

# **SANCTIONS POLICY**

**Coca-Cola**

**Hellenic Bottling Company**

**TABLE OF CONTENTS**

- I. Policy Statement 3**
- II. To whom does this Policy apply? 3**
- III. What are Sanctions? 3**
- IV. Compliance with Sanctions 4**
- V. Raise Concerns 5**
- VI. Non-compliance 5**
- VII. For further information 5**

## I. Policy Statement

Coca Cola Hellenic Bottling Company (“**CCHBC**” or the “**Company**”) will comply with all economic sanctions laws, regulations, embargoes or restrictive measures (**Sanctions**) to which it is subject. CCHBC will maintain effective measures to ensure compliance with and awareness of its Sanctions-related obligations.

To give effect to this Policy, we have adopted, and will maintain, a sanctions screening procedure. The procedure sets out the key steps and principles for ensuring compliance with applicable Sanctions. Failure to comply with Sanctions can lead to severe civil and criminal penalties, both for our business and individual employees, officers and directors, as well as significant reputational damage for CCHBC.

Non-compliance with this Policy is a serious matter that may lead to disciplinary action, up to and including dismissal. Violations of Sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment. Employees should report any suspected violations of Sanctions of this Policy either to the Relevant Legal Officer as soon as possible for further guidance or through our Speak Up! Line.

---

## II. To whom does this Policy apply?

This Policy applies to everyone working for the Company worldwide regardless of location, role or level of seniority. This includes all employees, Managers, Operating Committee Members, and Directors of the Company.

We require that temporary and contract employees, consultants, agents and any other third party which acts in the Company’s name, comply with the principles of the Policy.

Every non-wholly-owned subsidiary and joint ventures which the Company controls must adopt a similar sanctions policy. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Policy in both the joint venture and their own operations.

---

## III. What are Sanctions?

Sanctions are measures imposed by governments and international bodies (such as the United Nations) to restrict dealings with certain countries, entities and individuals. They take various forms, including:

- broad prohibitions on dealings with or within certain countries, individuals or corporate entities;
- trade restrictions, including arms embargoes and prohibitions on exports of certain equipment;
- financial sanctions, such as asset freezes and prohibitions on financial transactions; and
- travel bans.

Both the targets of Sanctions and nature of the restrictions imposed by Sanctions are subject to change on a regular basis, and for compliance purposes it is therefore essential to maintain up-to-date information about all Sanctions that apply to our business. Of particular importance are Swiss Sanctions, given that CCHBC is headquartered in Switzerland, and EU sanctions, given that CCHBC conducts a significant proportion of its business in the EU.

**EU Sanctions** apply to:

- EU companies and EU nationals in relation to anything they do anywhere in the world – even if an EU national is employed by a non-EU company;
- non-EU companies and non-EU national employees in relation to anything they do in the EU and any business conducted wholly or partly in the EU.

**US Sanctions** apply to:

- US companies and their overseas branches (and, for certain sanctions, non-US subsidiaries of US companies) in relation to anything they do anywhere in the world;
- US citizens and permanent resident aliens (i.e. “green card” holders) in relation to anything they do anywhere in the world;
- non-US companies and non-US nationals in relation to anything they do in the US and any business conducted wholly or partly in the United States;

US sanctions can also be applied to transactions that touch or concern the United States, including those that take advantage of the US financial system (e.g. dollar-denominated transactions) and those that involve US companies and individuals or US-origin items.

The United States has also implemented so-called “secondary sanctions” against certain countries – in particular, Iran – that directly apply to non-US companies and individuals who engage in specific kinds of transactions with those countries. These Sanctions provide for the imposition of a range of measures designed to exclude the non-US Person violator from the US economy.

**Swiss Sanctions** apply to:

- Swiss persons, any business organized under Swiss law and any person, regardless of citizenship, while in Switzerland.
- Persons and companies located outside Switzerland in relation to anything they do in Switzerland and any business conducted wholly or partly in Switzerland.

---

#### **IV. Compliance with Sanctions**

CCHBC and its subsidiaries, as well as its employees, must comply with all Sanctions applicable to them and may not engage in any business that could violate applicable Sanctions.

In general, sanctions:

- Prohibit dealing with individuals or entities listed on applicable assets freeze lists, such as the US list of specially designated nationals and blocked persons, the EU consolidated list of financial sanctions targets, or any list maintained by any a relevant authority.
- Prohibit dealing with entities owned or controlled by entities on the lists referred to above.
- Prohibit or restrict dealing with certain countries or territories. For example, US Persons are generally prohibited from dealing with Cuba, Iran, Syria, North Korea and Crimea (“**Restricted Territories**”). EU companies and nationals are restricted in their dealings with some of those locations as well.
- Prohibit facilitation of transactions that you cannot engage in directly yourself. For example, a US national cannot support or approve a non-US company’s dealings with Crimea. Likewise an EU company cannot use its non-EU subsidiary to conduct business with an EU assets freeze target.

Please note that Sanctions apply to individuals – not just companies – and therefore EU and US nationals operating outside the EU/US must be aware of the specific Sanctions applicable to them, in addition to those that apply to their employer company.

In order to enable compliance with Sanctions, CCHBC operates a screening process for its counterparties. The screening process is aimed at determining whether a proposed counterparty is named on an assets freeze list or may be owned or controlled by such a person. An approval process for transactions that would involve Restricted Territories is outlined below.

CCHBC and its subsidiaries should also be mindful of the Sanctions-related obligations in their financing agreements, such as lending and insurance agreements, which can extend beyond the legal obligations imposed by Sanctions.

### **Required Approvals**

Any proposed transaction, activity or project that involves a Restricted Territory or a person or entity that is an apparent match on a relevant sanctions list requires prior written approval from a lawyer in the relevant legal department of the Company (“**Relevant Legal Officer**”).

- Country Employees: your Relevant Legal Officer is your Country Legal Director;
- Country Function Heads and Regional Managers: your Relevant Legal Officer is your Regional Legal Director;
- General Managers and Group Function Employees: your Relevant Legal Officer is the Chief Compliance Officer;
- Operating Committee Members: your Relevant Legal Officer is the General Counsel.

Copies of these approvals should be maintained by the Relevant Legal Officer and made available to auditors or investigators if required.

---

### **V. Raise concerns**

If you become aware that CCHBC or one of its subsidiaries has inadvertently become involved in any business contrary to applicable Sanctions, you should either notify your Relevant Legal Officer as soon as possible for further guidance or report this through our SpeakUp! line. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to the Company’s reputation.

---

### **VI. Non-compliance**

We will consider non-compliance of this Policy as a serious matter warranting disciplinary action, up to and including dismissal, where allowable by law. Violations of Sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment.

---

### **VII. When in doubt, seek guidance**

If you are ever unsure of how to react to a situation or whether certain conduct may be improper or contrary to the Policy, you should always seek guidance from your Relevant Legal Officer before you take action.

If you have any questions about this Policy, please contact your manager or, alternatively, your Relevant Legal Officer.

This Policy may be amended and updated by from time to time in accordance with the Group Chart of Authority. The latest version of this Policy can be obtained upon request from the Chief Compliance Officer and is available on the Company’s Intranet and website [www.coca-colahellenic.com](http://www.coca-colahellenic.com).

**Your Personal Commitment to the Coca-Cola Hellenic Sanctions Policy**

I acknowledge that I received a copy of the Coca-Cola Hellenic Sanctions Policy (“the Policy”), that I have read the Policy and that I understand it. I will comply with the Policy. If I learn that there has been a potential violation of the Policy, I will contact my Relevant Legal Officer. I acknowledge that the Policy is not a contract and that nothing in the Policy is intended to change the existing relationship of employment, whether at will or governed by contract.

\_\_\_\_\_  
DATED

\_\_\_\_\_  
EMPLOYEE’S NAME

\_\_\_\_\_  
EMPLOYEE’S SIGNATURE