

Modern Slavery Statement 2018 (“Statement”)

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This Statement is published by Beverage Services Limited, an indirect wholly owned subsidiary of The Coca-Cola Company, in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by The Coca-Cola Company and its subsidiaries (together referred to as “The Coca-Cola Company” or the “Company”) during financial year 2018 to prevent and eradicate forced labor and human trafficking in Company operations and the supply chain. The discussions about actions taken by The Coca-Cola Company reflect steps taken at the parent company level and as also implemented where indicated by the entities publishing this Statement. Slavery, forced labor and human trafficking are referred to in this Statement as “forced labor and human trafficking.”

Overview

Respect for human rights is fundamental to the sustainability of The Coca-Cola Company and its subsidiaries and the Company is committed to working to ensure that people associated with the businesses and connected to the supply chains are treated with dignity and respect. The International Labor Organization estimates that 25 million people are in forced labor situations, over half of whom are in industries that may feed into global supply chains. This is one of the critical human rights issues of the time and all companies must make it clear that there is no place for such practices in modern business operations. The Coca-Cola Company’s Human Rights Policy and Supplier Guiding Principles prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

Over the last few years, the Company implemented policy enhancements and undertook work to identify risks deeper in the supply chain, collaborated with peer companies to support an industry-wide resolution against forced labor, conducted supplier trainings focused on the topic and became a founding member of a multi-stakeholder initiative to advocate for the “employer pays principle.”

Through these steps the Company aims to improve due diligence in the own supply chain and also raise awareness through collaboration.

Business organization, structure and supply chain

The Coca-Cola Company is one of the world's largest non-alcoholic beverage company with more than 500 sparkling and still brands and over 3,900 beverage choices. The Company's global portfolio features 21 billion-dollar brands including: Coca-Cola, Diet Coke, Fanta, Sprite, Coca-Cola Zero, vitaminwater, Powerade, Minute Maid, Simply, Georgia, Dasani, and Del Valle and others. Through the world's largest beverage distribution system, consumers in more than 200 countries and territories enjoy Coca-Cola beverages at a rate of more than 1.9 billion servings a day.

The Company makes beverage products available to consumers throughout the world through a network of Company-owned or -controlled bottling and distribution operations as well as independent bottling partners, distributors, wholesalers and retailers. There are approximately 250 independent bottling partners and more than 900 bottling plants and together the system employs over 700,000 people. The Company has approximately 3,500 direct suppliers that are authorized to sell ingredients, packaging, and other supplies to the system and are subject to potential audit.

Further details regarding Company organization and structure can be found in public filings.¹

Policies and Contractual Controls

The Coca-Cola Company's Human Rights Policy, which was approved by our Board of Directors, is based on the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

¹ The most recent of which can be found here – <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/investors/2016-AR-10-K.pdf>

The Human Rights Policy applies to Company-owned and controlled operations worldwide and clearly articulates its corporate commitment to respect human rights in its operations. Together the Human Rights Policy and Supplier Guiding Principles establish a foundation for requiring the business around the world to be maintained in accordance with Company standards, including prohibiting the use of forced labor and human trafficking. These policies also include rights that provide an important underpinning against forced labor, including freedom of association, child labor, abuse of labor and grievance mechanisms. There is a Committee within The Coca-Cola Company's Board of Directors that reviews the Company's human and workplace rights policies and how the Company demonstrates respect for human and workplace rights in the business system, in the supply chain and in the communities in which the Company operates. At a minimum, the Committee receives progress reports in this area annually.

The Supplier Guiding Principles are embedded into contractual agreements and purchase orders between the Company and direct and authorized suppliers. TCCC expects partners and suppliers to develop and implement appropriate internal business processes to ensure compliance with the Supplier Guiding Principles.

Policy and Due Diligence Enhancements

Recognizing that migrant workers are particularly vulnerable to exploitation and human trafficking, in 2014, the Company reviewed policies and due diligence activities with the aim of better protecting such workers throughout the supply chain. The Company publicly committed to three principles related to the recruitment and employment of migrant workers:

- 1) Employment terms are represented in a truthful, clear manner and in the language understood by workers prior to employment;
- 2) Worker does not pay recruitment, placement or transportation fees; and
- 3) Worker has access to personal identity documents.

These principles, along with the overall prohibition of forced labor, create a framework for responsible and transparent recruitment and employment practices. These practices were built into

the Company's audit protocol and conducted auditor training sessions around the world to familiarize third party auditors with the new expectations. The Company continues to do global audit firm meeting in Atlanta each March to provide a refresh on the Company program and ensure consistency. Regional auditor trainings are held as needed.

To further promote the "Employer Pays Principle," The Coca-Cola Company was a founding member of the Leadership Group for Responsible Recruitment, a group of companies that have committed to the principle. No worker should pay for a job - the costs of recruitment should be borne not by the worker but by the employer. The Leadership Group, supported by the Institute for Human Rights and Business (IHRB), the Interfaith Center on Corporate Responsibility (ICCR), International Organization for Migration (IOM) and Verite, is championing the idea among peer companies. The goal is to eradicate worker fees within 10 years. Members meet quarterly, either in-person or virtually, to align on priorities and seek collaboration with other industry associations and multi-stakeholder initiatives. To that end, the Leadership Group for Responsible Recruitment worked with The Consumer Goods Forum (CGF) to host two regional roundtables in 2018 on the topic of driving responsible recruitment in South East Asia. Roundtables were held in Malaysia and Thailand and provided an opportunity for brands, suppliers, and recruitment agencies to come together for constructive dialogue. In addition to in-person dialogues, the Leadership Group provides an online repository for guidelines and resources. <https://www.ihrb.org/employerpays/employer-pays-resource-bank>

Supplier Audits

As part of the contractual language, direct and authorized suppliers agree to perform audits by third parties to demonstrate compliance with the Supplier Guiding Principles. In addition, all of the bottling operations and authorized suppliers selling more than \$60,000 annually to the Coca-Cola system are required to complete a third-party audit and share the audit results with The Coca-Cola Company. Moreover, the Company has chosen not to limit the audits to those suppliers

identified on a risk-based approach – for instance only auditing in certain markets or certain product lines – because, as a global brand, Company standards and expectations are global as well. And, because The Coca-Cola Company believes that it is important to demonstrate that it holds itself to the same requirements that is asked of supplier partners, third party audits are also conducted at Company office locations.

Third party audits remain an important tool for confirming adherence to the Human Rights Policy and Supplier Guiding Principles, including any evidence of any forced labor or human trafficking. The Company approves a select number of independent audit firms and work with them to conduct the audits which generally span one to three-person days depending on facility worker population. The audits are generally announced, but the Company reserves the right to conduct unannounced audits as well. The primary components of an audit include an opening meeting to familiarize the facility management with the process and expectations and to answer any questions. A facility walk through enables the auditors to review safe workplace conditions including emergency exits, chemical storage, machine safety, etc. Confidential interviews which sample both employees and contingent workers enable auditors to hear directly from workers. Management is not allowed to be present during workers interviews and while guidance is provided to auditors on topics to cover, the intention is for the auditor to have a conversation and make workers feel comfortable. Record reviews enable the auditors to cross-check the information gathered throughout the assessment against personnel files, wage records and hours of work logs. At the completion of the audit, a closing meeting is held with management to review any findings identified and review recommended corrective actions. The facility manager is asked to sign a summary report. A full report is then be issued and sent to The Coca-Cola Company and the facility, generally within two weeks.

If a supplier fails to uphold any aspect of the Supplier Guiding Principles requirements, it is expected to pursue remediation. The Company works with suppliers to implement corrective actions and demonstrate compliance through a follow-up assessment. Depending on the type of finding, corrective actions are expected to occur to remediate issues immediately for critical findings or within 30-90 days for those findings that require additional implementation time. Validation of remediation occurs through in-person or remote follow-ups. A remote follow-up

would suffice when documents can be provided to show corrective action while in-person follow-ups are scheduled if interviews or visual inspection are needed. This process and associated expectations are explained to suppliers in detail in the Workplace Implementation Guide.

In areas where employment of foreign or migrant workers is common, auditors are asked to pay special attention to the recruitment process and document retention. Recruitment agencies can offer a valuable service, but can also render workers vulnerable to bonded or forced labor. Migrant workers may become trapped by debt incurred to pay recruiters or by visa and work permit regulations that bind them to a particular workplace, and by limited access to host country law enforcement. Audit firms are asked to take special care in identifying any higher risk recruitment practices, including verifying the employment terms were shared prior to employment and covered topics such as:

- Minimum and overtime wage rates;
- Maximum overtime hours that can be expected and that are consistent with local laws; Benefits to be provided;
- Summary of the living conditions if applicable;
- Any legalities regarding terminating employment or visas required for exiting the country.

Auditors inquire during interviews and review payroll records to identify instances where recruitment or placement fees were charged to workers.

Each year, The Coca-Cola Company facilitates more than 2,000 third-party audits of Company office locations, franchise bottlers, and suppliers each year and more than 25,000 third-party audits since the audit program began in 2003.

The Company's publicly stated goal is that, by 2020, 98 percent of bottling plants and 95 percent of in-scope suppliers will achieve compliance with the Supplier Guiding Principles. Based on the results of third-party audits, by the end of 2018, 90 percent overall achieved compliance with the Supplier Guiding Principles. As previously noted, the Company works with those sites that have not yet achieved compliance to remediate issues, make continuous improvement and then demonstrate progress during the next audit.

Audit results in 2018 revealed continued progress in implementing the priority principles however risk areas remained including in Taiwan, Malaysia and Thailand. In Taiwan, we hired Verite to deliver a tailored migrant worker training. As a result of the continued due diligence efforts, one promotional supplier was able to reimburse recruitment fees to employees. In Thailand, the Company circulated a specific migrant worker policy communication to all suppliers and will be offering a refresher training in Thailand and Malaysia in 2019. We also became active members of the Responsible Labor Initiative (RLI) XXX

Training and Peer Engagement

To support employees and suppliers in upholding the Human Rights Policy and Supplier Guiding Principles, the Company conduct training and provide online resources. Training on the Human Rights Policy has now been incorporated as a standard online training module for all employees, including special training for those responsible for supply chain management for the entities publishing this statement. Company employees are provided multiple internal mechanisms to report any violation of Company policy or law, including related to forced labor and human trafficking. The Company maintains a third-party service to allow employees and workers in the supply chain to report violations in multiple languages via KOethics.com 24 hours a day. The Company has published online simple brochures available in 14 languages outlining what employees and leaders need to know and do regarding respect for human rights overall. To further bring the topic of human rights to life, a video was assembled with a compilation of employees talking about what human rights means to them as part of a blog post. The Human Rights Managers Guide, which specifically covers the topics of forced labor and human trafficking, is available online and helps Coca-Cola managers globally, including managers of the disclosing entities, understand expectations including with regards to forced labor and human trafficking.

For suppliers, in-person training as well as online resources are provided. The Workplace Implementation Guide is available in multiple languages and outlines how to uphold the Supplier Guiding Principles. The Company also developed a mobile app which is available on iTunes and

is intended for use by suppliers and employees and includes interactive checklists related to key risk areas such as forced labor among migrant workers.

To underscore the message against forced labor and human trafficking, the Company collaborates with peer companies through the industry group AIM-PROGRESS to deliver supplier trainings. AIM-PROGRESS is a forum of Fast Moving Consumer Goods (FMCG) manufacturers and common suppliers, assembled to enable and promote responsible sourcing practices and sustainable supply chains. By working together with peers, the Company strengthens the common message about workplace rights overall and the prohibition of forced labor and human trafficking across the industry.

The Consumer Goods Forum (CGF) is a consortium of consumer goods manufacturers and retailers focused on pursuing efficiency and positive change. The Coca-Cola Company was one of the co-leads for a workstream focused on drafting and now implementing the CGF's Forced Labor Resolution. An Action Framework for implementation of the Resolution was subsequently developed and then approved by the Board of CGF in June of 2016. The Forced Labor Resolution identified a set of Priority Industry Principles. The Priority Industry Principles, listed below, aim to address employment practices that can lead to forced labor situations:

- Every worker should have freedom of movement
- No worker should pay for a job
- No worker should be indebted or coerced to work

The workstream encourages members to take steps to implement and mainstream these principles in their own operations and supply chain and to find opportunities for collaboration with other CGF members. In 2018, the Company continues to work with other CGF member companies to disseminate and advocate for the vision articulated in the resolution including through joint training efforts addressed to suppliers.

In 2018 we re-engaged with the Global Business Coalition Against Trafficking (GbCAT). The mission of GbCAT is to leverage the reach, scope and power of global business to address modern slavery. The organization is focused on three key workstreams including providing guidance and

tools to businesses, building capacity for small and medium sized enterprises and supporting survivors of human trafficking through job skills.

Human Rights Risk Verification and Management within Supply Chain

In addition to the rigorous implementation of the Human Rights Policy and Supplier Guiding Principles, the Company worked with the organization SHIFT to initiate a comprehensive global effort to identify salient human rights issues and risks throughout the value chain. SHIFT is an organization that works with companies to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs). The initial workshops were facilitated by SHIFT and included cross-functional staff from departments such as procurement, water stewardship, legal, public affairs, 5by20 women's empowerment and others and then the model was replicated in other geographies. The Company also carried out a workshop with top bottler partners to identify salient human rights issues across the system. These workshops eventually included more than 180 participants from a variety of functions across four continents. The risk ranking that resulted from these workshops was further discussed in a broad consultation process with more than 57 civil society groups, including NGOs, socially responsible investors, Global Union Federations and many others. The result was a list of 12 salient human rights identified, including forced labor.

Based on the above exercise we undertook a process to update our Human Rights Policy to reflect lessons learned from our review of salient human rights risks. We consulted widely with NGOs, civil society groups, trade unions, investors and key experts around the globe to ensure our updated policy meets the expectations, concerns and demands of stakeholders. Additionally, we published our first stand alone human rights report.

Human rights issues identified through these workshops, consultations and audit results are discussed with the Public Issues and Diversity Review Committee of the Board of Directors on an ongoing basis.

Risks in Agriculture

One potential area of risk for forced labor and human trafficking is agriculture. The Company and local subsidiaries do not typically purchase agricultural ingredients directly from farms, nor does the Company own farms or plantations. But, as a major buyer of agricultural ingredients, such as sugar, the Company strives to ensure human rights are respected across these ingredient supply chains. In 2013 the Sustainable Agriculture Guiding Principles (“SAGP”) was published. The SAGP, which build on the Company’s Supplier Guiding Principles, prohibit forced labor and human trafficking.

Additionally, the Company determined to make it a goal to conduct country level studies (or “country studies”) on forced labor, child labor, and land rights looking at a priority crop, sugar, in top markets where sugar is sourced. The studies – which are research efforts, not audits – enable us to better understand the sugar sourcing supply chain and to give visibility on how suppliers and bottling partners are addressing these three risks which are considered higher social risk factors in agricultural supply chains. The country studies are undertaken by third-party research firms and include three components of work: 1) A review of relevant literature such as data from the national government, International Labor Organization, US Department of Labor, World Bank, U.S. Department of State, and NGO expert publications as well as other public sources of information, ; 2) Stakeholder interviews including international, national and regional stakeholders; and 3) Field visits to farms, on-site interviews with cane-cutters and on-site documentation review at the sugar mills. Stakeholders have included ministries of labor and agriculture, local chapters of international organizations like Save the Children and Oxfam, local unions, community members, relevant sugar associations, etc. Specific stakeholder information is included in each published report. The farms visits may be a combination of announced and unannounced visits. At the conclusion of the research, a public report is issued on the website and, in consultation with relevant stakeholders, mitigation strategies are discussed as well as corrective actions that may be required should any incidents of those risks be found. More information on the country study methodology is available online.

By the end of 2018, The Coca-Cola Company published 18 country studies, and more are underway. The country studies are available on the [website](#) and findings vary from country to country. For instance, in [Brazil](#), where forced labor has been a historical issue, stakeholders interviewed for and listed in the report agreed that great strides have been made to combat the issue and no incidences of forced labor were identified in the sugar mills surveyed by the researchers. Thirteen of the twenty-one Brazilian sugar mills surveyed had written policies against forced labor, eleven of which extended to their suppliers² and all 21 Brazilian sugar mills were found to have practices aimed at preventing forced labor conditions. Since publication mills have implemented policies and processes to reduce the risk of forced labor by also incorporating independent producers into their Bonsucro certification. In contrast, only 1 of 6 sugar mills reviewed in the [Colombia study](#) had a written policy against forced labor in their operations and that policy did not extend to its suppliers. Notwithstanding the gap in existence of policies, no instances of forced labor were identified in Colombian sugar mills surveyed. In [Guatemala](#), three of the five sugar mills surveyed were determined to have strong management systems implemented to prevent forced labor, but in another Guatemalan sugar mill, forced overtime – a form of forced labor – was identified among internal migrant workers (those workers migrating within the country) coming to work for the harvesting season. In Côte d’Ivoire, the study found that a subcontractor utilized by the mill was engaging in forced labor via indebting migrant workers and withholding travel documents until the debt was repaid. The mill investigated the claims and immediate remediation was taken. In Mexico an issue that was identified was with the practice of providing a down-payment towards a promised full amount to workers at the start of the harvest season. If a worker stopped cutting for any reason during the season they did not receive their remaining wages. The Company works directly with these mills and more broadly with the relevant sugar associations to continue to build on their efforts to improve on key labor issues, including forced labor and human trafficking and overall respect for human rights.

These country studies are not an objective in and of themselves. It was expected, setting out that this would be a journey that would require significant collaboration with suppliers, bottlers and key stakeholders to carefully examine human rights risks and to improve efforts to prevent forced labor and human trafficking in the operations and supply chain. For example, in Mexico in 2018

we began working to develop a collaboration model with the government, producers, industry and end users to drive commonly agreed goals that would help to address historical practices of child and forced labor.

While these country studies are focused on sugarcane, we are addressing the risk in other industries as well. For example in citrus, our largest supplier demonstrated that their owned farms meet SAI FSA silver or gold and in 2018 we built a collaboration with the NGO Solidaridad and Innocent Brand to address labor and productivity with smallholders supplying farms.

These studies and projects are an important tool for facilitating an internal and external conversation on human rights impacts, including the risk of forced labor and human trafficking, deeper in the supply chain.

Additional Risk Areas

Another area of identified risk related to forced labor in the value chain is the sponsorship of mega-sporting events. Mega-sporting events, like the Olympics or World Cup, inspire athletes and fans alike, but have in some instances also been associated with human rights challenges. As sponsors of such events, the Company advocates for transparent and accountable administration that respects the human rights of all those involved – from those building event venues to the athletes themselves. The Company provided funding to research the topics of human rights in the context of mega-sporting events in partnership with the Institute for Human Rights and Business (“IHRB”) and others. After two years, the collaboration spun off in June 2018 to form the Center for Sport and Human Rights: <https://www.sporhumanrights.org>. The activities of the Center will focus on raising awareness, building capacity and increasing accountability in line with the Sporting Chance Principles. The Coca-Cola Company continued to providing funding to the Center in 2018.

Qatar, the site of an upcoming FIFA World Cup in 2022, has faced concerns about human rights issues, particularly with regards to migrant workers. As a result of the Company’s proactive engagement with FIFA on the topic, the Head of Coca-Cola’s Global Workplace Rights Department sits on the Human Rights Advisory Board to FIFA. The Advisory Board was

established in 2017 to strengthen FIFA's efforts with regards to respect for human rights. The Board is an independent body composed of eight international experts in human, including labor, rights and anti-corruption issues from the United Nations, trade unions, civil society and business. In 2017 and 2018 the Advisory Board published reports outlining recommendations for improvement and monitoring progress.

The Coca-Cola Company has operations in Qatar, including a bottling plant which the Company hopes can be a positive example for responsible business conduct in the region. It is policy that employees retain possession of their passports and identification papers and personal lockers are provided to ensure safe-keeping. Salaries are paid directly to workers' bank accounts which reduces opportunity for third parties to take deductions from workers' salaries. Quarterly payroll reviews are conducted by management for contingent workers to ensure adherence to local regulations. Responsible recruitment as well as employee well-being programs like snacks, summer hydration practices, first aid and safety training and pro-active attempts to get visas for female workers resulted in The Coca-Cola Bottling Company being named one of the Best Employers within the Gulf Cooperation Council (GCC) for best recruitment practices and employee engagement in 2016 and 2017.

Going forward, the Company's businesses and value chains will continually be reviewed to identify other areas, such as those listed above, where the risk of forced labor and human trafficking may exist.

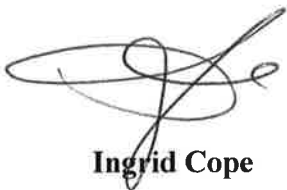
Further Steps to Strengthen the Approach

In the year ahead, the Company intends to continue to refine due diligence efforts related to monitoring recruitment practices and to update related wording in the Supplier Guiding Principles. To do so, technology applications will be piloted to improve baseline information gathering about recruitment and employment practices so the effectiveness of Company efforts can be assessed. Additionally, training initiatives with peer companies (as described above) will continue to underscore to suppliers that their commercial partners have common policies and goals related to the elimination of forced labor and human trafficking in their supply chains.

In 2019, the Company will continue to use its voice within the business community to advocate against forced labor and human trafficking in global supply chains. In particular, the Company will continue supporting industry collaboration and alignment, learning from experience to date and from stakeholder feedback to improve the recruitment risk monitoring program and testing new ways to scrutinize recruitment practices. When findings are identified the Company will continue to work with suppliers to ensure labor brokers utilized cease the practice of charging recruitment fees. The country studies continue to help identify the risk of forced labor beyond the first tier of the sugar supply chain, and plan to publish on the public website any additional country study reports completed in 2019.

The Coca-Cola Company is 133 years young, serving beverages that refresh the world. The Company strive to enable any consumer anywhere in the world to enjoy a moment of happiness from a beverage that has been made in line with the values and with respect for human rights.

Signature and approval

A handwritten signature in black ink, appearing to read 'Ingrid Cope', with a large, stylized flourish at the end.

Ingrid Cope

Director of Beverage Services Limited