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INTRODUCTION

Suntory Beverage & Food Europe is the European regional division of Suntory Beverage & Food which provides a broad variety of soft drinks and beverages into four regions, namely Japan, Europe, Oceania and Asia, Orangina Schweppes Group and Lucozade Ribena Suntory Limited being the companies conducting the business of the non-alcoholic beverages in Europe (hereinafter referred to as “SBFE”). SBFE is committed to a policy of complying and maintaining high standards of business conduct wherever it does business.

The present Code of Conduct (the “COC”) is intended to set out the principles of SBFE to its network of suppliers, bottlers/co-packers, business partners and customers (hereinafter referred to as “partners”).

The COC provides the basic principles that SBFE expects its partners to respect. It is the first step of the approval process before any commitment with SBFE. The acceptance of the COC ensures that SBFE partners share the same ethical values which are a key first step in any successful relationship.

SBFE is committed to providing the best quality of products possible to its customers and consumers. It is committed to the highest standards of social and environmental responsibility. SBFE partners must emphasize safe and responsible social values and work in line with eco-friendly principles.

SBFE partners must comply with international, national and local legislation wherever they operate. This document sets out the behaviour SBFE expects its partners to adopt. SBFE encourages its partners to go beyond legal compliance.

SBFE or SBFE appointed representatives have the right to access its partners’ premises at any time to check the quality of products and processes, and its partners’ compliance with human rights, environmental laws and ethical commitments. All partners shall be open and provide information related to their business to SBFE. New partners shall complete any prequalification questionnaire provided by SBFE and reply honestly to the questions posed relating to financial data, ethics, sustainability and quality.

To comply with SBFE’s values its partners must engage with their supply chain and subsidiaries to ensure that they in turn respect SBFE’s COC. SBFE reserves the right to terminate its contracts with or refuse to do business with any partner who fails to make this commitment.



LABOUR & HUMAN RIGHTS

SBFE treats its employees with the highest level of respect and dignity. SBFE partners must demonstrate the same values by respecting “International Labour Organisation” statements and encouraging fair treatment of employees.

Child labour

SBFE partners must avoid child labour. No child shall be employed full time until they have reached the minimum school leaving age, Children under the age of fifteen years old may not be employed or work within the hours set for school attendance. If they are employed outside the hours of school attendance, the employment shall not be such as to prevent their attendance at school.

Forced labour

SBFE partners must avoid involuntary labour. Employees must be free to leave the company. Workers must work under contract according to local law. Partners are not authorised to keep identification documents, passports or the working authorization documents of employees.

Working hours

Working hours must comply with local legislation and cannot exceed 48 hours per week and must include a minimum of one day off per week. Over time shall be voluntary.

Labour practices

Wages must be in line with local legislation and SBFE partners shall not pay less than the minimum requirement of the country of origin. If there is no minimum, wages shall be sufficient to meet workers' basic needs. No deductions from salary shall be made for disciplinary reasons

Non discrimination

Partners shall implement a policy that conforms to applicable legislation prohibiting discrimination in hiring and employment on the grounds of race, colour, religion, sex, age, physical ability, national origin, or any other prohibited basis.

 **PEOPLE ETHICAL STANDARDS**

SBFE partners make a significant contribution to the development of SBFE. Therefore their corporate values must be consistent with SBFE principles. The relationship between partners and SBFE employees must be professional and ethical.

Gifts and Hospitality

The relationship between SBFE partners and SBFE employees must be ethical and conducted without any actual or apparent conflict of interest. Therefore reasonable gifts and hospitality may be given and accepted. Lavish gifts and hospitality must not be provided or accepted. At all times you should consider whether, in all the circumstances, including the intention behind it, the gift or hospitality is reasonable and justifiable.

Conflict of interest

SBFE partners and SBFE employees must show the highest level of integrity in their relationships. Only proper criteria may be used to evaluate potential business partners. These include the quality, sustainability, price and nature of service being provided. Partners must show the same level of ethical conduct by prohibiting bribery, extortion and corruption. Business relationships must be based on arm's length commercial considerations and conflicts of interest, real or apparent, must be avoided.

Confidentiality / Intellectual property

Data shared on development and formulas are confidential and cannot be disclosed to third parties. Intellectual property relating to SBFE products shall only be shared with partner's employees if necessary for the business being conducted. A non-disclosure agreement provided by SBFE must be signed by SBFE partners.



HEALTH & SAFETY

SBFE partners shall follow our health and safety principles by providing a safe working environment to employees. A health and safety policy must be in place that complies with local legislation.

Health & safety policy

SBFE partners must identify risks sufficiently to provide safe working conditions to employees. Where necessary, risks shall be mitigated by having adequate training, policies and procedures in place. Partners shall provide protective equipment if needed to employees to guarantee their safety.

Health & safety communication

SBFE partners' employees must be told of any danger relating to their employment. A Health & Safety Policy must be written clearly and be accessible to all workers. Training shall be provided to workers regarding work related risks. Hazardous and toxic products must be handled by skilled workers with adequate protective equipment.

Emergency procedures

SBFE partners shall have warning systems in place to identify high risk situations and have an emergency action plan to enable safe evacuation of their premises.

PRODUCT QUALITY

SBFE partners must deliver to SBFE products and services which comply with all applicable legislation, that meet approved specifications and which guarantee a high level of quality and ensure consumer food safety. SBFE partners must implement a Quality and Food Safety policy and maintain an effective quality management system to ensure the quality of products and services delivered.

Quality

SBFE partners must comply with all applicable regulations. Products delivered must meet the approved specifications and requirements of SBFE. Records of complaints and corrective action plans shall be in place in order to meet the required quality.

Food safety and regulations

SBFE partners must keep up to date and respect all national and international legal requirements relating to products they manufacture. They must also have up to date awareness of problems relating to food safety and of any new technical and scientific advancements within their industry.

Hygiene and Control

SBFE partners must have implemented and maintain a high level of hygiene in their operations. SBFE partners shall have performed food safety analysis based on the internationally-recognised Hazard Analysis and Critical Control Point (HACCP) principles.

GMO and Traceability

SBFE partners must guarantee that all ingredients used are GMO free and free from adulterants and any residuals within regulatory limits (for example pesticides). SBFE partners must be able to demonstrate if required that they have implemented and maintained a system for identifying and tracing all the ingredients and packaging used in their products and ensure traceability for all products manufactured and/or distributed to SBFE.

Evaluation

SBFE partners must ensure that the product or service they deliver complies with the specifications of any member of SBFE and must send a certificate of analysis where

required. Should the product or service delivered do not meet SBFE member specifications, a complaint will be sent to SBFE partners who must take the appropriate corrective action.



SBFE aims to reduce its carbon and water footprint and more generally its impact on the environment as much as possible. Sustainability is a key concern. SBFE partners shall demonstrate the same values by implementing an environmental policy.

Compliance with legislation

SBFE partners must comply with local legislation relating to the environment. Systems shall be in place to ensure compliance with the law. Required certificates must be obtained from the authorities in the country, and where relevant region, in which SBFE partners operate.

Waste Management

SBFE partners shall implement plans to reduce the quantity of waste generated by their business. Procedures shall be in place to manage waste effectively. Hazardous solid waste must be treated separately and handled carefully in accordance with partners' policies. Recycling is highly encouraged.

Water Management

Partners should use water efficiently and strive for continuous improvement to reduce consumption. SBFE partners shall control the use of water in all their activities and ensure that there is no unlawful release of waste water into the external environment. SBFE promotes the use of the ALARA (As Low As Reasonably Achievable) method by its agricultural partners.

Use of energy

SBFE promotes the use of renewable energy by its partners and encourages the development of long term energy reduction plans.

Date

Print Partner Name

Partner Signature