



# Anti-Bribery Policy

# Table of Contents

Scope of this Policy/Administration/Seeking Guidance	page 1
Financial Records and Documentation	page 2
We Never Engage in Bribery!	page 2
No Retaliation	page 3
What Is Bribery?	page 3
Bribery in Relation to Public Officials	page 4
Who Is a 'Public Official'?	page 4
What Is Bribery of a Public Official?	page 5
Offering or Receiving Gifts and Entertainment	page 10
Tours of our Facilities and Demonstrations of our Products; Hospitality, Travel and Accommodation	page 12
Premium Events	page 13
Lobbying	page 13
Charitable Contributions	page 14
Political Contributions	page 15
Hiring Third Parties – General	page 15
Hiring Third Parties who Interact with Public Officials – Prior Due Diligence and Approval	page 16
Hiring Third Parties who Interact with Public Officials – Contracting and Monitoring the Relationship	page 17
Reporting Violations	page 18



## Chief Executive Officer's Letter



Dear Fellow Team Member:

Our success depends on the prosperity of our communities. Corruption is one of the biggest threats to such prosperity. We have a role to play and a very clear position on this matter: we have zero tolerance towards any form of bribery and corruption!

I know that we operate in some difficult markets where businesses sometimes may choose to participate in corrupt practices. This is not our choice, and it can never be an excuse for our behaviour.

This Anti-Bribery Policy has been approved by the Operating Committee and also by the Board which, in conjunction with the Audit and Risk Committee, has overall responsibility for its enforcement. The anti-bribery rules are already part of our Code of Business Conduct. The reason for this specific Policy is to provide you with more detailed, practical advice to help you detect and prevent bribery and corruption that could be associated with Coca-Cola HBC. It is particularly important that those of you dealing with public officials on a regular basis read this guidance extremely carefully.

I would like to reassure you that you are not alone in dealing with the challenges described in this Policy. Corruption and bribery issues can be complex and stressful. You should always feel free to seek the support of your manager and the advice of your Ethics and Compliance Officer on any questions or concerns.

We all want to feel proud of the communities we live in and the place where we go to work every day. Integrity is one of our core values and one that we must practise and promote in everything we do. Thank you for joining me in this effort.

Sincerely,

Zoran Bogdanovic  
Chief Executive Officer