ENTER

THE COCA-COLA COMPANY

INTEGRITY

The Essential Ingredient
Code of Business Conduct

Table of Contents

3 Be Aware
4 Why We Have a Code
5 Who Is Covered Under the Code
6 What You Need to Do
7 How to Make Good Decisions
8 Your Local Ethics Officer
9 Reporting Concerns

11 Protect What Is Ours
12 We Protect Non-Public Information
13 We Safeguard Company Assets
15 We Maintain Accurate Records
16 We Prevent Money Laundering

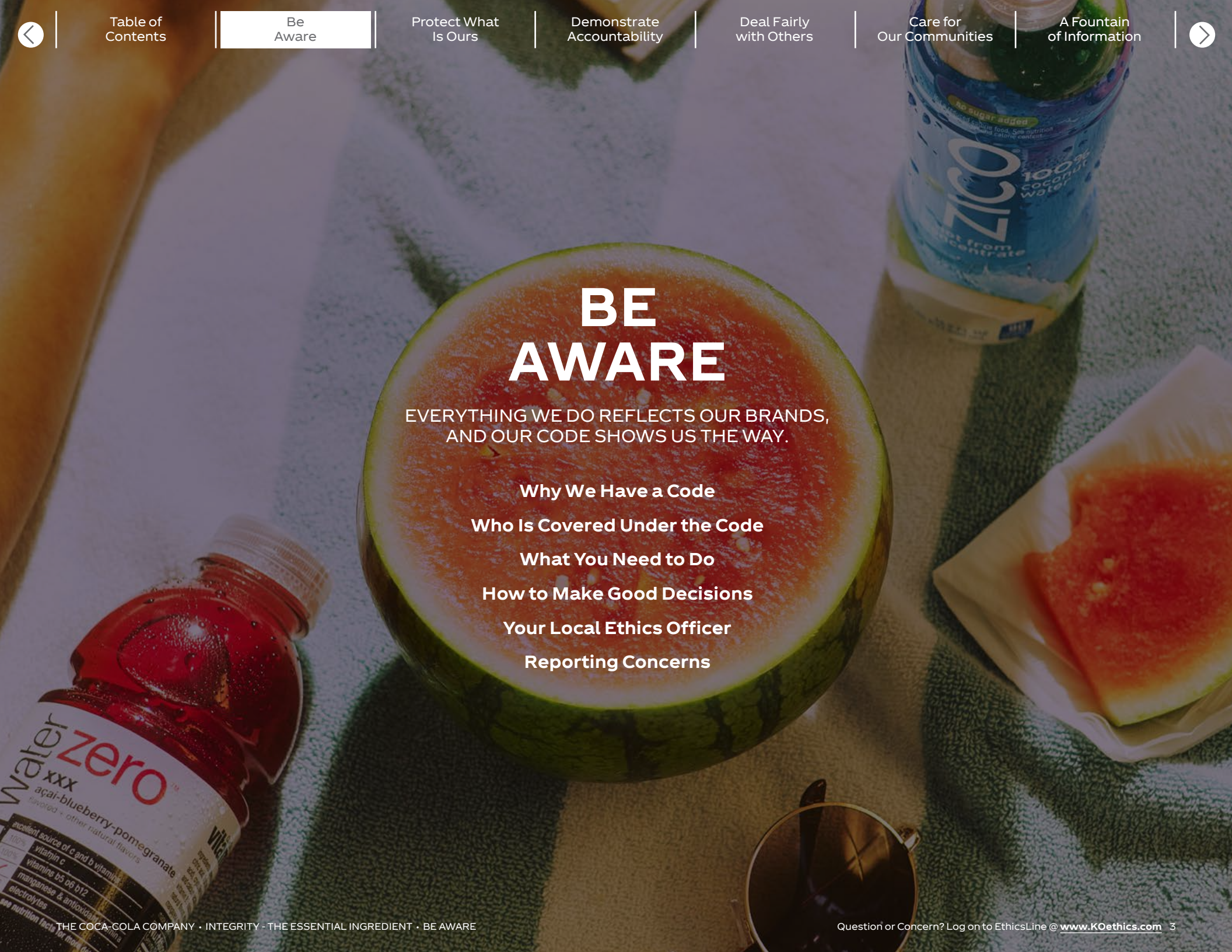
17 Demonstrate Accountability
18 We Avoid Conflicts of Interest
22 We Are Responsible with Gifts, Meals and Entertainment
25 We Build Transparent Relationships

26 Deal Fairly with Others
27 We Compete Fairly
28 We Comply with Trade Compliance Laws
29 We Do Not Tolerate Bribery
30 We Do Not Trade on Inside Information
31 We Follow Privacy Laws

32 Care for Our Communities
33 We Respect Human Rights
35 We Show That We Care

38 The Last Drop

39 A Fountain of Information
40 Glossary
41 Resources



BE AWARE

EVERYTHING WE DO REFLECTS OUR BRANDS, AND OUR CODE SHOWS US THE WAY.

Why We Have a Code

Who Is Covered Under the Code

What You Need to Do

How to Make Good Decisions

Your Local Ethics Officer

Reporting Concerns

Why We Have a Code

What makes Coca-Cola one of the most admired brands in the world? It is not just our products. It is also how we do our work and the integrity of our actions. Ingrained in our culture, integrity inspires our work and strengthens our reputation as a Company that does extraordinary things and always does what is right. Integrity is the essential ingredient to our success.

Sometime, you might face a situation where the right thing to do is not obvious. That is where our Code of Business Conduct can help. It is always here as your guide to preserving our reputation and living our values. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear.

How Can the Code Help You?

The Code enables you to...

- **Conduct yourself honestly and ethically.**
- **Uphold our values and protect our reputation.**
- **Understand what Coca-Cola expects from you.**
- **Make good decisions every day.**
- **Comply with the laws, regulations and standards that apply to our Company.**
- **Understand where to go for assistance or guidance if you have questions.**

Administering the Code

The Ethics & Compliance Committee is responsible for administering the Code in an independent, objective and consistent manner. The Committee is made up of a group of senior Company leaders who enforce the Code, and it is overseen by our Chief Financial Officer, General Counsel and the Audit Committee of the Board of Directors.

Policy Modifications and Waivers

We realize that the Code will not cover every possible circumstance, especially when issues arise with contracts or local laws. So our Company may modify the Code, as necessary. Any waivers of the Code, however, must be approved by the Board of Directors or the Board's designees. In the extremely rare situation that a waiver is approved, we will quickly and properly disclose it where required by law.

Who Is Covered Under the Code

It does not matter where you work or what you do for the Company – you have a responsibility to use good judgment and follow our Code. That includes every full-time or part-time employee at every level of the Company, all the way up to the executive suite. The Code also applies to controlled subsidiaries and entities in which the Company either owns a majority interest or manages operations (all of the above are referred to throughout this Code as "the Company"). All employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code.

Anyone who works on the Company's behalf (including suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Code when providing goods and services to the Company or acting on our behalf. Suppliers, as a condition of working with us, must comply with our Supplier Code of Business Conduct and our Supplier Guiding Principles.

Uphold the Law

Laws and regulations can vary widely from country to country. Because our Company is incorporated in the United States, our employees around the world often are subject to U.S. law in addition to the laws of the country where they work. Because we operate in over 200 countries, knowing which laws to follow can be complicated, so be sure you know the laws and regulations related to your job in the country (or countries) where you do business. Sometimes local customs or practices can conflict with our Code or the law. In cases like these, follow the law and our Code. Contact local legal counsel for guidance.

Your Rights as an Employee

While we expect you to follow our Code, we also recognize your rights as a Company employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the law.[1]

When a Code Violation Occurs

When one of our employees fails to follow our Code or applicable laws, ignores someone else's failure to follow the Code or pressures someone else to violate the Code, a violation has occurred. This can harm the Company's reputation and our bottom line.

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension without pay, loss of merit increases or annual incentives, and termination of employment. If an act violates the law, it could result in fines or criminal prosecution. Code violations are also documented in your employee record.

The Company has other policies and processes governing performance, conduct and behavior. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

[1] The Coca-Cola Company remains committed to both the physical and digital security of its employees' personal information as well as the enforcement of the security obligations of its custodians. For US-based employees, the term "employee information" should not be construed to prevent or discourage the Company's employees from disclosing or sharing information related to their wages, benefits, or terms and conditions of employment to exercise their rights under applicable law, including for the purpose of engaging in protected concerted activity under Section 7 (29 U.S.C. 157) of the National Labor Relations Act. Notwithstanding this, employees may not disclose sensitive employee information about others (such as medical information, government issued identification numbers, background check information and bank account information) that is entrusted to them in performing their job duties for the Company, except as may be required for legitimate business purposes. Similar rules may be applicable to employees in other countries as well.

What You Need to Do

As employees, each of us has as a responsibility to ...

Know and live the Code. Read it and follow it, along with any other policies that apply to your job.

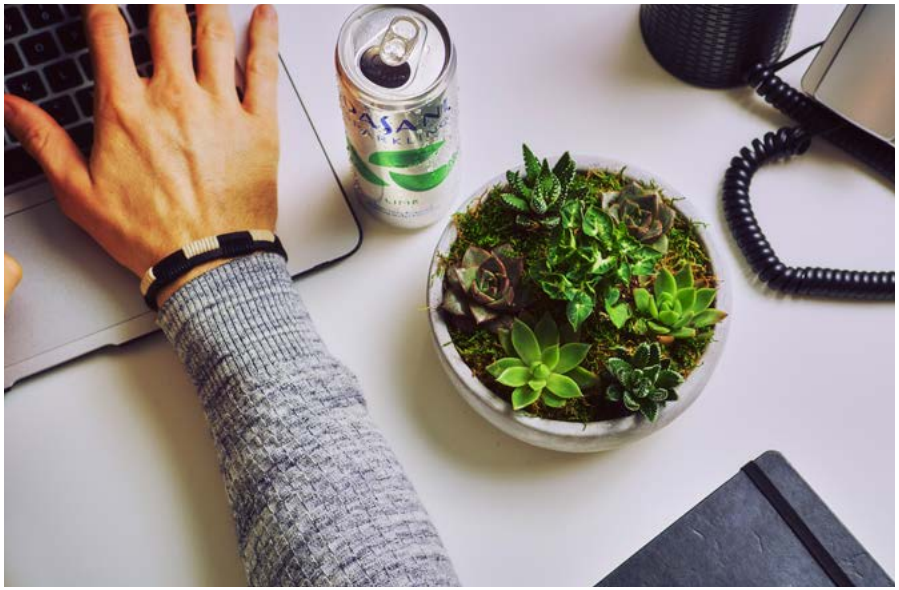
Think before you act. Use good judgment, being honest and ethical in every action you take. If you are asked to violate the Code, do not do it. Report the concern as soon as possible using the resources available to you.

Follow the law. Understand laws that apply to your job and our business. If you are ever unclear about a law or regulation, contact **Company legal counsel**.

Ask for help. When an answer is not clear, ask for guidance before taking action.

Stay alert. Pay close attention to any activity that is inconsistent with our Code, our policies or the law.

Report concerns. Do not ignore a violation. Prevent harm to our Company and its reputation by **reporting your concerns** immediately.



If you are a manager, you have additional responsibilities ...

Model the Code and our values. Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything you say and do. Never encourage or direct any employee to achieve a business result at the expense of violating our Code or the law.

Talk about the Code. Read the Code and understand it. Refer to it, your Local Ethics Officer or the Ethics & Compliance resources on Connect to answer questions. Make ethics conversations part of your routine.

Be informed. Recognize that you may not always find the answers that you need in the Code, so know where to go for answers when there are questions.

Expect the best. Discuss the importance of ethics and compliance and let employees know you expect them to always do what is right.

Be responsive and create a "speak up" culture. Encourage employees to come to you with questions or concerns. Listen to them carefully and offer guidance when they need help, including identifying available resources for reporting. Also, be careful not to create an environment where employees feel they can **only** bring concerns to local management.

Take action. Look out for misconduct and report it to your manager, Local Ethics Officer, **Ethics & Compliance Office** or **EthicsLine** if you see it.

CONSIDER THIS

"We really can't miss the quarter."

"Let's keep this to ourselves."

"Nobody needs to know about this."

Comments like these can create a misunderstanding for employees who hear them. Be sure to couple messages about meeting business goals with a reminder that we can only do so ethically. Also remind employees of the many resources available for expressing their concerns.

How to Make Good Decisions

Doing what is right is our goal. If the right thing to do is not clear, ask yourself:

Is it consistent with our Code?

Is it legal?

Does it follow our policies?

Does it benefit the Company as a whole – not just a certain individual or group?

Would I be comfortable if my actions were made public?

If you can answer "**YES**" to all of these questions, the action is probably okay. But any "no" or even "maybe" answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure. Contact any of these resources:

Your Manager	**Your Local Ethics Officer**	**The Ethics & Compliance Office**	**EthicsLine**

Your Local Ethics Officer (LEO)

Think of your **LEO** as a keeper of the Code – a resource for you if you have questions or want to raise a concern. In some situations, you will need written approval from your Local Ethics Officer before you take action. Examples of situations that may require written LEO approval: [2]

- **Use of Company assets**
- **Conflicts of Interest (or the appearance of a conflict)**
- **Gifts, Meals and Entertainment**

Some situations are ongoing over a long period of time and will require approval at least annually, when circumstances change or at other more frequent intervals as required by the LEO.

Who Is my Local Ethics Officer?

The Company appoints an employee to support each operation as its Local Ethics Officer. LEOs are authorized to give written approvals and offer guidance on ethics and compliance issues.

How Can I Reach my LEO?

All Local Ethics Officers are listed on the Ethics & Compliance intranet site.

How Do I Get Approval?

When seeking approval from your LEO, your best option is to use the online Local Ethics Officer Approval Tool. If you do not have access to the LEO Approval Tool, contact the Ethics & Compliance Office or your LEO for a hard-copy request form.

[2] The Company may implement technology solutions to facilitate approvals required by this Code. References in this Code to LEO Approval requirements will include approvals by any technology solutions approved by the Ethics & Compliance Office.

What if I Am a Local Ethics Officer and Need Approval?

For LEOs:
When a LEO needs approval under the Code, if an approved technology solution is not available, approval must come from the Local Ethics Officer at the next level up in their organization or from the Chief Ethics & Compliance Officer.

For Executive Officers:
The Chief Ethics & Compliance Officer serves as the Local Ethics Officer for Executive Officers; however, approvals of certain types of conflicts and use of Company assets will require written approval by the CEO or the Board of Directors.

Reporting Concerns

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies or the law. If so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened.
You also help build trust with each other and with our **customers**, our **suppliers** and **other business partners**.

How Do I Share Concerns?

For Code matters:

Talk to either:

- **Your manager**
- **Your Local Ethics Officer**
- **The Ethics & Compliance Office**

Or contact:

EthicsLine

This reporting service is run by an independent third party, is available 24-7 and allows you to remain anonymous, where permitted by law. You may either call or report online. Translation services are also available.

To reach EthicsLine: Visit www.KOethics.com

or Call toll-free using the access code for your country, which can be found on the website.

Special note for the European Union: Many countries in the European Union limit the types of reports you can make to EthicsLine. Find out about these limitations on the Ethics & Compliance intranet and the EthicsLine website.

For legal inquiries:
Contact local legal counsel

For possible criminal matters:
Contact local strategic security

For accounting and finance policy and procedure inquiries:
Contact local senior finance personnel

Reporting Concerns continued

What Happens When You Report a Code Concern

You may choose to remain anonymous, where permitted by law.

If you do give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.

We take every report seriously and our Corporate Audit Department Code investigation team (or a delegate for locally-managed or other matters) will investigate it thoroughly and as confidentially as possible.

We expect everyone involved to cooperate fully and honestly.

To ensure consistency in analyzing matters that arise all over the globe, outcomes from the investigation are presented to the Ethics & Compliance Committee (or its delegate for locally-managed matters) who will determine, based on the investigatory facts presented, if there has been a violation of the Code.

If the Ethics & Compliance Committee determines that the Code has been violated, it will determine a fair and consistent disciplinary action in accordance with applicable law.

Those found to have violated the Code can seek reconsideration in accordance with our Guidelines for Handling Code of Business Conduct Matters.

For more information on the Code investigation and decision-making process, consult our Guidelines for Handling Code of Business Conduct Matters.

No Retaliation

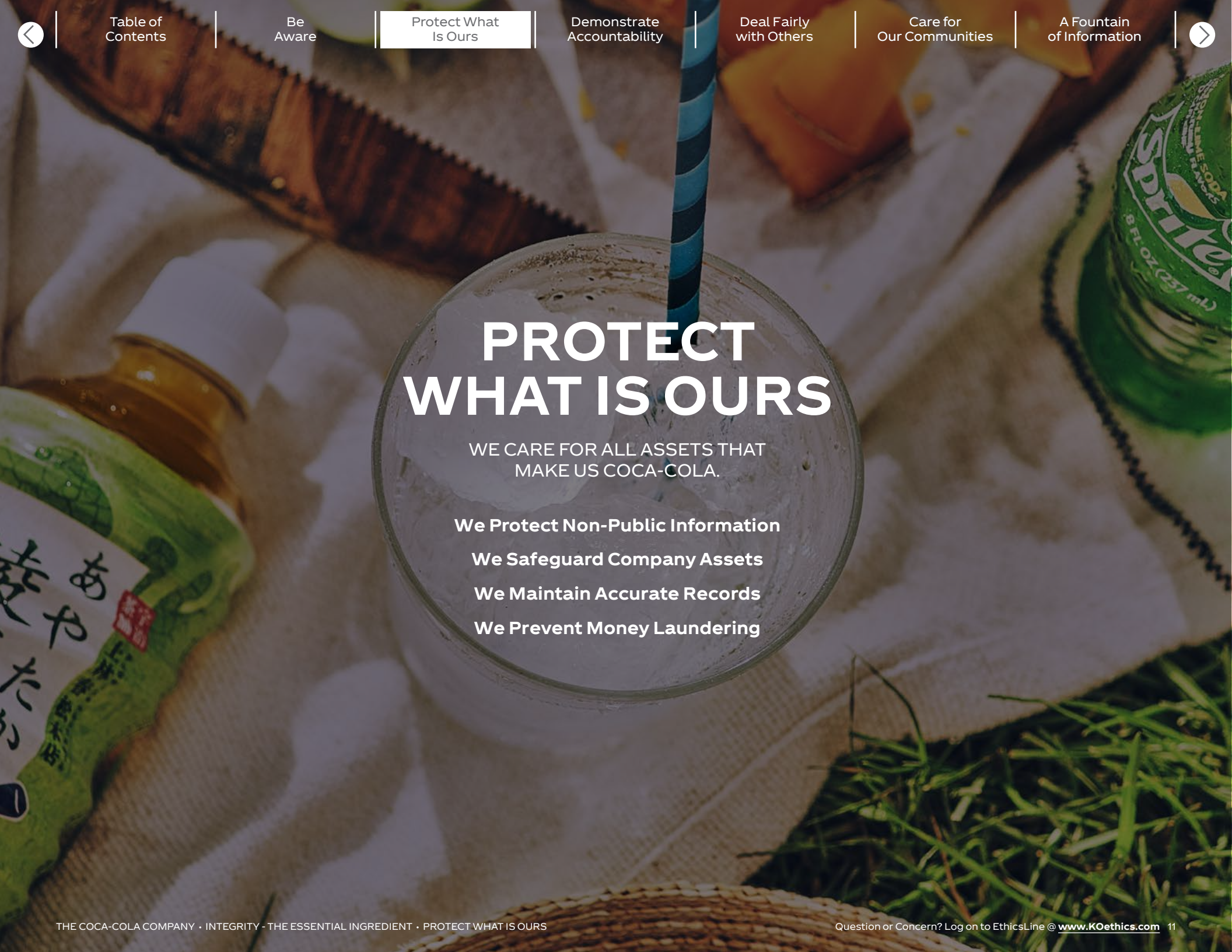
You are the eyes and ears of our Company, and we value your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

What is Retaliation?

We define retaliation under our Code as any action that would likely deter someone from reporting a Code concern or participating in a Code investigation. Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, threats, harassment or any other action taken against someone because they raised a Code concern, participated in a Code investigation, or attempted to deter someone from violating the Code. While we take the anti-retaliation provisions of our Code very seriously, these provisions do not protect you from disciplinary action for your own misconduct, meaning you should not report a Code concern simply to avoid discipline for your own violation of the Code or other Company policy.

No False Accusations

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale. Report what you have a reasonable, good-faith belief be true, but never knowingly make a false accusation, lie to investigators or refuse to cooperate in an investigation, as these actions may also violate our Code.



PROTECT WHAT IS OURS

WE CARE FOR ALL ASSETS THAT MAKE US COCA-COLA.

We Protect Non-Public Information

We Safeguard Company Assets

We Maintain Accurate Records

We Prevent Money Laundering

We Protect Non-Public Information

What We Believe

The formula for Coca-Cola is one of the best-kept secrets ever. We are good at keeping this and a lot of other non-public information confidential. This is because we understand that protecting the non-public information about our Company helps us maintain our competitive advantage and preserve our reputation as the industry leader.

How We Live It

Our responsibility when it comes to information is:

- **Knowing the kinds of information considered confidential.**
- **Knowing the ways to protect it.**

We consider any **non-public information** about the Company as well as certain information about our customers, suppliers, other business partners or consumers that you may have (or access) as part of your job, to be confidential information. It can be written, spoken or electronic.

WHAT IS NON-PUBLIC INFORMATION?

Non-public information about our Company can include ...

- Business plans, product formulas, marketing strategies and new product launches
- Financial information such as pricing, proposals and product costs
- Operational information such as major management changes and plans for mergers and acquisitions

We use a classification system to identify and protect non-public information. Details about information classification can be found in the Information Protection Policy.

Share non-public information only with those who have both the authorization to access it and a need to know the information in order to do their jobs. Take appropriate steps to protect classified information such as asking companies or individuals outside of Coca-Cola to sign a confidentiality agreement before gaining access to our information and follow other rules described in the Information Protection Policy. If you are not sure whether information can be shared or how to share it, ask your manager or Company legal counsel.

What Else Can You Do?

Watch what you say. Sharing non-public information with friends or family, or discussing it in public places such as elevators, public transportation and restaurants or on social media can put that information at risk of being disclosed (and possibly misused). Do your part to keep it safe. (Note that this is not intended to limit or interfere with your rights under the law – see the **Your Rights as an Employee section**).

Remember: your duty regarding non-public information lasts beyond your employment. Your commitment to protect non-public information applies to work you did before you came to the Company, and it applies when you leave. Never share non-public information from your former employer(s) – or ask others to do so – and, if you leave Coca-Cola, do not share our non-public information with others.

ONE MORE SIP

Information Protection Policy

Confidentiality Agreement and Procedures

Personal and Sensitive Personal Information

Pop the Question

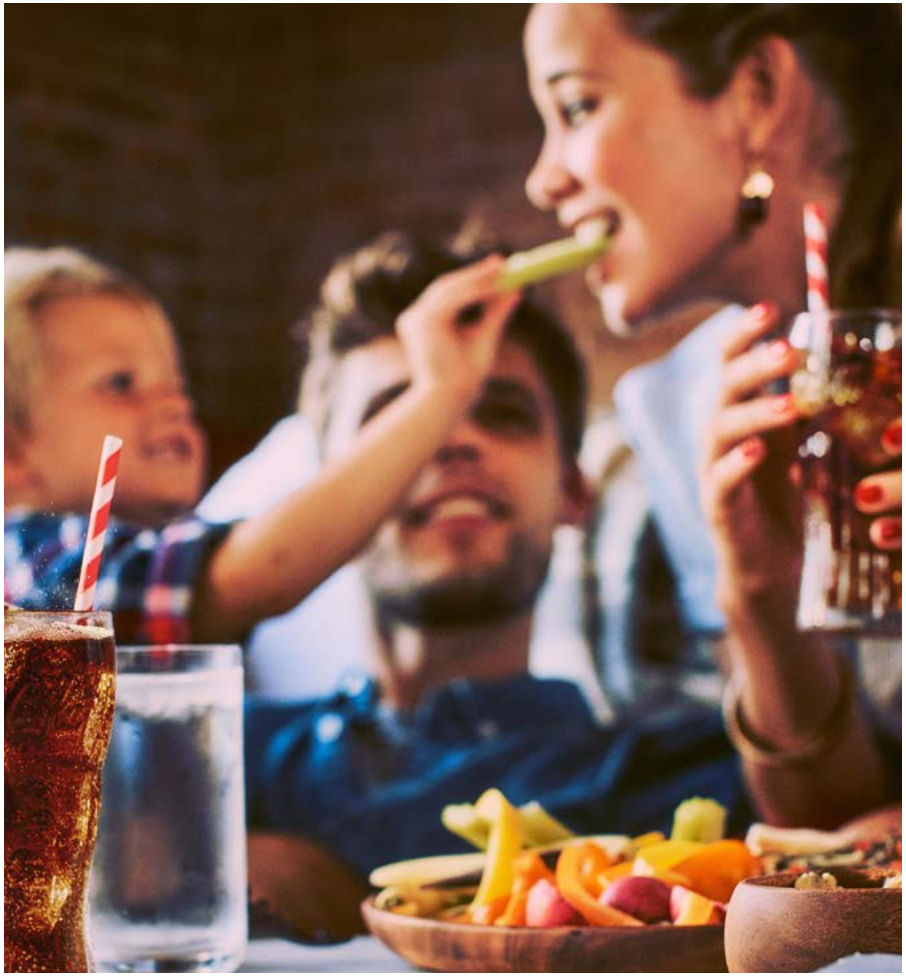
Q My supervisor travels a lot and is very busy. During one of her business trips, she asked me to log into a Company system that has highly restricted information using her user ID and password to retrieve some reports that I would not otherwise have access to. Is that okay?

A No. It is against Company policy to share passwords. Also, access to highly restricted information should be limited only to those who are authorized to have access. You should refuse the request and remind the supervisor that you do not have access to this system and this information due to its sensitivity. Immediately report this to your manager, your Local Ethics Officer, the Ethics & Compliance Office or EthicsLine, any of which can help you address this situation properly. In instances where you would otherwise be authorized to access the information, steps should be taken to provide you with appropriate access without using the password of another user.

We Safeguard Company Assets

What We Believe

The buildings we work in, the technology that connects us to others, the ideas we develop, the emails we exchange, the Company tickets we offer, the vehicles we use to deliver our product, the computers and mobile devices we use to do our jobs ... all of this and more are **Company assets** that we are each entrusted to protect. We use them to carry out Company business and must protect them from damage, loss, misuse and theft.



How We Live It

Do not use Company assets:

- **For an outside business or other personal gain**
- **For anything illegal or unethical (such as access to – or dissemination of – pornographic or offensive subject matter)**

Personal use of some assets, within reason and as allowed by local policies and procedures, is permitted, but your use should be appropriate, infrequent, lawful and never interfere with the time, talent and passion you, or any other employees, bring to work. Personal use may require LEO approval.

Physical assets - Physical property and resources are made available to each of us to help us do our jobs. When you safeguard the Company's assets, you safeguard our ability to grow and to thrive. Never lend, sell or give them away unless you are authorized to do so.

Electronic assets - We count on every employee to appropriately utilize electronic assets (including computers, hardware, software, mobile devices and other media). You can do your part by following our policies and using good judgment. Be aware that any information you create, share or download onto Company systems belongs to the Company, and we reserve the right to monitor system use at any time, to the extent permitted by law.

Intellectual property (IP) - Patents, copyrights, trademarks and trade secrets are also valuable Company assets. Protect IP with a passion, and remember that the Company owns any work product (such as ideas, processes and inventions) that you develop or design in your work with us to the extent permitted by law. That ownership continues even if you leave our Company.

Did You Know?

- **Loans from the Company to any employee are discouraged and must be approved by the Board of Directors or its designee. Loans to executive officers are prohibited.**

We Safeguard Company Assets continued

What Else Can You Do?

Observe good security practices. Use care with any property that has been issued to you (such as keys or building access cards), and do your part to prevent misuse, unauthorized use, or access to our facilities.

PROCESS POINT

The use of any Company assets outside of your Company responsibilities – for example, using a Company computer to take a class, a piece of equipment for a home project, or Company tickets for personal reasons (excluding those properly accessed through our ticket management system) – requires advance written approval from your Local Ethics Officer. This approval must be renewed annually if you continue to use the asset outside of work.

ONE MORE SIP

Acceptable Use Policy

Local Ethics Officer Approval Tool

Pop the Question

Q The senior leader of my organization asked for my help in organizing a small silent auction for a fundraiser to benefit a charity that she supports but which is not sponsored by the Company. She will be inviting everyone from the department to attend, and she will be hosting it in Company conference space. Is this an appropriate use of Company assets?

A No. Even though well-intentioned, these actions would constitute a misuse of Company assets. It might also be a violation of other Company policies depending on your location. You should let this leader know that you cannot assist her in this capacity. If you feel uncomfortable telling her "no," you should consult with your Local Ethics Officer or the **Ethics & Compliance Office**.

Q I work at a distribution facility and need to move some furniture out of my apartment. The Company has a small, wheeled platform that would help make moving easier. Can I borrow it for a day?

A It depends. Any use of a Company asset like this for a personal reason would require approval by your Local Ethics Officer.

Q I am an Account Manager and acquired two Company-owned tickets for a customer and myself to attend a sold-out concert of a popular band playing in town. At the last minute, however, my customer tells me he cannot attend. Can I still use the tickets myself?

A You should make every reasonable effort to find a business use for the tickets first. Check with your manager and other colleagues to see if they might know of an appropriate business use. If not, you should check with your **Local Ethics Officer** and any rules or policies applicable to usage to see whether personal use is an option or if the tickets should be disposed of another way and to obtain all necessary approvals. At all times, remember to be honest and transparent about the use of the tickets.

We Maintain Accurate Records

What We Believe

Accurate recordkeeping and reporting helps us meet our legal and regulatory requirements. Maintaining financial integrity also reflects positively on our reputation and credibility. Each of us – at every level of our Company – has a responsibility for ensuring the accuracy of all Company business and financial records.

How We Live It

From resumes, time sheets and benefit claim forms to expense reports, quality assurance records, budget forecasts and regulatory filings, we all handle Company "records." Be sure to follow all internal processes, policies and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate and complete in what you record.

What Else Can You Do?

Properly classify transactions. It is important that we never distort the true nature of any transaction. Make sure you always record and classify transactions in the proper accounting period and in the appropriate account and department. Never speed up or slow down the recording of a revenue or expense in order to meet a budgetary goal.

Maintain our high standards. We do not falsify or mischaracterize any record, account or transaction. And we cannot establish any undisclosed, unrecorded or off-the-record accounts for any purpose. If you submit expenses for reimbursement or make payments on behalf of our Company, include any supporting documentation and approvals that are required. Estimates and accruals must also be supported by appropriate documentation and based on your best judgment.

CONSIDER THIS

"Make the numbers work."

"Hold that sale until next month so we can meet next quarter's target."

"Punch my timecard for me because I am running a little late."

Hearing comments like these? Stop and seek help. If it sounds illegal or unethical, it probably is.

Be honest with regulators. If your job requires that you disclose information to the government or regulatory authorities, make sure the information you provide is full, fair, accurate, timely and understandable.

Manage records properly. Know and follow the policies that relate to maintenance, storage and disposal of records. Never destroy or dispose of information that might be needed for an investigation, an audit or a legal proceeding. If you receive a legal hold notice, follow the guidelines in the notification. And, if you are not sure about what is required, check Legal Counsel and our document retention policy

Pop the Question

Q Our team did not utilize all of our approved project budgets this year. In order to maintain this level of funding in the future, is it okay to ask a supplier to pre-bill us this year for one of next year's projects, referencing a current-year purchase order?

A No. Doing this would falsify expenses recorded in our books and records, misrepresenting the timing of actual spend. The law requires us to maintain accurate records and management relies on accurate financial records to steward the business and make decisions. This action would constitute a violation of our Code.

Q I work in Quality. During a very busy time, I documented that certain tests were performed even though I was not able to complete them. The test usually works fine so the risk of a problem seems very low. Is this a reasonable approach?

A No. Our customers and consumers trust the quality of our products, so we should never cut corners or misstate results. Falsifications of this nature represent a Code violation.

Q I work in Sales and am currently trending below my volume target. I was thinking about asking a customer to order product that they do not need now, telling them that they can always return it after the period closes. Is this okay?

A No. Manipulating the recording of revenue would violate our Code. The request would likely also put the customer in a terrible position that could damage the relationship.

We Prevent Money Laundering

What We Believe

We would never knowingly look the other way when it comes to illegal activities, but we understand that criminal activity like money laundering may not always be obvious, so it is important that we work to reduce our exposure and speak up about anything suspicious.

How We Live It

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin. We are committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so we comply with anti-money laundering, financial crime and anti-terrorism laws in all countries where we operate.

We take the time to know our **suppliers** and **other business partners** and the reputations they have for following the law, by performing appropriate due diligence and screenings.

Be proactive when it comes to spotting financial transactions that might signal a problem, and report your concern if you see or suspect an activity or transaction that is outside of normal process.

CONSIDER THIS

Red flags may include a request to ...

Transfer payment to or from entities or countries not related to the transaction

Process a transaction in a way that circumvents the normal process

Exchange many small-denomination bills for a large one

Make payments in cash

Red flags are a signal to ask more questions to better understand the transaction. If it sounds suspicious, speak up – awareness is the key to combatting money laundering.

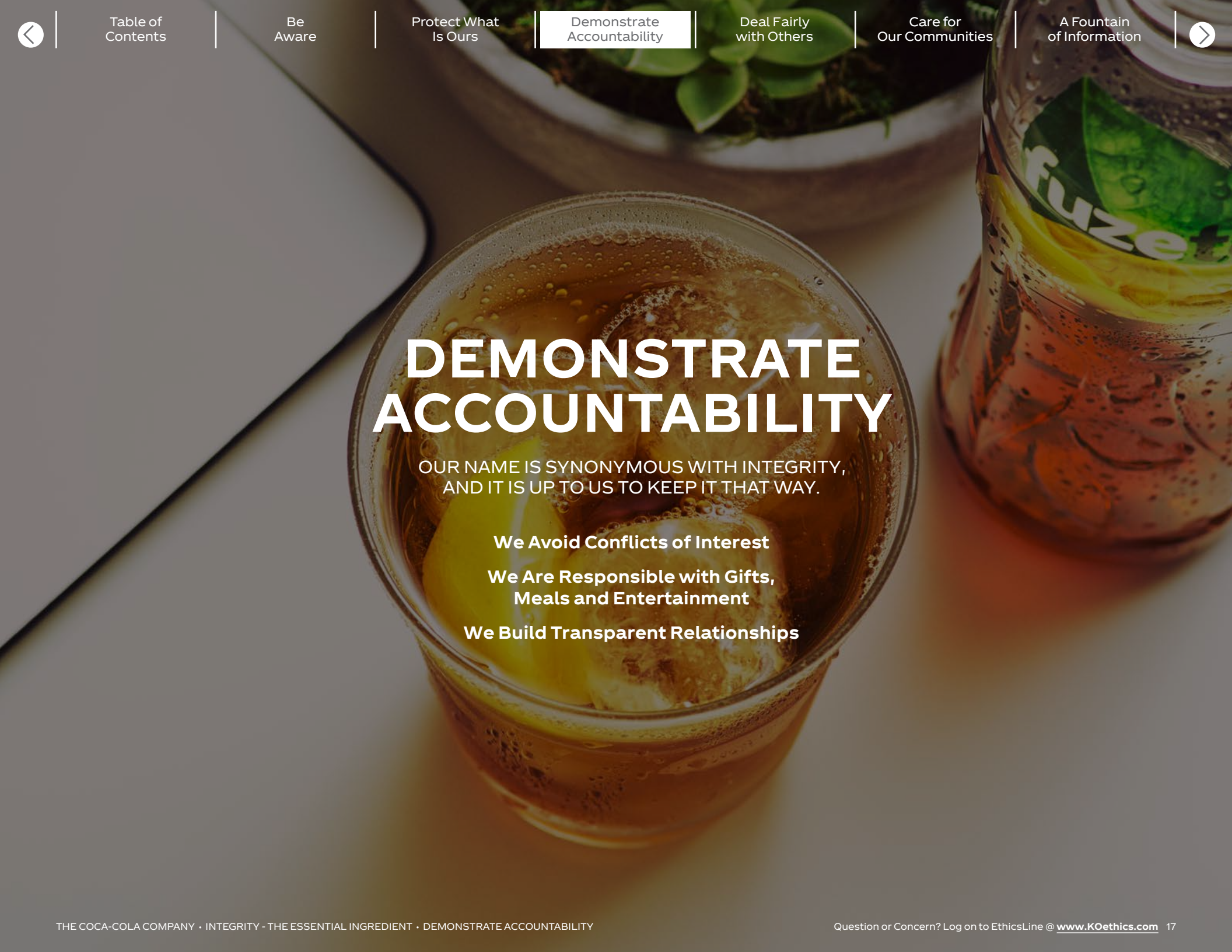
What Else Can You Do?

Be alert. Large cash payments or unusual fund transfers to or from foreign countries? Customers or suppliers who provide incomplete information or avoid recordkeeping requirements? These could be warning signs. Know the types of transactions and activities in your department that are more susceptible to acts of money laundering and require increased monitoring. Report any unusual activity to your manager, Local Ethics Officer, Ethics & Compliance Office or EthicsLine.

PROCESS POINT

One of the best ways to prevent money laundering is to comply with our due diligence screening procedures .

Request for third-country payments: We do not make it possible for others to avoid taxes or local currency laws. That is why, in general, a payment to a supplier should be made only to the person or company that actually provides the good or service, in a country where the supplier either does business or has sold goods or provided services to our Company. Exceptions to this policy must be approved by the Ethics & Compliance Office.



DEMONSTRATE ACCOUNTABILITY

OUR NAME IS SYNONYMOUS WITH INTEGRITY, AND IT IS UP TO US TO KEEP IT THAT WAY.

We Avoid Conflicts of Interest

We Are Responsible with Gifts, Meals and Entertainment

We Build Transparent Relationships

We Avoid Conflicts of Interest

What We Believe

We are all expected to act in the best interest of our Company. This means we must never allow our personal interests to influence our actions on behalf of the Company. Every decision we make while on the job must be objective and with our Company's business interests in mind.

How We Live It

In business, the line between personal and professional interests can become easily blurred. Separating the two can be challenging, especially when personal relationships, outside employment or investments are involved.

Before you act on the Company's behalf, you need to be able to recognize and avoid potential conflicts of interests. A conflict happens when you allow personal interests to interfere with the business decisions you make as an employee. Even the appearance of a conflict is inappropriate and can damage our Company and our reputation.

CONSIDER THIS

When someone says …

"Could you put in a good word for me?"

"No one needs to know – you can do the work in your free time."

"My nephew has a company …"

Be aware. These can be warning signs of a possible conflict.

Get to know the types of situations that can lead to conflicts or the appearance of a conflict. Potential conflicts should be disclosed and approved via the Local Ethics Officer Approval Tool.

What Else Can You Do?

Recognize potential conflicts. You may not realize right away that a situation may be a conflict of interest. Conflicts take many different forms, but very often they involve:

Personal Investments and Opportunities. In building your financial portfolio, you will find many companies in which to invest. Be aware that there are rules when these investments involve Company **suppliers**, **customers**, **competitors** or **other business partners**, especially if you deal with these organizations through your job. This would be a conflict, as would taking an opportunity for personal gain that you discovered through your work.

Did You Know?

- **If you have discretionary authority to deal with a supplier, customer or other business partner, you may not have any financial interest in that company without the approval of your LEO. If you have no discretionary authority with that company, you may own up to 1% of its stock, as well as up to 1% of the stock of a competitor.**
- **With your LEO's approval, you may own more than 1% of any customer, supplier, other business partner or competitor stock so long as you do not have discretionary authority.**
- **These rules apply to publicly traded and privately held companies. But, these restrictions do not apply to mutual funds or other investments that hold a broad range of companies where you do not control which companies are in the fund.**
- **Approvals under this section must be renewed annually if you continue to own the stock.**

We Avoid Conflicts of Interest continued

Outside Employment. Having a second job or consulting opportunity is permitted so long as it does not interfere with your ability to do your job with the Company.

Did You Know?

Before taking any second job or consulting opportunity with a customer, supplier, other business partner or competitor, you must seek approval from your LEO.

Outside Speeches or Presentations. We are often asked to speak at conferences or make presentations because we are Company employees or because of our expertise arising from our job responsibilities. A conflict can arise if you are offered payment or reimbursement of expenses in connection with this.

Did You Know?

Honorariums from our suppliers, customers and other business partners are prohibited, and those from other organizations are generally discouraged and should be declined. If you are unable to decline an honorarium, you should ask that a donation be made in your honor to a charity of your choice directly by the paying entity.

Before accepting an honorarium, other payment or reimbursement for expenses from any third party for outside speeches or presentations, you must receive approval from your LEO if:

- **Your speech or presentation is a part of your job with the Company.**
- **It describes your work for the Company.**
- **You are introduced as an employee of the Company.**

If your speech or presentation will discuss matters related to the Company, you may also need approval from your manager, **Public Affairs**, **Legal Counsel** and others regarding your content.

We Avoid Conflicts of Interest continued

Serving Other Organizations. Accepting a role as director, advisory member or officer for another organization may interfere with your obligations to the Company and create a conflict of interest. Approval from the **Ethics & Compliance Office** is required as outlined below. The Company generally discourages sitting on the board of a customer or supplier if you have discretionary authority in dealing with that customer or supplier as part of your job.

For-profit service: If you serve as a director, advisory member or officer of a for-profit company, you must disclose this service to the **Ethics & Compliance Office** and receive approval. Disclosure and approval is required on an annual basis with the exception of those circumstances where the Company requests that you sit on a bottler or equity investee board as part of your job for the Company. In such instances, approval is only required at the time of appointment in accordance with the Delegation of Authority.

Non-profit service: If you serve as a director, advisory member or officer of a non-profit organization and you have discretionary authority over whether money or other support will be provided on behalf of the Company to the non-profit, you must disclose this service to the **Ethics & Compliance Office** and receive approval on an annual basis.

Family-owned business or trade association/organization: Annual disclosure and approval by the **Ethics & Compliance Office** for service to a family-owned business or trade association is only required where the family-owned business or trade association is a customer, supplier or competitor of the Company.

Did You Know?

If you are offered a salary as part of your service, you may retain that salary.

- **If you serve as director of a bottler or equity investee at the Company's request, you may own up to one percent of their stock without Ethics & Compliance Office approval if stock ownership is a condition of your service.**
- **Unless your service as a director is for a bottler or equity investee or has otherwise been designated as having a legitimate business purpose for the Company, service to another organization is considered a personal activity and should not interfere with your ability to do your job with the Company, and time away from work to support this activity is subject to applicable time-off and vacation polices.**
- **Service as a director, advisory member or officer of a competitor requires annual Ethics & Compliance Office review and approval.**

Personal Relationships. Many of our employees may have **relatives** who work for, or have investments in, our **customers**, **suppliers**, **other business partners** or **competitors**. Having a personal relationship with any third party that you work with can suggest to others that you give preferential treatment to your friends and family. Conflicts may arise if either your relative interacts with the Company on the third party's behalf, or if you have discretionary authority in dealing with that third party. Occasionally, friendships you develop with individuals associated with our customers, suppliers or other business partners may also have at least the appearance of influencing your actions on behalf of the Company.

Did You Know?

- **You need the approval of your LEO if your relative works for, or has an investment in, a customer, supplier or other business partner, and either:**
  - **You have discretionary authority in dealing with the third party, or**
  - **Your relative deals with the Company on behalf of the third party.**
- **You also need the approval of your LEO if your relative works for, or has any investment in, a competitor – a relative may own less than 1% of stock in a competitor if it is a publicly-traded company without LEO approval.**
- **A relative can be a: spouse, sibling, parent, grandparent, child, grandchild, in-law or a same or opposite sex domestic partner. For the purposes of our Code, a relative can also be someone who lives with you, someone who is financially dependent on you, or who you are financially dependent upon regardless of familial relationship.**
- **Beyond the relative definition above, be careful that your relationships with other family members and friends do not interfere with your ability to make decisions on behalf of, or otherwise do your job for, the Company, as these other close relationships may also create a conflict.**
- **If you are unsure if a personal relationship creates the appearance of a conflict, contact your manager, Local Ethics Officer, the Ethics & Compliance Office or EthicsLine. Always err on the side of disclosure.**

We Avoid Conflicts of Interest continued

IS IT A CONFLICT? ASK YOURSELF ...

COULD MY PERSONAL INTERESTS OR RELATIONSHIPS INFLUENCE THE DECISIONS I MAKE?

COULD IT LOOK THAT WAY TO SOMEONE ELSE?

IF **YES**, IT IS PROBABLY A CONFLICT. SEEK GUIDANCE WHEN YOU ARE NOT SURE.

PROCESS POINT

If you feel you may be getting involved in a possible conflict of interest or the appearance of one, report it immediately to your Local Ethics Officer through the LEO Approval Request Tool or another technology solution approved by the Ethics & Compliance Office. Not disclosing a conflict is serious and could lead to disciplinary action.

ONE MORE SIP

Director Appointee Guidelines

Delegation of Authority

Employment of Relatives Policy

Pop the Question

Q Through my relationship with a supplier to whom I have recently awarded a contract, I became aware that this supplier is expanding and buying a smaller company. Based on the information gathered and the potential growth and opportunity, I would like to purchase stock in the supplier. Can I do this without approval given my current role with the Company?

A No. Since you have discretionary authority in dealing with the Company as part of your job, you may not have any financial interest in that company without prior written approval from your Local Ethics Officer. Additionally, this investment would be considered insider trading, which is a violation of the Code and the law.

Q I noticed that a customer's stock is doing well and would be a good personal investment for me and my family. Can I invest in the customer's stock since I have no contact with the customer as part of my job?

A Yes. If the investment is 1% or greater, you would need prior Local Ethics Officer approval. Since your current position does not involve contact with the customer, your request would likely be approved by your LEO and would require subsequent annual approvals.

Q I am responsible for planning a big meeting at our facility and need a caterer. Coincidentally, my sister just started a catering business. This event would be a big help to her. I know she would do a great job and offer great pricing. Can I hire her?

A No, not without approval from your Local Ethics Officer. Even though there may be legitimate reasons for hiring her, it could look to others that she was awarded the job just because she is your sister.

We Are Responsible with Gifts, Meals and Entertainment

What We Believe

We value the relationships we have built with our **customers**, **suppliers** and **other business partners**. It is important that these relationships remain positive and ethical – never influenced by offers of inappropriate gifts or hospitality.

How We Live It

The exchange of gifts and entertainment is nothing new in business. It is a traditional way to express gratitude and build relationships. But an overly generous gift can pressure the recipient to return the favor or feel indebted to the giver – with decisions that benefit the giver and create a conflict of interest or perception of a conflict of interest.

The Company's policy is simple. We do not exchange gifts or entertainment that look like an attempt to improperly influence a business decision. No matter if you are the giver or the recipient, you need to recognize when an offer is excessive under our policy.

It can be difficult to tell when a gift crosses the line, and laws and customs in different countries vary widely. That is where our position on gifts, meals and entertainment can help. Read the provisions in this section closely to learn what is or is not acceptable.

What Else Can You Do?

Just say "no." Decline gifts of any value from current or potential suppliers, customers or other business partners if it would create the appearance of a conflict of interest. And never request gifts, meals, entertainment or favors from these third parties – doing so is a violation our Code.

CAN I EVER ACCEPT A GIFT?

ONLY ACCEPT IF IT IS:

- **Modest in value**
- **A token item like a pen, t-shirt or logo branded item**
- **Symbolic, like a modestly-priced, inscribed trophy or statue**
- **Approved for a large group of employees**

DO NOT ACCEPT IF IT IS:

- **Given in exchange for some action**
- **Any value of cash or a cash equivalent, like a gift card or gift certificate**
- **In the form of stocks or securities**
- **More than modest in value**
- **Not available to others, like a special discount**

We Are Responsible with Gifts, Meals and Entertainment continued

Sometimes, you may not be sure if a gift is excessive or not, for example:

WHEN IT IS OKAY	WHEN IT IS NOT OKAY
AN OFFER TO GO TO LUNCH WITH A NEW SUPPLIER	AN EXTRAVAGANT MEAL FOR YOUR WHOLE FAMILY PAID FOR BY A SUPPLIER NOT IN ATTENDANCE
A GIFT BAG AT A SUPPLIER'S CONFERENCE FILLED WITH SNACKS AND SMALL TOILETRIES	A GIFT BASKET FILLED WITH AN EXPENSIVE ELECTRONIC FITNESS TRACKER, AMONG OTHER ITEMS, SENT TO YOU BY A SUPPLIER
A GOLF OUTING AND LUNCH AT A LOCAL COURSE WITH A SUPPLIER	AIRFARE AND ACCOMMODATIONS AT A GOLF RESORT
AN OFFER TO HAVE A DRINK WITH A SUPPLIER	A CASE OF FINE WINE
A SMALL DESK CLOCK WITH A SUPPLIER'S CORPORATE LOGO	AN EXPENSIVE WATCH

Do I need to do anything if I receive a gift? If you receive a gift that exceeds these limitations, you must contact your Local Ethics Officer for approval. Be mindful that there are some gifts that your Local Ethics Officer cannot approve, such as gifts of stock/securities, cash or cash equivalents.

But I might offend the giver! Sometimes it can be difficult to refuse a gift, especially if you are worried about insulting the giver or if you have been presented with a gift in front of a group. If you cannot decline the gift, accept it, but immediately notify your Local Ethics Officer, who will work with you to donate, distribute or raffle it among a large group of employees. Also, share our Company's rules regarding gifts with the giver to help prevent similar situations in the future.

What about meals and entertainment? Just as you do with gifts, do not accept meals or entertainment in exchange for some action. We recognize that sharing meals and entertainment is common in business, so you may accept occasional meals from customers, suppliers and other business partners if they also attend, and the costs are reasonable and customary.

Travel and Premium Events. If you receive an offer of paid travel to an out-of-town location or to a premium event like the Olympics, World Cup, Super Bowl or an award show, first, talk to your manager. Together you can determine if there is a good business reason for you to attend. Then, if there is a good business reason to attend, the Company should at a minimum pay for your travel (airfare and lodging) and any other expenses deemed appropriate by your Local Ethics Officer. Receipt of travel or premium event tickets should always be approved by your Local Ethics Officer.

We Are Responsible with Gifts, Meals and Entertainment continued

What about giving gifts, meals and entertainment? There are also times when you may need or want to provide gifts, meals or entertainment to a business contact. In these instances, be sure that the gift, meal or entertainment supports a legitimate business purpose and is reasonable and appropriate under the circumstances. Always be mindful that our business partners have their own rules on receiving gifts, meals and entertainment and never offer anything that would violate those rules and put the business partner in a potentially uncomfortable position.

PROCESS POINT

Depending on where you work, your local management team – in consultation with the Ethics & Compliance Office – may adopt more specific limits on what you may accept. You can find more information on the Ethics & Compliance intranet site.

ONE MORE SIP

Travel & Entertainment Policy

Local Rules

Pop the Question

Q An agency I work with knows that I am an avid skier. Before the holidays, they sent me ski equipment and clothing to use on my family vacation. This firm has worked for our Company for many years with good results, and everyone wants to continue the relationship. Can I accept the gift?

A No. A gift of this nature is lavish and clearly beyond what would be acceptable. It creates the appearance that we make decisions based upon what is given to us personally rather than what is best for the Company. Therefore, the gift must be returned.

Q A supplier invited me to go with him to a sold-out concert. Two days before the concert, his plans changed and he gave me the tickets so that I could take my spouse instead. Can I accept the tickets?

A No. In this situation, the tickets from the supplier are a gift. The event would be considered entertainment only if the supplier joined you for the concert. Since the tickets are of more-than-modest value, you cannot accept them without LEO approval.

We Build Transparent Relationships

What We Believe

Our **suppliers**, **customers**, **consumers** and **other business partners** place a great deal of trust in our brands and we are determined to never let them down. We see them as real partners – essential to our Company's growth and success.

How We Live It

Our relationships with our suppliers, customers, consumers and other business partners must be fair, positive and productive, always based on mutual trust and respect. Building these relationships is an ongoing process and requires an enduring commitment to high standards of business conduct. In every interaction we have with these third parties, we must demonstrate honesty and a commitment to our values.

Just one deceptive or dishonest act can seriously damage a relationship. So make sure you understand your responsibilities and always deal fairly with our suppliers, customers, consumers and other business partners.

Integrity is not a unilateral obligation – it is a responsibility we share with our suppliers and other business partners. That is why we require our suppliers and certain other business partners to adhere to our Supplier Code of Business Conduct. If you are responsible for a supplier relationship, help us ensure that we are only doing business with suppliers and other business partners who share our commitment to doing what is right by including contractual provisions regarding our Supplier Guiding Principles and, where applicable, supporting audits to ensure compliance.

What Else Can You Do?

Speak the truth. Everything we tell our customers, suppliers, consumers and other business partners must be truthful, including our product labels, advertising and other communications. Do not engage in any unfair, deceptive or misleading practices.

ONE MORE SIP

Privacy Policy

Supplier Code of Business Conduct

Treat them fairly. Be fair and honest in your interactions with customers, suppliers, consumers and other business partners. Avoid anything that even looks like a possible conflict of interest, and do not offer or provide anything to these business partners in exchange for an advantage for the Company.

Ensure their accountability. If you work with any supplier or other business partner, make sure they know about and uphold their commitment to our Supplier Code and any other policies. Hold them accountable for any violations that you see or suspect.

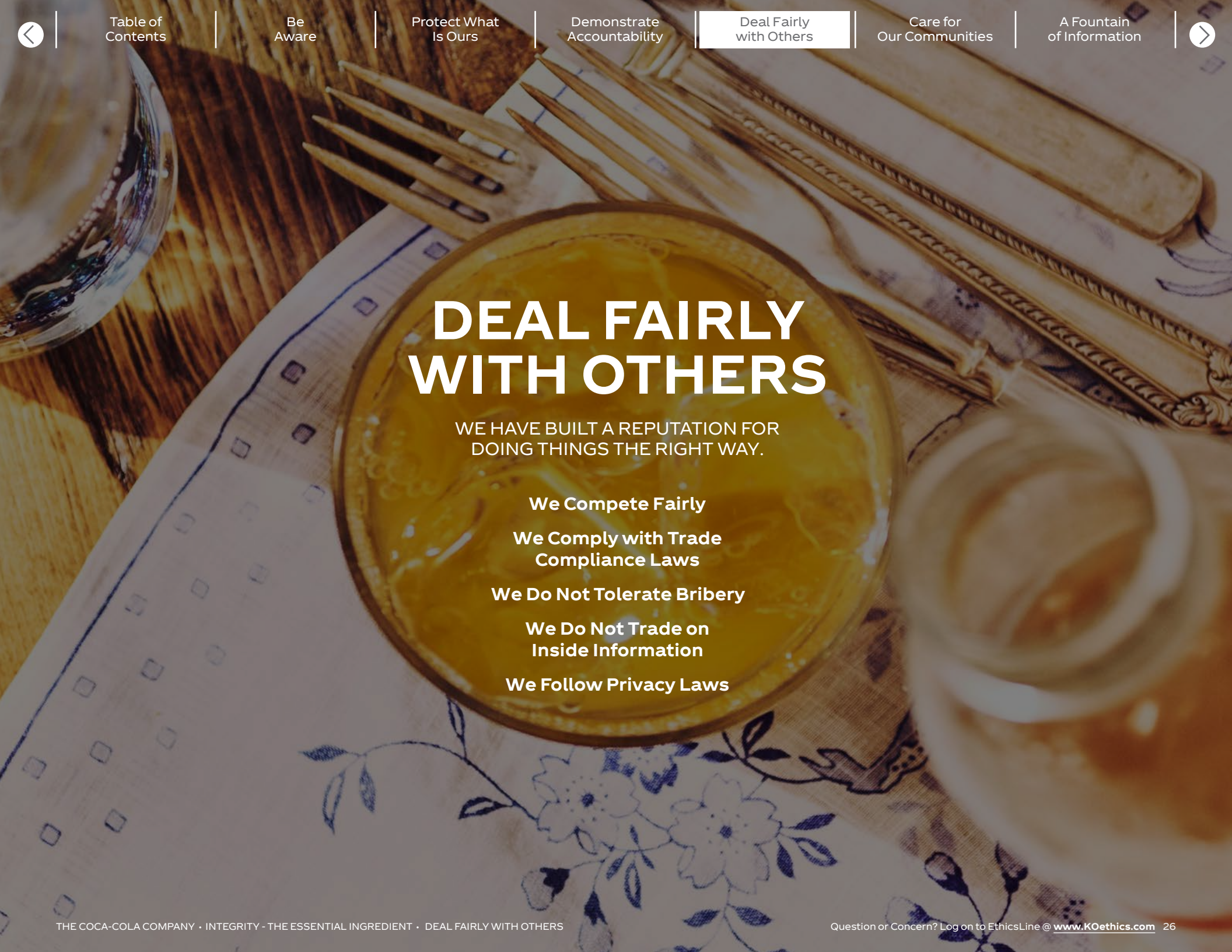
Choose suppliers ethically. If you are involved in selecting suppliers for the Company, make your choice objectively, selecting them based on price, quality and services they offer. Follow all procurement requirements.

Respect our government partners, too. If your work involves government interactions or compliance with government inspections, investigations or requests for information, cooperate fully – make sure you understand the rules and regulations that apply to you, and that any information you submit on behalf of the Company is accurate and truthful. Similarly, if your work involves sales to the government, make sure you know and follow all of the procurement, sourcing, due-diligence and other requirements that relate to this work. If your work involves managing a government contract, make sure we are meeting our obligations.

Pop the Question

Q During a call with a customer, my co-worker provided inaccurate information to them. I am hesitant to contact them because I do not want them to think we are dishonest. What should I do?

A It would be a violation of our Code to deliberately leave out important information. You and your co-worker should reach out to the customer immediately and correct any mistakes. While the customer may be unhappy that they received the incorrect information initially, your honesty will be appreciated in the end by the customer and the Company.



DEAL FAIRLY WITH OTHERS

WE HAVE BUILT A REPUTATION FOR DOING THINGS THE RIGHT WAY.

We Compete Fairly

We Comply with Trade Compliance Laws

We Do Not Tolerate Bribery

We Do Not Trade on Inside Information

We Follow Privacy Laws

We Compete Fairly

What We Believe

We compete fairly and within legal boundaries. We know that everyone benefits from a competitive marketplace, so we follow the antitrust and fair competition laws in all locations where we operate and avoid even the appearance of unfairly restricting another company's ability to compete against us.

How We Live It

We build market share and brand loyalty by delivering quality products, not by engaging in unfair or anti-competitive practices. Some agreements with **customers**, **suppliers**, **competitors** or **other business partners** have the potential to limit free and open competition, so if you are responsible for areas of our business where antitrust or fair competition laws apply, make sure you know how they apply in the country (or countries) where you operate.

Never enter into any agreement or understanding – even an informal understanding – with a competitor to:

- **Set prices on our products and services**
- **Divide territories, markets or customers**
- **Prevent another company from entering the market**
- **Participate in any form of bid rigging**
- **Refuse to deal with a customer or supplier for improper reasons**
- **Boycott another company**

PROCESS POINT

In gathering competitive information, make sure you ...

- **Review the information to determine whether it is highly sensitive or marked confidential.**
- **Ask if anyone has an obligation to keep the information confidential.**
- **If necessary, consult with Company legal counsel.**
- **Document how you handled the information.**

What Else Can You Do?

Be careful at conferences and trade shows. Do not discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, terms or conditions of sale, market segments, clients or marketing strategies. If a discussion turns to a competitively sensitive subject, stop the conversation, remove yourself from the situation and immediately report the incident to Company legal counsel.

Gather competitive intelligence ethically and lawfully. Obtaining information about our competitors is a normal business practice and necessary to be an effective competitor, but make sure you do it properly. Use public or other permitted sources and be honest about who you are and who you work for. Do not gather, or ask someone else to gather, information using any illegal or illicit activity; refer to the Competitive Intelligence Policy for what illicit activity means. Follow the steps in the Competitive Intelligence Policy when you receive or are offered competitive intelligence from internal or external sources.

Win business the right way. Deal honestly and fairly with our customers. Promote positive business relationships and never take unfair advantage of anyone by misleading or deceiving them. Be truthful about our Company and what we sell – do not make any claims you cannot substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.

Consult with Legal Counsel. The Company employs competition law experts who can help you assess the legality of any proposed conduct. Reach out to them for guidance before you act.

ONE MORE SIP

Competition Law Guidelines

Competitive Intelligence Policy

We Comply with Trade Compliance Laws

What We Believe

Our products are enjoyed around the world, so we are careful to comply with the laws and regulations that govern international trade. We expect those in our Company to know and understand the requirements that apply to the movement of our products, services and technologies.

How We Live It

In order to put our products into the hands of consumers everywhere, we follow all applicable import and export laws and regulations associated with the countries where we operate. We do not conduct unauthorized business with countries or third parties that are subject to trade embargoes or economic sanctions. And, as a United States-based company, we cannot participate in boycotts that the United States does not support.

What Else Can You Do?

Follow the rules. If you are responsible for or involved with the movement of Company goods (including ingredients, finished product, promotional or marketing items, equipment, etc.), people, services, technology, money or information across international borders, make sure you know and comply with the trade laws and regulations of the countries in which you do business. Be aware that the laws of more than one country may apply. Know the end-use and end-user of our transactions and be aware of applicable programs to reduce duties and tariffs.

PROCESS POINT

More information about your obligations as they relate to U.S. trade restrictions, as well as restrictions that may be imposed by governments other than the U.S., can be found on the International Trade Group intranet site.

If you are writing a contract, you should be sure to use our standard import/export and trade sanctions clauses and engage our International Trade Group when you need assistance.

Pop the Question

Q I am part of the sourcing team at one of the Company's non-U.S. based concentrate supply facilities and have been asked to purchase sour cherries from a supplier in Iran. The supplier is designated as a "Blocked Person" and appears on the U.S. government Specially Designated Nationals list. Since the facility where I work is outside the U.S. and I am not a U.S. national, is it ok for me to purchase this product from the supplier? If not, can I have an independent third party source this item on the Company's behalf?

A No. Our Trade Sanctions Policy and the law make clear that all "U.S. Persons" must comply with applicable trade sanctions laws and regulations. The definition of a U.S. Person generally includes our Company and its employees, regardless of where they are located. Additionally, it would be a violation of our Policy and the law to authorize a third party to make this purchase on our behalf.

Q To avoid paying customs duties in its country, an international customer has asked that I sign an origin declaration or certificate of origin identifying that the Company's products originate in Mexico. I know the product was bottled in Mexico, but am not aware of the manufacturing process. Can I sign the declaration / certificate of origin?

A Only with prior approval from the Corporate International Trade Group. Origin declarations and certificates of origin are governed by local and international laws, and require a detailed analysis of the manufacturing process under an established set of rules. An incorrect statement may result in false declarations to the customs authorities and subject the Company to significant fines and penalties, even when we are not the importer or exporter.

ONE MORE SIP

Trade Sanctions Policy

Anti-Boycott Policy

Import/Export Policy

We Do Not Tolerate Bribery

What We Believe

Our success is based on the quality of our products, never on unethical or illegal behavior. We do not tolerate acts of bribery or corruption. And we never offer or accept **anything of value** in order to get business, keep business or gain an unfair advantage.

How We Live It

In the drive to be successful in our business, there may be instances where you are asked to give or accept a bribe. Do not do it. The consequences of violating bribery laws can be severe – for you and for our Company. If the only way to make a sale or maintain customer loyalty is through payment of a **bribe**, walk away – business won this way is not business we value or want.

Follow anti-bribery and anti-corruption laws wherever you do business and, regardless of what local laws may permit, never offer, pay, promise to pay or accept anything of value either directly or indirectly to improperly influence the judgment or actions of others.

Laws in some countries make a distinction between bribing a **government official** and bribing someone who is not a government official. For us, there is no difference. Payment of a bribe – to anyone – is prohibited.

What Else Can You Do?

Learn to spot a bribe. Bribes come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, a charitable contribution – all could be considered bribes, if offered in exchange for any decision or favorable treatment.

Ask first and obtain necessary approvals. Before you offer or accept anything of value, check our policies, and ask for help if you are not sure of what to do. Giving anything of value to a government official requires following the appropriate approval procedures. If an offer is permitted by our policies, be accurate and complete in recording payments or expenses.

Do not make facilitation payments. A **facilitation (or "grease") payment** is a small payment made to a government official to speed up routine government actions like processing paperwork, delivering mail, installing phones or turning the power on. Regardless of amount, regardless of custom in that country, we do not pay them.

What about people who do business on the Company's behalf? As a company, we are not only responsible for the actions of our employees, but also for the actions of anyone who represents us. So, if you are responsible for hiring third parties, follow our due diligence procedures. And if you are responsible for managing third parties, monitor their work, speak up and report to the Ethics & Compliance Office anytime you see or suspect a bribe.

CONSIDER THIS

"Do not worry, that is just the way we do business in this country."

"This payment does not require approval."

"A political contribution might help speed things along."

Hearing comments like these? Stop and seek help. If it sounds illegal or unethical, it probably is.

PROCESS POINT

Anything of value given to a government official requires prior, written approval from Company legal counsel and must be recorded properly in our books and records.

ONE MORE SIP

Anti-Bribery Policy

Supplier Code of Business Conduct

We Do Not Trade on Inside Information

What We Believe

It is not fair – in fact, it is illegal – to buy or sell securities based on **material, non-public ("inside") information** we may know about because of our jobs with the Company. We comply with the law and believe everyone should make investment decisions based on the same set of rules, so we do not trade on inside information or tip off others so that they may trade. Insider trading is unfair because it puts the interest of the insider above those to whom he owes a fiduciary duty.

How We Live It

We are exposed to information about our Company, or other organizations with which we conduct business, that is not known by the public but, if it was, might influence a reasonable investor to make a decision to buy or sell Company stock or other securities. That knowledge makes us "insiders," and trading on inside information is against the law.

What Else Can You Do?

Know what kind of information is inside information. Examples include material, non-public information about:

- **A significant merger or acquisition**
- **Positive or negative earnings' information or volume results**
- **The gain or loss of a significant customer or supplier**
- **Pending regulatory action**
- **A change in control or in senior management**
- **Significant litigation**
- **New products, etc.**

Play it safe. If you are not sure if information is material and whether it is non-public inside information, treat it as though it is, and ask Company legal counsel or the **Office of the Secretary** about it before proceeding.

ONE MORE SIP

Insider Trading Policy

Pop the Question

Q I have learned that the Company is considering the acquisition of a small, publicly-traded beverage company. My brother just lost his job and really needs the money to support his family. Since it will not benefit me personally, can I tell him about this so he can acquire the stock of this company in anticipation of the acquisition?

A No. Trading on material non-public information is illegal and a violation of the Code, whether trading in the stock of the Company or the stock of another company. And the rules do not just prohibit you from buying or selling stock, but also from tipping others to do so. Do not share the information with your brother or anyone else. If you have additional questions, you should contact your **Local Ethics Officer**, **Ethics & Compliance Office**, **EthicsLine** or the **Office of the Secretary**.

We Follow Privacy Laws

What We Believe

The basis of any good relationship is trust. When our **customers** and consumers do business with us, they entrust us with their personal information or third parties' personal information. Our employees do the same when they join the Company. We take our responsibility and obligations to our customers, consumers and employees seriously to collect, use and process any personal information only for legitimate business purposes and protect it from possible loss, misuse or disclosure.

How We Live It

Keeping personal information secure is critical to our people, our business and our reputation. We recognize this responsibility and follow the laws requiring us to protect personal information that can identify an individual or which relates to an identifiable individual, also known as personal information (PI). Please know that certain PI can be sensitive and require an extra level of protection and a higher duty of care based on applicable law.

Many Company employees work with PI (including sensitive personal information) as a part of their jobs. If you are one of them, guard this information well by following the Company's policies regarding the access, transfer and use of this information. PI includes information about anyone such as:

- **Email addresses** (including business email addresses)
- **Telephone numbers**
- **Employee ID number**
- **IP-addresses**
- **Credit card information**
- **Financial information**
- **Medical information**
- **Names of family members**
- **Name and government identification number**
- **A combination of certain information such as consumer habits and demographics**

If you are not sure whether you are handling any PI or whether your use is in accordance with Company policies and procedures, ask your manager or contact the Privacy office.

What Else Can You Do?

If you have to use it, use it with care. Only collect PI for legitimate business reasons, and only use it for the purposes of its collection. Access only the limited amount of PI that you need to do your job, and only share it on a need-to-know basis with authorized people who also need the information for completing their work. Never share it with any unauthorized person outside of our Company or anyone in the Company who does not require use of such information to complete their job.

Protect your co-workers. You would never want your PI to be disclosed. The same goes for your co-workers. Secure their PI as you would your own, protecting it from deliberate or accidental exposure. Whether you work with this information or come across it inadvertently, do all you can to handle it properly and uphold data privacy and protection laws wherever we work.

Protect our customers and consumers. We are committed to protecting the PI of our customers, consumers and other third parties. We have a Privacy Policy to govern our Company-wide use of PI. Additionally, we comply with our legal obligations to protect PI from unauthorized disclosure and ensure the integrity and availability of PI.

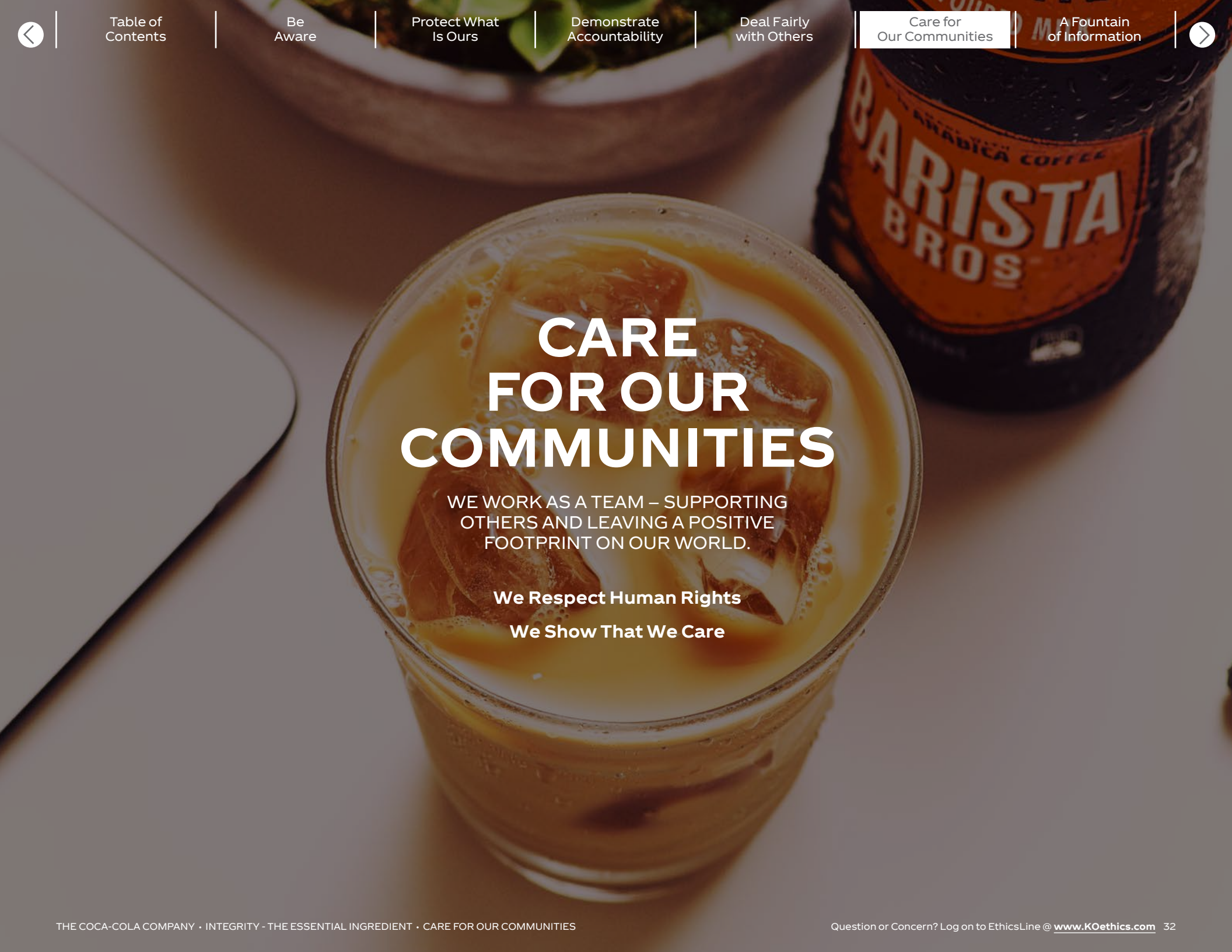
Pop the Question

Q Someone accidentally emailed me an HR report that includes names, government IDs and passport numbers. Should I just close it and forget I saw it?

A No. If it was accessed by you, it could be accessed by others without the proper authorization or need to know. Contact the privacy experts at privacypolicy@coca-cola.com, Company legal counsel or the Ethics & Compliance Office to help ensure the appropriate protections are put in place.

ONE MORE SIP

Privacy Policy



CARE FOR OUR COMMUNITIES

WE WORK AS A TEAM – SUPPORTING OTHERS AND LEAVING A POSITIVE FOOTPRINT ON OUR WORLD.

We Respect Human Rights

We Show That We Care

We Respect Human Rights

What We Believe

Respect for human rights is one of the Company's fundamental values. Through our actions and policies, we strive to respect and promote human rights by upholding the UN Guiding Principles on Business and Human Rights in our relationships with our employees, **suppliers** and independent bottlers. Our aim is to help increase the enjoyment of human rights within the communities where we operate. We expect all employees, bottling partners and suppliers to avoid causing or contributing to human rights infringements through their business actions.

The framework for our engagement on human rights is The Coca-Cola Company's Human Rights Policy, which covers the following topics:

- **Respect for Human Rights**
- **Community and Stakeholder Engagement**
- **Diversity and Inclusion**
- **Freedom of Association & Collective Bargaining**
- **Safe and Healthy Workplace**
- **Workplace Security**
- **Forced Labor and Human Trafficking**
- **Child Labor**
- **Work Hours, Wages and Benefits**
- **Land Rights and Water Resources**
- **Healthy Lifestyles**
- **Guidance and Reporting for Employees**

How We Live It

- Make respect for Human Rights, aligned with our Human Rights Policy, part of the way you work. Keep Human Rights at the core of your own behavior and display what "respect" looks like.
- Apply the same Human Rights standards that you would apply to your co-workers when engaging with suppliers, customers, communities and any other group that might be affected by our actions and choices.
- Apply a Human Rights lens to your work activities and decision-making, especially when considering new business processes, acquisitions or partnerships.
- Ensure that the vendors we engage comply with the Company's Supplier Guiding Principles.
- Be proactive. Human Rights risks can appear in any country and in any context, so remain attuned to new or emerging risks. If you become aware of a possible human rights infringement, report it immediately. You may report directly through higher levels of management, **Human Resources**, **Company legal counsel** or **EthicsLine**.

We Respect Human Rights continued

What Else Can You Do?

Seek guidance. If you are unsure what a particular right may mean in a specific situation, consult the Global Workplace Rights team at humanrights@coca-cola.com before taking action. Use the Company's Human Rights resources listed in One More Sip. Alleged violations of the Human Rights Policy may be investigated and administered separately from the Code.

ONE MORE SIP

Human Rights Policy

Supplier Guiding Principles

Human Rights Due Diligence Checklists

Implementation Guides

Other Resources on Journey

Pop the Question

Q How do I apply human rights in my daily work?

A As you go about your day, think about the impact that your work has on people, including your actions as well as your plans. If you think there may be any negative impacts to anyone inside or outside of the Company, you may be putting the Company at risk of violating the Human Rights Policy. Seek guidance as outlined above and in the full Human Rights Policy.

We Show That We Care

What We Believe

What makes our Company special? It is about more than what we create – it is about the people who create it and the consumers who enjoy what we create. Our products are made for people everywhere by people who care about delivering their very best. While our Code cannot encompass all of our important Company policies, there are some standards that sit at the core of who we are as an organization even if they are administered by other parts of the organization, such as our Human Rights Policy and Supplier Guiding Principles which establish a foundation for respecting people and environments across the world.

How We Live It

We look beyond ourselves and our needs, setting our sights on building a better world. To be good neighbors, we expect the best from ourselves, making sure our business decisions always have a positive impact on communities, the environment and people everywhere.

Remember that as an employee, you represent the Company to the world. You can help demonstrate our good citizenship by upholding our high standards and being aware of your own actions and how they might affect others.

What Else Can You Do?

Respect Each Other

Promote fairness, diversity and inclusion. Each person is a key player on our team, deserving of respect. Show that you appreciate others' varied backgrounds, skills and cultures. Never single anyone out for negative treatment, and be fair in all employment decisions. Base your decisions only on factors like skills, qualifications, performance and business needs – never on personal characteristics.

Watch for harassment. It takes many forms and can be verbal, physical, visual or sexual in nature. It might look like intimidation, bullying, racial slurs, sharing offensive material or making offensive or sexual jokes, comments or requests.

It happened – now what do I do? If you see, experience or suspect harassment or discrimination, speak up about it – either directly to the person or through your manager, **Human Resources**, **Employee Relations** , **Company legal counsel** or **EthicsLine** (in accordance with local regulations for EthicsLine reporting). We take this behavior seriously and do not tolerate retaliation against anyone who reports in good faith.

We Show That We Care continued

Be a Good Neighbor

Care for people. Protect the safety of your co-workers, suppliers and the public, and follow laws regarding working conditions. Ensure that our suppliers and other business partners do the same.

Help us preserve the environment. Do your part by using resources responsibly, helping to curb emissions, following environmental laws and regulations and participating in our sustainability, recycling and replenishment efforts.

Support communities. Respect, learn from and support the communities and cultures with which we work. Understand the impact our business may have on communities, including with regards to land rights. Take advantage of the many community outreach opportunities that the Company is involved in to make a personal impact.

What about my personal political activities? The Company encourages personal participation in the political process so long as it is consistent with applicable law; however, we will not reimburse you for personal political activity and you should not use the Company's reputation or assets (including your time at work) to further your own political activities and interests. Your job will not be affected by your personal political views or your choice in political contributions. If you plan to seek or accept a public office, you must obtain prior approval from **Company legal counsel**.

Will you support my charitable activities? The Company is known for its charitable activities and we have identified charitable organizations and activities that we support as an organization. We encourage you to get involved in these or other organizations that are important to you; however, your personal charitable endeavors should be undertaken without pressuring or requesting others within the Company or with whom we do business to support it, by using your own funds, your own time and without the use of Company assets. Requests for formal Company support should follow the appropriate processes.

We Show That We Care continued

Communicate Responsibly

Use social media wisely. If the subject of our Company comes up while you are on social media, make it clear in your postings that you are a Company employee, and your views are your own – you are not speaking for the Company. Never disclose confidential information about the Company, our **customers**, **suppliers**, **competitors** or **other business partners**, and never post anything that might constitute a threat, intimidation, harassment or bullying.

What if I already spoke on the Company's behalf? If you realize later that you may have sounded as though you were speaking for the Company in a post, contact your manager or EthicsLine so the Company can respond and minimize any harm that may have been done.

PROCESS POINT

If you are contacted by the media or anyone else outside of the Company, refer the request to those authorized to respond on behalf of the Company. For example, media requests should go to Media Relations. Financial and investor requests should go to Share Owner Services.

ONE MORE SIP

Equal Opportunity

Equal Opportunity and Affirmative Action Policy Statement

Supplier Code of Business Conduct

Non-Solicitation Policy

Political Contributions Policy

Social Media Principles (located on Journey)

Supplier Guiding Principles

Human Rights Policy

The Last Drop

Thank you for your commitment to The Coca-Cola Company and our Code of Business Conduct.

Coca-Cola's reputation as **The Real Thing** was built by generations of dedicated, hardworking employees like you who do the right thing every day, in every act and every transaction.

Be inspired and work each day in a way that inspires others.

Follow not only our Code, our policies and the laws and regulations that apply to your work, but also your conscience. When something does not feel right or puts our Company, our people or those we serve at risk, report your concerns. When you do, you preserve our good name and reputation and help us to better navigate the Coca-Cola journey for generations to come.

A FOUNTAIN OF INFORMATION

CHECK HERE FOR DEFINITIONS OF KEY TERMS AND FOR INFORMATION ABOUT PEOPLE AND RESOURCES AVAILABLE TO HELP YOU LIVE OUR CODE.

Glossary

Resources

Glossary

Anything of value
A term that can refer to cash, gifts, meals, entertainment, business opportunities, Company product, offers of employment and more – there is no minimum or maximum amount associated with this term.

Bribe
Giving or receiving anything of value in exchange for an improper decision or action.

Company asset
A term that refers to everything belonging to the Company, including its money or product, employees' time at work and work product, computer systems and software, electronic and communication devices, photocopiers, tickets to concerts and sporting events, Company vehicles, proprietary information and Company trademarks.

Competitive intelligence
Information about our competitors.

Competitor
For the purposes of the Conflicts of Interest and Competitive Intelligence provisions only, any business entity other than our Company, our subsidiaries or bottlers that manufactures or sells wholesale any non-alcoholic beverages or beverage concentrate or is actively considering doing so.

Customer
Any business or entity to which our Company – or one of our subsidiaries or bottlers – sells concentrate or a finished product bearing a trademark owned or licensed by the Company. Franchise bottlers of Company-trademarked products are considered customers.

Discretionary authority
In dealing with a company, it is the authority to influence our Company's selection of a supplier or our relationship with an existing customer or supplier.

EthicsLine
Our reporting service, administered by a third party, through which employees and others can ask questions or raise concerns about the Code of Business Conduct or other ethics and compliance matters. EthicsLine also accepts calls regarding the Human Rights Policy and involving employee relations in countries where such reports are allowed. While all concerns are received using the same contact information, human rights, labor and employee relations matters are handled outside of the Code process.

Ethics & Compliance Committee
A committee comprised of senior leaders representing corporate governance functions and operations, responsible for administration of our Code of Business Conduct.

Facilitation payments
Small payments made to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or phone service.

Government officials
Employees of any government anywhere in the world, even low-ranking employees or employees of government-controlled entities. The term also includes political parties and party officials, candidates for political office, employees of public international organizations, such as the United Nations, and government employees who may be acting in a commercial capacity, such as professors, doctors at public hospitals and military personnel.

Local Ethics Officer (LEO)
An employee at the Group, Business Unit or appropriate Bottling Investments level, recommended by business leaders and appointed by the Ethics & Compliance Committee, empowered to provide written approvals for actions under the Code in the areas of Conflicts of Interest and Company Assets. A list of Local Ethics Officers can be found on the Ethics & Compliance intranet site.

Material non-public information
Non-public information that would be reasonably likely to affect an investor's decision to buy or sell the securities of a company. Trading in such information provides an unfair advantage by allowing the insider to profit based on information not known to the public.

Non-public information
Any information that our Company has not disclosed or made generally available to the public and which it considers to be confidential.

Other business partners
Any other business partners who are not customers or suppliers as defined and which may include trade associations, talent and sponsorship partners.

Relative
A term that includes a spouse, parent, sibling, grandparent, child, grandchild, in-law or same or opposite sex domestic partner, as well as any other family member who lives with you or who is otherwise financially dependent on you or on whom you are financially dependent.

Supplier
Any vendor of products or services to the Company, including consultants, contractors and agents. The term also refers to any supplier that our Company is actively considering using, even if no business ultimately is awarded.

Resources

If you need advice or wish to raise a concern, start with your manager – he or she is in the best position to understand and take appropriate action. If you feel uncomfortable speaking with your manager, you may contact any of the following resources:

FOR	RESOURCE	CONTACT INFORMATION
Reporting Code of Business Conduct concerns	EthicsLine, your Manager, your Local Ethics Officer, or the Ethics & Compliance Office	Report online: www.KOethics.com or call toll-free using the access codes and phone numbers found on www.KOethics.com
Legal questions	Company legal counsel	Contact your local legal support
Written approvals and guidance on ethics and compliance issues	Your Local Ethics Officer (LEO)	See the Ethics & Compliance intranet site for the Local Ethics Officer supporting your business.
Questions about our Code of Business Conduct	The Ethics & Compliance Office, or your Local Ethics Officer (LEO)	Email: compliance@coca-cola.com Fax: +1-404-598-5579 Mail: Ethics & Compliance Office The Coca-Cola Company One Coca-Cola Plaza Atlanta, GA 30313 USA
Possible criminal matters	Strategic Security	Operation Center KOC@coca-cola.com 800-515-2022
Accounting and finance policy and procedure questions	Senior Finance Personnel	Contact your local finance support.
HR-related policy and procedure questions	Human Resources or Employee Relations Representatives	Contact your local HR support.
Inquiries regarding insider trading	Office of the Secretary	Contact the Office of the Secretary.
Human Rights Policy questions	Global Workplace Rights team	Email: humanrights@coca-cola.com