



Dear Fellow Employee,

Our culture and our reputation are built on our behavior in the workplace and when representing Coca-Cola UNITED. Our foundation is built upon our core values: *Quality, Excellence, Integrity, Respect*, and inspired by our world-class people. We are committed to being a trusted business partner to those we serve, and we all have an obligation to earn that trust every day. Each of you, no matter what position you hold or where in our Company that you work, plays a vital role in our future. More importantly, the decisions you make each day ultimately dictate the level of integrity we achieve at Coca-Cola UNITED and in the communities we serve. Our values require us to be open, fair and honest and to act with integrity always, even when no one is looking.

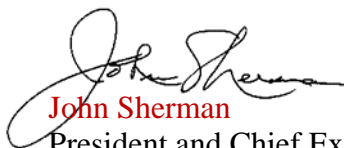
Our Code of Business Conduct is designed to help you understand our Company's high standards and how critical they are to achieve sustainable value creation for all our stakeholders including you, our number one asset. When you follow our Code and put its guidance into practice, working with integrity becomes automatic – it forms the foundation of every decision you make.

The communication of this Code of Business Conduct is part of our responsibility to ensure an inclusive work environment in which we uphold our Core Values and thereby sustain a business in which each of us has the opportunity to succeed according to our full potential. I encourage you to read our Code carefully. Do not look at it as a book of rules. But, rather, as a valuable resource you can refer to often – whenever you need guidance in daily situations. If you are faced with a situation that is not covered by our Code, please ask for help. And if you see conduct that is inconsistent with our high standards, have the courage to say something.

Above all, remember that you are a valued member of the Coca-Cola UNITED family. What sets us apart is our conviction to do things the right way, the first time and always. Our brands and our commitment to each other assist us in being one of the most trusted and respected companies in the communities where we operate. Our Code and core values are unique to UNITED and something we should respect and honor daily.

We ask each of you to join us in making a personal commitment to living our Core Values and applying them in everything that we do.

Sincerely,



**John Sherman**

President and Chief Executive Officer



**Hafiz Chandiwal**

Executive Vice President & Chief Administrative Officer



**Gianetta Jones**

Vice President & Chief People Officer



**Lucas Gambino**

Vice President & General Counsel

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## #1 WE KNOW OUR CODE

Our code is the cornerstone upon which our principles are based and our commitment to excellence is built. It provides information and answers to help us model our Core Values and set the standard for doing the right thing when acting on behalf of Coca-Cola UNITED.

### WHY A CODE?

Because we want you to find the answers you need to do your job lawfully and ethically and to promote our culture. Our Code provides an overview of the laws, regulations and company policies that affect our business as well as some resources we can reach out to for help. It doesn't just tell us how to work, but how to embrace our values in every business decision and action we take. It means doing things the right way. Making decisions guided by integrity and ethics. It's about keeping our promises. Honoring our values. Doing business as a trusted partner, the way we've done it for more than a century.

### WHO HAS TO FOLLOW IT?

As an employee of Coca-Cola UNITED, each of us has a responsibility to know and follow our Code and to ask questions about issues that are unclear. We also have a responsibility to communicate with each other and our partners about the standards we've put in place to ensure our Company is one of the best to work for and with. The Code governs every full-time and part-time employee at every level of our Company. Anyone who works on the Company's behalf (including suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Code. **If you are a manager**, you have additional responsibilities: Model our Code and Our Values, Talk about the Code, Stay Informed, Expect the Best, Be Responsive and create a **"Speak Up"** culture, Take Action if you see misconduct and report it to your leader and Human Resources.

### WHAT IS ETHICAL DECISION-MAKING?

Remember, our Code is the starting point, not the finish line. It lays out the basic rules for how we do things, but it doesn't have the answer to every question you might have or every situation you might face.

### NOT SURE OF WHAT TO DO?

ASK YOURSELF:



## WHAT HAPPENS WHEN OUR CODE IS VIOLATED?

The Coca-Cola UNITED legacy is built on **integrity** and ethical decision-making. When one person violates our Code, it affects us all. That's why we take violations seriously.

Anyone who knowingly violates our Code, our policies, regulations, or the law (or fails to report a violation) is not doing the right thing and may face corrective action, up to and including separation or additional training.

It is your responsibility, as part of the Coca-Cola UNITED family, to **Speak Up** when you suspect wrongdoing and to cooperate fully and honestly in any internal investigation.

## #2 WE HONOR OUR RESPONSIBILITIES

We're passionate about our Company. That's why we always strive to do what's right. No matter what job we do or where we do it, we're committed to the highest standards of business conduct.

### TOGETHER ... WE PUT OUR VALUES INTO PRACTICE

**Conduct business legally and ethically.** Preserve the trust that others have placed in us. Be sure there's no difference between what you say you will do and what you do.

**Know the policies and procedures that apply to your job.** Be aware that some markets, business groups or departments have policies that apply only to employees in their area of responsibility.

**Complete your mandatory training.** It will help you in not only knowing our policies and procedures, but also in applying them to your everyday work.

**Use the Code.** Re-visit our Code to keep issues top-of-mind.

**Ask questions.** It's the best way to be certain you're on the right path. Always remember there are people who want to help you.

**Take action.** If you see or suspect a violation of our Code, say something. Speaking up isn't just a good idea, it's your duty and required by our Code. It helps make our Company a better place to work.

## WHAT IF ...

**THERE'S A CONFLICT BETWEEN THE CODE AND A POLICY IN MY DEPARTMENT?**

**Follow the Code. Bring the conflict to the attention of your supervisor and HR representative.**

## HOW TO SHARE CONCERNS

**Start with your supervisor.** We have an Open-Door policy which means you are free to talk to your supervisor any time about any concerns. If you're not comfortable doing that, there are other leaders and resources available to help you.

**Our Ethics Hotline is accessible by phone or Web and allows you (anonymously, if you wish) to share your concerns 24 hours a day, 7 days a week with an independent, third-party interview specialist.**

**ETHICS HOTLINE: 1-866-614-4992**

**[www.CocaColaUNITED.EthicsPoint.com](http://www.CocaColaUNITED.EthicsPoint.com)**

When you contact the Ethics Hotline, the information you provide is documented in detail and forwarded to the Vice President & Chief People Officer and Corporate HR Director. The report document will be assigned to the appropriate HR office within Coca-Cola UNITED for confidential investigation and resolution. No matter who you contact or what resource you choose, your concern will be promptly addressed and handled with the appropriate level of confidentiality. Keep in mind, it may not be appropriate for the results of an investigation to be communicated back to you in light of our obligation to protect privacy and confidentiality, but you will have the ability to know whether the review or investigation has been closed.

# DID YOU KNOW?

## YOU CAN REPORT CONCERNS ABOUT:

- **Discrimination or harassment**
- **Conflicts of interest**
- **Theft, fraud or bribery**
- **Environmental or safety issues**
- **Inappropriate gifts or entertainment**
- **Accounting or financial issues**
- **Code violations**
- **Policy violations**
- **Retaliation**

Note that these are just examples, not an exhaustive list. Anytime you see or suspect something that could harm Coca-Cola UNITED, our employees or our customers, please **Speak Up**. By reporting misconduct, you help contribute to the ethical culture of our company.

## WE DON'T TOLERATE RETALIATION

We want you to feel comfortable coming forward so, as a Company, we don't tolerate retaliation against anyone who speaks up, in good faith, about unethical or illegal behavior.

See our Anti-Retaliation Policy to learn more. If you think that you or someone you know has been retaliated against for raising an issue, **Speak Up**.

### WHAT IF...THE CONCERN I RAISE IS ABOUT MY SUPERVISOR — COULDN'T I LOSE MY JOB?

No. Coca-Cola UNITED has an Anti-Retaliation Policy for concerns raised in good faith. If the concern is about your supervisor, calling your HR representative or the Ethics Hotline are good options. If you call our Ethics Hotline, you will speak to an interview specialist who doesn't work for Coca-Cola UNITED, so you can have the assurance of knowing that the situation will be investigated. Retaliation by anyone, including your supervisor, will not be tolerated.



Honestly believing in what you're doing. Sharing a concern "in good faith" means that you honestly believe that there's a violation of law or our company policies and that you're not deliberately making a false report.

### Are you a PEOPLE LEADER? Be a ROLE MODEL.

You have a special responsibility to lead with integrity. Set a good example for your team and show them, through your everyday words and actions, that you do business honestly and in compliance with our Code.

Be the kind of leader who people feel comfortable approaching.

- Promote our Open-Door Reporting Policy.
- Support employees who come forward in good faith to share their concerns or raise questions.
- Listen, take good notes and work to resolve issues as quickly and effectively as possible.
- Make sure employees aren't subjected to retaliation for speaking up.
- Ask HR if you're not sure of the right way to go.



### #3 WE PROMOTE AN INCLUSIVE WORKPLACE

The best thing about Coca-Cola UNITED is OUR employees. We blend our unique experiences, perspectives and talents together to create an amazing team, just like we do with all of our products. You are our Secret Ingredient!

#### WE CELEBRATE OUR DIVERSE WORKFORCE

Think about families. Although they may be alike in some ways, each member has a different way of looking at things, a different way of saying things, a different way of doing things.

The Coca-Cola UNITED family is no different. While we're all passionate about providing our customers with the very best experiences, each of us brings a different idea for powering that passion. It's that diversity of backgrounds, cultures and viewpoints that drives our success.

Our commitment to diversity is reflected in our everyday hiring and employment practices. You're not like anyone else, and we're glad about that.

We provide equal employment opportunities and don't discriminate against anyone on the basis of race, color, religion, sex, sexual orientation, gender identity, disability, genetic information, citizenship, pregnancy, age, national origin, military service, or any other status, trait or category protected under applicable law.

#### DID YOU KNOW?

##### OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY APPLIES TO ALL ASPECTS OF EMPLOYMENT INCLUDING THINGS LIKE:

- Getting a job at Coca-Cola UNITED
- Performance Evaluations
- Promotions and Advancement
- Pay and Fringe Benefits
- Discipline and Separation
- Development and Training Opportunities

##### LIVE IT

**HONOR THE INDIVIDUAL EXPERIENCES, CULTURES AND PERSPECTIVES OF EVERYONE ON THE COCA-COLA UNITED TEAM.**

**THINK ABOUT HOW YOUR WORDS AND ACTIONS ARE PERCEIVED BY OTHERS.**

**LIVE OUR VALUES.**

#### WE RESPECT EACH OTHER

We care about each other and work together to promote a work environment free from harassment and discrimination. We have a zero-tolerance policy with no exceptions. We prohibit any behavior (be it verbal, visual, physical, emotional or sexual) that reasonably creates an offensive, hostile or intimidating environment.

As part of our commitment to respect, we also provide reasonable accommodations to employees and applicants with disabilities or requirements based on religious beliefs. Discuss any request for accommodation with your manager or your local HR representative.

##### EXAMPLES OF INAPPROPRIATE BEHAVIOR

- Joking about someone's ethnic background
- Unwelcome hugging or touching
- Discussing sexual activities or desires or displaying obscene pictures, cartoons or posters
- Posting or circulating (via email or otherwise) materials that degrade or express hate of any kind
- Bullying behavior

**TREAT EVERYONE FAIRLY. DON'T SINGLE OUT SOMEONE (OR A GROUP) BASED ON THEIR BACKGROUND, APPEARANCE OR OTHER PERSONAL CHARACTERISTICS.**

**SPEAK UP, WITHOUT FEAR OF RETALIATION, IF YOU SEE OTHERS BEING TREATED IN A WAY THAT VIOLATES OUR POLICIES, OUR CODE OR THE LAW.**

## #4 WE CONDUCT BUSINESS LAWFULLY

We operate in an industry that's regulated, so we honor not just the letter of the law, but also the spirit of the law. Our commitment helps to build trust, protect our brand and secure our future.

### WE RESPECT THE PRIVACY OF OTHERS

Keeping personal information safe is the foundation of trust. Our customers count on us to provide transparent processes, respect their privacy, honor their choices and protect their personal information in a lawful manner.

Our fellow employees expect that we will respect their personal information, so that each of us can focus on providing the best service to our customers and website visitors.

We are committed to keeping personal information lawfully safe and secure. We treat our customers' and employees' personal information the same way we would expect others to treat our own personal information. If you are an employee who works with personal information, guard this information well and do not transfer or use this information improperly. Personal information includes email addresses, social security numbers, phone numbers, Employee ID number, IP addresses, financial or banking information, medical information, family member names, etc. The value generated by our use of personal information must clearly meet a responsible business need.

**LIVE IT.  
PROTECT PERSONAL  
INFORMATION AS IF IT  
WERE YOUR OWN.  
KNOW THE RULES WHEN IT  
COMES TO RESPECTING THE  
PERSONAL INFORMATION  
OF OUR CUSTOMERS AND  
OUR CO-WORKERS.**

### WE PROTECT COMPANY INFORMATION

The formula for Coca-Cola is one of the best-kept secrets ever. We are good at keeping this and a lot of other non-public information confidential. We understand that protecting our company information helps us maintain a competitive advantage and preserves our reputation as the industry leader.

We:

- Collect only the personal information that our business needs.
- Are open and honest about how we collect, use and disclose personal information.
- Provide appropriate choice and access regarding personal information.
- Take reasonable steps to keep personal information secure.
- Properly destroy any personal information we have that is no longer needed for business purposes.
- Notify our customers and employees promptly if their personal information has been compromised.
- Comply with all applicable policies, processes and guidelines to protect the security of customer and employee information.
- Take the appropriate and required training to understand our privacy and information security obligations.
- Appropriately report violations of any policy, process or guideline.

We recognize that the security and privacy of personal information is everyone's responsibility.

### WHAT IS COMPANY INFORMATION?

- Business plans, marketing strategies, etc.
- Financial information, such as pricing, proposals and product costs, etc.
- Operational information, such as processes, models, management changes, etc.

## ANTITRUST AND COMPETITION LAWS

We comply with applicable antitrust laws, which are designed to promote a thriving marketplace with free, fair and open competition.

Never take advantage of anyone by lying or manipulating information, never collude with competitors regarding pricing or other market strategy and never make false, misleading or disrespectful comments about our competitors or their products or services.

### WHAT IF... AN INFORMAL CONVERSATION WITH A COMPETITOR STARTS TO TURN INTO A DISCUSSION ABOUT PRICING STRATEGIES?

Make it clear that you won't participate in any discussion of competitive matters. Then, promptly leave and report the incident to UNITED's Legal Department. Any discussion with a competitor is high risk activity because statements can be misunderstood.

#### Do:

- Be up-front and honest in your business dealings and promote positive business relationships everywhere we operate.
- Sell our products and services on the basis of their great quality and performance.
- Avoid even the appearance of anything that could suggest something unfair or deceptive.
- Seek help from UNITED's Legal Department for questions about any law or regulation.

#### Don't communicate with our competitors about:

- "Fixing" prices (for example, setting minimum or maximum prices).
- "Fixing" terms (for example agreeing on pricing formulas, credit terms, etc.).
- Dividing up markets, customers or territories.
- Preventing another company from entering the market.
- Interfering with the competitive bidding process.
- Stealing trade secrets.

We build market share and brand loyalty by delivering quality products, not by engaging in unfair or anti-competitive practices. So, if you are responsible for areas of our business where antitrust or fair competition laws apply, make sure you know how they apply to our business. Deal honestly and fairly with our customers. Promote positive business relationships and never take unfair advantage of anyone by misleading or deceiving them. Be truthful about our Company and what we sell – do not make any claims you cannot substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.

When in doubt? Consult with our Legal Department. They can help you assess the legality of any proposed conduct, so always reach out to them for guidance before you act.





## #5 WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

It's important to be a good partner, so we do the things that are needed to honor the relationships we've built with others inside and outside of Coca-Cola UNITED. Our suppliers, customers, consumers and other business partners place a great deal of trust in our brands and we never want to let them down. They as well as each of you are essential to our Company's growth and success.

### WE MAINTAIN A SAFE AND HEALTHY WORKPLACE

We're committed to providing you (and anyone else lawfully on our property) with a safe and secure workplace.

Do your part:

- Be proactive in promoting your own health and safety.
- Follow our policies and procedures.
- Be alert to safety risks and only undertake work you're trained to do.

Safe and secure also means violence-free.

We don't tolerate:

- Threats of any kind
- Intimidation
- Violence
- Bullying

#### WHAT IF... THERE'S SOMETHING I CAN DO TO SAVE SOME TIME BUT IT POSES A SAFETY RISK?

Don't do it. Faster isn't better if it puts your safety or the safety of others at risk.

### WE HONOR THE PROMISES WE MAKE TO OUR CUSTOMERS

A good relationship is a two-way street. Help us build long-term customer relationships:

- Tell the truth in advertising, sales or marketing information.
- Inform them of any terms or conditions associated with our products or services.
- Interact honestly and with integrity. Never mislead, exaggerate, or leave out information.
- Don't promise products, features or services that we can't deliver.
- Comply with laws that promote consumer protection and prohibit deceptive trade practices.
- Protect their personal information (see We Respect the Privacy of Others on page 7).

Possession of a weapon of any kind within a Coca-Cola UNITED building or Company vehicle, at a customer's home or premises, while engaged in a Company activity, or at a Company-sponsored event, is prohibited unless possession or use is approved by the appropriate Company officer.

If your job involves operating a Company vehicle or using your own vehicle to conduct company business:

- Know and follow our Driving Policy and Drug Policy.
- Observe safe driving practices.
- Remember that reading or sending text messages or emails while driving is strictly prohibited and in most states is illegal.

We protect people in everything we do. If you experience or witness an accident, injury, illness or unsafe condition in the workplace, report it right away to your supervisor or local HR representative.

Drugs and alcohol can not only affect your ability to perform at your best, but also put you and others at risk. That's why we strictly forbid abuse or use of drugs or alcohol in the workplace or while operating company equipment. If you suspect drug or alcohol abuse in the workplace, **Speak Up**.

Our FREE confidential Employee Assistance Program (EAP) is available to help you and your family members resolve personal, family or work-related problems.

*These policies and procedures can be found within "Safety Policies & Forms" inside the Employee Resources Site at [www.cocacolaunited.com](http://www.cocacolaunited.com)*

## WE CONDUCT BUSINESS HONESTLY AND ETHICALLY ...

### ... WITH OUR SUPPLIERS

We choose suppliers based on factors like quality, cost, availability, and service. We hold our suppliers to the same high standards to which we hold ourselves and expect that anyone who conducts business on our behalf will operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies and Coca-Cola UNITED's best interests. We expect suppliers to respect and protect our confidential business information and, in return, we respect and protect theirs.

### ... WITH OUR COMPETITORS

It's okay to gather information about our competitors and their customers, suppliers and vendors, but we need to do it legally and ethically. Use good judgment. Gather information from public sources and customer feedback. Don't do anything you shouldn't, and don't ask someone else to do something you're not permitted to do yourself.

Sources of information about competitors?

Check public sources like ...

- Published articles, ads, trade press accounts
- Trade shows and customer feedback
- Information publicly available on the internet
- Industry surveys by reputable consultants

Using confidential business information about our competitors from current or former employees **is never** okay. If you receive any competitor information that you think may be confidential or has been obtained inappropriately, contact our Legal Department.

### ... WITH THE GOVERNMENT

We're proud to call federal, state and local governments our customers. As with all our customers, we work to be a responsible partner, but we recognize that the requirements on government contracts may be stricter than those governing our commercial contracts.

Responsible for a Government Contract?

- Understand the unique legal requirements and restrictions associated with this work.
- Know the rules around the procurement process if dealing with the government.
- Be accurate, current, and complete in anything you submit.
- Follow the rules on gift-giving (see our Policy about Work Ethics/Receipt of Gifts below).

Being transparent, accountable, and open is the key to not only winning, but also keeping, our government business.

**WHAT IF... THE NEW GUY ON OUR TEAM USED TO WORK FOR ONE OF OUR COMPETITORS. IS IT OKAY TO ASK HIM ABOUT THE NEW PRODUCT FEATURES THAT HIS PRIOR COMPANY WAS DEVELOPING RIGHT BEFORE HE LEFT?**

**NO.** It is never appropriate to obtain information about our competitors in this way. We have an obligation to gather competitive information lawfully and ethically only.

GIFTS, MEALS & ENTERTAINMENT: WHEN IT IS OKAY <sup>1</sup>	GIFTS, MEALS & ENTERTAINMENT: WHEN IT IS NOT OKAY
An offer to go to lunch with a new supplier	An extravagant meal for your whole family paid for by a supplier not in attendance
A gift bag at a supplier's conference filled with snacks and small items	A gift basket filled with an expensive electronic device or other items valued at more than \$200 sent to you by a supplier
A golf outing and lunch at a local golf course with a supplier	Airfare and accommodations at a golf resort
An offer to have a drink with a supplier	A case of fine wine
A small desk clock with a supplier's corporate logo	An expensive watch

<sup>1</sup> Note that certain customers may have adopted policies that prohibit any form or amount of gifts, including the items reflected above. Please contact the Legal Department if you are not certain whether a particular customer has adopted such a restrictive policy.

## #6 WE DO THE RIGHT THING

We're loyal, and we follow the generations of loyal employees who came before us. We don't engage in activities or relationships that could make it hard for us to impartially, objectively and effectively carry out our jobs.

### WE AVOID CONFLICTS OF INTEREST

Our lives outside of Coca-Cola UNITED are filled with activities, but when those activities interfere with the decisions you make on our behalf, that puts you and our Company in an awkward position and can impact the job you do as an employee. A conflict of interest may happen when what you do (or what your family members do) outside of Coca-Cola UNITED interferes with the job you do as an employee.

While it's not possible to list every situation that could present a conflict, there are certain situations in which conflicts typically arise. You have an obligation to avoid even the appearance of a conflict.

Avoid these kinds of situations whenever possible and disclose them if they do arise by completing a Conflict of Interest Disclosure Form with Human Resources. If you have questions about the right thing to do in any situation, **Speak Up**. Most conflicts can easily be avoided or addressed if promptly disclosed and properly managed.

WHAT KINDS OF SITUATIONS COULD PRESENT A CONFLICT?	
<p><b>A SECOND JOB:</b> Work outside of Coca-Cola UNITED can pose a potential conflict if it competes with the work you do for us or interferes with the time and talent you bring to your job. <i>Doing work or serving as a consultant for one of our competitors, customers or suppliers could present a conflict.</i></p>	<p><b>OUTSIDE ACTIVITIES:</b> Board directorships or advisory roles with companies, universities or other organizations may pose a conflict if decisions you make for them affect decisions you make for Coca-Cola UNITED. <i>It could be a conflict to serve on an Advisory Board for a company that offers services similar to ours.</i></p>
<p><b>PERSONAL RELATIONSHIPS:</b> Business decision can become difficult if the person with whom you are dealing is a friend or family member. <i>Selecting a friend or family member from the applicant pool for a job in your department or as a Coca-Cola UNITED vendor or supplier could be a conflict.</i></p>	<p><b>SUPERVISOR/EMPLOYEE RELATIONSHIPS:</b> Romantic relationships can present divided loyalties. <i>Personal relationships can (or may appear to others to) affect an employee's objective decision-making. Always disclose this information to Human Resources.</i></p>
<p><b>INVESTMENTS:</b> A conflict can also arise if you or a family member holds a financial interest in (or exercises control over) one of our suppliers, customers or competitors. <i>Investing in a customer that you deal with as part of your job responsibilities at Coca-Cola UNITED could be a conflict.</i></p>	

### WE UNDERSTAND THE RULES ABOUT GIFTS AND ENTERTAINMENT

Gifts and entertainment can help build good business relationships, but they can also pose a conflict of interest when they make it hard for someone to be objective about the person or the company that provides them. Seek help if you're not sure about what's okay when it comes to giving and receiving gifts. Avoid doing anything that might compromise (or appear to compromise) the decisions you make as an employee of Coca-Cola UNITED. Anything you give or get that's valued at more than \$200 must be reported to Human Resources and approved by your Region Vice President. Keep in mind, even if something is offered to you as "free," it still has a value associated with it and must be reported.

**Government & Public Officials:** The rules for giving gifts, entertainment or travel to government employees or public officials are very strict and violating them can have serious consequences for the giver, the giver's organization and the receiver. Never offer, provide or approve anything of value (even if of a nominal amount) to someone affiliated with the government unless you obtain approval in advance from the Legal Department.



**LIVE IT.**

**KNOW AND FOLLOW THE RULES FOR GIFT-GIVING AND GIFT-GETTING.**

**DON'T GIVE ANYTHING OF VALUE TO A GOVERNMENT EMPLOYEE WITHOUT ADVANCE APPROVAL.**

## WE ARE RESPONSIBLE WHEN COMMUNICATING ABOUT COCA-COLA UNITED

Every word we speak, write or share about Coca-Cola UNITED has an impact on our reputation, our brand and our people. That's why only a few people are authorized to make official statements about our Company to the public. We want to make sure that information that's communicated on behalf of our Company is reliable, consistent and accurate.

Contacted by:

- The media?
- A user group?
- A member of the national consumer or trade press?
- Someone in the financial community?
- An industry/research analyst?

Unless you're authorized to handle media and public relations, don't speak on behalf of Coca-Cola UNITED if contacted by the media. Even if you know the answer, even if the caller says it's "off the record," even if you think you're doing the right thing, refrain. By following our policies, you help us avoid sending confusing messages or worse, sharing information that's incorrect and could have possible legal implications.

**Speaking Engagements.** What if it's not about an official Company position? For example, what if you're asked to sit on a panel or make a speech to an outside group or participate in a joint press release with one of Coca-Cola UNITED's vendors? Always check first with your manager and Public Affairs. You'll need to get approval before you may accept an offer from an outside organization to speak as a representative of Coca-Cola UNITED.

**Requests from the Government.** If you receive an inquiry from a government official or agency, contact Public Affairs immediately.

### **Social Media.**

Social media offers a great way to exchange ideas and build relationships. but be smart and use it in a way that's consistent with our values and our policies. If you wouldn't say it, write it or share it in the office, don't say it, write it or share it online. Use it wisely.

Other rules of the (social media) road:

- Use good judgment. Don't disclose anything that could violate employee or customer privacy.
- Protect Coca-Cola UNITED's confidential information. Don't disclose anything that could harm our Company's business interests.
- Comply with laws that protect people, privacy, copyrights and confidentiality.

Again, unless you're authorized to speak on our behalf, make it clear on any online postings that your views are your own and don't represent the views or official company position of Coca-Cola UNITED.

Remember, you are responsible for any content that you publish.

**WHAT IF... I HAVE BEEN CONTACTED BY A REPORTER ABOUT SOME NEW PRODUCTS WE ARE DEVELOPING. SHARING NEWS ABOUT IT WOULD HELP GENERATE EXCITEMENT. IS IT A PROBLEM TO TELL THE REPORTER WHAT I KNOW?**

YES. Unless you are the official spokesperson for our Company, you shouldn't communicate with the reporter. The information you have may be incorrect or incomplete and is best addressed by referring the reporter to Public Affairs.

## #7 WE SAFEGUARD OUR COMPANY’S ASSETS

We’re good stewards of our locations and production facilities as well as everything on it and in it. From assets like the products we create and distribute, to physical assets like the vehicles we drive and the computers and mobile devices we use to do our jobs, we take care of what’s ours.

### WE PROTECT OUR ASSETS

Just about everything we use to do our jobs every day would be considered Company assets, and each of us is responsible for protecting them from theft, loss, waste or abuse. By protecting our assets, we’re protecting our competitive advantage in the industry.

**Physical and Technology Assets.** We want you to have everything you need to inspire your work. We trust you to use Coca-Cola UNITED’s assets for company business and to take good care of them, protecting them against theft, fraud and unauthorized use.

In general, you shouldn’t use Coca-Cola UNITED’s assets for your personal activities. Occasional personal use of things like email, internet access, phone and fax machines is okay as long as it:

- Really is only occasional.
- Doesn’t interfere with your work (or anyone else’s).
- Doesn’t violate the law or our policies.
- Doesn’t cost Coca-Cola UNITED anything.
- Isn’t for personal gain or political purposes.

Be aware that anything you create, send, receive, download or store on our systems is Company property, and we may review any of it at any time, where permitted by law. You shouldn’t have any expectation of privacy when it comes to using our electronic systems. You can help us protect our systems from viruses and downtime.

**Information Assets.** Information is woven into every aspect of our business. Protecting it is a critical responsibility.

#### We own:

- Proprietary information — things that are unique to Coca-Cola UNITED like ideas, strategies, processes and other business ideas.
- Intellectual property — our knowledge base, which includes trademarks, patents, copyrights and trade secrets.
- Sensitive information about our Company — reports, spreadsheets, financial information.

EXAMPLES OF OUR ASSETS	
<b>PHYSICAL ASSETS:</b> Office furniture, funds, equipment and inventory.	<b>INFORMATION ASSETS:</b> Trademarks, copyrights and other confidential business information.
<b>TECHNOLOGY ASSETS:</b> Computer hardware, software and systems, mobile phones and tablets.	<b>THINGS THAT MAKE US COCA-COLA UNITED:</b> Our name, our brand and our customer relationships.

#### Do:

- Keep passwords and PINs in a secure place and don’t share them with anyone.
- Ensure the physical security of information or hardware assigned to you.

#### Don’t:

- Install unauthorized software, applications, hardware or storage devices on your computer.
- Access our network through unauthorized applications or devices.
- Download music files.
- Use unlicensed software (it’s illegal).
- Make copies of software, associated manuals or other materials to use at home or for someone else to use.
- Put software on a local area network (LAN) for use by others.

## WE PROTECT OUR ASSETS (continued)

Treat all confidential business information with care and take precautions before disclosing it to anyone inside or outside of our Company. Disclose it only to those who have both a right and need to know the information.

Limit the amount of information shared to only what is required, and make sure the person receiving the information understands any restrictions related to its use or dissemination.

Take precautions:

- Don't share confidential business information with friends, family, relatives or the media.
- Don't leave confidential information unprotected on your desk, on white boards or in meetings.
- Don't discuss confidential information in public places where others could hear you. If you come to Coca-Cola UNITED from another company, honor the promise you have made to protect that company's confidential information. And if you leave Coca-Cola UNITED, don't share our confidential information with your new employer.

**The Coca-Cola UNITED Name.** Widely recognized and respected, our name, our brand and its connection to a rich heritage is one of our most valuable assets. Each of us has an obligation to **protect the Coca-Cola UNITED name** by following our brand standards and by reporting any misuse, whether internally or externally. As a company, we don't tolerate retaliation against anyone who speaks up, in good faith, about misconduct.

## WE MAINTAIN ACCURATE RECORDS

The records we create and maintain are important Company assets, too. Always be honest and accurate in what you record. Follow any recordkeeping requirements associated with your job and support transactions with the documentation necessary to provide a complete, accurate and auditable record. If you're responsible for preparing these reports, make sure the information you provide is fair, accurate, timely, understandable and transparent. If you suspect someone of misrepresenting or falsifying information or engaging in a questionable accounting or auditing activity, **Speak Up**. As a company, we don't tolerate retaliation against anyone who speaks up, in good faith.

**WHAT IF... I'M GOING ON VACATION. IT WOULD BE GREAT IF MY CO-WORKER RESPONDED TO ANY EMAILS THAT COME IN WHILE I'M GONE. IS IT OKAY TO LEAVE MY PASSWORD WITH HIM, AS LONG AS I RE-SET IT WHEN I GET BACK?**

No, your password is, and should remain, private. Use an out-of-office message to alert people to your absence and direct them to a colleague for help while you're away.

**Timekeeping.** If you are required to record your time using either our automated time record system or a manual timesheet, be accurate and truthful. **Speak Up** if, at any time, someone tells you to under- or over-report your hours (or someone else's hours) or asks you to conceal the dishonest timekeeping of others.

**Records Management.** Know and follow our Records Retention Policy. It helps us maintain the records we need to meet our legal, tax and regulatory requirements and provides information we need to securely dispose of records that are no longer needed. If you have questions about our Records Retention Policy, contact the Legal Department.

Take care never to dispose of information that may be relevant to current or threatened litigation or if you have received a litigation hold notice from Human Resources.

**WHAT IF... I DON'T WORK IN FINANCE OR ACCOUNTING?**

You still have a responsibility to maintain the integrity of our recordkeeping. From time-and-expense reports and benefits records to test data, work orders and sales invoices, everyday transactions must be accurate, complete and properly recorded. The successful operation of our business depends upon it.

## #8 WE ARE GOOD NEIGHBORS

We put our values into action in communities in which we operate. Being there, being accessible, supporting initiatives that benefit youth, education, diversity and the environment, that defines who we are as a Company.

### WE GIVE BACK

We're committed to giving back to the communities we serve. We lend our time, talent, energy and money to support not only those around the corner, but around the Southeastern U.S.

We encourage your personal involvement in the communities where you live and work, but when you contribute your own time or money to a charitable organization you care about, take care to make sure your activities are lawful and consistent with our policies. You shouldn't use or donate Coca-Cola UNITED's funds or assets for any outside activity unless you receive approval in advance.

**Charitable Contributions.** We make contributions that:

- Provide goodwill to organizations and causes in need.
  - Strengthen the social, economic and educational infrastructure of our community.
- All donations, whether monetary, media or otherwise, must be consistent with our goals and approved in advance.

**Political Activities.** We respect your right to engage in personal political activities, but again, you must do so on your own time, with your own resources. Don't use Coca-Cola UNITED's time, property or equipment for personal political activities without prior authorization from Government Affairs.

We are prohibited from making contributions as a company to any federal candidates and will not reimburse any employee for making a campaign contribution to a federal, state or local candidate or other campaign committee, even if state and local laws permit it.

**Lobbying.** If your work involves contacts with legislators, regulators, executive branch officials (or their staffs), government contacts or efforts to influence legislative or administrative actions, make sure you discuss these activities with Government Affairs to determine if disclosure and other rules apply.

### WHAT IF... A FRIEND IS RUNNING FOR U.S. CONGRESS. CAN I HELP HER OUT WITH HER CAMPAIGN?

Your personal support is your personal business. You should complete a Conflict of Interest form in order to receive further instructions and make sure you do not use Coca-Cola UNITED's assets to advance the campaign.

### WE PROTECT AND RESPECT HUMAN RIGHTS

Respect is one of our Core Values. We operate with integrity and are committed to conducting business in a way that respects human rights and the dignity of people. We strive to respect and promote human rights by upholding the UN Guiding Principles of Business and Human Rights in our relationships with our employees, suppliers and customers.

We prohibit the employment of underage children or forced labor, as well as any form of physical punishment or abuse.

We expect suppliers throughout our global supply chain to share our commitment to the same high standards.

Do your part to respect the human rights of people in communities that are impacted by our activities and report any human rights abuse that you see or suspect either in our operations or in those of our business partners.

See our Human Rights Policy for more details.

## WE ARE GOOD STEWARDS

At Coca-Cola UNITED, we create positive environmental change by operating in ways that reduce our impact and inspire our employees, customers, suppliers and partners. Coca-Cola UNITED is committed to environmental sustainability. We focus on reducing waste and energy consumption, as well as conserving water. Coca-Cola UNITED's goals:

**LIVE IT.**

**REDUCE AND RECYCLE  
WHEREVER POSSIBLE AND  
REPORT ANY DANGEROUS OR  
HAZARDOUS ENVIRONMENTAL  
CONDITIONS.**

## SUSTAINABILITY AND SOCIAL RESPONSIBILITY

Coca-Cola UNITED, as part of the global Coca-Cola System, is committed to being part of the solution when it comes to societal issues that may be impacted by our industry.

The Coca-Cola Company and its bottlers, through The American Beverage Association, are participating in the Balanced Calorie Initiative (BCI), which has a goal of helping to reduce beverage calories consumed per person nationally by 20% by 2025. Initially, this effort focuses on communities where obesity rates are above the national average, such as Montgomery, Alabama, in Coca-Cola UNITED's territory. Our local team has worked with its customers to provide increased supply and promotion of low- and no-calorie beverages; smaller packaging, such as mini-cans; and improved labeling encouraging "balance" in what we eat and drink. Results after the first year of BCI in the Montgomery market have been positive.

Coca-Cola UNITED is also partnering with The Coca-Cola Company in its "A World Without Waste" initiative. This bold undertaking includes recycling the equivalent of a bottle or can for each one we sell by 2030 and significantly increasing the amount of recycled materials we use in our products.

World Without Waste efforts that include recycling across the U.S. will be launched in seven model markets, including Atlanta. Millions of dollars in grants from The Coca-Cola Foundation will be provided to charities for use with local governments and environmental organizations to help increase recycling efforts and implement educational programs throughout this important market our Company.

We value our place in the community and are committed to conducting business in an ethical, socially responsible and environmentally sustainable manner. We follow applicable laws, policies, permits and regulations as they relate to protecting the environment and conserving energy and natural resources, and we work to reduce the environmental impact of our operations everywhere we do business. Your commitment helps our Company to be good stewards, to reach our goals and to make positive environmental change.

