Coca-Cola HBC

SANCTIONS AND RECUSAL POLICY

I. Policy Statement

Coca-Cola HBC and its subsidiaries (collectively, "**CCHBC**" or the "**Company**") will comply with all economic sanctions laws, regulations, embargoes or restrictive measures ("**Sanctions**") to which it is subject.

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. This Policy sets out the key steps and principles for ensuring compliance with applicable Sanctions.

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 and the Company, including severe monetary fines and imprisonment.

To give effect to this Policy, CCHBC has adopted a Sanctions Screening Process. Please refer to CCHBC **Guidance on Sanctions Screening Process,** which provides employees with practical steps on the information which should be screened when entering potential transactions. The Sanctions Screening Process is an important internal control procedure that should be followed to assess business transactions that may be subject to Sanctions restrictions.

II. Who must comply with this Policy?

This Policy must be complied with by everyone working for the Company worldwide regardless of location, role or level of seniority. This includes all employees, Managers, Executive Leadership Team 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.

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.

IV. Who can violate Sanctions?

EU Sanctions apply to:

- EU companies and EU nationals in relation to anything they do anywhere in the world;
- 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 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.

The United States has also implemented so-called “secondary sanctions” that directly apply to non-US companies and individuals. 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.

UK Sanctions apply to:

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

V. What is prohibited under 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 relevant authority (including in Switzerland and the UK).

- Dealing with entities owned or controlled by entities on the lists referred to above.

- Dealings in goods or services that would violate applicable trade sanctions, including export or import bans.

- Dealing with certain countries or territories. For example, US Persons are generally prohibited from dealing with Cuba, Iran, North Korea and Crimea. EU, Swiss and UK companies and nationals are restricted in their dealings with some of those locations as well.

- 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 asset freeze target or to undertake business prohibited by EU Sanctions.

VI. When and how must EU, Swiss, UK or US persons recuse themselves?

There may be circumstances where a CCHBC entity is, in accordance with applicable laws, permitted to engage in business that would be a prohibited transaction under EU, Swiss, UK or US Sanctions for other CCHBC entities or employees.

In those circumstances, all EU, Swiss, UK or US entities and employees subject to a Sanctions prohibition, must not participate in or otherwise support such business or transaction unless licensed by a relevant authority or otherwise authorised.

Those employees, officers, or directors who must comply with the Sanctions applicable to them are **prohibited** to do any of the following:

- Provide any advice, assistance, or other support in connection with business related, directly or indirectly, to any prohibited transaction.
- Supervise, authorise, or approve any business related, directly or indirectly, to a prohibited transaction, or manage or direct the conduct of other employees in regard to such business.
- Review, approve, or comment on the terms of any transaction or deal documents, engage in any negotiations, or otherwise assist in moving a transaction forward related, directly or indirectly, to any prohibited transaction.
- Participate in the restructuring of any transactions, operations, products or services for the purpose of facilitating business related, directly or indirectly, to a prohibited transaction.
- Provide any services (e.g., accounting, logistics, contract administration, and technical services) to support business related, directly or indirectly, to a prohibited transaction.
- Refer any business related, directly or indirectly, to a prohibited transaction to a non-EU, Swiss, UK or US person.
- Participate in any portion of any meeting or committee, including planning or voting, in furtherance of business related, directly or indirectly, to a prohibited transaction.
- Participate in altering operating policies or procedures for a specific transaction where it would permit unauthorised business relating to a prohibited transaction.

If an EU, Swiss, UK or US person receives an inquiry from anyone that relates to a matter that directly or indirectly involves a prohibited action, that EU, Swiss, UK or US person **must decline to respond** (or confirm that they cannot respond).

It is, however, permissible to receive general information relating to the Company's business, such as general reports, business plans, budgets, and reports of earnings, to include such information in preparing consolidated reports, and to otherwise make decisions relating to the Company's business more generally.

VII. What must non-EU, Swiss, UK or US persons do in a recusal situation?

In a recusal situation, non-EU, Swiss, UK or US person employees, officers, or directors **must not** do any of the following:

- Delegate to a EU, Swiss, UK or US person responsibility for any matters that relate, directly or indirectly, to prohibited transaction, or request that a EU, Swiss, UK or US person assist with that transaction.
- Discuss any parties or other aspects related, directly or indirectly, to a prohibited transaction, to a EU, Swiss, UK or US person, except to alert them to the need for compliance with this Policy or raise a compliance issue.
- Include EU, Swiss, UK or US persons in any discussions, meetings, or other correspondence regarding any matters related, directly or indirectly, to a prohibited transaction.
- Attempt to involve EU, Swiss, UK or US persons in any matters related, directly or indirectly, to a prohibited transaction by withholding information (e.g., intentionally removing references to the name of a sanctioned person from correspondence or communications).

Any questions in this regard must be brought to the attention of your Ethics and Compliance Officer.

VIII. Training

Training on the Sanctions and Recusal Policy will be conducted on a regular basis. If you have any questions concerning your training curriculum, please contact your Ethics and Compliance Officer. It is the responsibility of every employee to undergo the mandatory training and to do so in a responsible and engaged manner.

IX. Raise concerns

If you become aware that CCHBC or one of its subsidiaries has become involved in any business contrary to applicable Sanctions, either notify your **Ethics and Compliance Officer** as soon as possible for further guidance or report this through our **Speak Up! line**.

No adverse employment action will be taken against any employee for reporting a violation of this Policy.

X. 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 this Policy, seek guidance from your Ethics and Compliance Officer or the Speak Up! line before you take action.

If you have any questions about this Policy, please contact your manager or, alternatively, your Ethics and Compliance Officer. The Ethics and Compliance Officer that you should contact depends on your role:

- Country Employees: Country Legal Director
- Country Legal Director and Group Function Employees: Head of Legal Compliance
- General Managers, Executive Leadership Team Members and CEO: General Counsel

XI. Policy Update

This Policy is regularly reviewed and the Company reserves the right to amend and revise the contents of this Policy at any time. The latest version of this Policy is available on the Company's Intranet and website www.coca-colahellenic.com.

Last update: May 2026