

Britvic Conduct of Business Policy

Britvic's business is founded upon the principles of honesty, accountability and responsibility. Everyone working for Britvic should believe in these core values and incorporate them into our daily work. Our professional conduct and personal actions should reflect our belief in a culture of integrity and transparency.

To enable Britvic to develop and thrive in the global market we must operate in accordance with the highest international standards of corporate best practice. Our growth and movement into new markets will bring new challenges. We must manage our business effectively and ensure we are always aware of the risks of corruption and bribery. We must ensure our standards are maintained for operations and distribution in new territories and that our business associates and contractors subscribe to our values.

Ethical working is vital in ensuring Britvic is a great place to work and a successful company. This Conduct of Business Policy sets out how you should incorporate our principles into every day working practices. Compliance with this policy is compulsory to ensure effective operation of our business and future success.

Paul Moody

Chief Executive

Scope

This Conduct of Business Policy (the "Policy") defines the appropriate professional behaviour which you must use when conducting business on behalf of the Britvic Group. Please read this Policy carefully and make sure that you understand it and follow it at all times.

The rules in this policy cover your responsibilities in relation to the following:

- when you may accept gifts or hospitality;
- when you may offer gifts and hospitality;
- how you should conduct business; and
- how you should manage your personal interests and activities insofar as they affect your role in Britvic.

This policy also sets out the procedure for 'whistle blowing' which is reporting any concern you may have over a breach of this Policy or any other Group policy.

This Policy must be complied with by all Britvic Group ("Britvic" or the "Group") employees whether operating in Britvic's home territories or in any other country across the world. Compliance with this Policy is also mandatory for all third parties

acting on behalf of the Group including, secondees, advisors, contractors and other companies. Such operators in any country must be made aware of, and comply with, its terms.

As with all Group policies, line managers are responsible for ensuring that their employees and contractors acting on behalf of the Group engaged by them comply with this Code.

If you are in any doubt as to your responsibilities you must speak to your line manager. If you are a line manager and are unsure about any aspect of this Policy or would like further guidance you should speak to one of the Group Legal Team or e-mail legalteam@britvic.co.uk.

Failure to Comply With This Policy

Failure to comply with this Policy is a serious matter which may constitute gross misconduct and could result in dismissal. This will be dealt with in accordance with your local disciplinary policy. In some instances failure to comply may also be a criminal offence.

Breach of this Policy could have severe consequences for the Group including the following:

- damage to our reputation and brands;
- loss of customers and revenue;
- adverse publicity;
- negative effect on share price;
- breach of law;
- criminal charges against Group employees and directors (including fines and imprisonment);
- unlimited corporate fines for the Group; and
- disruption of the working environment.

Gifts and Corporate Hospitality

The giving and receiving of small gifts and the offering of, and participation in, corporate hospitality is part of building positive business relationships. You should be aware of the boundaries between positive interaction between businesses and the risk of improper inducement, bribery and personal advantage.

You must carefully consider any offer of gifts or hospitality from any person or organisation with whom Britvic has had, or may have, dealings. Anything you are offered, or promised, may be, or may be seen as, an inducement to improperly influence your judgement. Any gift or entertainment accepted must not create the expectation of special treatment toward the donor.

You must never attempt to improperly influence the judgement or decision of a third party by the offering of any personal incentive or gift.

Any gift or hospitality accepted other than in accordance with the procedures below, or not properly recorded, may be assumed to have been accepted corruptly. Any gift or hospitality offered other than in accordance the procedures below may be perceived to have been offered as an improper inducement.

Neither hospitality nor gifts should be accepted as frequently as could appear to influence a business decision. If you are in any doubt as to the appropriateness of any gift or hospitality you must speak to your line manager. If you are a line manager and are unsure about as to the appropriateness of any gift or hospitality or would like further guidance you should speak to one of the Legal Team or e-mail legalteam@britvic.co.uk.

If you are offered any money, hospitality or gift which you suspect may be a deliberate attempt to improperly influence your judgement you must report it immediately to your line manager.

Accepting Gifts and Hospitality

Britvic does not permit you to accept any bribe, inducement or gift intended to obtain a business advantage or to influence your commercial decisions. It is important to assess the value and appropriateness of an item or the hospitality offered.

A gift is anything of any value which is offered, promised or given and includes any present or token of gratitude such as food, flowers, clothes, electronic items or alcohol. Gifts include benefits in kind such as goods or use of services or facilities provided to you free of charge or at a reduced rate (car hire, holiday home, interest free loan, credit or discounted goods or services).

Corporate hospitality includes any, party, drinks, services, meal, tickets or access to a sporting, music or entertainment event and includes payment for travel and accommodation expenses.

You may accept and retain any gifts of a nominal or low value (worth less than fifty Pounds (£50.00) or equivalent in Euros). This includes items such as business diaries, desk calendars, flash sticks, food, alcohol and confectionery.

You must never accept any gift of money (or its equivalent including vouchers, personal discount or credit except those discounts or vouchers offered as part of the Group employee benefits package) from any third party regardless of the value. You should not accept a gift or hospitality where there is any condition attached, or favour expected, either specific or implied.

You may accept any invitations to hospitality events which are modest meals, business drinks, conferences and professional or trade events.

You may only accept and retain gifts of reasonable value (worth between fifty and a hundred and fifty Pounds (£50.00 to £150.00) or equivalent in Euros) where there is an existing relationship with a third party and there is a bona fide reason for such gift (for example, wedding, birth of child, Christmas or other religious event or completion of a significant deal beyond normal working). All such gifts must be approved by your line manager and recorded in the Register of Gifts and Hospitality (see below).

The circumstances and timing of the offer, its appropriateness to the business relationship in question and the value of the gift will determine whether or not it may

be personally retained. Just because a gift is worth under a hundred and fifty Pounds (£150.00) it does not mean it would be appropriate to accept the gift, for example retaining seasonal gifts toward the upper limit would not be appropriate.

You may accept an invitation to hospitality including events such as sports, music or other entertainment worth up to two hundred and fifty Pounds (£250.00) or equivalent in Euros per person (including travel expenses) where your host is present and it is related to the building of business relationships and it is appropriate to the circumstances and timing of the relationship. All such hospitality worth more than fifty Pounds (£50.00) must be approved by your line manager and recorded in the Register of Gifts and Hospitality (see below).

You may not retain any gift worth over a hundred and fifty Pounds (£150.00) or equivalent in Euros nor accept any hospitality worth over two hundred and fifty Pounds (£250.00) or equivalent in Euros. Such gifts or hospitality should not be accepted unless genuine offence would be caused to the donor (see below). If you are in any doubt as to the value of any gift or hospitality you must speak to your line manager. If you are a line manager and are unsure about as to the value of any gift or hospitality or would like further guidance you should speak to one of the Legal Team or e-mail legalteam@britvic.co.uk.

Valuing Hospitality and Gifts

The value of hospitality or gifts may be hard to assess. If you are unsure as to the value of hospitality or a gift offered you should discuss this with your line manager and agree a genuine reasonable estimate of market value. Do not forget to include any travel and accommodation expenses which are part of the offer when valuing hospitality.

The value of gifts or hospitality accepted from a single source in any year is to be added together cumulatively. The maximum acceptable from any one source in a year is a hundred and fifty Pounds (£150.00) or equivalent in Euros for gifts and two hundred and fifty Pounds (£250.00) or equivalent in Euros for hospitality.

Dealing with Gifts You Cannot Retain and Hospitality You Cannot Accept

If you are offered a gift or tickets to an un-hosted event you cannot retain (either because accepting or keeping it would not be appropriate or it is worth more than a hundred and fifty Pounds (£150.00) or equivalent in Euros) you should consider whether this offer can be politely declined without causing offence. If you can decline such offer without causing genuine offence then you should.

If declining the offer will cause genuine offence to the donor then the gift or tickets may be accepted. The gift must be recorded in the Register of Gifts and Hospitality and then submitted to your line manager. Managers should deal with such gifts appropriately for example donation to charity or raffled to employees, or offered back to the employee for purchase at market value (repaid to the donor where possible) less fifty Pounds (£50.00) or equivalent in Euros.

If hospitality is offered to you which is of significant value (worth more than two hundred and fifty Pounds (£250.00) or equivalent in Euros) you should politely decline and explain you are unable to accept in accordance with this policy. If there is an exceptional business justification for participation in such an event it may be

accepted only if approved in advance by a Functional Director (e.g. Senior Leadership Team; Ireland or France Exco. member) and your involvement should be recorded in the Register of Gifts and Hospitality. If you are a Functional Director then such attendance should be approved by the Exco.

Under certain circumstances you may not be aware of the full value of hospitality until you are at, or after, the event. If you accept hospitality for valid business reasons which you subsequently believe to be worth more than two hundred and fifty Pounds (£250.00) or equivalent in Euros you should report this to your line manager and record it in the Register of Gifts and Hospitality.

Gift Acceptance 'Zero Tolerance' Departments (including Procurement)

Certain departments within Britvic are sensitive to external influences and, if you work in such a department, you may not keep personal gifts of any real value. You should check with your line manager whether you work in such a team, for example the Procurement Department is a 'zero tolerance' team. Such teams may only accept and retain gifts of nominal value such as stationery or small value gifts branded with the logo of the donor.

If you work in a gift zero tolerance team and are offered a gift of any real value the gift must be either be refused or accepted with the approval of your line manager and recorded in the Register of Gifts and Hospitality then submitted to your line manager. Managers should deal with such gifts appropriately for example donation to charity or raffled to employees, or offered back to the employee for purchase at market value.

Hospitality worth up to two hundred and fifty Pounds (£250.00) or equivalent in Euros may be accepted in gift zero tolerance departments only with the prior approval of your line manager. The hospitality must not be Britvic specific (so other companies are invited) and must be of the kind which would be reciprocated by Britvic.

Recording Gifts and Hospitality

You should keep a personal record of all gifts and hospitality you accept in accordance with this Policy in a Register of Gifts and Hospitality. A copy of the register is attached at Appendix 1. It is your responsibility to keep the Register updated and ensure that the gift or hospitality accepted is recorded correctly and authorised.

Acceptance of gifts or hospitality of nominal value (worth up to fifty Pounds (£50.00) or equivalent in Euros) need not be recorded in the Register of Gifts and Hospitality.

If you accept any gift or hospitality worth more than fifty Pounds (£50.00) or equivalent in Euros) you should report this to your line manager and record such gift in the Register of Gifts and Hospitality.

If you have accepted any gift(s) or hospitality (which is required to be recorded in accordance with this Policy) in any year you should submit a copy of your Register of Gifts and Hospitality to the Britvic Company Secretary by 31 October for each financial year in which the gift(s) or hospitality is received (e-mail company.secretariat@britvic.co.uk).

Offering Gifts and Hospitality

Britvic encourages you to promote our business and brands by a wide variety of means, including the offer of promotional gifts and corporate hospitality as appropriate. However you must be careful that such promotion is not, and is not perceived as, an attempt to improperly influence the performance of a third party.

Britvic does not permit the offering of any bribe, financial inducement or gift to obtain business, orders or favour of any description whatever. Any gift must be given unconditionally.

Before you offer any gift, corporate hospitality or token of gratitude to a third party in the course of business it is your responsibility to obtain confirmation in advance that it can be accepted in accordance with the potential recipient's company's policy on the receipt of gifts and hospitality.

You may offer gifts of low value (worth less than fifty Pounds (£50.00) or equivalent in Euros) to any third parties to promote our business and brands and strengthen business relationships.

You may only offer gifts of reasonable value (worth between fifty and one hundred and fifty Pounds (£50.00 to £150.00) or equivalent in Euros) to third parties with the advance approval of your line manager and where there is an existing relationship and there is a particular reason for such gift (for example, wedding, birth of child, Christmas or other religious event or completion of a significant deal beyond normal working).

The circumstances of offer, its appropriateness to the business relationship in question and the value of the gift will determine whether or not it is appropriate. Just because a gift is worth under a hundred and fifty Pounds (£150.00) it does not mean it would be appropriate to offer the gift, for example, offering seasonal gifts toward the upper limit would not be appropriate.

You should not offer a third party any gift worth more than one hundred and fifty Pounds (£150.00) or equivalent in Euros.

You may offer corporate or other hospitality or invitations to entertainment or sports events (such as Wimbledon, Premiership football or Six Nations rugby) worth in up to two hundred and fifty Pounds (£250.00) or equivalent in Euros (to each recipient) only where it is directly related to the building of business relationships or the promotion of Britvic or its brands. All hospitality offered should be modest in nature and must be hosted by Britvic representatives.

If you are planning a special event to entertain business contacts which is, or may be, worth over two hundred and fifty Pounds (£250.00) or equivalent in Euros per head it must be approved in advance by a Functional Director (e.g. Senior Leadership Team; Ireland or France Exco. member) and it must be recorded in the Register of Gifts and Hospitality. If you are a Functional Director planning such an event then such hospitality should be approved by the Exco. For such special events you must obtain from all attendees in advance a specific confirmation (as part of the RSVP) that attending such event is in accordance with the attendee's company's policy on the acceptance of hospitality.

Public Officials and Overseas Public Officials

You must never attempt to bribe a public official whether in Britvic's home territories or overseas. You should not offer any gifts to public officials whether in Britvic's home

territories or overseas. You may offer reasonable hospitality to public officials in Britvic's home territories and overseas in accordance with the above rules but you must confirm with the intended recipient in advance that they can accept our hospitality in accordance with their relevant policy on the acceptance of hospitality. You must record all hospitality involving Public Officials in the Register of Gifts and Hospitality.

International Operations

Britvic's operations in all countries must comply with this Policy at all times. Compliance with this Policy takes complete precedence over any local customs or traditions. If you are operating outside the UK, in addition to this Policy, it is your responsibility to ensure you are aware of national laws and customs so as to avoid breaching national or local laws or causing offence or embarrassment either to Britvic or to third parties.

If you are involved in international operations you must be aware of the risk of bribery and corruption in the country in which Britvic is operating or considering operating. You must ensure that Britvic does not deal with third parties who are, or may be, involved in bribery or corruption.

You may not make 'facilitation payments' (payments which are made to bypass or speed up official processes or for officials to show favour to Britvic) to any third parties or public bodies to assist Britvic's overseas development. No such payments should ever be made by third parties on Britvic's behalf.

Business Incentives and Prizes

This policy does not prevent you from offering promotional incentives, free products, discounts, rebates, promotional credits and other sales incentives where these are a business to business arrangement (including promotions and offers to sole traders). You may also offer prizes to third parties where there is an element of competition. If you are considering offering personal sales incentives or similar rewards to third party individuals or representatives you should speak to a member of the Legal Team or e-mail legalteam@britvic.co.uk.

Charitable Contributions

You should carefully consider making requests for gifts or contributions from any suppliers, customers or other business contacts even if made so on behalf of a charity. You may have the best intentions in making such requests but this may put the recipient of the request in a compromising position and may oblige you to return the favour in future. If you are asking for a significant donation you should first speak to your line manager.

Gifts and Hospitality Dos and Don'ts

Dos	Don'ts
▲ Keep gifts worth under £50 if appropriate.	▼ Offer personal items to your business contacts worth over £50 except with prior approval of your line manager.
▲ Obtain the approval of your line manager before you accept a gift or hospitality worth over £50.	▼ Keep a gift worth over £150 and think 'no-one will ever know' (or keep a gift worth over £50 without recording it in your Register of Gifts and Hospitality).
▲ Accept hospitality worth up to £250 if approved by your line manager and recorded in your Register of Gifts and Hospitality	▼ Accept hospitality (including travel expenses paid for) worth over £250 (in very exceptional circumstances this may be accepted with the prior approval of your line manager).
▲ Record all accepted gifts and hospitality worth over £50 in your Register of Gifts and Hospitality.	▼ Give gifts to, or receive gifts from, your business contacts so often that they become an accepted perk of doing business (maximum £150 in any year).
▲ Invite your business contacts to join you at sporting events such as Wimbledon, Premiership football or Six Nations rugby or to see live bands or shows.	▼ Supply your business contacts with tickets to sports or other events unless a host from Britvic will be there.
▲ Turn down a gift or hospitality if you suspect there are 'strings attached'.	▼ Expect anything in return for gifts or hospitality.
▲ Hold business events such as golf days, product launches and drinks parties and buy your contacts food and wine to celebrate significant events.	▼ Hold events in exclusive places or pay for guests' expenses for foreign travel or accommodation (unless there is a genuine business reason).
▲ If you are planning a special event to entertain business contacts worth over £250.00 per head it must be approved in advance by a Functional Director (e.g. Senior Leadership Team, Ireland and France Exco.)	▼ Offer any hospitality worth more than £250 per head to your contacts (unless approved by a Functional Director e.g. Senior Leadership Team, Ireland and France Exco.).
▲ Use your sensible discretion in deciding whether a gift offered or received is appropriate to the business relationship. If in doubt speak to your line manager.	▼ Be embarrassed to turn down any inappropriate gift or hospitality. Your decision will be understood by the business counterparty who, in most cases, will be subject to similar rules.
▲ Offer prizes, branded freebies and other goodies to our customers to promote our products.	▼ Offer any gifts to public officials (and for hospitality check in advance whether or not it can be accepted).
▲ Offer promotional incentives, free products, discounts, rebates, promotional credits and other sales incentives where these are a business to business arrangement.	▼ Offer personal financial sales/promotion incentives without speaking to Group Legal first (e-mail legalteam@britvic.co.uk).

Conducting Business

As a representative of Britvic you must treat all co-workers, customers, competitors, suppliers, advisers, officials, joint venture partners, and any other persons or groups you come into contact with from time to time with equality, respect and integrity.

When conducting business on behalf of the Group you must at all times act in the best interests of Britvic.

Honesty

Britvic supports responsibility and openness amongst colleagues and discourages blame and secrecy (except for genuine reasons of business confidentiality or commercial sensitivity). Our business can only be effectively run if everyone has an accurate, complete and true picture of the business.

You should be honest and open with your colleagues and must ensure that you record and communicate information accurately and impartially. You must not misrepresent or improperly omit any information for any reason or alter or change any records retrospectively (other than to increase reporting accuracy in the light of new information).

You must act at all times in accordance with your local Fraud Policy to prevent and report fraud.

Equality and Respect

You must remain absolutely impartial and independent at all times and must not show favour or disfavour to any company or person. For further information please see your local Equality Policy.

You are expected to treat your co-workers with fairness and respect. Managers must ensure employees and workers are given an equal opportunity to succeed regardless of their perceived or actual race, colour, sex, sexual orientation, religion, age, national origin or disability.

You should treat your colleagues, customers and suppliers with fairness and respect. You must not harass, cause offence to or treat anyone unequally in relation to their perceived or actual race, colour, sex, sexual orientation, religion, age, national origin or disability. Managers are expected to foster an environment that encourages each employee or worker to develop their capabilities to the fullest without interference from discriminatory, offensive or harassing treatment. For further information see your local Harassment and Bullying Policy.

Correspondence and Records

Although many of the matters you deal with will be confidential you must assume that they may become public knowledge in future, for example if investigated by a Court of Law or regulatory body. All communications of the business, whether internal or external must be written in a manner which could be disclosed to officials, judges or other third parties including the subject company or person.

All dealings must be conducted fairly and ethically in such a way that should every aspect of the transaction become widely known (for example in the media) this would not cause any embarrassment, injury or damage to the reputation of the Group whatsoever.

Correspondence (including e-mails, instant messages and texts) must never contain anything unprofessional or that could damage the Group's reputation. You should not refer to anyone (either internally or externally) in any correspondence (including e-mails, instant messages and texts) in a way that you would not want them to read.

E-mails tend to be treated more informally than other written correspondence. However, E-mails form a permanent record of any correspondence and nothing should be put in an e-mail which you would not be prepared to put on an internal memorandum or on Group headed notepaper. Review each e-mail carefully before sending it.

Use of Group Resources

You must not use any company assets, property, money, resources, equipment, software, services, intellectual property or information to which you may have access for any purpose except the business of the Group. You must not appropriate such items for personal, family or third party use or gain. Company cars may be used for authorised personal use.

You may not use company credit cards or other Group credit facilities for the purchase of personal services or items except in an emergency (and at your expense).

You must not consume or take products except as specifically authorised or purchased. Where Britvic products are made available on site free of charge these are for your own personal consumption, and consumption by visitors, only. Staff shop purchases may not be sold onward. Any significant breach of the above rules may be regarded as theft.

Managing Personal Activities and Interests

Conflicts of Interest

You must act in the best interest of the Group at all times. Conflict of interest includes dealing with matters (such as contracts, business agreements, recruitment or invitations to quote) involving:

- a) your friends, partner, family members (either immediate or extended) either as individuals or as employees or directors of the relevant company; or
- b) your personal interest in the relevant company (financial interest such as shares, assets, interest in a contract, company loan or other investment or a position such as employee, consultant or statutory director).

Britvic wholly supports the individuality and diversity of our employees but you must not let any personal interest, political view or religious belief affect any business decision you make. You must remain personally impartial between customers,

suppliers and all other third parties and make all decisions based solely on the best commercial interests of the Britvic.

You must fully disclose to your line manager all situations in which your financial interests, personal involvement or personal beliefs may affect your impartiality or potentially conflict with the interests Britvic. All such interests must be recorded in the Register of Conflicts of Interest (see below). We will then work with you as appropriate to ensure your position is not compromised.

We encourage you to refer talent, including your friends and family, as potential employees to Britvic for recruitment purposes but you should make your relationship with the recommended candidate clear to the Human Resources Team.

Recording Conflicts of Interest

You should keep a Register of Conflicts of Interest for recording all potential conflicts of interest in accordance with this Policy. A copy of the register is attached at Appendix 2. It is your responsibility to keep your Register updated.

If you have made any entries in your Register of Conflicts and Interests in any year in accordance with this Policy you should submit a copy of your Register of Conflicts of Interest to the Company Secretary by 31 October in each financial year for the year in which the conflict arose (e-mail company.secretariat@britvic.co.uk).

Political Activity, Donations and Outside Interests

You are free to take part personally in any political or other activities you may choose. However, you must be careful not to state or create the impression that you represent Britvic in any such personal activity. You should not make donations or provide support to politically orientated groups or parties using Britvic resources without the advance written approval of the Company Secretary, who will consult the Chief Executive and the Chairman before doing so. Such approval will only be granted in exceptional circumstances and will need to be disclosed in Britvic's Annual Report and Accounts. Political donations made by the company of £5,000 or more in any year will need Britvic's shareholders approval, so donations are unlikely to be approved.

Whistle blowing: How to report a concern at work

What is whistle blowing?

Whistle blowing is reporting a concern you have that company affairs are not being run properly or that an employee is not acting in the interest of Britvic. Your concern may involve the conduct of one, or more, people or may relate to a particular business matter about which you have a concern.

At Britvic we have a culture of honesty and openness. We need your participation in whistle blowing should you encounter or suspect improper conduct from any of our employees, no matter how senior, in any area of our business.

All reported matters reported will be dealt with in a safe and confidential manner.

What sort of things should be reported?

You should report any breach of this Policy or any other Britvic company policy or the law. Examples of the appropriate sort of 'concerns' to report include: involvement in bribery or corruption; misuse of company resources or theft; fraud; anti-competitive behaviour such as price fixing or information sharing with competitors; misuse of position or health and safety procedure violations. This list is not comprehensive but gives you an idea of the nature of concerns you should report.

If you are considering reporting a matter it is your responsibility to ensure that any report is made in good faith and you have reason to believe that the allegation is true.

When reporting a concern you are encouraged to provide as much information as possible, including names, dates, places, and details of the events that took place.

Grievance or Harassment and Bullying Policies

If your concern is of a personal or employment related nature please refer to your local Grievance Policy or your local Harassment and Bullying Policy which may be more suitable. You should consider which process is most appropriate to raise your concerns.

Employee Confidentiality and Anonymity

If you report any improper behaviour the matter will be treated with absolute confidence and your details will not be disclosed unless there is a legal obligation to do so. Britvic is under a legal obligation to protect your interests and position and we will ensure anyone who raises an honest concern in good faith is supported and protected.

You may report a matter anonymously but we would encourage you to go on the record. If we don't know who you are when a matter is reported we cannot guarantee your subsequent protection of confidentiality in dealing with the matter.

Whistle Blowing to Your Line Manager

If you have concerns about improper behaviour you are encouraged to report them to your line manager in the first instance. If your manager is involved in the improper behaviour you should use one of the alternative reporting methods below.

Whistle Blowing to Head of Audit & Risk

If your line manager is unable to address the problem or if you do not feel comfortable reporting the matter to your line manager you may contact Britvic's Head of Audit & Risk who will deal with the matter in absolute confidence.

Whistle Blowing Hotline

Alternatively you may contact the confidential 'Whistle Blowing Hotline', which is operational 24 hours a day and manned by an independent company.

Telephone	0800 525472	Fax	01275 859563
Email	mailbox@courtenays.co.uk		
Address	The Courtenay Group, Leveret House, Manor Park, Nailsea Wall Lane, Nailsea, Bristol. BS48 4DD		

Further Steps and Outcome

Once you have raised a concern by any of the channels referred to above you will be advised on what further steps will be taken. All matters reported will be referred to the Head of Audit and Risk for further confidential investigation. Investigation may involve other people in the business and teams such as HR and Legal but your details will not be given to those investigating the matter unless absolutely necessary. The Head of Audit and Risk may need to arrange a secret and confidential meeting with you to talk through your concern further and to get as much detail as possible.

You will be told the outcome of any investigation into your concern, unless there is a legal reason why we can't share this with you. Due to the, often sensitive, nature of a concern at work you may be told the outcome in confidence, which should not be shared.

If you are not satisfied by this approach you may request that the matter is referred to the Managing Director of the business unit in which you work. If you are still not satisfied, you may raise the matter with the relevant external authority.

Managing Reported Concerns

If you are a line manager who receives a report of improper conduct you should maintain absolute confidentiality between yourself and the person making the report. **Do not contact the subject of the report.** Document all of the facts available: person(s) involved, details of concern, evidence, dates, etc. You should then act immediately to contact the Head of Audit and Risk to discuss the matter further.

Appendix 1: Britvic Plc

Register of Gifts and Hospitality

Name of Employee: _____

Name of Britvic Department: _____

Name of Line Manager: _____

Date	Nature of Gift or Hospitality (and value if known)	Name of Donor and relationship to Britvic (supplier/adviser/customer etc.)	Retained by employee or handed to relevant line manager?	Date approved by line manager (including signature of line manager)

Signed (Employee) _____

Date _____

ALL REGISTERS MUST BE SENT TO THE COMPANY SECRETARY, BRITVIC PLC, BRITVIC HOUSE, BROOMFIELD ROAD, CHELMSFORD, ENGLAND CM1 1TU.

(E-MAIL: COMPANY.SECRETARIAT@BRITVIC.CO.UK) BY 31st OCTOBER FOLLOWING THE YEAR IN RESPECT OF WHICH THE RECORD IS KEPT.

Appendix 2: Britvic plc

Register of Conflicts of Interest

Name of Employee: _____

Name of Britvic Department: _____

Name of Line Manager _____

Name of relevant organisation with which Britvic has a business relationship with i.e. supplier, customer, tender competitor, or competing company	Relationship to person with interest if not self (family or extended family)	Nature of interest (e.g. shares owned by self or family, fact that family member is an employee or director of the organisation etc.) together with value of such interest if known.	Date interest was acquired/ began (or ended / was disposed of)	Date approved by line manager (including signature of line manager)

I confirm that the above information is true, complete and accurate in all respects.

Signed (Employee) _____

Date _____

ALL REGISTERS MUST BE SENT TO THE COMPANY SECRETARY, BRITVIC PLC, BRITVIC HOUSE, BROOMFIELD ROAD, CHELMSFORD, ENGLAND CM1 1TU.

(E-MAIL: COMPANY.SECRETARIAT@BRITVIC.CO.UK) BY 31st OCTOBER FOLLOWING THE YEAR IN RESPECT OF WHICH THE RECORD IS KEPT.

Responsible Author:	Jonathan Marsh, Senior Group Legal Business Partner
Approving Authority:	Emma Thomas, Company Secretary and General Counsel
Date Approved:	14 June 2011
Policy Review Date:	Annually
Purpose:	<p>To enable Britvic to :</p> <ul style="list-style-type: none"> • Comply with all laws relevant to the business • Follow best practice • Protect Britvic’s customers, suppliers, staff and other individuals • Protect Britvic from the consequences of a breach of its responsibilities.
Roles & Responsibilities:	<p>Britvic Board – Has the responsibility for ensuring regulatory compliance approval and support of implementation of policies and procedures.</p> <p>Company Secretary – Has the following responsibilities :</p> <ul style="list-style-type: none"> • Brief the Board on Conduct Of Business responsibilities; • Review Conduct of Business Policy and assess anti bribery policy and process implementation annually; and • Ensure Group Legal Team advise staff on bribery related issues and provide adequate training on Anti bribery takes place <p>All teams within Britvic – To allocate a member to take responsibility for :</p> <ul style="list-style-type: none"> • Drawing up own procedures to ensure the Act is adhered to; • Annual submissions of the registers of Gifts and Hospitality and Conflicts of Interests; and • To ensure team members are familiar with this Policy (and all related policies) <p>All staff members of Britvic – To take individual responsibility to :</p> <ul style="list-style-type: none"> • Read, understand, and comply with all policies and procedures that relate to business conduct and any issues arising during the course of their employment with Britvic; • Update as appropriate; and • Make protected disclosures of suspected or actual offences via the whistle blowing hot line.
Enforcement:	Significant breaches of this Policy by any employee within Britvic plc shall be handled under Britvic Plc’s disciplinary procedures as well as possible criminal action if applicable.