

Policy on Compliance with Sanction and Trade Embargo

CCE Holding GmbH



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Policy on Compliance with Sanction and Trade Embargo

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1. Policy on Compliance with sanction and trade embargos

CCE is committed to ensuring that it complies with the laws of all jurisdictions in which it does business, including sanctions laws and regulations. This Policy applies to all employees of CCE, and its operating Groups, Divisions, joint ventures, and other operations globally (collectively, "CCE"). This policy also applies to all persons who act on CCE's behalf, including employees, officers, directors, consultants, and agents.

The principles of this policy also apply to CCE's suppliers, vendors, consultants, independent contractors, agents, or any other third party engaged to carry out any action on our behalf ("suppliers") as stated in CCE's Supplier Code of Conduct.

You, must comply with all applicable laws and regulations ("Sanction Laws") regarding restrictions on engaging in business with:

- countries and/or political subdivisions of countries that are subject to sanctions (collectively, "Sanctioned Countries"); and
- persons, companies, or entities, including representatives and agents thereof, that are domiciled in Sanctioned Countries or are listed on national or international sanction lists (collectively, "Sanctioned Persons").

What is a Sanction or Trade Embargo?

Sanctions and trade embargoes are measures implemented by a government or an international organization such as the United Nations. They are intended to pressure the government of the Sanctioned Country, or the Sanctioned Persons, to change policies or practices alleged to be harmful to international peace and security.

What Do Sanction Laws Prohibit?

Sanction Laws restrict or prohibit different things, depending on the Sanctioned Country and Sanctioned Person involved. Sanction Laws typically place restrictions and controls on the movement of goods, services or funds. Sanction Laws may, but do not necessarily, restrict or prohibit the:

- Sale or purchase of any goods, services, or technical information to or from anyone in a Sanctioned Country.
- Sale or purchase of any goods, services, or technical information to or from a Sanctioned Person wherever that person may be located.
- Transfer of funds to or through any Sanctioned Country or Sanctioned Person, as well as receipt of funds from a Sanctioned Person (e.g., a bank); and
- Sale of any goods, services, or technical information to a permitted person in a permitted country, if the seller knows that the goods, services, or technical information is intended for a Sanctioned Country or to a Sanctioned Person.

How does a country or person become a sanctioned country or sanctioned person?

Typically, a country, individual or company faces sanctions or embargoes because it is alleged to engage in certain types of illegal activity, such as terrorism, human rights violations, unlawful exports, nuclear proliferation, and other criminal actions. The key operating jurisdictions of CCE (i.e., Austria, the European Union and Chile) prepare and publish lists of Sanctioned Countries and Sanctioned Persons.

Policy

CCE will not enter business transactions with or involving any Sanctioned Country or Sanctioned Person. If you become aware of an existing or possible business transaction with or involving any Sanctioned Country or Sanctioned Person, promptly contact your CCE Corporate lawyer.

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Sanctioned Countries

CCE's policy is to comply globally with the Sanctions Laws of the European Union in all its global operations. In addition, Chile, and most of the countries in which CCE operates also have restrictions on trading with Sanctioned Countries and Sanctioned Persons.

Sanction Laws can change frequently to ensure that you have the latest information, please consult the following websites and, if necessary, check with a Group, Regional or CCE Corporate lawyer for further advice.

European Union:

<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>

United Nations:

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list#composition%20list>

United States

<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>

Violations

CCE has no tolerance for compliance violations. Any violation will be treated as a serious matter and will be sanctioned with disciplinary action up to and including termination of employment for cause.

If you are aware of or suspect that anyone is in violation of CCE's Code of Conduct and Ethics or this policy, you should report your concern by informing your manager or CCE's Corporate lawyer.

Pursuant to the Policy on Anti-Retaliation, CCE will protect employees from being penalized, discharged, demoted, suspended, or discriminated against for reporting in good faith any violation of CCE's Code of Conduct and Ethics or this policy.

For further Information:

For further information or advice, please contact your CCE's Corporate lawyer.