

# HUMAN RIGHTS

2022 Overview



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Our company’s purpose is to refresh the world and make a difference. As a global business, this includes a focus on respecting human rights in our own business, as well as our supply chain. We’re doing our part while also working extensively with others, because broad collaboration is essential to create lasting changes. We’re committed to acting with speed to address the many changes we continually see around the world.

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# INTRODUCTION

Respect for human rights is a core value embedded in everything we do at The Coca-Cola Company. We were among the first multinational companies to embrace the UN Guiding Principles on Business and Human Rights, and we are committed to upholding them. As a global company, we recognize the constant vigilance required to respect the human rights of

those lives touched by the broad reach of our products, business activities and value chain.

This document provides a summary of the company’s human rights policies, processes and practices that are all aimed at ensuring that we respect human rights everywhere we operate.

It also outlines the requirements for our suppliers and system partners to embrace responsible workplace practices.



**James Quincey**

Chairman and CEO  
The Coca-Cola Company

# POLICIES

Our requirements for our own operations, as well as our those of our bottling partners and suppliers, are outlined in three key company documents: our Human Rights Policy, our Supplier Guiding Principles (SGP) and our Principles for Sustainable Agriculture (PSA).

## Human Rights Policy

The Coca-Cola Company's [Human Rights Policy](#) was approved by our board of directors in July 2017. Available in 22 languages, the policy aligns our operations with international human rights standards, including the Universal Declaration of Human Rights and core International Labor Organization Conventions.

### Topics covered include:

- Respect for human rights
- Community and stakeholders engagement
- Valuing diversity
- Freedom of association and collective bargaining
- Safe and healthy workplace
- Workplace security
- Forced labor and human trafficking
- Child labor
- Work hours, wages and benefits
- Guidance and reporting for employees

Our Human Rights Policy applies to The Coca-Cola Company, the entities that we own, the entities in which we hold a majority interest and the facilities we manage. The company also expects our bottling partners and suppliers to uphold these principles

and urges them to adopt similar policies within their own businesses. The Coca-Cola Company places special emphasis on ensuring respect for the rights of vulnerable populations such as women, children, migrants and indigenous peoples. We take special care to ensure respect for those groups' rights across our own operations as well as the operations of our bottlers and suppliers.

## Supplier Guiding Principles (SGP)

We require our suppliers and system partners to embrace responsible workplace practices in line with our Human Rights Policy. We communicate these requirements through our [Supplier Guiding Principles \(SGP\)](#). The SGP program is a vital element of the company's overall sustainability platform and reflects the belief that our responsibility to respect human rights extends across our value chain and is essential to long-term business success. Our SGP align with our Human Rights Policy and are included in all contractual agreements with direct and authorized suppliers.

## Principles for Sustainable Agriculture (PSA)

[The Principles for Sustainable Agriculture \(PSA\)](#) describe the company's commitment to sustainable agriculture based on environmental, animal welfare, social and economic criteria. The PSA include seven human and workplace rights principles. The PSA are aimed at primary production level (i.e. farm), are inclusive of small-scale farmer cooperatives, medium and large commercial operations, and form the basis for our continued engagement with suppliers to achieve compliance, transparency and continuous improvement of their farm base according to these principles.

# GOVERNANCE

Human Rights is a key focus among the top leadership of our company. The Coca-Cola Company's CEO James Quincey supports and communicates our Human Rights Policy internally and externally. At the board of directors level, the ESG & Public Policy Committee has oversight of the company's policies related to human rights and their implementation.

The ESG & Public Policy Committee is composed of four independent directors, plus the company's chairman and CEO. It includes members with deep human rights expertise, which the committee deploys to help guide the company's human rights strategy. The committee is chaired by Alexis M. Herman, who has been a director of The Coca-Cola Company since 2007. From 1997 to 2001, Ms. Herman served as U.S. Secretary of Labor. Also serving on the committee is Dr. Helene D. Gayle. Dr. Gayle is the president and chief executive officer of The Chicago Community Trust, a community foundation dedicated

to improving the Chicago region through strategic grant-making, civic engagement and inspiring philanthropy. She has held this position since October 2017. During her tenure as a member of our board of directors, Dr. Gayle also held the positions of chief executive officer of McKinsey Social Initiative from 2015 to 2017, and president and chief executive officer of CARE USA, a leading humanitarian organization, from 2006 to 2015.

The company's global vice president of human rights informs the ESG & Public Policy Committee of the board of directors on progress against our human rights commitments, open issues, risks and challenges at least annually and the Committee receives an overview on progress against key metrics at each meeting. Regular engagement with external stakeholders informs our identification and understanding of human rights risks that are reported to the committee. The global vice president of human rights ensures that stakeholder perspectives also inform the board's larger deliberations around human rights strategy. In addition, a report is provided to the ESG & Public Policy Committee on a bimonthly basis which includes updates on human rights issues.



# EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE & MANAGEMENT SYSTEMS

## Responsibility and Communications Related to Human Rights

Within the company, the Global Human Rights (GHR) function oversees implementation of the Human Rights Policy, Supplier Guiding Principles and overall human rights governance. It addresses relevant global issues, identifies human rights risks throughout the value chain, and develops easy-to-use due diligence tools to help identify and mitigate human rights risks. GHR works with a wide variety of functions across the company, such as procurement, health and safety, diversity and inclusion, public affairs, communications and sustainability, legal and enterprise risk management (ERM). The global vice president human rights reports to the corporate senior vice president and global chief people officer.

The GHR team is well-staffed and encompasses a wide range of practical human rights expertise. The team has several directors who are embedded at the regional level to ensure compliance with human rights expectations in our supply chain and in our own operations. It also includes staff with deep expertise on human rights due diligence and supply chain human rights management writ large.

On an annual basis GHR integrates key human rights risks into the larger ERM process for the company. In addition, workplace and human rights were identified as a priority ESG issue following a thorough review of our priority issues for our annual Business & ESG Report. This review was done in collaboration with a cross-functional internal team and key external stakeholders.

Regional human rights directors provide dedicated support to business operations in their respective

operating units. They use a networked approach to leverage the full team's experience to drive globally effective solutions and help incorporate a human rights lens into all of our associates' strategic thinking and business decisions. Topics related to business and human rights and responsible business conduct are regularly included in senior management meetings to ensure awareness and coherence within the company and the Coca-Cola system. In addition, individual operating units are regularly updated on the implementation of the company's Human Rights Policy and SGP, as well as relevant human rights developments and risks. These updates are provided to a broad group of internal stakeholders, helping to ensure human rights issues receive the necessary attention at both the global and local levels.

## Human Rights Training

The company provides a series of human rights training sessions, informational videos, region-specific webinars and regular updates on human rights issues and developments for our employees worldwide, including senior managers across key functions such as procurement and sustainability. These resources help to embed, at both the corporate and operating unit levels, a practical understanding of fundamental human rights, our human rights policies and programs, and how we



as a company can improve respect for human rights within our own operations and throughout the Coca-Cola system and value chain. Our goal is a proactive approach to human rights, where our employees are empowered with the knowledge to make decisions that help advance the company's human rights approach.

In addition to educating our own employees, the company conducts local training sessions for our suppliers and bottling partners, addressing our expectations of them and our audit program. In 2021, the company conducted bottler and supplier human rights-focused training attended by more than 1,200 participants.

## Human Rights Resources

The company provides additional resources, guidance and checklists to support company employees, bottling partners and suppliers in understanding and complying with our Human Rights Policy and principles. These include:

- [Hours of Work Improvement Guide](#) - a guide is intended to share our learning to date and be a resource to help facility management identify and address the root causes of overtime.
- [Human Rights Due Diligence Checklists](#) help to identify and mitigate human rights risks for a range of functions and operational settings, such as land rights and plant siting, micro distribution center operations, migrant labor, contract labor and many others.
- [Human Rights Restructuring Guidelines](#) provide a holistic approach to support The Coca-Cola System in managing a range of human and workplace rights issues and impacts that often emerge during

the restructuring, sale or acquisition of a business or elements of a business.

- [Human Rights Policy Posters](#) - downloadable versions of our Human Rights Policy in [poster](#) and [brochure](#) formats for [employees](#) and [leaders](#). All documents are available in 22 different languages.
- [Human Rights Policy Managers Guide](#) provides detailed advice for company managers on the application of our Human Rights Policy and relevant issue discussions.
- [Human and Workplace Rights Issue Guidance](#) provides expanded guidance for our suppliers on some of the most challenging issues: land rights, HIV/AIDS, pregnancy and nonjob-related medical testing, migrant worker recruitment and employment practices.
- [Mergers and Acquisitions \(M&A\) Guidance](#) - M&A present a range of human rights-related risks and challenges for companies to manage. The GHR function worked with the company's M&A team to issue guidance to ensure potential human rights impacts are reviewed as part of the due diligence process. The M&A team has a procedure in place to escalate human rights-related issues within the company as they arise.
- [Pass it Back Supplier Toolkit](#) assists suppliers in self-managing their compliance with the company's Human Rights Policy and promoting similar standards and values within their own supply chain.
- [Principles for Sustainable Agriculture \(PSA\) Supplier Guide](#) serves as a supplier reference guide for implementation of the PSA and establishes the expectation to source more sustainably and ethically all agricultural ingredients that contribute

to The Coca-Cola Company's products and plant-based packaging.

- **Responsible Land Acquisition (and Free, Prior, and Informed Consent) Guidance** includes an introductory overview of Free, Prior and Informed Consent (FPIC) as well as practical strategies to implement FPIC.
- **Supplier Guiding Principles for Waste Management** Waste pickers are often some of the most vulnerable people in their communities, operating in working environments that can include child labor and other unacceptable practices. To help combat this, we recently developed a set of tools called the Supplier Guiding Principles for Waste Management, which are designed to help us understand and improve the economic conditions and practices for people working across the waste collection chain, particularly in developing countries.
- **Supplier Guiding Principles Implementation Guide** Available in nine different languages, this guide describes the Supplier Guiding Principles (SGP), the assessment process and the proactive steps a supplier can take to align with SGP. In addition, the guide explains a supplier's role and responsibilities in meeting our SGP standards.

## Engaging Affected Stakeholders

Consistent, open communication with a diverse range of stakeholders is a foundation of our human rights program, as we work to continually improve respect for human rights across The Coca-Cola System. Our policies and programs are only as strong as the engagement with the people and communities where we operate. Our approach to stakeholder engagement is not one-off or event driven. Rather, we pursue continuous dialogue that enables us to identify and address potential issues proactively and collaboratively.

We work with a wide range of stakeholders within The Coca-Cola System and among our business

partners. This includes suppliers, workers, customers, and communities, as well as our many external stakeholders across the private, public, nonprofit and labor sectors. We believe together we can have a greater and more sustainable impact than by working alone.

### Our principles for stakeholder engagement include:

- **Transparency:** Respect the diversity of views and values stakeholders present and work to engage openly, providing the information they need to make meaningful contributions to our decision-making processes and activities.
- **Inclusiveness:** Include a wide range of stakeholders, especially those who are often the most vulnerable (e.g., women, youth, indigenous groups and disadvantaged communities).
- **Consistency:** Maintain regular and consistent communication to ensure continuity and meaningful engagement.
- **Accountability:** Inform stakeholders of how their feedback influenced the outcome of a decision or activity.

We use a variety of communication channels and platforms to engage with stakeholders. These include our human rights conferences, commodity assessments (e.g., [country sugar studies](#)), on-the-ground projects, participation in business or human rights-specific associations, and standing dialogues with a wide array of labor and nonprofit organizations. These dialogues include discussions on the content and implementation of the company's Human Rights Policy and opportunities for program improvement. Examples of recent stakeholder engagement include:

#### 1. Harvesting the Future, Child Labor Initiative in Turkey

As part of the company's efforts to work towards ethical and sustainable sourcing of agricultural ingredients, The Coca-Cola Company joined the

Fair Labor Association (FLA)-led Harvesting the Future (HTF) project in Turkey. The HTF project draws from a shared vision of partners to bring about large-scale change on child protection and responsible recruitment by pursuing a "multi-commodity, multi-company, multi-stakeholder approach". The HTF project has brought together more than 30 ecosystem entities and in the first phase identified salient human rights risks related to child and forced labor. The second phase is focused on remediation efforts such as access to childcare, ongoing engagement with labor intermediaries, improved access to water, sanitation facilities



and hygiene materials and improved grievance mechanisms. More information is available [here](#).

#### 2. The "Bayanihan Awards"

The "Bayanihan Awards" is a pilot launched in the Philippines to initiate a company-wide recognition for the best Labor Management Cooperation (LMC) practices that help in addressing challenges to effective labor and management cooperation. The LMC serves as a forum where worker and management representatives consult, discuss and arrive at a consensus to consider or make decisions on employment, social protection and risk prevention, among other issues. This is to ensure we rise above individual interests and focus on collective interests as a force for good for the organization.

### The main objectives of this award are:

- Facilitate collaboration and foster partnerships with all employees to build a shared vision and strategy
- Reduce barriers both with labor and management
- Utilize the program for better decision making in managing labor issues
- Each site, whether it has single or multiple unions, has the opportunity to vie as a model LMC contingent to the achievement of set criteria

#### 3. Bi-Annual Meetings with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Association (IUF)

In 2005, following collaboration on an issue of mutual interest, The Coca-Cola Company entered into a joint agreement with its largest international union, The International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Association (IUF), to meet twice a year in person to engage and collaborate on human and labor rights matters that may arise from time to time within the broader Coca-Cola system. These meetings serve as a forum through which the Global Human Rights team and the IUF leadership discuss developing labor-related human rights risks, receive regional updates, and seek opportunities to drive respect for human rights throughout the company's value chain.

#### 4. Annual Engaging Business Forum on Business & Human Rights

The Coca-Cola Company annually hosts the Engaging Business Forum on Business and Human Rights, a two-day event sponsored by the United States Council for International Business (USCIB), the International Organisation of Employers (IOE) and the US Chamber of Commerce. Now in its 13th year, the forum brings together business, civil society and government leaders from around

the world for discussion regarding the most significant human rights challenges of the day. In 2021 Deputy Secretary General of the United Nations Amina Mohammed delivered the conference keynote address and joined CEO James Quincey for a discussion on key human rights issues facing the world today. 2021 was recognized as the international year to end child labor and the issue is one of the most egregious human rights harms facing the world. As such, Nobel Laureate Kailash Satyarthi discussed the imperative to end child labor and the responsibilities all stakeholders, including businesses, to work together to achieve this. Following Mr. Satyarthi's address, a vital discussion on child labor was moderated by the company's global vice president, human rights which included a child labor survivor who became a lawyer and child rights activist. The Engaging Business Forum addresses some of the most challenging human rights risks and issues facing the world and business. Past topics of discussion have included The Meaning of Social Justice on a Global Scale, Living Wage, Human Rights Defenders, Human Rights and Sustainability, Forced Labor in Global Supply Chains, and Human Rights Legislation.

### 5. Asia Pacific Responsible Recruitment Series

With an estimated 2 million documented migrant workers, Malaysia is a large destination for workers coming from across Southeast Asia. These workers are especially vulnerable to exploitation through unethical recruitment practices. To address this issue, we joined with our peers within the AIM-PROGRESS regional Asia Pacific hub to host a virtual responsible recruitment capacity building series in Malaysia. The aim was to help suppliers better understand expectations around responsible recruitment and receive practical guidance on how to strengthen existing recruitment and employment practices of migrant workers. The six-week series was a combination of webinars and online eLearning modules that covered topics including pre-departure information, arrival and ongoing worker engagement,

and working with labor brokers. Collaborative approaches provide a common message for the supply chain on the importance of responsible recruitment and improve performance by providing suppliers with practical guidance.

### Memberships and Engagements

We are an active member of several initiatives, groups and associations that foster collaborative learning and action to advance the implementation of the UN Guiding Principles on Business and Human Rights. These include:

**AIM-PROGRESS**, a global forum of Fast-Moving Consumer Goods manufacturers and common suppliers within AIM, the European Brands Association, assembled to enable and promote responsible sourcing practices and sustainable supply chains. The Coca-Cola Company is an active member of AIM-PROGRESS with representatives on the advisory board, leadership team and human rights steering group. Additionally, the company supports various workstream activities including supplier capability building, regional networks, human rights in the informal waste sector, due diligence in the transportation sector and living wage. Industry-wide approaches, including that of AIM-PROGRESS, are an effective way to assure supply chain performance and meet increasing stakeholder demands in a way that reduces duplication and cost for our suppliers and ultimately consumers. By working together with peers, the company strengthens common messaging about workplace rights overall.

**BSR** is an organization of sustainable business experts that works with its global network of the world's leading companies to build a just and sustainable world. As a spark member, we partner closely with BSR to redefine sustainable business. In 2022 we are partnering with BSR to evaluate living wages in our own operations as well as identify opportunities in our supply chain.

**Global Business Initiative on Human Rights (GBI)** is a cross-industry, business-led organization focused on advancing corporate respect for human rights around the world. GBI works to shape practice, inspire commitment and build capability to implement respect for human rights in line with the UN Guiding Principles on Business and Human Rights. GBI's membership comprises a committed group of multinational corporations operating in diverse industries and regions and The Coca-Cola Company is a founding member. GBI convenes multiple times per year, in-person and remotely, through a unique program of peer learning and regional engagement work that supports business practitioners to deepen, strengthen and share their progress.

### Institute for Human Rights and Business (IHRB)

is an international think tank on business and human rights. We engage with IHRB in a number of ways on human rights-related issues, including as a founding member of its Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organizations to drive positive change in the way that migrant workers are recruited. IHRB's mission is to shape policy, advance practice, and strengthen accountability in order to make respect for human rights part of everyday business. Since its founding, IHRB has established a number of organizations and initiatives that are now free-standing, namely: the **Myanmar Centre for Responsible Business (MCRB)**, **Centro Regional de Empresas y Emprendimientos Responsables (CREER)**, the **Corporate Human Rights Benchmark (CHRB)**, and the **Centre for Sport and Human Rights (CSHR)**.

### International Organisation of Employers (IOE)

is the largest network of the private sector in the world, with more than 150 business and employer organization members. In social and labor policy debates taking place in the International Labor Organization, across the UN and multilateral

system, and in the G20 and other emerging processes, the IOE is the recognized voice of business. The Coca-Cola Company is a partner of the IOE and is engaged in its Human Rights and CSR Policy Working Group as well as the Global Industrial Relations Network (GIRN).

**The Responsible Business Alliance (RBA)** is one of the world's largest industry coalitions dedicated to corporate social responsibility in global supply chains. Recently The Coca-Cola Company's global vice president of global human rights was elected to the RBA's Responsible Labor Initiative (RLI) steering committee, which is a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.

**Shift** is a center of expertise on the UN Guiding Principles on Business and Human Rights. Founded in 2011, Shift's team of experts facilitate dialogue, build capacity and develop new approaches with companies, governments, civil society and international institutions to enable implementation of the UNGP.

**The Centre for Sport and Human Rights** is committed to advancing a world of sport that fully respects and promotes human rights by generating awareness, building capacity and delivering impact. The Coca-Cola Company is a founding member of, and provides funding to, the Centre. As a member of the Centre's advisory council, we're working to create sporting events that are respectful of human rights and inclusive for all athletes, spectators and community members.

**United States Council for International Business (USCIB)** represents U.S. business at the ILO, United Nations and many other international organizations and initiatives. The Coca-Cola Company is an active member of the USCIB Corporate Responsibility & Labor Affairs Committee.

# HUMAN RIGHTS DUE DILIGENCE

## 1. Identification of Salient Human Rights Risks

The UN Guiding Principles Reporting Framework encourages companies to focus their human rights disclosure on “the most severe actual and potential impacts on human rights associated with their activities and business relationships.” These risks are called a company’s salient human rights risks.

The company engaged Shift, a center of expertise on the UN Guiding Principles on Business and Human Rights, in the mapping and prioritization of our human rights risks according to scale, scope and ability to remediate, which were then discussed and evaluated in workshops with participants from all functions across four continents, involving more than 180 experts. The risk ranking that resulted from these workshops was further discussed in a broad consultation process with more than 57 civil society groups, including NGOs (advocating for vulnerable groups), socially responsible investors, Global Union Federations and many others.

**As a result of this process, we identified the following 12 salient human rights risks associated with the company’s activities and business relationships:**

- Safety and health of all workers/security/right to life
- Equality/nondiscrimination and related issues/risks
- Child labor
- Forced migrant labor/forced labor of seasonal workers
- Freedom of association
- Access to water

- Healthy lifestyles
- Working hours
- Land rights
- Product safety/quality
- Rights linked to sponsorships
- Right to privacy

We continue to identify and assess the human rights risks associated with our activities and business relationships on an ongoing basis, through stakeholder engagement with affected rights holders and civil society and reviews with industry peers and the public sector.

## 2. Integrating and Acting on Human Rights Risks and Impacts Identified

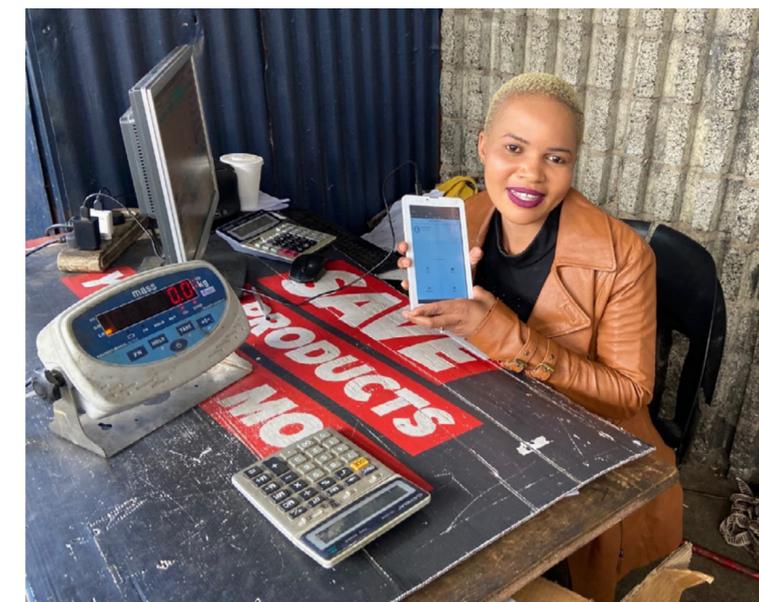
Where our internal assessments identify human rights risks, we integrate such findings into relevant internal functions and processes to take appropriate actions to cease, prevent or mitigate possible adverse impacts. These actions may include engagement with our suppliers, bottlers and stakeholders, as well as engagement in multi-stakeholder initiatives, to take relevant actions.

One area where we have identified human rights risks, including child labor, is in the informal waste collection sector. In an independent journalist investigation, the company was cited for not attending to its responsibility to ensure respect for human rights in its upstream value chain – specifically, the collection of recyclable waste. In response, in 2018 the company implemented a Human Rights in Waste Management due diligence program to improve working conditions, livelihoods

and ethical sourcing practices in the informal waste collection sector. This program included the development of the Supplier Guiding Principles for Waste Management which are designed to help us understand and improve the economic conditions and practices for people working across the waste collection sector. Examples of where we are taking further action globally with our partners include:

- Our partner in Mexico, PetStar, developed a social inclusion model, “Modelo de Acopio Inclusivo Petstar (MAIP),” focused on respecting human rights and eliminating child labor in the collection value chain. Through the MAIP framework, PetStar has developed partnerships in high-risk zones to help ensure that children are at school or playing and not working. Through these partnerships PetStar has contributed to the well-being of over 900 children. The approach engages the whole family on why education is important. Additionally, PetStar rolled out a communication campaign called #SeguirCreyendo or #KeepBelieving to catalyze collective action to eliminate child labor.
- The company is partnering with a UK-based NGO, and end-users of recycled plastics to define a set of principles overseen by an interim advisory group to support the engagement of waste pickers. The goal of these principles is to ensure the protection by states and respect by the private sector for their individual rights.
- In South Africa, where waste-pickers recycle more than 60% of the country’s plastic and packaging, we are partnering with BanQu to use blockchain technology to track, trace and ensure payment for recycled material. Our Africa operating unit will be rolling out the BanQu platform as a service to 100 Buy-Back Centers or aggregators that buy

and sell recyclables. The project is providing small businesses with free access to the BanQu system, allowing them to capture their transactions in a blockchain-based system that works with any smartphone or tablet. The system will also allow these businesses to use cashless payments, reducing reliance on cash and avoiding the risks inherent with the use of cash. Waste-pickers will also benefit by receiving an immutable blockchain verified proof of transaction via SMS. These records, which are similar to a pay slip, can then provide waste-pickers with the proof of economic activity necessary to access banking and financial services as well as be integrated with the government’s initiative to build an active waste-picker register. Through cashless payment and integration with a system called “6DOT50”, waste-pickers will also be able to receive and make payments on a system at low cost. Through Project UP we plan to expand registration to around 10,000 waste-pickers. More information on BanQ can be found [here](#).



### 3. Verifying Human Rights Compliance in Company, Tier 1 Suppliers and Bottling Partner Operations

It is important for the company to understand and verify how our own operations, as well as those of our bottling partners and suppliers, perform in relation to our human rights policies and standards. To do so, the company utilizes an industry-leading independent third-party audit program in which auditors go on site to review worksite practices and verify compliance. In addition to document reviews, facility walkthroughs, and meetings with management, these onsite assessments include confidential interviews with employees and onsite contract workers. Our audit guidelines require auditors to select employees from different production lines and duties within the facility; employees of different genders, ethnic

or religious backgrounds; employees who appear very young; employees who are pregnant; union representatives, when available; and contingent workers. Protection of the workers in the process is of utmost importance. Worker participation in interviews is voluntary, and the interviews are strictly confidential with no reference to the employee's name when findings are disclosed to management. Interviews are conducted in a private location that guarantees separation from management influence. Furthermore, all documentation is destroyed away from the facility location.

If a company, supplier or bottling partner facility fails to uphold any aspect of the audit requirements, implementation of corrective actions is required within an agreed-upon time frame. Any serious non-compliance is managed by the regional team

lead and escalated, as needed, to the global level for further action. A corrective action plan should include a root cause analysis, the actions to be taken to prevent future non-compliance and the assignment of a person responsible for implementation. Corrective actions may range from drafting and implementing policies, to enhanced training procedures, to investing in the physical infrastructure of a facility to improve health and safety. These corrective action plans are tracked and require an in-person or remote re-audit to determine if improvement has occurred. Generally, follow-up assessments should occur within six months and if serious non-compliances are identified, a re-audit is scheduled after a year to ensure compliance is sustained.

The company reserves the right to terminate an agreement with any supplier unable to demonstrate compliance with our SGP requirements.

However, this should be considered a last resort. Instead, aligned with the UN Guiding Principles, we aim to build leverage with other major buyers to increase the pressure on suppliers to improve.

All new suppliers must demonstrate compliance to our SGP prior to their authorization as an approved supplier, and authorized suppliers undergo periodic audits thereafter to ensure continued compliance.

As of Q4 2020, 93% of company-owned facilities, 90% of bottlers and 87% of suppliers reached full compliance with our Human Rights Policy and SGP. Audit results are discussed at the board level on an annual basis.

In 2021, we worked with 564 locations to successfully complete their respective corrective action plans and bring them into full compliance by the end of the year. We continue to work with a number of other facilities to ensure they complete their plans and are in full compliance with our SGP principal company, supplier and bottling partner audits are

complemented with data from our [EthicsLine](#) and local information from our GHR managers in the field across the globe. These managers monitor compliance at the regional level and have great insight into the regional specificities, challenges and performance.

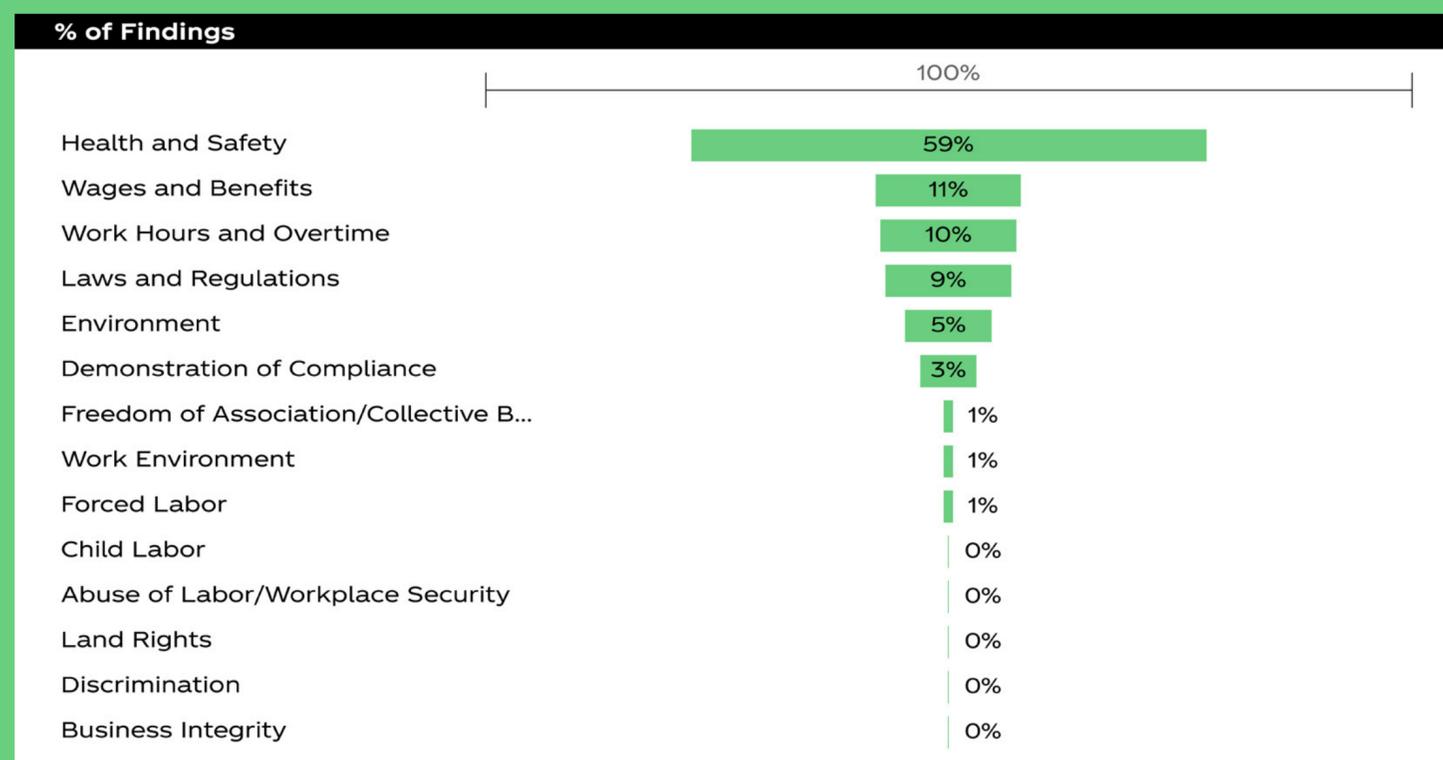
We also support our bottling partners and suppliers through additional training and the provision of resources, guidance and checklists. These cover a range of key human rights issues including women's rights, child labor, forced labor, non-discrimination, health and safety, freedom of association, land acquisition and environmental impacts.

### 4. Tracking Performance at the Farm Level Below Tier 1



Since 2013, our goal has been to more sustainably source our priority agricultural ingredients. For The Coca-Cola Company, "sustainably sourced" means our suppliers can demonstrate that the farms growing our ingredients - which in nearly all cases are not owned or operated by the company - meet one of a suite of leading global sustainability standards that are aligned with our Principles for Sustainable Agriculture (PSA) and cover human and workplace rights, environmental protection, responsible farm management as well as animal health and welfare. Approved global standards can be found in our PSA

## Top Audit Findings in 2021



Supplier Guide (see Appendix B on p.14) and include Bonsucro for sugar, the [Sustainable Agriculture Initiative Platform](#) – Farm Sustainability Assessment (SAI-FSA) for multiple ingredients and VIVE Claim for cane and beet sugar.

All Tier 1 suppliers of global priority ingredients are expected to make measurable progress in meeting the PSA for on-farm practices and report at least annually to the company on their supply volume aligned to the PSA and continuous improvement programs for internal and external reporting. Suppliers are responsible for ensuring that all information provided to the company is accurate

and complete. Supporting evidence, including third-party independent assessments and certifications, and other documentation that reasonably supports the responses and claims, must be made available on request.

We track progress against our sustainable sourcing goal for 12 global priority ingredients, which represent about 80% of our total annual agricultural ingredient purchases. In 2020, 56% of ingredient volumes for our 12 global priority ingredients were sustainably sourced, up from 54% in 2019 and 8% in 2013 at the beginning of the program.

The Coca-Cola Company has also engaged third parties to assess human rights risks in specific agricultural ingredient supply chains. For example, in our sugar supply chain we have had studies conducted in 21 countries focusing on three key human rights risks: child labor, forced labor and land rights. So far, we have published [21 country-specific studies](#), each of which has helped us better understand risks and overall systemic challenges and opportunities within our sugar supply chain. The company is exploring several ways to map its supply chain beyond Tier 1. One such effort is the Lumen Migrant Worker Tool Initiative. In the Middle East, its estimated that 50% or more of workers are migrants. Due to the inherent risks to workers involved in cross-border migration, we are developing additional measures beyond regular audits to ensure that migrant workers are recruited in a responsible manner and are not victims of forced labor. Specifically, together with our bottler and a peer company, we have partnered with Diginex Solutions to develop Lumen 360, a technology-led due diligence tool that, among other things, provides a record of the full supply chain to improve transparency, identify risks and increase governance to ensure ethical recruitment.

We regularly evaluate the effectiveness of audits and corrective actions and adjust programs accordingly. We involve affected stakeholders in evaluation(s) of whether the actions taken have been effective.

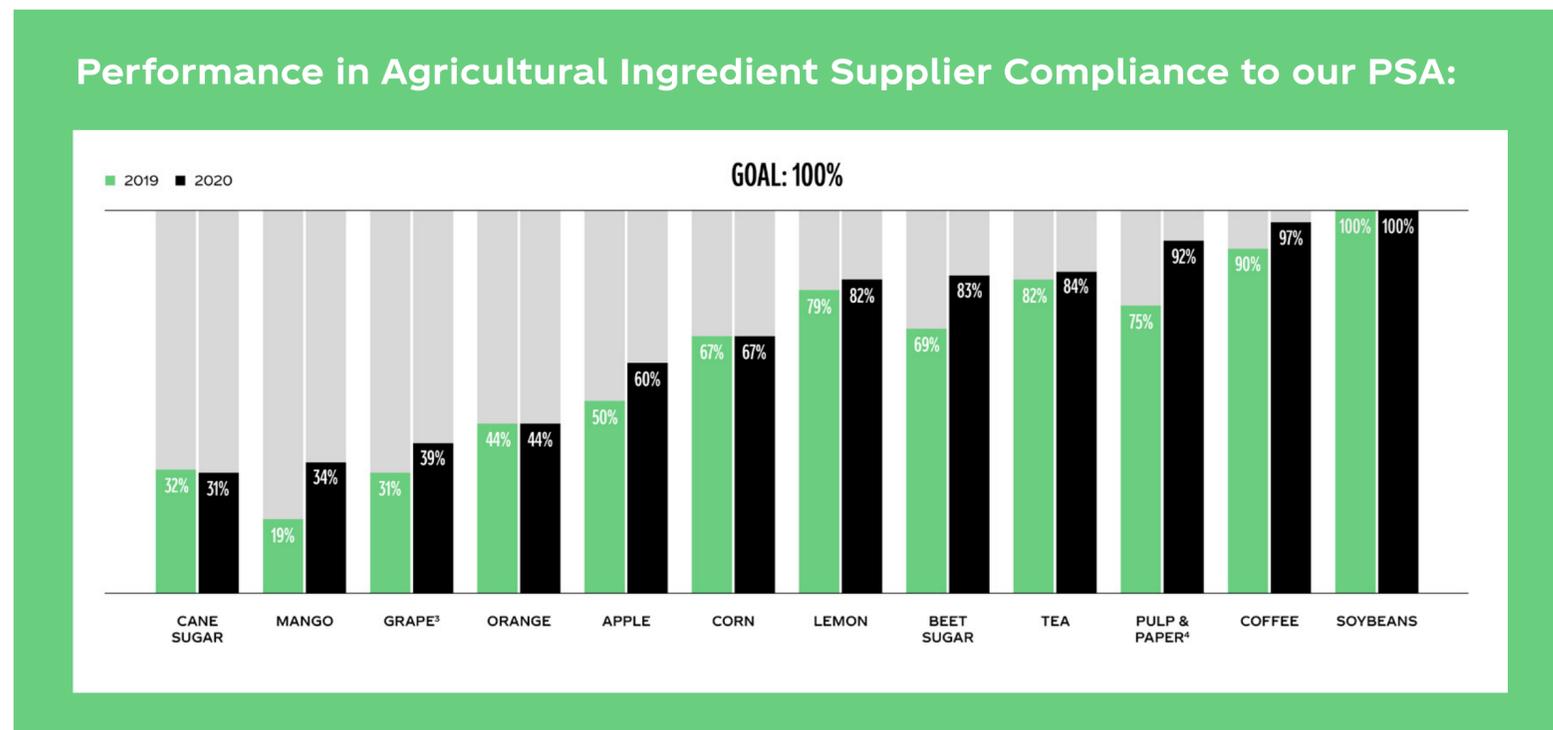
**5. Grievance Mechanisms & Remedy**

Employees of The Coca-Cola Company are encouraged to ask questions and report complaints or concerns through [EthicsLine](#), which has a specific tier for reporting alleged human rights violations. Workers at our bottling partners and in our supply chain are also able to access EthicsLine. This is operated by a third party, NAVEX Global, and both employees and non-employees can use this service by phone (numbers vary by locality) or online. The online tool is available in 23 different languages. Telephone calls

are toll-free, and the EthicsLine is open 24 hours a day, seven days a week, with translators available. Company employees can also ask questions and report grievances via email ([humanrights@coca-cola.com](mailto:humanrights@coca-cola.com)), telephone, in person or letter to relevant human resources representatives, leaders and managers in their function that are knowledgeable about our Human Rights Policy and local regulations. The option to report grievances through the EthicsLine mechanism is consistently reinforced with employees and is available to non-employees. The company's SGP requires its suppliers to provide their employees with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

The company strictly prohibits retaliation of any kind against human rights defenders or anyone who shares a human rights concern. We define retaliation as any action that would likely deter someone from reporting a concern or participating in an investigation, including demotion, firing, a reduced salary, job reassignment, threats, harassment, or legal action for the purpose of retaliation. When reporting a concern or complaint through EthicsLine, employees and non-employees alike may remain anonymous, unless prohibited by law from doing so. If an employee chooses to make their identity known, the relevant investigators will take every reasonable precaution to keep the reporter's identity confidential, consistent with conducting a thorough and fair investigation. If employees believe someone has retaliated against them as a result of their report, they are encouraged to report the matter through EthicsLine.

Every report related to human rights policy violations that is received via our grievance mechanisms is investigated in a timely manner. Throughout the investigation every effort is made to engage and inform the complainant, which is normally done through EthicsLine, including when complaints are made anonymously.



<sup>3</sup> The sustainably sourced percentage for grape was incorrectly reported as 41% in our 2019 report, and the 2020 report corrects this figure to 31%.  
<sup>4</sup> 92% sustainably sourced Pulp & Paper relates to the ~83% of our global purchase volume for which we have data. In 2019, we had data for ~75% of our global purchase volume.

## Human Rights Cases Reported by Category for The Coca-Cola Company

Year ended December 31,	2012	2013	2014	2015	2016	2017	2018	2019	2020
Ask a Workplace Rights Question				20	11	8	2	—	—
Child Labor				1	—	—	—	—	—
Discrimination				88	55	42	59	45 <sup>2</sup>	30
Forced Labor				3	—	—	—	—	—
Freedom of Association				3	4	1	1	—	—
Retaliation				47	37	23	17	17 <sup>2</sup>	17
Safe and Healthy Workplace				55	33	22	31	5 <sup>2</sup>	74
Work Hours and Wages				64	42	34	36	18 <sup>2</sup>	5
Workplace Security				20	10	13	15	12 <sup>2</sup>	9
<b>Total Cases</b>				<b>300</b>	<b>192</b>	<b>143</b>	<b>161</b>	<b>97<sup>2</sup></b>	<b>135</b>

<sup>2</sup> In 2019, Employee Relations redefined how cases were captured in the case management tool of record. Therefore, the reported figure includes only those allegations that required investigations only as opposed to generalized questions raised to Employee Relations. Please note, however, that all questions presented to Employee Relations were answered even if the question did not warrant an investigation. While we previously reported on all cases and questions raised through our case management tool, we no longer capture that data. This helps us to ensure that we have more accurate visibility to annual human rights cases. This change accounts for the 2019 variance when compared to previous years.

Employees in the Coca-Cola system are made aware of the existence of these grievance mechanisms and how they can access them through onboarding training when employees are hired and regular training sessions on Ethics and Compliance, as well as human rights specific training sessions. Further details on grievance mechanisms are available to all company employees via our internal Connect platform. [EthicsLine](#) posters are also made available to be printed and displayed in 23 different languages and include details of the website address and the local number to call.

In addition, the company utilizes independent third parties to undertake regular audits of our company-owned facilities and our bottling partners and direct, authorized suppliers. The audits include confidential interviews with workers where they

have an opportunity to safely raise complaints or concerns. We also expect our suppliers and bottling partners to maintain their own mechanisms through which workers can express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner. Furthermore, our Principles for Sustainable Agriculture (PSA) include the provision that primary product-level suppliers, “Provide workers and communities with a mechanism to express grievances anonymously without fear of reprisal, and ensure concerns are appropriately addressed in a timely manner. Ensure remediation and grievance procedure are aligned to UN Guiding Principles on Business and Human Rights”.

We are also actively supporting suppliers to introduce and strengthen grievance mechanisms in our supply chain. For example, one of the planned

outcomes of the Harvesting the Future (HTF) project in Turkey (see p.6 for more details) is for suppliers to introduce grievance mechanisms in their agricultural supply chain which are community-based, community-owned, and include worker representation. This is achieved through mapping of all existing grievance mechanisms, establishment of a referral service and training for suppliers, producers, and workers.

At a regional level, company employees working in our operating units around the world proactively engage with local communities where we conduct business. Any serious issue raised in these regular engagements which cannot be addressed locally may be escalated to the global level, where a cross-functional team will examine the issue. External stakeholders can also raise grievances through civil society organizations with which we

communicate on a regular basis.

One example of the company’s engagement in external grievance mechanisms is our participation in the OECD National Contact Point (NCP) process, including good faith engagement in the NCP voluntary mediation program. More information can be found [here](#).

Access to remedy is a critical element of our human rights program. Where we have caused or contributed to adverse human rights impacts, we are committed to providing for, or cooperating in, remediation. Our mechanisms do not obstruct access to other remedy procedures.

# KEY AREAS OF HUMAN RIGHTS FOCUS

## 1. Access to Water

As outlined in our human rights policy, The Coca-Cola Company respects the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. As a beverage company, we recognize the indispensable nature of water in advancing healthy ecosystems, communities, business, agriculture and commerce. We understand our business activities might impact local communities' access to water.

Since 2010 The Coca-Cola Company has improved access to safe drinking water, sanitation and hygiene (WASH) for more than 13.5 million people globally.

We manage water access risks through our water stewardship program, through which we have implemented a rights-based approach to water. The Coca-Cola System employs a three-tiered framework to identify and assess water-related risks across our value chain, including when our system opens new plants. The first is the Global Enterprise Water Risk Assessment (EWRA) that uses the World Resources Institute (WRI) Aqueduct tool to conduct a high-level assessment of water quantity, quality and access risks. The results provide granular geographical and watershed-level detail on the potential levels of risk exposure across our business. Additionally, we use our internal, proprietary Facility Water Vulnerability Assessment (FAWVA) tool, which collates all historical data and analysis conducted since our

global program commenced in 2004. The final tool is the Source Vulnerability Assessments (SVA) used by our bottling operations. At the plant level, these are required every five years or every time the supply source changes. The SVA feeds into Source Water Management Plans (SWMP) for local action, and also inform the FAWVA. This assessment is aligned with our external water stewardship standards using the AWS approach.

**As part of our 2030 Water Security Strategy, one of our Global Goals is to improve access to water and sanitation, and resilience with a focus on women and girls, and have set high-level targets related to water access:**

- 100% of priority communities supported with water and sanitation services
- 100% WASH provision in bottling system and Tier 1 supply chain facilities. We are working to better incorporate a review of WASH in the audit process

We are taking a phased approach to implementation that builds upon our work to date and are identifying priority communities, as well as suppliers, to drive progress against these goals. We will continue to report on our progress towards these goals in our annual Business & ESG Report.

We expect our suppliers and business partners to recognize and safeguard the rights of indigenous peoples and local communities to land and natural resources, with particular attention to marginalized groups, such as women and ethnic minorities.

Our Principles for Sustainable Agriculture (PSA) include the expectation that primary production level suppliers, "Recognize and safeguard the rights of indigenous peoples and local communities to land and natural resources, with particular attention to marginalized groups, such as women and ethnic minorities". The PSA also include a principle on water management, "Ensure long-term sustainability of water resources in balance with community and ecosystem needs by measuring their water use and quality where crops are irrigated, maximizing water use efficiency and minimizing water quality impacts from wastewater discharges, erosion and nutrient/ agrochemical runoff".

We work collaboratively with a number of organizations, groups and initiatives to increase water security where we operate, source ingredients and touch people's lives. Some of these are:

- **CEO Water Mandate** - The CEO Water Mandate is a joint UN Global Compact-Pacific Institute initiative that mobilizes business leaders on water, sanitation, and the Sustainable Development Goals. The Coca-Cola Company is an endorser of the CEO Water Mandate and is committed to continuous progress against six core elements of water stewardship. We are also members of the CEO Water Mandate's Water Resilience Coalition, taking collective action with peer companies to preserve the world's freshwater resources in water-stressed basins.
- **Business for Nature** - Is a global coalition that brings together business and conservation organizations (World Economic Forum, The Nature Conservancy, World Wildlife Fund and the World Resources Institute) and forward-thinking



companies, to amplify a credible business voice on nature and call for governments to adopt ambitious nature policies. The Coca-Cola Company has joined more than 1,000 companies with revenues of \$4.7 trillion (US), calling on governments to adopt policies to reverse nature loss in this decade through the '[Nature Is Everyone's Business](#)' Call to Action.

- [The Global Environment & Technology Foundation \(GETF\)](#) - Since 2009, the Replenish Africa Initiative (RAIN) has been supported by The Coca-Cola Foundation and managed by GETF. Over the course of a decade, RAIN made catalytic investments to impact more than 6 million people across 41 countries and territories through a range of water-based initiatives that were tailored to address local community needs. RAIN harnessed resources from a vast network of more than 300 partners, including governments, the private sector and civil society to support projects with multiple socioeconomic benefits.
- [The 2030 Water Resources Group \(2030WRG\)](#) - As a global member, The Coca-Cola Company works with other private sector companies, as well as public and civil society actors to address the growing gap in water resource availability by transforming agricultural value chains, promoting circular water use and championing technological innovation through multi-stakeholder engagement, project investment and policy reform.
- [WASH4Work](#) - An initiative comprised of public and private stakeholders, which aims to address Water Sanitation and Hygiene (WASH) challenges in the workplace, in communities where companies operate and across supply chains. It is guided by the ambition that companies can effectively contribute to achieving the Sustainable Development Goal (SDG) 6 - available and sustainable management of water and sanitation for all.
- [WWF](#) - The Coca-Cola Company has partnered with WWF for 15 years, supporting projects in more than 50 countries focused on water access, security or resilience.

#### Additional Resources

- [2030 Water Security Strategy](#)
- [Water Stewardship](#)
- [2020 Business & Environmental, Social and Governance Report](#)
- [Principles for Sustainable Agriculture](#)
- [Supplier Guiding Principles](#)

## 2. Child Labor

The Coca-Cola Company is committed to respecting child rights across our entire value chain. In our own operations, applicants are screened to verify, among other things, that they are of legal age to work in their respective work locations. The company's audit protocol requires auditors to verify that suppliers and bottlers have reviewed and comply with the legal age of all workers. While child labor is not a high risk in our own operations, we recognize that there is risk deeper in the supply chain such as in agriculture and post-consumer collection.

**Agriculture:** Our deep dive into the company's sugar supply chain exposed the risk of child labor in eight of 21 published studies. We are using these findings to develop initiatives to address this risk holistically. For example, as part of the company's efforts to eliminate child labor from our agricultural ingredient supply chain The Coca-Cola Company joined the Fair Labor Association (FLA)-led Harvesting the Future (HTF) project based in Turkey. Every summer for six to eight months, Turkey witnesses the migration of thousands of laborers, along with their families, to work on different crops. It is common for children to work alongside their families, at the great cost to their own development and lack of opportunities for their future life. The HTF project draws from a shared vision of partners to bring about large-scale change on child protection and responsible recruitment by pursuing a "multi-commodity, multi-company, multi-stakeholder approach". HTF project has

brought together more than 30 ecosystem entities. In Phase I the project mapped supply chains, engaged stakeholders, conducted training of suppliers and labor intermediaries, conducted needs-assessments and human rights risk assessments including risks of child labor and hazardous tasks by young workers. In Phase II, which will continue until December 2023, the project is mitigating and preventing the hiring of child labor and improving working conditions for young workers through a number of activities and



mechanisms including: proper contracting, providing support for age verification of workers, training supplier staff and supporting suppliers to integrate child protection and remediation systems into their core operating procedures, promoting health and safety, and engaging with labor intermediaries to legally register them and establish no child labor clauses and decent work principles, referring identified child labor to available services.

In 2020, on behalf of the company, WWF and the Committee on Sustainability Assessment (COSA) conducted agriculture supply chain risk assessments of our top agricultural commodities, including soybeans and coffee, by source country. The risk assessments considered child and forced labor

amongst other environmental, social and economic risks. We continue to use insights from this risk assessments to engage suppliers and partners, improve our due diligence processes and where necessary, ensure proper remediation for any human rights impacts to which The Coca-Cola Company are directly or indirectly linked.

We are also a founding member of the International Labor Organization's (ILO) Child Labour Platform (CLP). Under the leadership of the ILO, the International Organisation of Employers (IOE) and the International Trade Union Confederation (ITUC), and in a multi-stakeholder approach, the CLP aims to identify obstacles to the implementation of the ILO Conventions in supply chains and surrounding communities, identify practical ways of overcoming these obstacles, and catalyze collective action. More information can be found at [Child Labour Platform \(CLP\) \(IPEC\)](#).

## 3. Equality/Non-Discrimination

The company is committed to diversity, equity and inclusion. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identity or expression, political opinion or any other status protected by applicable law. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. This commitment, which the company expects of its bottlers and suppliers as well, includes a clear prohibition on threats, intimidation, violence, punitive action, surveillance or any kind of attacks against human rights defenders, trade union members and trade union representatives. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace. These commitments are outlined in our Human Rights Policy and Code of Business Conduct. Similarly, our Supplier Guiding Principles (SGP) and Principles for Sustainable Agriculture (PSA) request suppliers

and business partners to maintain workplaces that are free from any discrimination.

#### Additional Resources

- [The Coca-Cola Company 2017 Human Rights Policy - English](#)
- [Code of Business Conduct](#)
- [Supplier Guiding Principles](#)
- [Principles for Sustainable Agriculture](#)
- [Diversity, Equity & Inclusion](#)
- [Equal Employment Opportunity Employer Information Reports \(EEO-1\)](#)
- [U.S. Racial Equity](#)
- [Our Culture](#)
- [Diversity Leadership Councils](#)
- [Employee Groups](#)
- [Workplace Fairness](#)
- [Q&A with Lori George Billingsley, Chief Diversity, Equity & Inclusion Officer](#)
- [2020 Business & Environmental, Social and Governance Report](#)

#### 4. Freedom of Association and Collective Bargaining

The Coca-Cola Company is committed to respecting our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. This commitment extends to those exercising their rights to freedom of expression, freedom of association and peaceful assembly. Where employees are represented by a legally recognized union, we are committed to establishing constructive dialogue with their freely chosen representatives in addition to bargaining in good faith with such representatives. This commitment is included in our company's Human Rights Policy. The Coca-Cola Company supports

other means for employees to provide collective input on workplace issues where local laws restrict traditional means. We also expect our bottlers and suppliers to uphold these commitments. Additionally, we have developed extensive guidance on Freedom of Association and the right to bargain collectively to support our operating units in fully respecting these important human rights.

Over 30% of the 700,000+ associates in the global Coca-Cola system are unionized.

Similarly, our Supplier Guiding Principles (SGP) and Principles for Sustainable Agriculture (PSA) expect suppliers and business partners to respect Freedom of Association and the right to bargain collectively. Our SGP are included in all contractual agreements with direct and authorized suppliers.

#### Additional Resources

- [The Coca-Cola Company 2017 Human Rights Policy- English](#)
- [Supplier Guiding Principles](#)
- [Principles for Sustainable Agriculture](#)

#### 5. Forced Labor

The Coca-Cola Company is committed to preventing the use of all forms of forced labor across our entire value chain. The Coca-Cola Company's Human Rights Policy, Supplier Guiding Principles (SGP) and Principles for Sustainable Agriculture (PSA) specifically prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

**As part of our policy commitment, the company has committed to the Consumer Goods Forum's Priority Industry Principles on forced labor, namely:**

- Every worker should have freedom of movement;

- No worker should pay for a job and the costs of recruitment should be borne not by the worker but by the employer (The Employer Pays Principle); and
- No worker should be indebted or coerced to work.

We are also a founding member of the [Leadership Group for Responsible Recruitment](#), which advocates for the "Employer Pays Principle" focused on preventing the charging of any recruitment fees to migrant workers. Our global vice president for human rights also co-chairs the Consumer Goods Forum (CGF) Human Rights Coalition, which is focused on implementing due diligence measures to prevent forced labor.

The Coca-Cola Company pays workers regularly, in full and on time, and all workers receive a pay slip with their wages explaining any legal and legitimate deductions.

The company does not retain workers' personal identity documents, restrict workers' freedom of movement or require workers to use company-provided accommodations. With respect to our own operations, human resources conducts regular reviews of its personnel practices to ensure compliance with company personnel policies. Audits of all suppliers and bottlers verify that workers have free access to personal identity documentation. The prohibition on forced labor is embedded into contractual agreements between the company and direct and authorized suppliers. The company expects supplier partners to develop and implement appropriate internal business processes to ensure compliance with these principles and we closely monitor implementation through independent third-party audits. Each year, The Coca-Cola Company facilitates more than 2,000 third-party audits of company facilities, franchise bottlers and suppliers and more than 30,000 third-party audits have been conducted since the audit program began in 2003. Audits look for signs of forced labor, including

the payment of recruitment fees or related costs to secure a job, withholding of wages, retention of workers' documents and restrictions of movement. Our audit protocol also includes a similar review for employment agencies, labor brokers and recruitment intermediaries in our own operations.

Expanded guidance on migrant worker recruitment and employment practices for suppliers is provided in our [Human and Workplace Rights Issue Guidance](#). The guidance covers three key areas which can help to protect workers from the risks of forced labor:

- **Work is represented in a truthful, clear manner and in the local language.** The employment contract is to be in a language that migrant employees can easily understand and is provided prior to arrival in the host country. The employment contract is to clearly indicate employees' rights and responsibilities under a voluntary employment relationship.
- **Workers do not pay recruitment fees.** Facilities must take all reasonable steps necessary to ensure that business is conducted with reputable recruitment agencies to avoid fraudulent practices that may enable forced labor. **In addition, the following will be considered with regards to recruitment fees and deductions:**
  - All fees, such as recruitment, renewal, work or exit visas, will be paid for by the employer.
  - Transportation to and from the host country is paid by the employer.
  - Employees will be allowed full and complete control over the monies they earn and facilities will not withhold money to guarantee a term of employment.
- **Workers have access to personal identity documents.** Facilities are to allow an employee full control over his or her passport and similar documentation. It is not acceptable for an employee to sign anything forfeiting his/her access to personal documentation.

The Coca-Cola Company has also developed human rights self-assessment checklists to assist our employees, bottling partners and suppliers in identifying and mitigating human rights risks as part of our human rights due diligence process. There is a specific self-assessment checklist for [Migrant Workers](#).

In addition to guidance, we conduct focused training and capacity building for suppliers and other business partners. As an example, we worked with our peers within the AIM-PROGRESS regional Asia Pacific hub to host a virtual responsible recruitment capacity building series in Malaysia. The aim was to help suppliers better understand brand expectations around responsible recruitment and receive practical guidance on how to strengthen existing recruitment and employment practices of migrant workers. The six-week series was a combination of webinars and online eLearning modules that covered topics including pre-departure information, arrival and ongoing worker engagement, and working with labor brokers. Collaborative approaches provide a common message for the supply chain on the importance of responsible recruitment and improve performance by providing suppliers with practical guidance.

**The Coca-Cola Company also works collaboratively with a number of organizations, groups and initiatives to eliminate all forms of forced labor:**

- We are a founding member of the [Global Business Coalition Against Human Trafficking \(GBCAT\)](#), harnessing the power of business across sectors to prevent and reduce human trafficking and support survivors. As part of the coalition's efforts to build the capacity of corporate suppliers to address forced labor and modern slavery risks, a [toolkit](#) has been produced. This toolkit aims to help suppliers quickly identify areas of their business which carry the highest risk of modern slavery and develop a simple plan to prevent and address any identified risks.

- We are a member of the Leadership Group for Responsible Recruitment (LGRR), a business leadership group working closely with international organizations, NGOs and trade unions to drive positive change in the international recruitment industry and a global prohibition of recruitment fees being paid by workers. More information can be found at [The Leadership Group for Responsible Recruitment | Institute for Human Rights and Business \(ihrb.org\)](#)

#### *Additional Resources*

- [The Coca-Cola Company 2017 Human Rights Policy - English](#)
- [Supplier Guiding Principles \(coca-colacompany.com\)](#)
- [Principles for Sustainable Agriculture](#)
- [Human and Workplace Rights Issue Guidance](#)
- [Human Rights Self-Assessment Checklists](#)
- [UK Modern Slavery Statement](#)

#### **6. Health & Safety**

Our Human Rights Policy reflects our commitment to take responsibility for maintaining a productive workplace by working to minimize the risk of accidents, injury and exposure to health risks for all of our associates and contractors. And in 2021 we published our [Occupational Health & Safety Policy](#).

We give associates within the Coca-Cola system the tools, training and resources needed to ensure their safety, promoting a culture that empowers safe behavior across each element of our business. Our goal is to achieve zero work-related injuries and illnesses for all employees and contractors, driven by our vision of Zero Is Possible.

To help us get there, our Coca-Cola Operating Requirements (KORE) define the policies and

standards for managing safety, the environment and product quality throughout our operations. KORE requires our manufacturing and distribution facilities to implement health and safety management systems that improve employee safety, reduce workplace risks and instill a mindset of continuous improvement.

We have invested in our digital Environmental Occupational Health and Safety (EOSH) performance management tools to give us greater visibility to expanded environmental and safety data system-wide and a better understanding of performance for targeted initiatives and business decision making. The platform also helps us identify the precursors that can lead to serious injuries and fatalities—and thereby establish ways to prevent them. Alongside the protocols, our Life Saving Rules are a set of easy-to-understand, non-negotiable requirements to further prevent serious injuries and fatalities and effectively evaluate the strength of safety defenses in place.

Occupational Safety and Health is also a key area of our engagement with our supply chain and focuses on enabling services, building capabilities, technical governance and policy. Our Supplier Guiding Principles (SGP) include the expectation that our suppliers will, “Provide a secure, safe and healthy workplace. Maintain a productive workplace by minimizing the risk of accidents, injury and exposure to health risks”, and our Principles for Sustainable Agriculture (PSA) request primary production level suppliers to, “Ensure productive workplace by minimizing the risk of accidents, injury and exposure to health risks. Occupational health and safety risks are managed through Health & Safety management plans. Provide and require the use of Personal Protective Equipment (PPE). Provide trainings on health and safety, including the use of PPE. All workers have access to drinking water, toilets and hygiene facilities and are made aware of medical care facilities. All worker accommodations

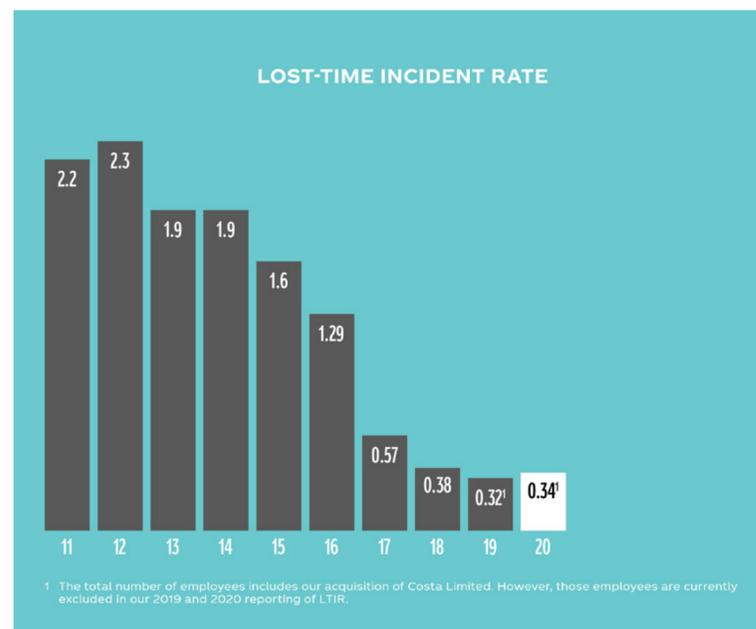
provided by employer are safe, sanitary and in line with applicable standards outlined in ILO Recommendation 115 (Workers Housing).”

Across our value chain a priority for us is the Route-to-Market (RTM) segment. RTM encompasses the downstream storage and distribution of our product, and any movement of employees and contractors along public roadways. Product distribution often involves a very complex chain of events that vary throughout the world based on local market, socioeconomic, and infrastructure factors. Large and small trucks, three- and two-wheeled motorized vehicles, as well as bicycles, carts and small boats are used in the distribution process. Operating safely in the public remains a top priority for The Coca-Cola System. Proactive safety processes that emphasize situational awareness and attention to detail are critical to ensure we are doing everything we can to avoid RTM collisions and incidents. Therefore, bottling partners continue to place intense emphasis on the route risk assessments and comprehensive, defensive driver training. This aids drivers with awareness of the identifiable risks they may encounter and the understanding of how to avoid a collision or incident. Bottlers also continue to engage in community outreach to influence at-risk behaviors observed by the public at large.

Our audits of company-owned facilities, bottling partners and suppliers cover a range of safe and healthy workplace conditions including emergency planning, machine safety and behavior facets (KORE Company Requirements). We engage in training and capability building across our supply chain.

The Coca-Cola Company follows all country health and safety reporting obligations including OSHA requirements in the U.S.

On our journey of continuous health and safety improvement, The Coca-Cola Company has made notable progress. We have reduced lost-time incident rates from 2.2 in 2011 to 0.34 in 2020.



*Additional Resources*

- [Product Quality and Safety](#)
- [Safety & Health](#)
- [Occupational Health & Safety Policy](#)

**7. Land Rights**

The Coca-Cola Company is committed to respecting land rights, responsible land acquisition and—where applicable—the right to Free, Prior and Informed Consent (FPIC).

We added protocols on land rights into our Supplier Guiding Principles (SGP) and assessment process, and our Principles for Sustainable Agriculture (PSA) advise our primary production suppliers to “Recognize and safeguard the rights of indigenous peoples and local communities to land and natural resources, with particular attention to marginalized groups, such as women and ethnic minorities. Where applicable, uphold principle of Free, Prior and Informed Consent (FPIC). Maintain positive community relations and contribute to local economic development.”

We developed [Responsible Land Acquisition Guidance](#) for suppliers in partnership with Landesa, and developed training materials. This guidance includes strategies to identify rights holders and land users who will be affected by a land acquisition, stating that particular attention should be placed on the inclusion of women in the process, and strategies to inform and consult stakeholders, including details of proposed compensation for the leasing or purchasing of lands.

*Additional Resources*

- [Responsible Land Acquisition Guidance](#)

**8. Portfolio and Reducing Added Sugar**

Our most recent human rights risk assessment identified 12 salient human rights risks associated with the company’s activities and business relationships. One of those risks was classified as ‘Healthy Lifestyles’. As we continue to evolve as a total beverage company and respond to consumers’ desires for more choices across categories, we are reducing added sugar while providing more drinks with nutrition and hydration benefits; optimizing

our mix of products; offering more small packaging choices so it’s easier for consumers to choose which product best fits their diet and lifestyle; and providing consumers with clear nutrition information to enable them to make informed choices. As a result, we feel that the term ‘Portfolio and Reducing Added Sugar’ better reflects this human rights focus.

*Additional Resources*

- [Coca-Cola 2020 Business & Environmental, Social and Governance Report](#)
- [In Our Products](#)



## 9. Privacy

The Coca-Cola Company is committed to protecting the fundamental right to privacy for all individuals. We strive to honor this right to privacy for all of the information we collect from and about consumers, customers, employees and the other stakeholders that interact with us.

**How we collect and handle this personal information about our stakeholders is based on these foundational privacy principles:**

- Clear and transparent explanations of our personal information handling practices in our privacy policies and other communications with stakeholders
- Respect for the rights of individuals to control their own personal information
- Trust driven by our accountability for our personal information handling practices and our commitment to protecting information from misuse
- Fair and purposeful collection and use of personal information, as well as sharing personal information only with others that share these commitments

Our humancentric approach to privacy is driven by our global commitment to sustainable and equitable business practices. We enforce our commitment to our privacy principles at all levels of the business through training, contracts with our suppliers and partners, a robust data protection program and working to align our privacy practices with industry standards.

## 10. Product Safety/Quality

Our commitment to meeting consumers' trust and their expectations for refreshing, high quality and safe products manufactured in a sustainable way is central to our company's philosophy. The Coca-Cola Company and our bottling partners work tirelessly every day to manufacture and deliver products of

the highest quality and safety to our customers and consumers. Quality and food safety are foundational to our company and are embedded in our purpose to refresh the world and make a difference.

We are a world class leader in the products we serve as a result of strong product quality, diligence in standards, continued testing and auditing and taking a progressive view on innovation and science techniques.

Food safety is integral to our gold standard of quality. Our fundamental responsibility is to ensure safety standards for the products we produce and distribute. Safety and product quality are a fundamental part of our product design, manufacturing and proactive consumer feedback processes. Our robust supplier requirements program is intended to ensure quality throughout the supply chain.

Our high standards are set so a quality product can be enjoyed around the world. We demand our standards and policies are met for all products we serve in every country where we operate and sell our products.

The Coca-Cola Operating Requirements (KORE) define the policies, standards and requirements for managing our quality and food safety responsibilities across our operations. In addition to requiring compliance with applicable legal laws and regulations, KORE requires that our manufacturing facilities implement FSSC 22000 (internationally recognized standard for food safety) that ensures the provision of resources to achieve the organization's food safety objectives, together with the fostering of continual improvement in food safety performance.

To guide us in working to achieve a safe, quality product, KORE also defines a rigorous set of operational controls to manage known risks. These controls generally align with top global requirements and consensus standards, local regulatory needs, and, where needed, establishing our own standards to protect consumers.

**Our governance framework includes regulatory compliance, standards, requirements and guidelines for all aspects of the supply chain, including:**

- Product Formulation
- Supplier Management
- Ingredients
- Packaging
- Labeling
- Claims and Communications
- Manufacturing
- Equipment
- Occupational Safety
- Environmental Protection
- Marketplace Management
- Risk

**We promote continuous improvement through innovation and collaboration with industry and partners. We have a continual program for audit and measuring our performance against safety and quality standards.**

*Additional Resources*

- [Product Quality & Safety](#)
- [Quality & Food Safety Policy](#)
- [Supplier Requirements](#)
- [Human Rights](#)
- [Occupational Health & Safety Policy](#)
- [In Our Products](#)

## 11. Rights Linked to Sponsorships

Almost a century ago, The Coca-Cola Company sponsored the 1928 Olympic Games and partnered with the U.S. Olympic Committee for the first time. Since then, we have proudly supported the International Olympic Committee (IOC) and Team USA. We are also a longstanding partner of other major sporting events, including the FIFA Men's & Women's World Cups, the UEFA Championships, the Paralympic Games, the Special Olympics—of which we are a founding partner—and many others. We sponsor these events because we believe that sport is unique in its ability to bridge divides between people and showcase the best of the human spirit.

We have been at the forefront of the drive to deliver sustainable and socially responsible global sporting events. For instance, The Coca-Cola Company is a founding member of, and provides funding to, The Centre for Sport and Human Rights, a multi-stakeholder organization committed to advancing a world of sport that fully respects and promotes human rights by generating awareness, building capacity and delivering impact. As a member of the Centre's advisory council, we're working to create sporting events that are respectful of human rights and inclusive for all athletes, spectators and community members.

*Additional Resources*

- [Centre for Sport and Human Rights](#)

## 12. Working Hours

The Coca-Cola Company is committed to ensuring that all components of our value chain, including bottlers, copackers, direct and authorized suppliers, are in compliance with local wage and hour laws and related values reflected in our policies and codes. Compliance with local work hours and overtime laws is a fundamental component of our Human Rights Policy, Supplier Guiding Principles (SGP) and Principles for Sustainable Agriculture (PSA). In addition to legal violations, excessive overtime in the workplace can lead to serious operational consequences and disrupt employee work-life balance. Reducing overtime may significantly increase employee morale, decrease quality incidents and reduce overtime labor costs, thereby improving business.

We developed an [Hours of Work Improvement Guide](#) to share our learning to date and be a resource to help facility management in our system and supply chain to identify and address the root causes of overtime.

### Key solutions include:

- Mapping production flow and identifying bottlenecks.
- Increasing manpower to cover peak periods, vacations and other absences.
- Cross training to increase manpower available for critical skills.
- Implementing absence controls.
- Adjusting shift patterns and production floor layout to help reduce bottlenecks.
- Increasing inventory to help level demands.
- Educating managers and associates concerning the legal restrictions and costs of overtime.
- Implementing monitoring and approval processes.

### Additional Resources

- [Hours of Work Improvement Guide](#)



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