

CCHBC'S DIGITAL ETHICS CODE

The Code describes the standards and behaviour we expect from people who work for or work with Coca-Cola HBC in the digital space and the standards and behaviours you can expect from us, including working in accordance with all applicable laws, regulations and industry standards.

Governance

- ✓ Promote equality of opportunity.
- ✓ Never make distinctions with regard to race, colour, religion, sex, sexual orientation, etc.
- ✓ Safeguard the company's non-public information.
- ✓ Always act in compliance with applicable privacy laws.
- ✓ Respect the privacy of all your colleagues, business partners and consumer.
- ✓ Always maintain an arms-length relationship with customers and suppliers.
- ✓ Never engage in bribery.
- ✓ Do not seek competitive advantages.

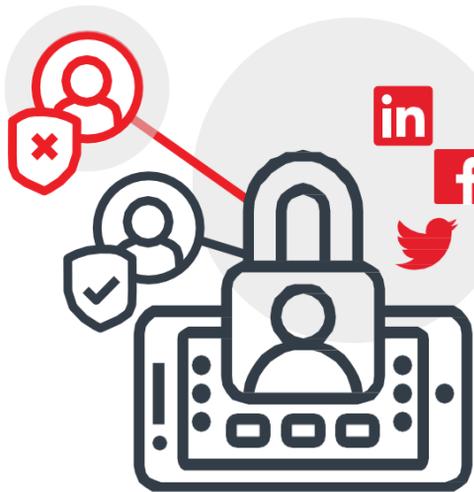


Data Privacy

- 1 Comply with GDPR and other applicable data privacy legislations.
- 2 Protect information and process that information fairly, lawfully and in a manner compatible with the purposes for which it was collected.
- 3 Only disclose information only in accordance with the company's procedures.
- 4 Limit collection of personal data to only necessary and do not keep them longer than required.

Information Security

- 1 Protect corporate information assets from threats and events that can have negative impact on information asset confidentiality, availability and integrity.
- 2 Always adhere to the principles, rules and requirements of our Information Protection Policy (IPP).
- 3 All employees and third parties are required to use corporate information assets in a secure way, limiting risks of information leakage, misuse and corruption in accordance with our Acceptable Use Policy (AUP).



Social Interactions

- ✓ Transparency in every social media engagement.
- ✓ Protection of privacy in compliance with applicable policies, rules and regulations.
- ✓ Respect of copyrights, trademarks, rights of publicity and any other third party rights.
- ✓ Respect for diversity.
- ✓ Be a Coca-Cola HBC ambassador and show pride in our company, the Coca-Cola System and our brands.
- ✓ Sensitive and confidential information are not disclosed on social media.
- ✓ Never to speak on behalf of the company unless you are designated to do so.
- ✓ Accountability for online actions and liability for own posts.

Living Our Code

If you work for us, or with us, we expect you to always

- Know, understand, use and live our Code.
- Always (re)present Coca-Cola HBC products in an honest way.
- Proactively participate in ensuring the highest standards for our digital environment.
- Report any concern when you think our digital values and policies may be threatened.



OUR COMMITMENTS AT A GLANCE

Responsible Digital Design

✓ Privacy, security and integrity

For us data protection is of utmost importance. We are able to prove/check/validate that data privacy rules and practices are fully compliant to the international and local laws any time.

✓ Compliance

We continuously monitor the industry standards, the applicable information technology and the data regulations. We have established processes for achieving and demonstrating compliance.

✓ Reliability and Safety

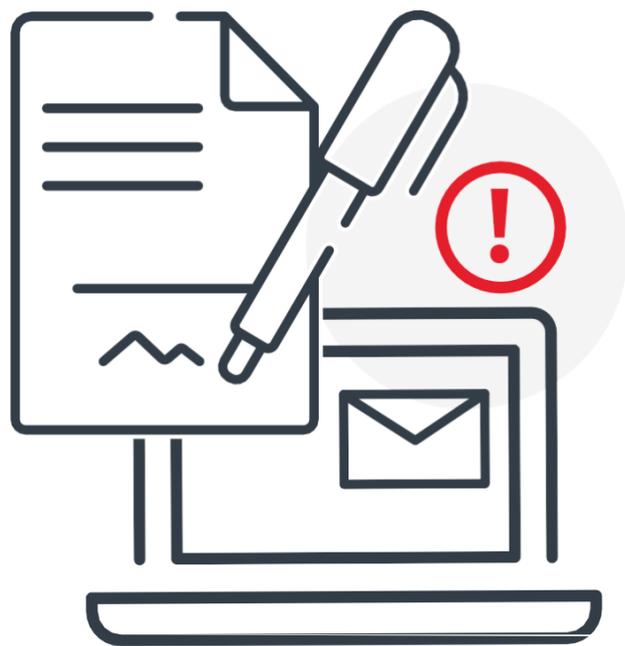
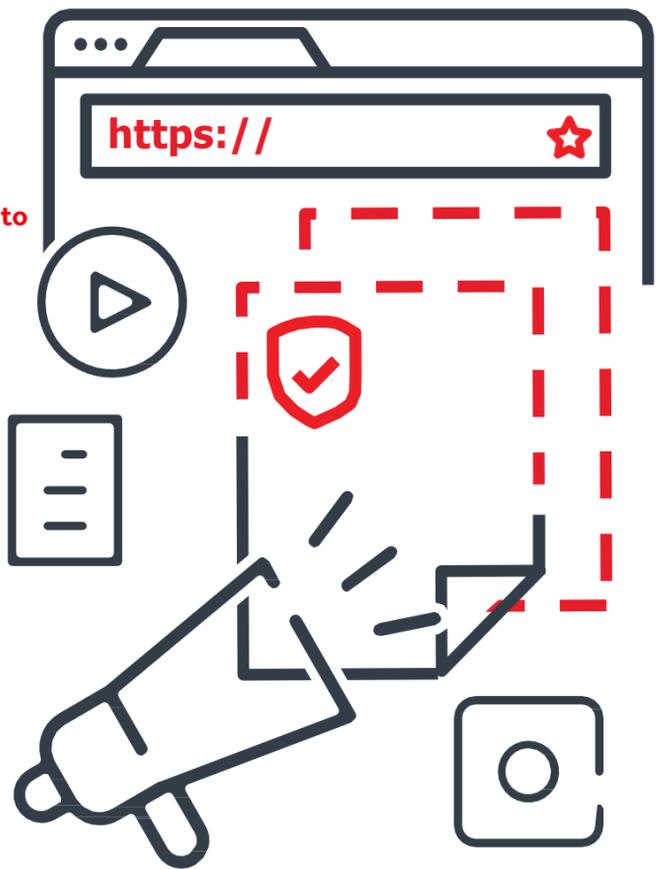
Our solutions are built around the highest standards for availability and on top of this we have established procedures for contingency that are tested regularly.

✓ Plain Language

We communicate in simple and clear statements, no small print, no complicated clauses, no ambiguity.

✓ Maintain adequate knowledge and competence

We are open to learn and improve in everything we do.



Accountability

✓ Maintain processes and quality assurance

We stand behind every word we say. We strive to maintain the same high quality levels for all digital products in all our markets.

✓ We ensure we have transparent and sustainable processes for:

- data collection, storage, protection and archiving
- product updates and enhancements
- solution selection (RFI/RFQ/RFP, etc.)

✓ Make people responsible

We provide the right level of access to the right people – authorized, capable and equipped to handle data.

Transparency and Fairness

✓ Informed consent

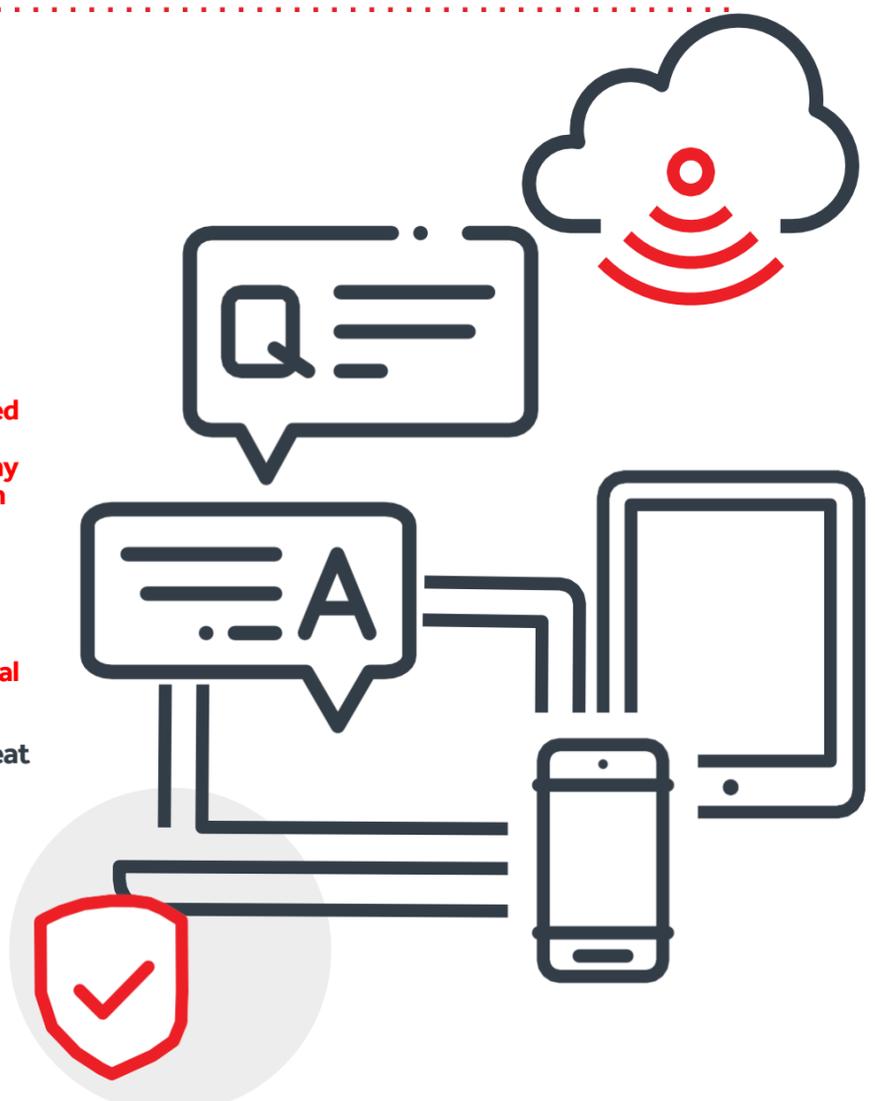
We never use data for purposes beyond the agreed scope. We proactively reach for, inform and request consent from users and customers for any changes in the terms and conditions, under which their data will be handled.

✓ Respect, treat people fairly, promote trust

As per the established CCH Code of Business Conduct, Policies and with a full respect of the legal regulations and the highest ethical norms.

✓ Artificial Intelligence in service of humanity, treat people without bias

We believe that the technology evolution is an enabler for our social evolution, and will always respect the human rights.



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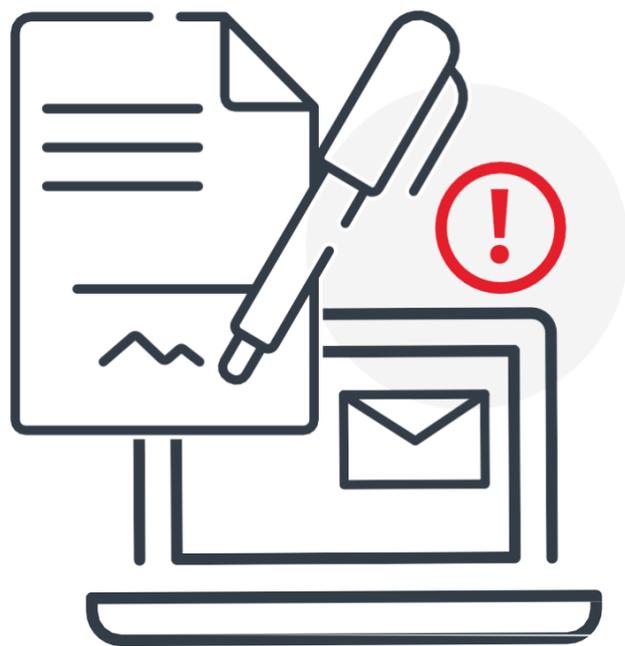
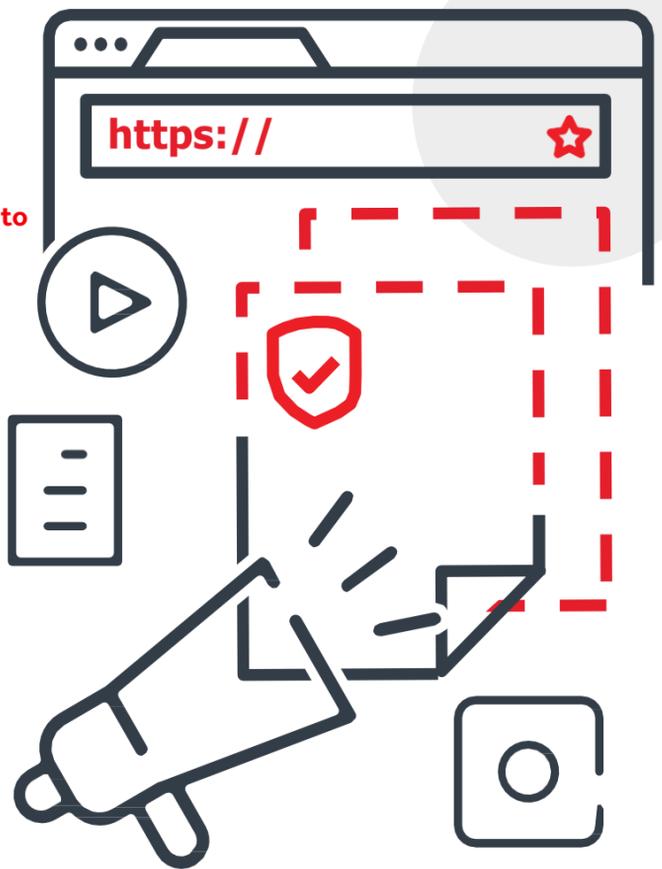
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