers screened for ESG risks.
5. Percentage of significant T1 & Tier 2 (T2) suppliers assessed for ESG performance.

Additionally, we provide the following information, which is available on our Corporate Website.

6. Percentage of significant Tier 1 (T1) suppliers assessed for sustainability risks, including human rights risk in any reference year;
7. Number of significant non-tier 1 (T2) suppliers assessed for sustainability risks, including human rights risk in any reference year; and
8. Percentage of the total T1 & T2 significant suppliers where high risk is identified.
9. Percentage of T1 & T2 significant suppliers participating in capacity building programs.

We ensure 100% of our suppliers have accepted our Supplier Guiding Principles by using our 'SGP Coverage Triangle' with three checkpoints throughout the procure-to-pay process.

 [Read about Corporate website](#)

 [Read about Mission 2025](#)

 [Read about Supply Chain](#)



* RFX: Request for Proposal, Quotation or Information

Training and development

All new Coca-Cola HBC employees, including national security leaders and managers, receive Code of Business Conduct (COBC) and anti-bribery training. All new employees are also required to acknowledge and commit to comply with the Code and related policies, including the Human Rights policy.

In April 2021, a new consolidated e-learning programme on our Code and Anti-Bribery Policy was launched to all employees. The course comprises a preliminary questionnaire on COBC and Anti-Bribery Policy as a knowledge test for our employees and acknowledgement and re-commitment to compliance with the Code and its related policies, including the Human Rights Policy. By the end of the last training wave in December 2024, 95,8% of the total population had passed the course and we continue to train every newly hired employee. As in the past, this training will be a regular requirement for all employees.

Most on-site security personnel are employees of contracted partners, who are also required to abide by Coca-Cola HBC's Supplier Guiding Principles and all other applicable Company policies as per their contract. They receive relevant information as part of their induction.

We have a guide to the Human Rights Policy for managers, and in 2024 we relaunched an e-learning module to help all employees understand their role in ensuring compliance with the Policy; by end of 2024, 499 employees had completed it resulting in 58% completion rate against the target.

 [Read about Human Rights Policy](#)

Training effectiveness

The effectiveness of our training programmes is assessed through completion rates, periodic refresh requirements, feedback from participants and observations from audits and supplier engagements.

As to training for our staff, see also the initiatives described under Capacity Building and Collaboration above.

Continuous improvement

Addressing modern slavery risks is an ongoing process. We recognise that the identification of risks and challenges reflects active engagement rather than failure, and we remain committed to strengthening our approach through improved transparency, enhanced supplier collaboration and regular review of our policies and practices.



Board Approval

This statement has been approved by the Coca-Cola HBC Northern Ireland Limited's board of directors and signed by one director, who will ensure it is reviewed and updated annually.



Simon Fitzpatrick

Managing Director

Coca-Cola HBC Northern Ireland Limited

Dated: 29th May 2026