



# INTEGRITY

## the essential ingredient

### Code of Business Conduct for Suppliers to The Coca-Cola Company

This document is applicable to suppliers, including contingent workers, of The Coca-Cola Company and its majority-owned subsidiaries. Use of the terms "The Coca-Cola Company" and "the Company" in this document refers to The Coca-Cola Company or one or more of its subsidiaries, whichever is relevant to the particular supplier relationship. The Coca-Cola Company expects that all of its suppliers will comply with the law and act ethically in all matters. This Code of Business Conduct for Suppliers sets forth our expectations for doing business with our Company. Working together, we can achieve great success by doing the right thing, with integrity.

This Code contains general requirements applicable to all suppliers to The Coca-Cola Company. Particular supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

### Conflicts of Interest

Employees of The Coca-Cola Company should act in the best interest of the Company. Accordingly, employees should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of The Coca-Cola Company. For example, suppliers should not employ or otherwise make payments to any employee of The Coca-Cola Company during the course of any transaction between the supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but suppliers should take care that any personal relationship is not used to influence the Coca-Cola employee's business judgment. If a supplier's employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, in-law, or same or opposite sex domestic partner) to an employee of The Coca-Cola Company, or if a supplier has any other relationship with an employee of The Coca-Cola Company that might represent a conflict of interest, the supplier should disclose this fact to The Coca-Cola Company or ensure that the Coca-Cola employee does so.



### Gifts, Meals and Entertainment

Employees of The Coca-Cola Company are prohibited from accepting anything more than modest gifts, meals and entertainment from suppliers. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but suppliers should avoid offering Coca-Cola employees travel, frequent meals or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed. When providing services to the Company or otherwise when acting on the Company's behalf, supplier's employees are subject to the same limits described in this section when offered gifts, meals or entertainment by Company's customers, suppliers, or other business partners.

### Protecting Information

Suppliers should protect the confidential information of The Coca-Cola Company. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by The Coca-Cola Company. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received in the course of providing services to or acting on behalf of The Coca-Cola Company. If a supplier believes it has been given access to The Coca-Cola Company's or any other third party's confidential information in error, the supplier should immediately notify its contact at the Company and refrain from further distribution of the information.

Similarly, a supplier should not share with anyone at The Coca-Cola Company information related to any other company if the supplier is under a contractual or legal obligation not to share the information.



## Bribery

Suppliers acting on behalf of The Coca-Cola Company must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all local laws dealing with bribery of government officials. In connection with any transaction as a supplier to The Coca-Cola Company, or that otherwise involves The Coca-Cola Company, the supplier must not transfer anything of value, directly or indirectly, to any government official, employee of a government-controlled company or political party, in order to obtain any improper benefit or advantage. Suppliers may not give anything of value to a government official on the Company's behalf (or in the course of interacting with government on the Company's behalf) without prior written approval from Company legal counsel, which can be obtained through the Supplier's primary contact/relationship manager at the Company. The Company also prohibits commercial bribery. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of The Coca-Cola Company or out of funds provided by The Coca-Cola Company. Suppliers must furnish a copy of this accounting to The Coca-Cola Company upon request.

## Business and Financial Records

Both the supplier and The Coca-Cola Company must keep accurate records of all matters related to the supplier's business with The Coca-Cola Company. This includes the proper recording of all expenses and payments.

If The Coca-Cola Company is being charged for a supplier's employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.



## Reporting Potential Misconduct

Suppliers who believe that an employee of The Coca-Cola Company, or anyone acting on behalf of The Coca-Cola Company, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. The supplier can contact the employee's manager or The Coca-Cola Company Ethics & Compliance Office at [compliance@coke-cola.com](mailto:compliance@coke-cola.com), or use the Company's EthicsLine reporting service at [www.KOethics.com](http://www.KOethics.com), or call toll-free using the access codes that can be found on the EthicsLine website. A supplier's relationship with The Coca-Cola Company will not be affected by an honest report of potential misconduct.

### Question or concern?

Log on to EthicsLine at [www.KOethics.com](http://www.KOethics.com)

