

BRITVIC SOFT DRINKS POLICY STATEMENTS

ETHICAL TRADING POLICY

SUPPLIER COMPLIANCE FORM

I HAVE READ AND UNDERSTOOD THE ATTACHED ETHICAL TRADING POLICY AND HEREBY AGREE TO THE STANDARDS LAID OUT THEREIN.

NAME _____

COMPANY _____

SIGNED _____

PRINT NAME &
POSITION _____

DATE _____

IF DIFFERENT FROM YOU, THEN NAME & POSITION OF PERSON
RESPONSIBLE FOR CR/ETHICAL TRADING _____

RETURN TO:-

Post, fax or e:mail:

SHARON GARDINER

PROCUREMENT SYSTEMS & SUPPORT MANAGER

BRITVIC SOFT DRINKS

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BRITVIC SOFT DRINKS POLICY STATEMENT

ETHICAL TRADING POLICY

Britvic Soft Drinks is committed to meeting its consumer's and stakeholder's expectations that we supply high quality drinks that are sourced and manufactured in a fair, ethical and environmentally responsible way.

We procure goods and services from all over the world. In order to ensure that we meet our expectations, we need to work closely with our suppliers. We acknowledge the role they play in the success of our business and recognise that we have a responsibility towards them and their employees.

This policy sets out the standards that we expect of ourselves and our suppliers. In turn, we expect those suppliers to apply similar standards or principles with their suppliers throughout the supply chain.

We require them to confirm their compliance to 'Our standards' set out below within this policy. It is a contractual requirement for new suppliers, and will be for existing suppliers, as and when contracts come up for renewal. Where non compliance is identified, we will work with these suppliers to prioritise concerns and agree solutions. Where this approach fails, we reserve the right to take steps, up to and including termination of contract.

This policy also applies to any businesses we acquire, though we acknowledge the need for the business to make the transition in accordance with a timeline agreed in a post-acquisition plan.

Our standards

- Suppliers must comply with all relevant legislation, through national law and practice.
- Wages and working hours must comply with national laws, including minimum wage, overtime and maximum hours.
- Employment must be freely chosen. There must be no forced or compulsory labour and workers must be free to leave their employer after reasonable notice.
- Suppliers must respect their workers' rights to freedom of association and the right to collective bargaining. Where this is restricted under law, the employer should facilitate alternative means for independent and free association and bargaining.
- Systems and procedures to ensure a healthy and safe working environment must be implemented by employers and reviewed regularly.

- Suppliers should have an environmental management system in place and are encouraged to report on their environmental performance. e.g. as guidance ISO14001 or EMAS or equivalent.
- In respect of child labour, suppliers must conform to the provisions of the ILO Convention 138 Minimum Age for Admission to Employment.
- Suppliers must ensure that discrimination, harsh or inhumane treatment of any employees is prohibited and systems are in place to prevent this.

BRIBERY ACT

- Suppliers must not make or offer bribes, or payments of money or anything of value to Britvic Soft Drinks for the purpose of obtaining or retaining business relating in any way to Britvic Soft Drinks.
- Suppliers must refrain from accepting money in any form, gifts over a nominal value, special hospitality, or other financial benefits that may influence any decision.
- Suppliers must refrain from unethical or compromising practices in relationships, actions or communications.
- Suppliers must ensure that any expenditure incurred in connection with any current or future transactions with Britvic Soft Drinks are transparent, recorded and duly incurred in the ordinary course of business.
- Suppliers should refrain from offering any business courtesies to Britvic Soft Drinks where refusal could cause discomfort or embarrassment to the Supplier or Britvic Soft Drinks.
- In the event that a conflict of interest arises (whereby the Supplier's ability to act with total objectivity with regards to the supply of goods or services to Britvic Soft Drinks is compromised), the Supplier shall report all pertinent details to Britvic Soft Drinks immediately.
- The Supplier should immediately report any situations where it is aware, or is expected to be aware that a current owner, officer, director, employee, consultant, agent or representative of the Supplier is a current owner, officer, director, employee, consultant, agent or representative of Britvic Soft Drinks.

MANAGEMENT AND REPORTING

Britvic Soft Drinks takes a risk and responsibility-based approach to our supply chain management. One central part of this approach is the provision

of information on our own standards via SEDEX (Supplier Ethical Data Exchange).

We require all suppliers of the type listed below to supply data via SEDEX.

- all packaging and raw material suppliers; and
- all suppliers of promotional premium materials
- all suppliers of goods and services

Where suppliers are using another recognised data exchange we expect suppliers to submit a return to the SEDEX system within a one year period.

We encourage all other suppliers to consider reporting through the SEDEX system.

For suppliers where risks have been identified, we retain the right to conduct audits and work with suppliers to develop appropriate remediation plans. We will also work with relevant industry-wide initiatives to manage our concerns, where appropriate.

We will review this policy and publicly report on our progress and implementation on an annual basis.

We also undertake to conduct annual training and awareness building amongst our procurement teams and where relevant, our suppliers.

It is our goal to work towards continual improvement of conditions in our supply chain and we welcome any views or support from our stakeholders on how to best achieve this.

For and on behalf of Britvic Soft Drinks



Fabienne Lesbros
Director of Group Procurement
Date: January 2012