



KnowTheChain Engagement Questions 2018 Food & Beverage Benchmark

Completing these questions provides you the opportunity to guide us to information regarding your company's efforts to address human trafficking and forced labor in its supply chains. **Answers to these questions will be made publicly available on the [Business & Human Rights Resource Centre \(BHRRC\) website](#), a KnowTheChain partner.**

KnowTheChain will review the information available on your public website, as well as information you link to from your website.

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If your company was included in our 2016 benchmark and you completed our engagement questionnaire at that time, relevant responses will be included in our 2018 benchmark as long as the information is not more than three years old.

Over a period of two months (during Q2-2018), you will be invited to review the information we collected and provide additional disclosure. We will particularly welcome specific examples you may be able to provide regarding the implementation of your processes, as well any leading practices. We will invite you either publish additional disclosure on your website, and send us the link to the specific page(s), or send the information to us, and we will publish them on the [website of Business & Human Rights Resource Centre](#).

In case you do not have sufficient publicly available information on some or all of the indicators of the KnowTheChain benchmark methodology (see attached methodology and guidance), you **are welcome to disclose relevant information to us at this stage already**.¹ Please let us know by 9 February that you wish to do so, and send us the additional information by 9 March. We will publish the information provided on the [website of Business & Human Rights Resource Centre](#).

Please email your response to the below questions to Felicitas Weber, BHRRC KnowTheChain Project Lead at weber@business-humanrights.org and CC companies@knowthechain.org.

The accuracy of our reports is important to us, we appreciate your help and cooperation. Should you have any questions, please contact Felicitas Weber at weber@business-humanrights.org.

¹ Please indicate which benchmark indicators the information relates to. Should this be of interest, we would be happy to send you the indicators in an Excel or Word document for you to fill out.



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General Information

Name of company: The Coca-Cola Company

Name of respondent: Jennifer Ann Ragland

Position of respondent: Sr Dir, Govt & Stakeholder Relations, Internat'l Gov't Relations

Respondent's email address: jeragland@coca-cola.com

Disclosure Information

1. Documents

KnowTheChain aims to decrease the reporting burden for companies. Therefore, we will review information available on your company's public website. However, to ensure we take into consideration all relevant documents, we invite you to provide us with links to any statements, reports, webpages, or documents that you would us to take into account as we review your company's approach to managing forced labor risks in its supply chains.

Please find below some preliminary responses of The Coca-Cola Company. Further information will be provided in due course.

1. Commitment and Governance

1.1	Commitment	The company: (1) has publicly demonstrated its commitment to addressing human trafficking and forced labor.
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The Coca-Cola Company determinedly prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and human trafficking. The Company also expressly prohibits any form of human trafficking within our system or by any company that directly supplies or provides services to our business.



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The foundation of our corporate commitment to respect human rights is grounded in two overarching policies that apply to our operations globally: our [Human Rights Policy](#) and our [Supplier Guiding Principles](#). These policies provide a consistent approach to human and workplace rights, including forced labor, across our system and embed the expectation as an integral part of our culture, strategy and day-to-day operations.

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In the first half of 2017 we have worked to revise our Human Rights Policy to reflect lessons learned from our in-depth assessments on salient human rights risks, which are, the most severe potential impacts associated with our business. We have consulted widely with NGOs, civil society groups, trade unions, investors and key experts around the globe to ensure our updated policy meets the expectations, concerns and demands of stakeholders. We received a valuable amount of constructive feedback, comments and suggestions, which have decisively influenced the revision of our policy. The updated policies, which has been translated into 22 languages and distributed to all facilities around the world, was launched on 11 December 2017 and can be downloaded under the following link: <http://www.coca-colacompany.com/our-company/human-rights-policy>

Our responsibility does not end at the company gate. Aligned with the UNGP and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, we seek to avert any human rights violations by our system partners and across our global value chain linked to our products. We expect our suppliers and system partners to embrace responsible workplace practices and uphold the principles of our Human Rights Policy. We communicate these expectations through our Supplier Guiding Principles (SGP). The SGP are aligned with our Human Rights Policy and are a part of all contractual agreements between The Coca-Cola Company and our direct and authorized suppliers. We expect our suppliers to develop and implement appropriate internal business processes in compliance with the SGP. Our SGPs and supporting documents can be found here: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>

More in our [Human Rights Report](#).

Please see also:

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (pages 23-24)
- <http://www.coca-colacompany.com/stories/updated-human-rights-policy>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf> (pages 11-12)



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- <http://www.gbcacat.org/#about>
- http://www.coca-colacompany.com/coca-cola-unbottled/coca-cola_s-brent-wilton-named-global-leader-in-addressing-human
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- <http://assets.coca-colacompany.com/30/fb/c98f5720411990545de2ea248360/sagp-with-criteria-final-12-10-13.pdf>

1.2	Supply Chain Standards	<p>The company's supply chain standard:</p> <p>(1) requires suppliers to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor.</p> <p>(2) has been approved by a senior executive.</p> <p>(3) is easily accessible from the company's website.</p> <p>(4) is updated regularly, following internal review and input from external stakeholders.</p> <p>(5) is communicated to the company's suppliers.</p>
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The Supplier Guiding Principles reflect the provision of the ILO Declaration on Fundamental Principles and Rights at Work and include the following topics:

- Freedom of association and collective bargaining
- Prohibit child labor
- Prohibit forced labor and abuse of labor
- Eliminate discrimination
- Work hours and wages
- Provide a safe and healthy workplace
- Protect the environment
- Business integrity
- Grievance procedure and remedy
- Management systems for ensuring lawful compliance and respect for all human rights.



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The SGP are part of all contractual agreements between The Coca-Cola Company and our direct and authorized suppliers. We closely monitor the implementation of the SGP by direct, authorized suppliers and apply the equivalent audits to independent bottlers.

The SGP can be downloaded in 12 languages and many guidance documents from our website: <http://assets.coca-colacompany.com/30/fb/c98f5720411990545de2ea248360/sagp-with-criteria-final-12-10-13.pdf>

Our audit protocols are not static but are constantly further developed. Understanding that recruitment fees are a major cause of forced labor, we recently, for instance, enhanced safeguards related to the recruitment and employment practices of such workers. These safeguards were built into our audit protocol and we conducted supplier and auditor training sessions globally to familiarize them with these expectations. More in our [Human Rights Report](#) (pages 12-18).

Please see also:

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (pages 23-24)
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf> (pages 11-12)
- <http://www.gbc.org/#about>
- http://www.coca-colacompany.com/coca-cola-unbottled/coca-cola_s-brent-wilton-named-global-leader-in-addressing-human
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- <http://assets.coca-colacompany.com/30/fb/c98f5720411990545de2ea248360/sagp-with-criteria-final-12-10-13.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf>



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1.3	Management and Accountability	<p>The company:</p> <p>(1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies and standards that address human trafficking and forced labor.</p>
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(2) has tasked a board member or board committee with oversight of its supply chain policies and standards that address human trafficking and forced labor.

Global Workplace Rights is responsible for policy development and oversight. Policy implementation is owned by the appropriate relationship owner. The relationship owner ensures our requirements are communicated to facilities, contracted into agreements, checked through audits and compliance is achieved. Quarterly scorecard metrics at the regional level track implementation and compliance performance. The Global Workplace Rights is part of the Human Resources function and reports semi-annually to The Coca-Cola Company Board of Director's Public Issues and Diversity Review Committee.

At the Board of Directors level, the Public Issues and Diversity Review Committee, chaired by former U.S. Secretary of Labor Alexis Herman, has oversight of the Company's policies related to human rights and supply chain policies which address forced labor and human trafficking and their implementation. More in our [Human Rights Report](#) (page 9-11).

The updated Human Rights Policy was launched publicly by Alexis Herman, chair of the Board's Public Issues and Diversity Review Committee (<http://www.coca-colacompany.com/stories/updated-human-rights-policy>)

Please see more under:

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/11/human-rights-policy-pdf-english.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf> (pages 3-4, 9-11)
- <http://www.coca-colacompany.com/investors/by-laws-of-the-coca-cola-company>



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1.4	Training	<p>The company undertakes programs that include:</p> <p>(1) the training of all relevant decision makers within the company on risks, policies, and standards related to human trafficking and forced labor.</p> <p>(2) the training and capacity-building of suppliers on risks, policies, and standards related to human trafficking and forced labor, covering key supply chain contexts.</p>
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Each year we train thousands of Company associates on our Human Rights Policy, which includes reference to the prohibition on forced labor and includes colleagues, for instance, from procurement and technical.

In order to enable our associates to fully meet expectations described in our Human Rights Policy, the Company provides a series of human rights training brochures to employees worldwide. In addition, we have Human Rights Due Diligence Checklists for a range of functions and operational settings, such as for plant siting, micro-distribution center operations, migrant labor, contract labor and many others. These guidance and checklists are available via our Company's internet site (<http://www.coca-colacompany.com/our-company/supplier-guiding-principles>):

- Human Rights Brochure for All Employees (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/human-rights-brochure-for-employees/TCCC-Human-Rights-Brochure-Employees-English.pdf>)
- Human Rights Brochure for Leaders (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/human-rights-brochure-for-leaders/TCCC-Human-Rights-Brochure-Leaders-English.pdf>)
- Human Rights Policy Manager's Guide (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>)
- Human and Workplace Rights Issue Guidance (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>)
- Global Workplace Rights Implementation Guide (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>)



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- Pass It Back Toolkit (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Pass-It-Back-Toolkit-2016.pdf>)
- Human Rights Due Diligence Checklist - Background and Guidance (<http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>)
- Human Rights Due Diligence Checklist for Plant Siting (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/plant-siting-due-diligence-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Micro Distribution Centers (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/mdc-human-rights-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Migrant Workers (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>)<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Pre-sourcing Design (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/pre-sourcing-human-rights-checklist-9-13.pdf>)
- Human Rights Due Diligence Checklist for Child Labor in Agriculture (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>)<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>
- Human Rights Due Diligence Checklist for Non-trademark Activation (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/non-trademark-activation-due-diligence-checklist.pdf>)

We also have developed a mobile phone app, which encompasses guidance, checklists and contacts, to provide associates with direct and easy access to these materials, independently



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wherever they are located. The app, which is publicly available, can be found [here](#). The app is also promoted through our internal Company app-store and internal website.

Mergers and acquisitions (M&A) present a range of human rights-related risks and challenges for companies to manage. In 2016, the M&A team received in-depth guidance to ensure potential human rights impacts are fully taken into account in decision making and during the merger and acquisition process. The M&A team has a procedure in place to escalate human rights-related issues within the Company as they arise.

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In 2016, the Global Workplace Rights team provided 40 SGP-related training programs to bottlers, suppliers and auditors across the world.

Number of human rights training programs facilitated by the Global Workplace Rights team for bottlers, suppliers and auditors in 2016

Region	Africa	Asia/Pacific	Central Asia/MENA	Latin America
Number of training programs	11	9	4	16

The Coca-Cola Company is a leading member of [AIM-PROGRESS](#), a forum of 45 fast-moving consumer goods manufacturers and suppliers working together to promote responsible sourcing practices. Member companies recognize supplier audits completed on behalf of another company, benchmark best practices and collaborate to jointly deliver supplier training programs around the world.

The training programs cover the four major pillars of responsible sourcing: human rights and labor standards, health and safety, environmental compliance and business integrity. Over the last few years The Coca-Cola Company co-hosted events in collaboration with other AIM-PROGRESS members in Bangkok, New Delhi, Dubai, Nairobi, Johannesburg, Lagos and Istanbul. Overall, AIM-PROGRESS has organized over 20 such sessions globally, reaching over 2,500 people.

More in our [Human Rights Report](#). (pages 9-10, 14, 17, 27-28)



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1.5	Stakeholder Engagement	<p>In the last three years, the company has engaged relevant stakeholders:</p> <p>(1) It provides at least two examples of engagements with policy makers, worker rights organizations, local NGOs, or other relevant stakeholders in countries in which its suppliers operate on forced labor and human trafficking, covering different supply chain contexts.</p> <p>(2) It actively participated in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.</p>
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Collaborative action of the private sector is key to achieve the necessary scale and momentum to advance responsible recruitment practices. In 2016 we collaborated with four other companies to launch the Leadership Group for Responsible Recruitment (LGRR) (<https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>), focused on promoting ethical recruitment and combating the exploitation of migrant workers in global supply chains across industries. The founding companies committed to the ‘Employer Pays Principle,’ which states that no worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer. LGRR is supported by the Institute for Human Rights and Business (IHRB), Interfaith Center on Corporate Responsibility (ICCR), International Organization for Migration, and Verite.

As an active member of The Consumer Goods Forum (CGF), The Coca-Cola Company supports and implements the CGF’s commitment on the eradication of forced labor, which is based on the following principles: Every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. The Coca-Cola Company co-chairs the work stream focused on implementing the resolution among members. As part of the implementation, we actively engage with suppliers and peers to promote awareness of these principles. For instance, in 2016 we partnered with peer companies under the umbrella of AIM-PROGRESS to deliver supplier training focused on ethical recruitment. We co-sponsored supplier days in Thailand in 2016 and Dubai in early 2017. These forums provide an opportunity for suppliers to hear from multiple customers, share best practices and gain access to additional tools and guidance materials.

In 2016 we engaged with the Interfaith Center on Corporate Responsibility (ICCR) to address challenges in Taiwan. Taiwan remains a market where we know migrant workers face fees, including in our supply chain. In order to address this, in 2016, we invited ICCR to shadow two audits in the region to validate our process and provide constructive feedback on opportunities to progress the dialogue locally. They found that many migrant workers experience a large financial burden in part because of the government imposed requirements to take loans that secure return



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to their home countries. These government-imposed fees create risks for workers as they incentivize illegal migration through unregistered brokers who bypass government regulations, placing many vulnerable job seekers at risk for human trafficking. Engagement with our industry peers will be critical to implement the priority principles in these types of challenging markets. ICCR published a report, Best Practice Guidance on Ethical Recruitment of Migrant Workers, highlighting case studies related to good practices, including reference to The Coca-Cola Company. (<http://www.iccr.org/best-practice-guidance-ethical-recruitment-migrant-workers-0>).

We also drafted with stakeholder engagement an action plan to follow-up the findings of the Sugar Study in Brazil. Case study: Follow up to the sugar study in Brazil

- Through the Brazil sugar study, which we published in January 2016, we were able to identify gaps and potential risks on land rights for our sugar suppliers, which include
- Absence of policy: The study found that none of the participating mills had land rights policies in place related to land acquisition.
- Land expansion: Nine mills had already expanded their lands over the last 10 years and seven currently have expansion plans.
- Complexity in Brazil land tenure: The study found that complexities of Brazilian land tenure, environmental and indigenous law, especially in certain areas like the northeast, as well as other social and economic dimensions, elevate risks for our suppliers operating in these areas.
- Based on these findings, the Company has developed an action plan, which will also serve as a framework for other countries, addressing the above risks, and including the following components.
- Supplier Guidance on land rights: Working with our knowledge partner, Landesa, we have committed to provide guidance on land rights that outlines concrete steps to educate our suppliers and help ensure adherence to the company's policy. Although the guidance is intended to help safeguard against major conflicts arising from land transactions, disagreements or conflicts may still arise. Because of this, the guidance encourages suppliers to establish a monitoring and evaluation process and to provide the community with access to a functioning and accessible grievance mechanism.
- Case studies on land rights: In partnership with Landesa, we intend to develop global case studies on the implementation of the guidance from 2017 to 2018, including on Brazil.
- Audit protocols: Through our Supplier Guiding Principles (SGP), in 2016 we continued to monitor indicators related to land rights. Issues such as title, compensation and grievance mechanism are captured in the audit reports under a separate land rights section. These



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audit protocol elements allowed us to monitor land expansions and socialize our policy with suppliers. In addition, we are working with Bonsucro to refine its land rights indicators for its mill audits.

- Strengthened communications: We have strengthened our communications with our Brazil sugar suppliers on social and land rights issues to address social issues, including issues raised in the sugar studies (e.g., expansion and land tenure complexity). We are focused on continued engagement on the Usina Trapiche case and working with counterparts at Oxfam, PepsiCo and local organizations on a positive resolution.
- Building upon analysis in the Brazil sugar study on women and land rights questionnaires, we will explore working with our suppliers to provide additional context and information on the importance of land rights and women.

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Our approach with regards to Usina Trapiche, a sugar mill on the coast of Pernambuco in northeastern Brazil: the mill has been embroiled in conflict with local fishing communities over the control of nearby islands and contamination of the estuary at least since 1998. Usina Trapiche is a supplier to a Coca-Cola bottler and other major brands. In 2016, working with Oxfam, we have been engaged with a coalition of buyers to strengthen leverage for engagement. The Global Workplace Rights Director of The Coca-Cola Company reported on these efforts and discussed the case with a multi-stakeholder audience on an Oxfam-led panel at the UN Forum on Business and Human Rights in November 2016. More information can be found [here](#). However, building leverage and triggering change does not happen overnight and requires engagement, persistency and vision.

The Coca-Cola Company is also founding member of the multistakeholder Mega-Sporting Events Platform for Human Rights (MSE Platform), which began to take shape in 2016/17. The purpose of the MSE Platform is to develop more comprehensive, consistent and accountable approaches to managing social risks and adverse human rights impacts arising from major sporting events, including forced labor and human trafficking. We are part of the Steering Committee, which is chaired by Mary Robinson, former U.N. High Commissioner for Human Rights and former President of Ireland. The Director of The Coca-Cola Company's Global Workplace Rights function is also co-chair of the Task Force on Sponsors and Broadcasters. With others, the Task Force will identify the concrete responsibility of sponsors and broadcasters, needs assessments and the next steps. As our Company's Director of Global Workplace Rights stressed in the Regional UN Forum on Business and Human Rights in April 2016 in Doha, "It is now time for those involved in mega-sporting events to commit to human rights, to implement those commitments and demonstrate their effectiveness. For sponsors it is critical to get behind global engagement efforts and be part of the solution – to use sponsors' leverage to drive further change in the sector, including supporting the creation of an independent center of learning and accountability on mega-sporting events that can support any country interested in hosting an event to put their bid together in a way that effectively prevents negative impacts and maximizes the positive legacy." See more here.



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More information on the MSE Platform is available under:
<https://www.ihrb.org/megasportingevents/mse-about>

The Coca-Cola Company has also joined in 2017 the Steering Committee of the Alliance 8.7, which aims to coordinate worldwide efforts with regards to the eradication of forced and child labor.

In 2017, the Company's Global Workplace Rights Director Brent Wilton was recognized as a global leader on the [Top 100 Human Trafficking & Slavery Influence Leaders List](#). This list recognizes leaders across government, civil society and the private sector shaping the future of supply chain excellence and corporate social responsibility on efforts to reduce human trafficking and slavery by increasing public awareness, advocating for supply chain education and helping companies meet their responsible sourcing goals.

Lessons learned from our Oxfam America engagement

Dialogue and engagement have always been a cornerstone of The Coca-Cola Company-Oxfam America relationship. Many different issues have surfaced over the more than 10 years of the Company-NGO relationship, spanning human rights, supply chain, land rights, women's empowerment, and climate change. A willingness to participate in open and transparent communication has been an important engagement principle embraced by both organizations.

This approach was tested during Oxfam's Behind the Brands campaign, which focused on the top 10 food and beverage companies, and a specific campaign in 2013 targeting The Coca-Cola Company on land rights and sugar. Oxfam highlighted a gap in the Company's Supplier Agriculture Guiding Principles, which led to a commitment by Coca-Cola to address land rights in its policies and human rights due diligence process. Since then, we have worked with Oxfam on several land rights workshops, the Company's sugar studies on land rights, child labor, forced labor, and specific land cases in Brazil and Cambodia. This engagement has allowed us to gain important insights and bring about increased momentum to drive change more broadly.



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Throughout this engagement process, the Company has benefited from Oxfam's perspective, and importantly realized to be successful, we must:

- Be vulnerable, it's ok to not have the all the answers;
- Ensure consistent and open communication;
- Align on clarity of purpose and the process; and
- Establish communication routines with clear lines of accountability.

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Challenges certainly remain as we work to align our very different perspectives at times. We have not always agreed, but we continue to move toward a shared understanding of both constructive problem-framing and problem-solving. Both organizations are committed to systemic, long-term change, which we think will help provide a roadmap toward a more sustainable future.

In 2016/17 we were an active member of a number of initiatives, groups and associations in this regard, such as:

- **AIM-PROGRESS.** AIM-PROGRESS is a forum of Fast Moving Consumer Goods manufacturers and common suppliers, assembled to enable and promote responsible sourcing practices and sustainable supply chains. As an active member of AIM-PROGRESS, The Coca-Cola Company leads a work stream to develop and deliver supplier trainings. 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. Please see our engagement chapter on our supply chain activities. More information can be found at www.aim-progress.com/.
- **Business for Social Responsibility (BSR).** BSR is a global nonprofit organization that works with its network of more than 250 member companies and other partners to build a just and sustainable world. BSR develops sustainable business strategies and solutions through consulting, research, and cross-sector collaboration. The Coca-Cola Company has engaged particularly in the peer learning activities of BSR. More information can be found at www.bsr.org/.
- **CSR Europe.** CSR Europe is the leading European business network for Corporate Social Responsibility. The Coca-Cola Company is member of its network of around 46 corporate



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members and 42 National CSR organizations. CSR Europe acts as a platform for businesses looking to enhance sustainable growth and positively contribute to society. More information can be found at www.csreurope.org/.

- **Global Business Initiative on Human Rights (GBI).** GBI's mission is to advance human rights in a business context through cross-industry peer learning, outreach and capacity building, and by informing policy. The Coca-Cola Company is part of a core group of corporations from different industries, headquartered in diverse countries with global operations that meet at least two times per year and engage in this in-depth exchange of experience and problem solving. More information can be found at www.global-business-initiative.org/.
- **ILO Child Labor Platform (CLP).** Under the leadership of the International Labor Organization (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. The Coca-Cola Company is a founding member of the CLP and actively engages in peer learning. More information can be found at www.ilo.org/ipecc/Action/CSR/clp/lang--en/index.htm.
- **International Organisation of Employers (IOE).** The 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 debate 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). More information can be found at www.ioe-emp.com.
- **Leadership Group on Responsible Recruitment (LGRR).** LGRR is a business leadership group working closely with international organizations, NGOs and trade unions to eliminate all worker fees in recruitment, both in law and practice, by 2026. The first international forum on responsible recruitment was hosted in Berlin on 19 June 19, 2017 to explore collective action to end the global demand for exploitation in supply chains and also increase the supply of ethical recruitment. More information under the following link: <https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>
- **Mega-Sporting Events Platform for Human Rights (MSE Platform).** The Mega-Sporting Events Platform for Human Rights (MSE Platform) is an emerging multi-stakeholder coalition of international and intergovernmental organizations, governments, sports governing bodies, athletes, unions, sponsors and broadcasters, and civil society groups. Through dialogue and joint action the mission is to ensure all actors involved in



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staging an event fully embrace and operationalize their respective human rights duties and responsibilities throughout the MSE lifecycle. Chaired by Mary Robinson, former U.N. High Commissioner for Human Rights and former President of Ireland, the MSE Platform is facilitated by IHRB. The Coca-Cola Company is founding member of the MSE Platform and co-chairs the task force of Sponsors and Broadcasters. More information can be found at www.ihrb.org/megasportingevents.

- **Shift.** The Coca Cola Company participates in the Business Learning program of Shift, the leading center of expertise on the UNGP on Business and Human Rights. Founded in 2011, Shift's team of experts facilitate dialogue, build capacity and develop new approaches with companies, government, civil society and international institutions to enable implementation of the UNGP. More information can be found at www.shiftproject.org/.
- **The Consumer Goods Forum (CGF).** The mission of CGF is to bring together consumer goods manufacturers and retailers in pursuit of business practices for efficiency and positive change across the industry, benefiting shoppers, consumers and the world without impeding competition. As an active member of the CGF, The Coca-Cola Company co-chairs the work stream focused on implementing the resolution on eliminating forced labor among members. More information can be found at www.theconsumergoodsforum.com/.
- **UN Global Compact.** The Coca-Cola Company has been a member of the UN Global Compact, the world's largest corporate sustainability initiative, since 2006, and has actively engaged in several projects, such as CEO Water Mandate, where we helped fund and develop the Water Action Hub. More information can be found at www.unglobalcompact.org/.
- **United States Council for International Business (USCIB).** The 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. More information can be found at <http://www.uscib.org/>.
- **World Business Council for Sustainable Development (WBCSD).** The WBCSD is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world. The Coca-Company is member of the WBCSD and engages, among other areas, in its work stream on human rights. More information can be found at www.wbcscd.org/.



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2. Traceability and Risk Assessment

2.1	Traceability	<p>The company discloses:</p> <ul style="list-style-type: none"> (1) the names and addresses of its first-tier suppliers. (2) the countries of below-first-tier suppliers (this does not include raw material suppliers). (3) the sourcing countries of raw materials at high risk of forced labor and human trafficking. (4) some information on its suppliers' workforce.
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We are transparent about our supply chain as well as our risks and successes. In 2016, we launched an agricultural ingredients Sourcing Map. <http://www.coca-colacompany.com/sustainable-agriculture/SourcingMap>

The map

- Provides information on 11 of our top agricultural ingredients;
- Reflects over 90 percent of supply for ingredients shown; and
- Links to dozens of stories that describe how we are promoting more sustainable agriculture practices through partnerships looking to reduce post-harvest loss, improve efficiency in water use, promote sustainable livelihoods for farmers, enhance skills and capabilities for women farmers, tackle child labor in agriculture, and improve land management.

Moreover, in 2016, we conducted third-party due diligence studies focused on child and forced labor, and land rights related to our sugar supply chain. We placed these studies on the Coca-Cola Global Workplace Rights landing page: <http://www.coca-colacompany.com/human-and-workplace-rights/addressing-global-issues#1>. Our studies focus on sugar because it is one of the biggest commodities we source.

Finally, with regards to the suppliers` workforce, we published in our [Human Rights Report](#) the top 10 findings in our audits of direct, authorized suppliers, bottlers and Company-owned facilities in 2016 (page 14).



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2.2	Risk Assessment	<p>The company discloses:</p> <p>(1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks, or assessments that focus specifically on forced labor risks.</p> <p>(2) details on forced labor risks identified in different tiers of its supply chain.</p>
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Examples of Processes The Coca-Cola Company uses to gather information on human rights risks and issues across its value chain:

- EthicsLine, our global web and telephone information and reporting service for employees of The Coca-Cola Company
- Incident Management and Crisis Resolution System
- 2,500+ third-party audits annually
 - TCCC Plants and Offices
 - Independent Bottlers' plants
 - Direct and Authorized Suppliers to TCCC
- 28 sugar studies to be conducted by 2020
 - focused on Child Labor, Forced Labor and Land Rights
 - 14 studies completed & published
- Ongoing dialogue and biannual meetings with the IUF
- Engagement with other organizations to assess and address risks in our value chain

In our [Human Rights Report](#) (pages 19-20) as well as on the [Coca-Cola website](#), we explain in detail our approach to our salient human rights risks (inclusive forced labor and human trafficking) as well as the results of our sugar studies in high risk countries on forced labor, child labor and land rights:

Country Studies

- [Bolivia](#)
- [Brazil](#)
- [Cameroon](#)
- [Colombia](#)
- [Congo](#)
- [Côte d'Ivoire](#)
- [Gabon](#)
- [Guatemala](#)
- [El Salvador](#)
- [Honduras](#)
- [Malawi](#)
- [Paraguay](#)



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- [South Africa](#)
- [Swaziland](#)

Moreover, we developed a large number of due diligence guidance, which is publicly available.

- Human Rights Due Diligence Checklist - Background and Guidance (<http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>)
- Human Rights Due Diligence Checklist for Plant Siting (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/plant-siting-due-diligence-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Micro Distribution Centers (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/mdc-human-rights-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Migrant Workers (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>)
<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist-8-13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist-8-13.pdf>)
- Human Rights Due Diligence Checklist for Pre-sourcing Design (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/pre-sourcing-human-rights-checklist-9-13.pdf>)
- Human Rights Due Diligence Checklist for Child Labor in Agriculture (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>)
<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>
- Human Rights Due Diligence Checklist for Non-trademark Activation (<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/non-trademark-activation-due-diligence-checklist.pdf>)



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3. Purchasing Practices

3.1	Purchasing Practices	<p>Purchasing practices and pricing may both positively impact labor standards in the company's supply chain, and increase risks of forced labor and human trafficking. The company:</p> <p>(1) is taking steps towards responsible raw materials sourcing.</p> <p>(2) is adopting responsible purchasing practices in the first tier of its supply chain.</p> <p>(3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts).</p>
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We communicate Sustainability and Responsible Sourcing requirements to our suppliers and track progress through audits and certification documentation. We have as a procurement principle that we will reward suppliers who help us accelerate progress on our journey with greater allocations of our supply volumes. There are several examples of this across our agricultural supply with regard to our sustainable sourcing commitments. Those commitments are detailed at <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements>.

Please see also:

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/unknown/unknown/S GP Brochure ENG.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>

Moreover, in 2013, we set a goal to more sustainably source our priority ingredients by 2020. Priority ingredients include cane and beet sugar, high fructose corn syrup, stevia, tea, coffee, oranges, lemons, grapes, apples, mangos, pulp and paper fiber for packaging, palm oil and soy.

For us, 'sustainably sourced' means that our farm suppliers meet certain standards, among other requirements, relating to human and workplace rights (including forced labor and human trafficking), environmental protection, and responsible farming management, otherwise known as our Sustainable Agriculture Guiding Principles (SAGP). Consisting of 15 principles, our SAGP establish the framework for defining our commitment to sustainable sourcing and are integrated into internal governance routines and procurement processes.



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The agricultural supply chain, from farm to finished ingredient, is complex and every commodity is different. We're working to engage and enroll smallholder farmers, including women, in our efforts toward improved sustainable sourcing consistent with the Company's SAGP. We have convened numerous workshops in regions around the world to help educate stakeholders across our agricultural supply chain, including bottlers, suppliers, farmers, and others to drive implementation against our 2020 goal.

Sugar update

Through global sourcing efforts, in collaboration with bottling partners, Coca-Cola sourced over 1 million tons of more sustainable sugar in 2016. This achievement positions The Coca-Cola Company at an estimated 15-20 percent toward the Company's goal to sustainably source our sugar by 2020. Coca-Cola anticipates doubling the amount of sugar it sustainably sources over the next year. Bonsucro certification is The Coca-Cola Company's preferred method for sugarcane mills and growers to demonstrate compliance with the Company's SAGP. Coca-Cola worked with Bonsucro members to create the first global metric standard for sustainable sugarcane production and was the first to purchase Bonsucro-certified sugar in 2011. The Company also achieved Bonsucro Chain of Custody Standard certification, which enables the tracking of claims on the sustainable production of Bonsucro sugarcane and all sugarcane-derived products along the entire supply chain. In October 2015, Coca-Cola received the 2015 Bonsucro Sustainability Award for Buyers Supporting Transformational Change. The award recognizes the Coca-Cola system's efforts to support critical and progressive advancements in the sugarcane sector.

Coffee and tea

More than 95 percent of the sourced coffee and tea in 2016 have met at least one of the Company's required sustainable sourcing standards, with the majority adhering to the Company's SAGP. This means that Coca-Cola is purchasing these products from farm locations and suppliers that meet one of the following standards: Ethical Tea Partnership, Rainforest Alliance, UTZ, Fairtrade, SAI Platform, 4C*, or SAGP audit or validation. Coca-Cola prefers and encourages suppliers to strive for SAGP, which, among other things, sets standards to be met by farm suppliers for human and workplace rights, environmental protection and responsible farming management.

Fruits update

Coca-Cola estimates to have reached 54 percent of our goal to more sustainably source our lemon by 2020. Half of Coca-Cola's lemon is sourced from Argentina, with 90 percent of the country's supply for Coca-Cola sustainably sourced. Citrus and mango are the major fruit areas of focus in Africa, where Coca-Cola is supporting economic development through Source Africa, an initiative to advance sustainable and financially viable supply chains of key Coca-Cola agricultural ingredients. Source Africa builds on Coca-Cola's successful Project Nurture, a



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partnership with nonprofit TechnoServe and the Bill & Melinda Gates Foundation to double the average income of 50,000 small-scale mango and passion fruit farmers in Uganda and Kenya, and help them connect into Coca-Cola's supply chain.

We are cooperating in our agricultural supply chain work with other organizations and institutions, such as the World Wildlife Fund (WWF). One project with WWF, which began in 2013, has included working together with Cargill in China to help 26,000 corn grower smallholdings expand their livelihoods through training. With the International Finance Corporation (IFC), we are working together to assist sugarcane farmers in India to address the challenges of soil well-being, reducing the cost of cultivation, and addressing the challenges of poor yields. Additionally, with Technoserve, we have supported capability building of mango farmers in India and Haiti and women coffee growers in Colombia.

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3.2	Supplier Selection	<p>The company:</p> <p>(1) assesses risks of forced labor at potential suppliers prior to entering into any contracts with them.</p>
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Suppliers are required to complete a SGP audit as part of the authorization process which includes a review of forced labor and human trafficking indicators.

- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Supplier Requirements: <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- Addressing Global Issues: <http://www.coca-colacompany.com/our-company/addressing-global-issues>
- Human Rights Due Diligence Checklist - Background and Guidance: <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>
- Human Rights Due Diligence Checklist for Migrant Works: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>



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3.3	Integration into Supplier Contracts	<p>The company:</p> <p>(1) integrates supply chain standards addressing forced labor and human trafficking into supplier contracts.</p>
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The SGP are part of all contractual agreements between The Coca-Cola Company and our direct and authorized suppliers (see www.coca-colacompany.com/our-company/supplier-guiding-principles).

3.4	Cascading Standards through the Supply Chain	<p>The company:</p> <p>(1) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in line with the company's supply chain standards addressing forced labor and human trafficking.</p>
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In 2016, we started the “Pass It Back program”. The Pass It Back program is intended to enable suppliers to self-manage their compliance performance and to promote similar standards and values in their supply chain. In order to demonstrate effective implementation of the program the supplier will provide The Coca-Cola Company with converted Assessment Summary Reports (ASRs) and periodic stewardship reports. The ASRs need to be uploaded by audit firms into the TCCC database system for tracking purposes. Overall stewardship reporting is required to be done on quarterly basis on the first two years of the implementation. The “Pass It Back Toolkit” can be downloaded under the following link: <http://www.coca-colafrica.com/content/dam/journey/aa/en/private/pdfs/spg/Pass-It-Back-Toolkit-2016.pdf>

4. Recruitment

4.1	Recruitment Approach	<p>The company:</p> <p>(1) has a policy that requires direct employment in its supply chain.</p> <p>(2) requires employment and recruitment agencies in its supply chain to uphold workers' fundamental rights and freedoms (those articulated in the ILO Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor.</p> <p>(3) discloses information on the recruitment agencies used by its suppliers.</p>
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The audit protocol include provisions to ensure that the suppliers have a due diligence process with regards to the recruitment agencies they use as well as that the workers which come from recruitment agencies do not pay fees and not in a bonded or forced labor situation (please see [issue guidance](#)). The supplier guiding principles, which apply to all workers from our direct suppliers – independently whether they are employees or contract workers - are based on the ILO Fundamental Principles and Rights at Work.

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Furthermore, in 2016, we started the “Pass It Back program”. The Pass It Back program is intended to enable suppliers to self-manage their compliance performance and to promote similar standards and values in their supply chain, also their recruitment agencies. In order to demonstrate effective implementation of the program the supplier will provide The Coca-Cola Company with converted Assessment Summary Reports (ASRs) and periodic stewardship reports. The ASRs need to be uploaded by audit firms into the TCCC database system for tracking purposes. Overall stewardship reporting is required to be done on quarterly basis on the first two years of the implementation. The “Pass It Back Toolkit” can be downloaded under the following link: <http://www.coca-colafrica.com/content/dam/journey/aa/en/private/pdfs/spg/Pass-It-Back-Toolkit-2016.pdf>

Moreover, the SAGP require from our agricultural suppliers that “Policies and procedures are in place to ensure permanent workers are hired in lieu of long-term contract labor”. (<http://assets.coca-colacompany.com/30/fb/c98f5720411990545de2ea248360/sagp-with-criteria-final-12-10-13.pdf>)

Please see also:

- Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (P-24)
- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Human Rights Due Diligence Checklist for Migrant Works: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>



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4.2	Recruitment Fees	<p>The company:</p> <p>(1) requires that no worker in its supply chain should pay for a job—the costs of recruitment should be borne not by the worker but by the employer ("Employer Pays Principle").</p> <p>(2) takes steps to ensure that such fees are reimbursed to the workers, in the event that it discovers that fees have been paid by workers in its supply chain.</p>
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Recruitment fees, which many migrant workers have to pay, are a major cause of forced labor. Recognizing that migrant workers are particularly vulnerable to exploitation and human trafficking, we recently enhanced safeguards related to the recruitment and employment practices of such workers. These safeguards were built into our audit protocol and we conducted supplier and auditor training sessions globally to familiarize these expectations. Please see:

- Issue Guidance: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issue-nce-guidance.pdf>
- Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (P-24)
- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Human Rights Due Diligence Checklist for Migrant Works: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>



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4.3	Monitoring and Ethical Recruitment	<p>The company:</p> <p>(1) takes steps to ensure employment and/or recruitment agencies used in its supply chain are monitored to assess and address risks of forced labor and human trafficking.</p> <p>(2) provides details of how it supports ethical recruitment in its supply chain.</p>
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All contract labor agencies with full-time employees on-site are included in-scope for audits. They are sampled separately, records are reviewed and workers interviewed.

- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Addressing Global Issues: <http://www.coca-colacompany.com/our-company/addressing-global-issues>
- Human Rights Due Diligence Checklist - Background and Guidance: <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>

Moreover, our audit protocol includes provisions to ensure that the suppliers have a due diligence process with regards to the recruitment agencies they use as well as that the workers which come from recruitment agencies do not pay fees and not in a bonded or forced labor situation (please see [issue guidance](#)).

As one example, in Florida orange sustainability audits, harvest management organization labor practices are audited and assessed for compliance with labor policies, specifically the U.S. government H1A program. There are other examples of this across our agricultural supply with regard to our sustainable sourcing commitments. Those commitments are detailed at <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements>

Furthermore, the supplier guiding principles, which apply to all workers from our direct suppliers – independently whether they are employees or contract workers - are based on the ILO Fundamental Principles and Rights at Work.

In 2016, we also started the “Pass It Back program”. The Pass It Back program is intended to enable suppliers to self-manage their compliance performance and to promote similar standards and values in their supply chain, also their recruitment agencies. In order to demonstrate effective implementation of the program the supplier will provide The Coca-Cola Company with converted Assessment Summary Reports (ASRs) and periodic stewardship reports. The ASRs need to be uploaded by audit firms into the TCCC database system for tracking purposes. Overall stewardship reporting is required to be done on quarterly basis on the first two years of the implementation. The “Pass It Back Toolkit” can be downloaded under



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the following link: <http://www.coca-colaafrica.com/content/dam/journey/aa/en/private/pdfs/spg/Pass-It-Back-Toolkit-2016.pdf>

4.4	Migrant Worker Rights	<p>The company:</p> <p>(1) ensures migrant workers understand the terms and conditions of their recruitment and employment, and also understand their rights.</p> <p>(2) takes steps to ensure its suppliers refrain from restricting workers' movement, including through the retention of passports or other personal documents against workers' will.</p> <p>(3) takes steps to ensure migrant workers are not discriminated against, and not retaliated against, when they raise grievances.</p> <p>(4) provides evidence of how it works with suppliers to ensure migrant workers' rights are respected.</p>
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The audit protocol includes provisions to ensure that the suppliers don't restrict workers' movement. Suppliers are required under the SGP to have a grievance mechanism. The suppliers are audited against these provisions. We also provided training for suppliers on these issues.

Please see

- Issue Guidance: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (P-24)
- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Human Rights Due Diligence Checklist for Migrant Works: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract->



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- [labor- human-rights-checklist.8.13.pdf](#)
<http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf> (pages 12-17; 26-28)

5.1	Communication of Policies	<p>The company takes steps to ensure:</p> <p>(1) its policies and standards, which include human trafficking and forced labor, are available in the languages of its suppliers' workers.</p> <p>(2) its human trafficking and forced labor policies and standards are communicated to workers in its supply chain.</p>
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The audit protocol requests that policies regarding wages, benefits, or other terms of employment have been communicated to employees. These policies need to be in line with the SGPs and are audited against. Moreover, in the confidential interviews with workers, the audit protocol requires that auditors interview also non-employee.

Furthermore, the SGPs have been translated into 12 languages:

- | | |
|-------------------------|----------------------------|
| Arabic | Italian |
| Burmese | Japanese |
| Chinese | Portuguese |
| English | Russian |
| French | Spanish |
| German | Turkish |

Please see:

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/unknown/unknown/SGP_Brochure_ENG.pdf



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- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- <http://assets.coca-colacompany.com/30/fb/c98f5720411990545de2ea248360/sagp-with-criteria-final-12-10-13.pdf>

5.2	Worker Voice	<p>The company:</p> <p>(1) works with relevant stakeholders to engage with and educate workers in its supply chain on their labor rights.</p> <p>(2) takes steps to ensure that there are worker-to-worker education initiatives on labor rights in its supply chain.</p> <p>(3) provides evidence of the positive impact of worker engagement in its supply chain.</p> <p>(4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.</p>
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5.3	Freedom of Association	<p>The company:</p> <p>(1) describes how it works with suppliers to improve their practices in relation to freedom of association and collective bargaining.</p> <p>(2) works with local or global trade unions to support freedom of association in its supply chain.</p> <p>(3) takes steps to ensure workplace environments in which workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association.</p>
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Freedom of association and the right to bargain collectively are part of the International Bill of Human Rights and the International Labor Organization’s (ILO’s) Declaration on Fundamental Principles and Rights at Work. At The Coca-Cola Company, we respect our employees’ right to join, form or not join a labor union without fear of reprisal, intimidation or harassment. Where



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employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives. Similarly, our SGP request suppliers and business partners to respect freedom of association and the right to bargain collectively. We audit our suppliers and bottlers against these principles. Moreover, we have developed extensive guidance on freedom of association and the right to bargain collectively to support our Business Units in fully respecting these important rights.

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Of the more than 700,000 associates in the Coca-Cola system, more than 30 percent are unionized. At the global level, we meet twice annually with the International Union of Food and Allied Workers (IUF) and several of its affiliates (please find the joint statement of the Company and the IUF [here](#)). The IUF is a worldwide federation of trade unions representing workers in sectors including agriculture and plantations, food and beverages, and hotels, among others. The semi-annual meetings, in addition to ongoing communications, provide a forum to discuss a variety of labor-relations matters. For us, this close contact is also a form of due diligence – to understand problems at a very early point in time and solve them at the most local level when possible. James Quincey joined the meeting with the IUF in May 2017, directly after he took over his new role as CEO of the Company, demonstrating the importance our top leadership places on meetings with the IUF.

Qatar is an example where we engage with workers in alternative ways:

In Qatar, we practice the following:

- There is monthly town hall wherein The Qatar Managing Director addresses all the employees and gives an opportunity to discuss any issues on any matter.
- HR meets with employees from all the departments at least once a quarter and has an open forum. This is done in vernacular / common language for assimilation and understanding.
- There is a Grievances Committee led by a non-HR person who can be easily approached by the associates for any help / clarification again done in local language
- We have Health and Safety Committee, in which workers are represented by 6 representatives (out of 14 people), which meets every quarter.

Please see also:

- Human Rights Policy Manager's Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- Sustainable Agriculture Guiding Principles (SAGP): <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>
- Sustainable Agricultural Guiding Principles (June 2013): <http://www.coca->



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colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>

Additional Requirements for Specific Ingredients:

- Coffee: Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFE E.pdf>
- Tea: Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>

Growing and Learning in Myanmar: <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>



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<p>5.4</p>	<p>Grievance Mechanism</p>	<p>The company:</p> <p>(1) takes steps to ensure a formal mechanism to report a grievance with regards to labor conditions in the company's supply chain to an impartial entity is available to its suppliers' workers and relevant stakeholders.</p> <p>(2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers.</p> <p>(3) takes steps to ensure an independent third party or workers are involved in the design or performance of the mechanism, to ensure that its suppliers' workers trust the mechanism.</p> <p>(4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism.</p> <p>(5) provides evidence that the mechanism is available and used by workers below tier one in its supply chain, or by relevant stakeholders in key supply chain contexts.</p>
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There are various channels through which individuals, groups and communities can raise grievances. At the global level, trade unions and civil society may raise concerns about adverse human rights impacts through our ongoing dialogue. At a regional level, our Business Units around the world proactively engage with local communities where they conduct business. Any serious issue, which cannot be addressed locally, may be escalated to the global level, where a cross-functional team will examine the issue. In addition, we undertake regular audits of our Company-owned facilities, independent bottlers, and direct, authorized suppliers. The audits include confidential interviews with workers in these organizations. When an audit identifies non-compliance, a corrective action plan is established to have these issues addressed within an agreed-upon time frame. The corrective action is tracked and may require a re-audit to determine if improvement has occurred. Through this process, 475 facilities were brought into compliant status in 2016, thereby positively impacting the workplaces of more than 135,000 workers.

We also expect our suppliers and bottlers to provide workers with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner. In our supplier audits questions are asked to determine if a grievance mechanism is in place and if and how worker satisfaction is tracked.



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For systemic issues, such as human rights risks linked to mega-sporting events, we collaborate with other like-minded organizations and companies to prevent, mitigate and remedy adverse human rights impacts.

Employees of The Coca-Cola Company are encouraged to report grievances through the EthicsLine, a global web and telephone information and reporting service. Telephone calls are toll-free, and the EthicsLine is open 24 hours a day, seven days a week, with translators available. In 2016 we had 192 cases related to workplace rights reported through the EthicsLine. The main issues/allegations were related to:

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- Discrimination (55 cases / 27 percent)
- Work hours and wages (42 cases / 23 percent)
- Retaliation (37 cases / 20 percent)
- Safe and healthy workplace (33 cases / 17 percent)
- Ask a workplace rights question (11 cases / 6 percent)
- Workplace security (10 cases / 5 percent)
- Freedom of association (4 cases / 2 percent)

In fall 2015, through anonymous polling, we asked our employees globally whether they think they could report suspected violations of the Code of Business Conduct through the appropriate company channels without fear of retaliation or reprisal. 83% of employees agreed they think that they could do so. We took action to address issues in parts of the organization where the scores were lower.

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf>, (page 43)
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (page 17)
- <https://secure.ethicspoint.com/domain/media/en/gui/51294/index.html>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf>
- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>



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- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>

<p>6.1 Auditing Process</p>	<p>The company has a supplier audit process that includes:</p> <ul style="list-style-type: none"> (1) non-scheduled visits. (2) a review of relevant documents. (3) interviews with workers. (4) visits to associated production facilities, and related worker housing. (5) supplier audits below the first tier.
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We closely monitor the implementation of the Human Rights Policy in Company-owned facilities as well as the implementation of the SGP by direct, authorized suppliers and apply the equivalent audits to independent bottlers. The Company utilizes independent third parties to assess supplier and bottler compliance. We partner with a select number of accredited audit firms and conduct training on a regular basis to ensure they understand and align to our program requirements. The Company supports the efforts of [APSCA](#) to ensure a common accreditation for auditors and audit firms. Currently all of our preferred audit firms are involved in APSCA.

Assessments include confidential interviews with employees and on-site contract workers. Our audit guidelines thereby 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.

Workers` Housing is part of the assessment process.

Please find a comprehensive overview of the assessment project in our Workplace Rights Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace->



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[rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf](#) (particularly pages 13-18, pages 37 and 49 relate to housing).

We not only request compliance with our SGP, but also provide training programs and guidance on their implementation. We have developed guidance on specific topics to support our supplier partners to uphold the values outlined in the SGP. Our Issue Guidance document provides additional guidance on challenges which, to date, include land rights, HIV/AIDS and pregnancy testing, and migrant worker recruitment and employment practices. The intent is to provide background information on the issue and for the expectations to comply with SGP. In 2016, the Global Workplace Rights team provided 40 SGP-related training programs to bottlers, suppliers and auditors across the world.

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Number of human rights training programs facilitated by the Global Workplace Rights team for bottlers, suppliers and auditors in 2016

Region	Africa	Asia/Pacific	Central Asia/MENA	Latin America
Number of training programs	11	9	4	16

The Coca-Cola Company is a leading member of [AIM-PROGRESS](#), a forum of 45 fast-moving consumer goods manufacturers and suppliers working together to promote responsible sourcing practices. Member companies recognize supplier audits completed on behalf of another company, benchmark best practices and collaborate to jointly deliver supplier training programs around the world.

The training programs cover the four major pillars of responsible sourcing: human rights and labor standards, health and safety, environmental compliance and business integrity. Over the last few years The Coca-Cola Company co-hosted events in collaboration with other AIM-PROGRESS members in Bangkok, New Delhi, Dubai, Nairobi, Johannesburg, Lagos and Istanbul. Overall, AIM-PROGRESS has organized over 20 such sessions globally, reaching over 2,500 people.

- <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/Human-Rights-Report-2016-2017-TCCC.pdf> (pages 12-18)
- <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- <http://www.coca-colacompany.com/2016-sustainability-report>

While we reserve the right to conduct unannounced audits, our audits are generally



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scheduled in collaboration with our supplier partners.

Our Progress: Human and Workplace Rights: <http://www.coca-colacompany.com/stories/our-progress-human-and-workplace-rights>

Human Rights Policy Manager’s Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>

6.2	Audit Disclosure	<p>The company discloses:</p> <ul style="list-style-type: none"> (1) the percentage of suppliers audited annually. (2) the percentage of unannounced audits. (3) the number or percentage of workers interviewed during audits. (4) information on the qualification of the auditors used. (5) a summary of findings, including details regarding any violations revealed.
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Number of audits of suppliers, bottlers and company-owned facilities per region

Region	Africa	Eurasia	Europe	Latin America	North America	Pacific	MENA	Total
Number of audits in 2016	188	93	339	705	180	1207	77	2789

We partner with a select number of accredited audit firms and conduct training on a regular basis to ensure they understand and align to our program requirements. The Company supports the efforts of [APSCA](#) to ensure a common accreditation for auditors and audit firms. Currently all of our preferred audit firms are involved in APSCA.

When an audit identifies non-compliance, a corrective action plan is established to have these issues addressed within an agreed-upon time frame. The corrective action is tracked and may require a re-audit to determine if improvement has occurred. Through this process, 475 facilities



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were brought into compliant status in 2016, thereby positively impacting the workplaces of more than 135,000 workers.

New suppliers must demonstrate compliance to SGP prior to their authorization as an approved supplier. The Company reserves the right to terminate an agreement with any supplier unable to demonstrate SGP requirements abidance. However, this should be considered a last resort. Walking away from issues does not ultimately solve the problem or improve the situation of affected communities and stakeholders. Instead, aligned with the UN Guiding Principles, we aim to build leverage with other major buyers to increase the pressure on suppliers to engage. An example where we have implemented this approach is with Usina Trapiche, a sugar mill on the coast of Pernambuco in northeastern Brazil. It has been embroiled in conflict with local fishing communities over the control of nearby islands and contamination of the estuary at least since 1998. Usina Trapiche is a supplier to a Coca-Cola bottler and other major brands. In 2016, working with Oxfam, we have been engaged with a coalition of buyers to strengthen leverage for engagement. The Global Workplace Rights Director of The Coca-Cola Company reported on these efforts and discussed the case with a multi-stakeholder audience on an Oxfam-led panel at the UN Forum on Business and Human Rights in November 2016. More information can be found [here](#). However, building leverage and triggering change does not happen overnight and requires engagement, persistency and vision.

Since inception of our SGP program, we have collaborated with our bottling and supplier partners to complete over 20,000 human and workplace rights audits. Although our values have remained the same, our program has evolved for continuous improvement. In 2014, for instance, we enhanced our audits with regards to the recruitment and employment practices for migrant workers and protecting the land rights of local communities.

Compliance of direct, authorized suppliers, bottlers and Company-owned facilities with the Human Rights Policy and the Supplier Guiding Principles

Year	2016	2015	2014	2013	2012	2011	2010
Compliance	90%	92%	90%	86%	81%	73%	63%

The top 10 findings in our audits of direct, authorized suppliers, bottlers and Company-owned facilities in 2016 were:

Excessive overtime	14%
Overtime not properly compensated	7%
Equipment does not meet legal safety requirements	5%



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Rest day not provided	5%
Inadequate worker safety training	5%
Unhealthy workplace conditions (e.g., temperature, noise, ventilation, or lighting issues) in violation of local law	5%
Blocked or locked emergency exits	4%
Mandated benefits not provided to 10% or more workers	4%
No functioning fire alarms	4%
No emergency lighting	3%

Please see [Human Rights Report](#) (particularly pages 12-18; 42-43)

7. Remedy Programs

7.1	Corrective Action Plans	<p>The company's corrective action plans include:</p> <ul style="list-style-type: none"> (1) potential actions taken in case of non-compliance, such as stop-work notices, warning letters, supplementary training and policy revision. (2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, spot-checks or other means. (3) potential consequences if corrective actions are not taken. (4) a summary or an example of its corrective action process in practice.
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We undertake regular audits of our Company-owned facilities, independent bottlers, and direct, authorized suppliers. The audits include confidential interviews with workers in these organizations. When an audit identifies non-compliance, a corrective action plan is established to have these issues addressed within an agreed-upon time frame. The corrective action is tracked and may require a re-audit to determine if improvement has occurred. Through this process, 475



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facilities were brought into compliant status in 2016, thereby positively impacting the workplaces of more than 135,000 workers.

We also expect our suppliers and bottlers to provide workers with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

Please see also:

- Our [Human Rights Report](#)
- Workplace Rights Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- Growing and Learning in Myanmar: <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>



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7.2	Remedy Programs	<p>A. If no allegation regarding forced labor in the company’s supply chain has been identified in the last three years, the company discloses:</p> <ul style="list-style-type: none"> (1) a process for responding to the complaints and/or reported violations of policies and standards. (2) at least two examples of outcomes for workers of its remedy process in practice, covering different supply chain contexts.
		<p>B.1. If one or more allegations regarding forced labor in the company’s supply chain have been identified in the last three years, the company discloses:</p> <ul style="list-style-type: none"> (1) a process for responding to the complaints and/or reported violations of policies and standards. (2) a public response to the allegation, which covers each aspect of each allegation. (3) outcomes of the remedy process in the case of the allegation(s). (4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.
		<p>B.2. If one or more allegations regarding forced labor in the company’s supply chain have been identified in the last three years, and the company denies the allegation, the company discloses:</p> <ul style="list-style-type: none"> (1) a process for responding to the complaints and/or reported violations of policies and standards. (2) a public response to the allegation, which covers each aspect of each allegation. (3) a description of what actions it would take to prevent and remediate the alleged impacts. (4) that it engages in a dialogue with the stakeholders reportedly affected in the allegation, or requires its supplier(s) to do so.

Since the introduction of our ‘no fees’ position, we have had success in combatting recruitment fees in many markets, while other markets remain a challenge. In Qatar, for example, where passport retention is routine and paying fees is frequent, we have operations, including a bottling plant, which we believe can be a positive example for responsible business conduct in the region. There, employees maintain their passports, workers do not pay recruitment fees, salaries are paid



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directly to workers bank accounts, which avoids deductions from intermediaries, and exit visas are signed at the time of engagement. These processes were developed to align with our global policy.

In contrast, Taiwan remains a market where we know migrant workers face fees, including in our supply chain. In order to address this, in 2016, we invited ICCR to shadow two audits in the region to validate our process and provide constructive feedback on opportunities to progress the dialogue locally. They found that many migrant workers experience a large financial burden in part because of the government imposed requirements to take loans that secure return to their home countries. These government-imposed fees create risks for workers as they incentivize illegal migration through unregistered brokers who bypass government regulations, placing many vulnerable job seekers at risk for human trafficking. Engagement with our industry peers will be critical to implement the priority principles in these types of challenging markets. ICCR published a report, Best Practice Guidance on Ethical Recruitment of Migrant Workers, highlighting case studies related to good practices, including reference to The Coca-Cola Company.

(<http://www.iccr.org/best-practice-guidance-ethical-recruitment-migrant-workers-0>).

Regarding the aforementioned sugar due diligence studies, despite the fact that forced labor continues to be a problem in the wider sugarcane sector, no systematic forced labor was found in the mills or at the farms in any of the nine countries at the center of the studies through the end of Q2 2017. However, in Cameroon there were issues found around overtime and rest days. Some subcontracted workers reported not being given rest days, despite working seven days in a row. The mill addressed this issue with the relevant subcontractor to ensure each worker is allowed the mandatory rest days aligned with Cameroonian law. In Côte D'Ivoire, the study found that a subcontractor utilized by the mill was engaging in forced labor via indebting migrant workers and withholding travel documents until the debt was repaid. The mill investigated the claims and immediate remediation was taken. The travel and identity documentation was returned to the employees and the subcontractor received training to ensure full compliance and understanding of labor laws and Company policy. In addition, in the Bolivia study, which launched and published in Q3 of 2017, researchers found situations of debt bondage. As is the case of the discovered child labor in Bolivia, we are currently working with the mills to address the findings. Moreover, the studies for all countries also found that most of the mills lacked appropriate formal procedures to prevent or address instances of forced labor in owned, leased, or supplier farms. We will follow up on this issue.

Please see also the Company's report provided under the UK Modern Slavery Act (<https://www.coca-cola.co.uk/content/dam/journey/gb/en/hidden/PDFs/human-and-workplace-rights/Modern-Slavery-Act-Statement-FY2016-Coca-Cola.pdf>) as well as under the California Transparency in Supply Chains Act (<http://www.coca-colacompany.com/our-company/ca-transparency-in-supply-chain-act>).



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2. Membership in industry and multi-stakeholder associations

Please indicate your membership in industry and multi-stakeholder associations relevant to addressing forced labor in the supply chain.

In 2016/17 we were an active member of a number of initiatives, groups and associations in this regard, such as:

- **AIM-PROGRESS.** AIM-PROGRESS is a forum of Fast Moving Consumer Goods manufacturers and common suppliers, assembled to enable and promote responsible sourcing practices and sustainable supply chains. As an active member of AIM-PROGRESS, The Coca-Cola Company leads a work stream to develop and deliver supplier trainings. 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. Please see our engagement chapter on our supply chain activities. More information can be found at www.aim-progress.com/.
- **Business for Social Responsibility (BSR).** BSR is a global nonprofit organization that works with its network of more than 250 member companies and other partners to build a just and sustainable world. BSR develops sustainable business strategies and solutions through consulting, research, and cross-sector collaboration. The Coca-Cola Company has engaged particularly in the peer learning activities of BSR. More information can be found at www.bsr.org/.
- **CSR Europe.** CSR Europe is the leading European business network for Corporate Social Responsibility. The Coca-Cola Company is member of its network of around 46 corporate members and 42 National CSR organizations. CSR Europe acts as a platform for businesses looking to enhance sustainable growth and positively contribute to society. More information can be found at www.csreurope.org/.
- **Global Business Initiative on Human Rights (GBI).** GBI's mission is to advance human rights in a business context through cross-industry peer learning, outreach and capacity



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building, and by informing policy. The Coca-Cola Company is part of a core group of corporations from different industries, headquartered in diverse countries with global operations that meet at least two times per year and engage in this in-depth exchange of experience and problem solving. More information can be found at www.global-business-initiative.org/.

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- **ILO Child Labor Platform (CLP).** Under the leadership of the International Labor Organization (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. The Coca-Cola Company is a founding member of the CLP and actively engages in peer learning. More information can be found at www.ilo.org/ipecc/Action/CSR/clp/lang--en/index.htm.
- **International Organisation of Employers (IOE).** The 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 debate 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). More information can be found at www.ioe-emp.com.
- **Leadership Group on Responsible Recruitment (LGRR).** LGRR is a business leadership group working closely with international organizations, NGOs and trade unions to eliminate all worker fees in recruitment, both in law and practice, by 2026. The first international forum on responsible recruitment was hosted in Berlin on 19 June 19, 2017 to explore collective action to end the global demand for exploitation in supply chains and also increase the supply of ethical recruitment. More information under the following link: <https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>
- **Mega-Sporting Events Platform for Human Rights (MSE Platform).** The Mega-Sporting Events Platform for Human Rights (MSE Platform) is an emerging multi-stakeholder coalition of international and intergovernmental organizations, governments, sports governing bodies, athletes, unions, sponsors and broadcasters, and civil society groups. Through dialogue and joint action the mission is to ensure all actors involved in staging an event fully embrace and operationalize their respective human rights duties and responsibilities throughout the MSE lifecycle. Chaired by Mary Robinson, former U.N. High Commissioner for Human Rights and former President of Ireland, the MSE Platform is facilitated by IHRB. The Coca-Cola Company is founding member of the MSE Platform and co-chairs the task force of Sponsors and Broadcasters. More information can be found at www.ihrb.org/megasportingevents.



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- **Shift.** The Coca Cola Company participates in the Business Learning program of Shift, the leading center of expertise on the UNGP on Business and Human Rights. Founded in 2011, Shift's team of experts facilitate dialogue, build capacity and develop new approaches with companies, government, civil society and international institutions to enable implementation of the UNGP. More information can be found at www.shiftproject.org/.
- **The Consumer Goods Forum (CGF).** The mission of CGF is to bring together consumer goods manufacturers and retailers in pursuit of business practices for efficiency and positive change across the industry, benefiting shoppers, consumers and the world without impeding competition. As an active member of the CGF, The Coca-Cola Company co-chairs the work stream focused on implementing the resolution on eliminating forced labor among members. More information can be found at www.theconsumergoodsforum.com/.
- **UN Global Compact.** The Coca-Cola Company has been a member of the UN Global Compact, the world's largest corporate sustainability initiative, since 2006, and has actively engaged in several projects, such as CEO Water Mandate, where we helped fund and develop the Water Action Hub. More information can be found at www.unglobalcompact.org/.
- **United States Council for International Business (USCIB).** The 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. More information can be found at <http://www.uscib.org/>.
- **World Business Council for Sustainable Development (WBCSD).** The WBCSD is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world. The Coca-Company is member of the WBCSD and engages, among other areas, in its work stream on human rights. More information can be found at www.wbcسد.org/.