

## COUNTRY SPECIFIC ADDENDUM TO THE CCHBC WHISTLEBLOWING POLICY

### FOR COCA-COLA HELLENIC BOTTLING COMPANY BULGARIA AD

This Addendum to the CCHBC Whistleblowing Policy ("Policy") ("Addendum") contains the whistleblowing reporting rules that apply to Coca-Cola Hellenic Bottling company Bulgaria AD ("CCHBC Bulgaria") due to the specific Bulgarian legal requirements in this respect.

In the event of a difference between this Addendum and the Policy, the provisions of this Addendum shall apply to CCHBC Bulgaria.

## **Purpose**

In addition to the purpose of the Policy provided in section 2 of the Policy the purpose of the Policy as regards CCHBC Bulgaria is to list some specific requirement which apply when reporting violations within the scope of the Bulgarian Law on the Protection of Persons Who Report or Publicly Disclose Information on Violations ("the Bulgarian Law")

## Scope:

In addition to the scope of this Policy provided in section 2 of the Policy as regards CCHBC Bulgaria, the Policy will also apply to suppliers.

#### Whistleblowers:

In addition to the persons listed in section 4 of the Policy, a person who works without an employment contract and/or is a freelance worker and/or a craft worker; a volunteer or an intern; a partner, a shareholder, a sole owner of the capital, a member of the management or supervisory body of a commercial company, a member of the audit committee of an enterprise; a candidate for employment who has participated in a competition or another form of recruitment and who has received in that capacity information on a breach; a worker or an employee, where the information has been obtained in the framework of an employment or service relationship, which has been terminated at the time of the reporting or the public disclosure may file a report with CCHBC Bulgaria.

# What to report:

Under Bulgarian law, whistleblowing can be reported breaches: of Bulgarian law concerning the rules for payment of outstanding public state and municipal receivables; of the labour law; and of the legislation related to the performance of public service, and all whistleblowing reports under this heading is afforded the same protection.

By contrast to the rules of the Policy, for anonymous reports and/or for reports relating to breaches committed more than two years ago when the breach is within the scope of the Bulgarian Law, investigations will not be initiated.

### How to report:

Wherever possible you should report concerns internally first. Alternatively, you can choose to report externally to the Bulgarian Commission for Personal Data Protection at: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, E-mail: kzld@cpdp.bg



# Specific rules on investigation of the reports:

When you report concerns in specific areas as listed in Article 3 of the Bulgarian Law, such reports will be handled according to the procedures of that law and you will receive the protections provided by the same law.

Each report for potential violation within the scope of the Bulgarian law should be submitted by filling in a registration form and issuing by the person taking the report of an Unique Identification Code (UIC), provided by the Bulgarian Commission for Personal Data Protection. The individual will be informed for the UIC as well as for the incoming number from the information system of the Company no later than 7 days after receipt of the report. If the reporting person would not like to use the specific form, the person taking the report will collect from the whistleblower the information contained in the abovementioned registration form. If all the required information is not collected, the Company may refuse to continue with the investigation.

The reports and the enclosed materials, including the subsequent materials related to the investigation, will be retained by the Company for a period of 5 years following the closing of the investigation, unless there is a criminal, civil, labor and/or administrative proceedings initiated in relation to the report.

### **Protection:**

In addition to the protection afforded by the Policy, the Bulgarian law protect from retaliation legal entities where the whistleblower has a stake, where the whistleblower works or with which the whistleblower is connected in a work-related context.

False accusations are subject to criminally liability for libel under Bulgarian legislation.

## Feedback:

Whenever the investigation is about a violation within the scope of the Bulgarian law, the feedback will be provided to the whistleblower within three months of the concern being reported.

# **Availability of the Policy**

The Company will make the Policy and this Addendum available to the public on its website.