

MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2020



This statement is made in accordance with obligations under the UK Modern Slavery Act 2015 and sets out the actions Britvic has taken during the year ended 30th September 2020 ('2020') to understand potential modern slavery risks and prevent modern slavery and human trafficking in its business and supply chain. This statement covers the activities of all relevant companies in the Britvic plc group, as listed on pages 171 - 172 of the 2020 Annual Report and Accounts.

OUR COMMITMENT

As a business with a complex global supply chain we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking. Britvic is committed to ensuring all our businesses and partners are free from slavery and human trafficking.

OPERATIONS & SUPPLY CHAIN

Britvic is the largest supplier of branded still soft drinks and the number two supplier of branded carbonated soft drinks in Great Britain (GB), and it is an industry leader in Ireland and France. Headquartered in the UK, we have manufacturing operations in GB, Ireland, France and Brazil where we produce our iconic brands, including Robinsons, Tango, J2O, drench, MiWadi, Ballygowan, Teisseire, Fruité, Maguary and DaFruta. Alongside our own manufacturing sites, we also contract manufacture in the UK, rest of Europe and the US. In addition, in GB and Ireland, we produce and sell a number of PepsiCo's soft drinks brands, including Pepsi, 7UP and Mountain Dew, under exclusive agreements with PepsiCo.

We directly employ over 4,500 people and have a diverse supply chain of approximately 1,700 supplier

organisations, sourcing ingredients, materials and services from over 50 countries. These suppliers range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain. We are committed to producing high quality soft drinks which are sourced and manufactured in a fair, ethical and environmentally responsible way.

COVID-19 RESPONSE

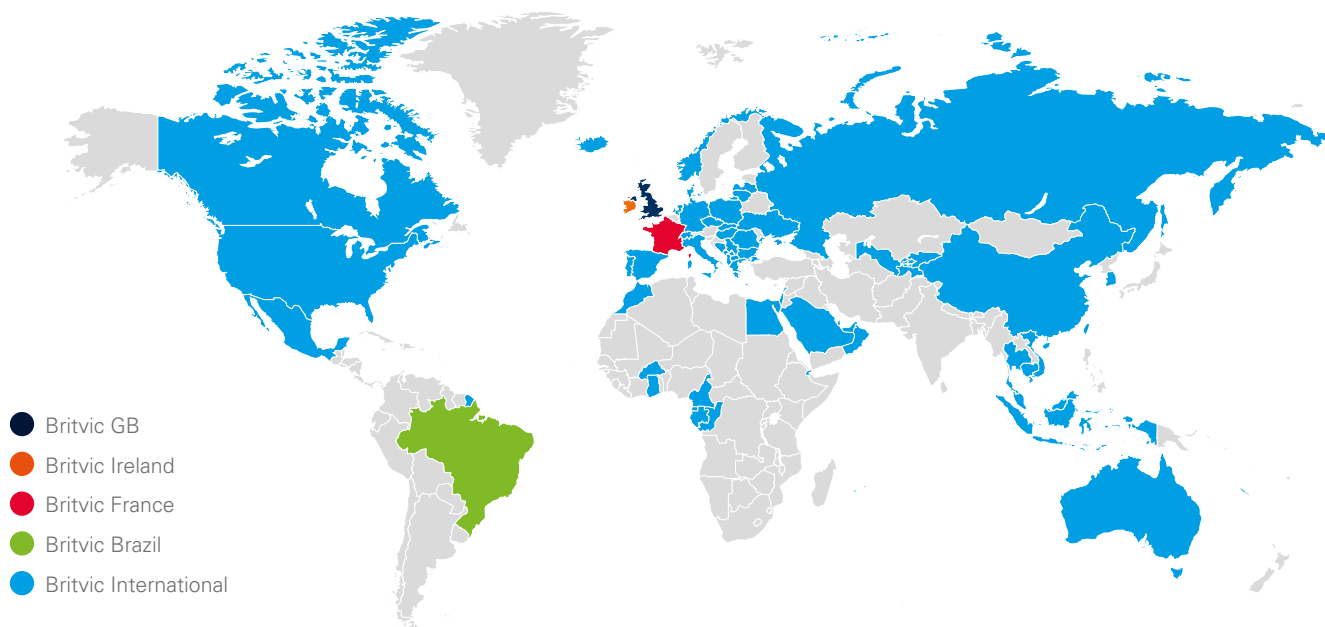
Internal Employees

Safeguarding our employees was our first priority during the COVID-19 pandemic. Where possible, all our employees worked from home, when lockdown was imposed in our different locations, using enabling technology solutions and working flexibly around their domestic circumstances. For those employees unable to work from home, primarily our factory-based teams, we implemented both social distancing and introduced health measures, including temperature checking and additional cleaning regimes, to ensure the safety of our people. All employees classified as vulnerable, or with a vulnerable family member, were identified early on and special measures put in place to support and safeguard them. As you would expect we have adopted all government and public health authority guidelines in each of our markets. We have also put additional

measures in place to support the health and wellbeing of all our employees in these uncertain times. We have gradually reopened our offices, where appropriate to do so, for those who wanted to use them and re-organised our offices so as to allow for social distancing.

Suppliers: SEDEX SAQ (COVID-19 specific)

The COVID-19 pandemic also had a significant impact on the people in the supply chain of Britvic. In order to address this, we accessed the SEDEX platform to assess the impact of the pandemic upon the supplying companies. SEDEX launched an addendum to the self-assessment questionnaire for suppliers' to share the effects of COVID-19 on their workforce and business, in general. Britvic reviewed the suppliers COVID-19 questionnaire responses to learn how suppliers were managing during the pandemic.



GOVERNANCE

We recognise that having the right governance framework to address human rights and ethical behaviours is fundamental to managing the risk of modern slavery in our business and supply chains. In 2017, Britvic established a Modern Slavery Prevention Group, made up of representatives from across the relevant business functions including risk, supply chain, procurement and sustainability. The team was expanded to include a specialist HR representative in 2020. The group is responsible for overseeing Britvic's approach to preventing modern slavery and reviewing the effectiveness of our policies and processes. It is sponsored by the Chief Supply Chain Officer who is a member of the Executive Team and chaired by the Deputy Company Secretary, and the activities of the group are monitored by the Environment, Social and Governance Committee.

Ethical scorecard updates that measure and report progress against our responsible sourcing KPIs are included when appropriate in Quality, Health, Safety, Environment and Wellbeing reports to the Executive Team and Board. Modern slavery issues are also considered during risk assessments at all levels throughout the business and are covered in principal risk reviews of Supply Chain, International Expansion and Legal & Regulatory. (See the description of Principal Risks and Uncertainties on pages 54 – 59 of the 2020 Annual Report and Accounts at [Britvic.com/annualreport](https://britvic.com/annualreport).)

POLICIES IN RELATION TO MODERN SLAVERY

Britvic has developed a suite of policies that relate to ensuring ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code.

Code of conduct

The Britvic Code of Conduct sets out Britvic's core values and how we work. It explains what "doing the right thing" means for Britvic, including with respect to human rights and speaking up about concerns. The code applies to the whole Britvic workforce worldwide regardless of their role or seniority.

➔ FIND THE BRITVIC CODE OF CONDUCT HERE:
[BRITVIC.COM/CODEOFCONDUCT](https://britvic.com/codeofconduct)

Ethical Business Policy

The Ethical Business Policy sets out the appropriate ethical and legal behaviour that an individual is expected to adopt when doing business on behalf of Britvic, along with a set of ethical business standards expected of both Britvic operations and our suppliers.

It states that we:

// **RESPECT AND PROTECT HUMAN RIGHTS BY ENSURING THAT WE AND OUR SUPPLIERS WORK IN A CLEAN AND SAFE ENVIRONMENT, HAVE PROPER STANDARDS OF EMPLOYMENT, COMPLY WITH LOCAL LAWS AND DON'T OPPRESS OR EXPLOIT ANYONE**

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This policy applies to the whole Britvic workforce and to all third parties acting on behalf of Britvic including secondees, advisors, agency workers, contractors and other companies.

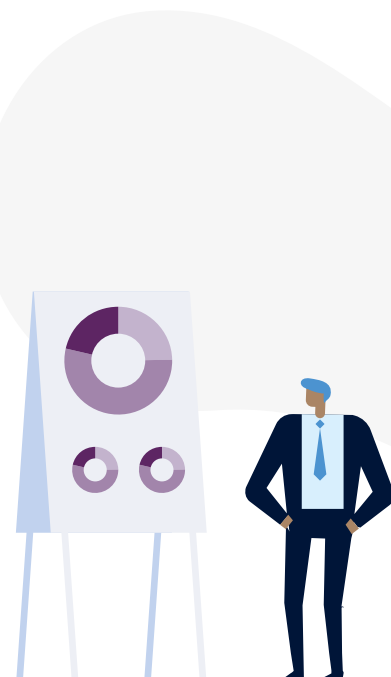
The ethical business standards that support the policy include a statement that

// **STANDARDS OF EMPLOYMENT MUST COMPLY WITH THE UK MODERN SLAVERY ACT 2015 WHICH FORBIDS THE EMPLOYMENT OF ANYONE UNDER CONDITIONS OF: 'FORCED LABOUR', 'COMPULSORY LABOUR', 'SLAVERY' OR 'SERVITUDE' OR THE EXPLOITATION OF ANY PERSON BY 'HUMAN TRAFFICKING'.**

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Furthermore, Britvic and our suppliers must maintain standards of employment in accordance with the Ethical Trading Initiative (ETI) Base Code (see box below).

➔ FIND THE BRITVIC ETHICAL BUSINESS POLICY HERE:
[BRITVIC.COM/ETHICALBUSINESS](https://britvic.com/ethicalbusiness)



Ethical Trading Initiative (ETI) Base Code Labour Standards

1

EMPLOYMENT IS
FREELY CHOSEN

2

FREEDOM OF ASSOCIATION
AND THE RIGHT TO
COLLECTIVE BARGAINING
ARE RESPECTED

3

WORKING CONDITIONS
ARE SAFE AND HYGIENIC

4

CHILD LABOUR SHALL
NOT BE USED

5

LIVING WAGES ARE PAID

6

WORKING HOURS ARE
NOT EXCESSIVE

7

NO DISCRIMINATION
IS PRACTISED

8

REGULAR EMPLOYMENT
IS PROVIDED

9

NO HARSH OR INHUMANE
TREATMENT IS ALLOWED

Speak-Up Code

This code sets out various methods by which employees, suppliers and third parties can raise concerns about working practices that they believe breach any company policies or the law. Britvic provides a confidential hotline via both phone and web, which is available 24/7 and 365 days a year. The hotline is operated by an independent external organisation.

Any concerns reported via the hotline or through line management are referred to the Company Secretary and the Director of Audit and Risk, and all matters are treated in the strictest confidence. Concerns can be reported anonymously and are investigated as quickly and thoroughly as possible, and the position of the person reporting the concern is protected, regardless of the outcome of the investigation. The Board receives reports on all concerns raised and progress towards resolving them at every Board meeting.

During 2020, Britvic relaunched the confidential hotline service with a new external supplier, called mySpeakup. The new service was communicated via the intranet in December 2019 and again in July 2020, with local language versions sent via email to all colleagues in France and Brazil. The new system is open to anyone and can be used anonymously. No issues related to Modern Slavery were raised in 2020

→ FIND THE BRITVIC WHISTLEBLOWING POLICY HERE
[BRITVIC.COM/WHISTLEBLOWING](https://britvic.com/whistleblowing)



Other policies relating to Modern Slavery

Britvic has other policies in place which contain terms relating to the principles of ethical business, including the Work Experience and Young People Manager Guidance, the Equality & Diversity Policy and the Harassment & Bullying Policy.

Policy implementation, compliance and training

Each policy is assigned to a Global Policy Owner who is responsible for ensuring the policy is kept up to date and is properly implemented. Local policy owners are responsible in different countries to ensure that policies are amended in line with requirements of local regulation. Each market has its own approach to implementing, communicating and training on our global policies.

On joining the business, new starters are required to read key Britvic policies, which include the Code of Conduct and the Ethical Business Policy. Key personnel in functions such as procurement and research and development are given extra training to raise awareness of the associated risks within the supply chain.

All our suppliers, as part of the onboarding process, are required to read and confirm adherence to our Ethical Trading Policy. Failing to do so will result in the vendor not being accepted as a supplier to Britvic.

Britvic has a Compliance function responsible for overseeing the compliance agenda, including working with policy owners to ensure that individual policies form a coherent framework across the business. One of the objectives of this function is to ensure that policies remain relevant and new policy areas are identified and addressed.

RISK ASSESSMENT, DUE DILIGENCE AND ASSESSMENT OF SUPPLIERS AND SUPPLY CHAIN

Our suppliers



Sedex

Sedex is a not-for-profit organisation and the largest collaborative platform for sharing ethical supply chain data. It is dedicated to driving improvements in ethical and responsible business practices in global supply chains and has more than 60,000 members in over 180 countries (as reported on www.sedexglobal.com on 10 October 2020). It has a secure, online database which allows members to store, share and report information about labour standards, health & safety, the environment and business ethics.

We continue to proactively contribute to the Sedex data platform and its continuous improvement. Britvic has been a member of Sedex since 2005 and we contribute to the development of the SMETA 4 Pillar audit at the Sedex Stakeholder Forum.



AIM-PROGRESS

Britvic is one of the founding members of AIM-PROGRESS which started in 2007. AIM-PROGRESS is a global fast-moving consumer goods manufacturer and supplier forum whose goal is to positively impact people's lives through combined leadership of robust responsible sourcing practices throughout our supply chains. AIM-PROGRESS members exchange views and share learnings that help us to develop best practice and continually enhance our ethical processes. Further information can be found at www.aim-progress.com

We are a part of the Mutual Recognition working group whose aim is to enable the social and ethical audits conducted by AIM-PROGRESS members to be recognised and accepted by other fellow members.

As part of monitoring our ethical performance, we assess the ethical risks in our supply chains. All direct suppliers* are required to join Sedex, complete the Sedex self-assessment ethical questionnaire and permit us access to their data through the on-line database. We assess each supplier's risk using the platform risk assessment tool which identifies the likelihood of an issue occurring. The risk score is calculated using Sedex's new inbuilt risk assessment tool, RADAR, launched in March 2020. It calculates a supplier risk rating based upon inherent risk and the management proficiency by capturing the risk associated with a suppliers country as well as the inherent risk associated with the sector, making RADAR significantly more powerful, which has consequently increased the overall number of high risk suppliers. Combining the impact of the new risk assessment tool with the supplier site level information (the self-assessment questionnaire and site audit reports), RADAR provides deeper insights into the potential risks suppliers may present at individual manufacturing site level.

Britvic requires all direct suppliers* identified as "high-risk" to have a SMETA 4 Pillar audit (Sedex Members Ethical Trade Audit), which assesses and verifies compliance against:

- Labour Standards (including absence of forced labour),
- Environmental Standards,
- Business Ethics (including absence of Bribery & Corruption)
- Health & Safety.

These audits also include confidential interviews with a percentage of the workforce and are carried out by independent auditors from internationally recognised audit bodies. If any issues or non-compliances with the audit standard are identified during an audit, the supplier is required to prepare a corrective action plan and remediate them within an agreed period.

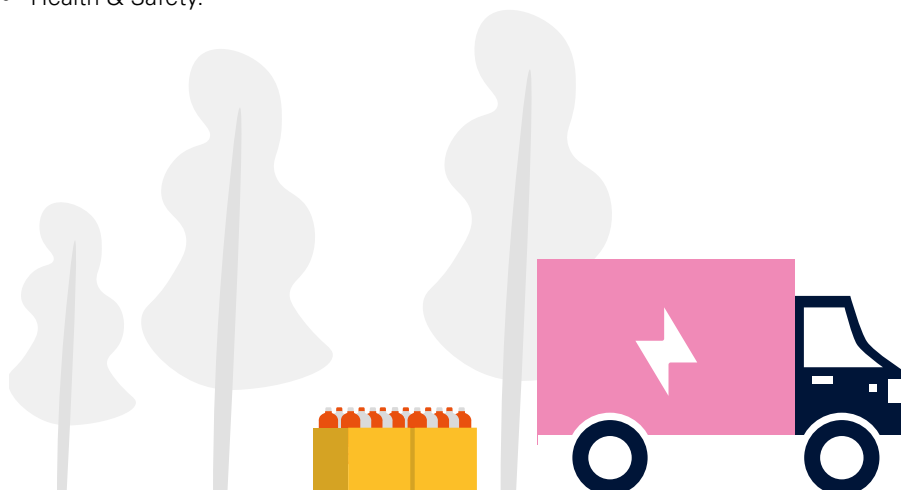
Our own business

As part of our commitment to meet the same standards that we're asking of our supply chain, all our manufacturing sites in GB, Ireland, France and Brazil have completed the Sedex self-assessment questionnaire and successfully completed SMETA 4 Pillar audits. All Britvic manufacturing sites are regularly receiving SMETA audits.

The SMETA audit findings highlighted an opportunity for the management teams at each Britvic manufacturing site to receive training to increase awareness and demonstrate ethical standards. Britvic will roll out Ethical Trading Initiative (ETI) base code training to management teams at each site in 2021.

The COVID-19 pandemic has interrupted the completion of on-site audits, meaning some scheduled audits for 2020 have been postponed until local Government restrictions are lifted.

As SEDEX member we are exploring the Sedex Virtual Audit for SEDEX members to receive virtual audits while pandemic restrictions continue.



HUMAN RIGHTS DUE DILIGENCE

Britvic is working closely with AIM-PROGRESS to develop a plan for the potential new EU Human Rights Due Diligence legislation.

TRAINING

Britvic is introducing a new starter induction training on raising awareness of the existence of modern slavery in the UK. The course was developed by qualified instructional designers using information from the Modern Slavery Act and various anti-modern slavery Non-Governmental Organisations (NGOs), for example Anti-Slavery and the Modern Slavery Partnership.

Britvic has trained key internal staff on the ETI Base Code and the Sedex Members Ethical Trade Audit to promote awareness of modern slavery within FMCG practices.

In the year 2020, we were planning to work in partnership with Stronger Together to carry out on-site training on tackling modern slavery in our factories and offices. Due to the current pandemic all face to face training had been cancelled and postponed to a future date. We do believe that training and raising awareness through workshops are key factors in tackling modern slavery efficiently and we are considering options for 2021. Due to the uncertainty caused by the COVID-19 pandemic, while the preference would be to hold face to face sessions, we will conduct online training for key employees (resourcing, procurement etc) for 2021.

➔ MORE INFORMATION ON STRONGER TOGETHER
CAN BE FOUND AT
[STRONGER2GETHER.ORG](https://stronger2gether.org)

Employee Wellbeing and Diversity & Inclusion Programme

At Britvic, our people are our lifeforce. This is why we don't stop at conducting the required due diligence to tackle modern slavery and human rights abuses, but we go further and take positive actions to maximise the wellbeing of our employees.

Britvic's wellbeing framework is made up of the following interconnected elements:

- Promoting good health, energy and physical wellbeing.
- Building emotional health, resilience and mindfulness.
- Promoting dynamic working.

In support of the above points we have trained employees who have volunteered as Wellbeing Warriors and Mental Health First Aiders playing a proactive role in employee wellbeing.

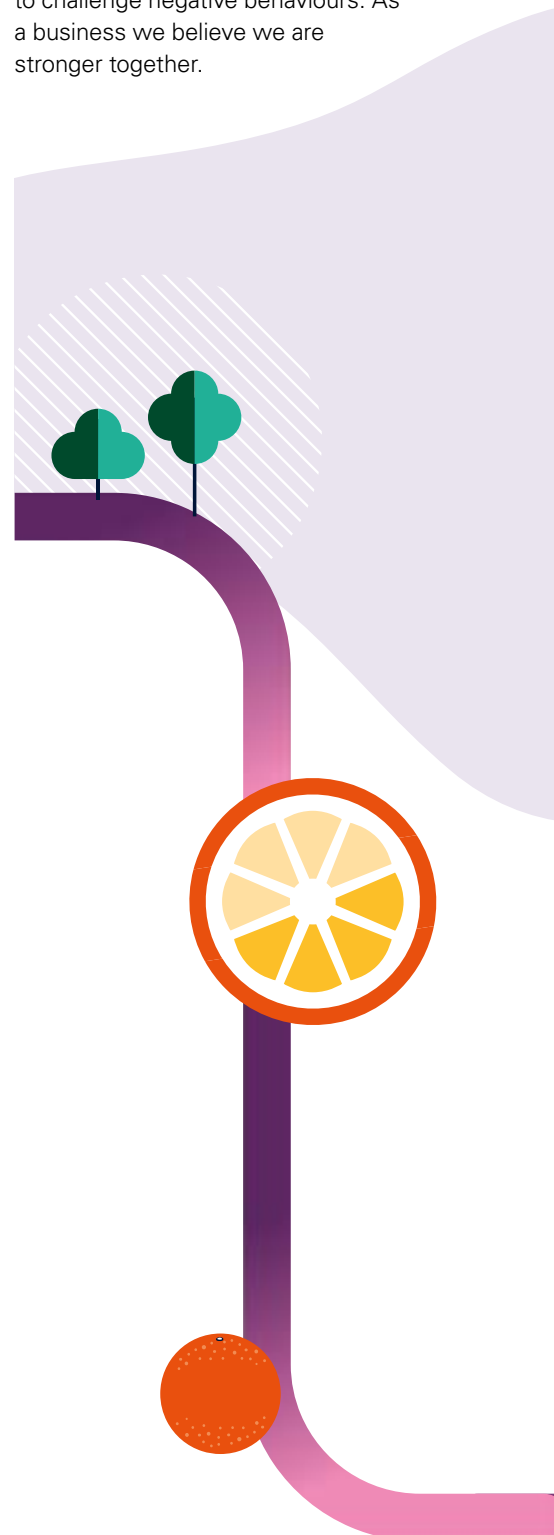
From a technology point of view, the myLife app was launched in November 2019 and is supported by a suite of resources, including a comprehensive digital resource hub and a 24/7 confidential employees assistance support.

In parallel with our Wellbeing agenda, we have implemented a strong Diversity & Inclusion Programme.

At Britvic, we celebrate our keen sense of belonging to one family. This sense is fuelled by our business-wide inclusion and diversity agenda, where every individual's unique and different contributions are valued, and we are encouraged to be our true selves at work.

Since the start of this programme, we have launched four network groups across the business. Our B-Empowered is focused on supporting, developing and retaining great female talent within Britvic. Our B-Proud network represents our LGBTQ+ community. Our B-Seen network represents diverse abilities across our organisation, and our B-Diverse network represents colleagues from all ethnic minorities.

Diversity & Inclusion is a part of our DNA and is built into our core values as a business. We continuously re-enforce our Speak-up framework and equip line managers with skills to tackle any bullying, harassment and discrimination and build confidence in our people to challenge negative behaviours. As a business we believe we are stronger together.



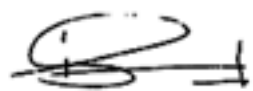
EVALUATING OUR PROGRESS AND NEXT STEPS

The percentage of direct suppliers linked to Britvic on Sedex is 88%, consistent with the numbers linked in the individual Britvic business units supply bases.

Since the launch of the new Sedex risk assessment tool in 2020 and due to the COVID-19 pandemic, the number of supplier audits which took place this year dropped. As a result, we saw an increase in the number of high risk suppliers, creating a small decrease in the number of our high-risk suppliers with audits. In 2021, we will be requesting our high-risk suppliers host virtual audits in place of on-site audits, until on-site audits may resume.

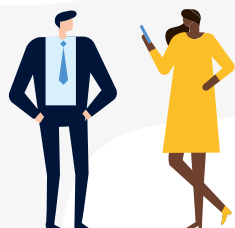
The Modern Slavery Prevention Group will continue to identify areas of focus to drive progress and provide assurance that our practices and those of our suppliers are conducted ethically for 2021.

This statement has been approved by the Board of Directors of Britvic plc.



Signed

Simon Litherland
Chief Executive Officer
November 2020



2021 Goals

DEVELOP A RISK MAP TO IDENTIFY
FOCUS AREAS AND TO REVIEW THE
STRATEGY AND ACTION PLAN TO
TACKLE MODERN SLAVERY

COMPLETE A GAP ANALYSIS OF OUR
POLICIES IN RELATION TO HUMAN
RIGHTS / TACKLING MODERN SLAVERY

RAISE AWARENESS WITHIN THE
BUSINESS ON MODERN SLAVERY
(FROM POSTERS IN FACTORIES TO
VIDEOS ON OUR DIGITAL
LEARNING PLATFORM)

MONITOR COMPANY HELD DATA FOR
MODERN SLAVERY RED FLAGS

REVIEW CONTRACTS WITH OUR
TEMPORARY LABOUR PROVIDERS,
INCLUDING SPECIFIC LEGAL CLAUSES
ON TACKLING MODERN SLAVERY

ROLL OUT OF THE MODERN SLAVERY
AWARENESS TRAINING PROGRAMME
(SEE PAGE 6)

PROMOTE SEDEX VIRTUAL AUDITS
FOR HIGH RISK SUPPLIERS

* Direct suppliers are those who supply raw materials, defined as any items that end up in the completed products on sale. This includes ingredients and packaging.

