

COUNTRY SPECIFIC ADDENDUM TO THE CCHBC WHISTLEBLOWING POLICY FOR CCHBC HUNGARY

This Addendum to the CCHBC Whistleblowing Policy (“Policy”) (“Addendum”) contains the whistleblowing reporting rules that apply to CCHBC Hungary due to the specific Hungarian 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 Hungary.

Whistleblowers:

In addition to the persons listed in section 4 of the Policy, the Company's former and prospective (having negotiations on the employment contract) employees, former and prospective contractors of the Company who are in the process of entering into a contract, owners of the Company, former and prospective senior executives, members of the management board, members of the supervisory board, former and prospective volunteers, trainees who are in the process of entering into a contract, and former and prospective supplier’s contact persons may file a report with CCHBC Hungary.

Reportable misconduct:

Under Hungarian law, whistleblowing can be reported for any breach of the law, alleged breach of the law, statutory omission, and other misconduct, and all whistleblowing report under this heading is afforded the same protection.

The consequences of reporting in bad faith:

If the whistleblower submits a report in bad faith, including if she/he/they knowingly and intentionally make an untrue report, the report will not be considered legitimate, and the whistleblower will not be protected by the law and the Policy. And if such a bad faith report gives rise to a suspicion of a crime or offence, the Company will transfer the personal data of the whistleblower to the body entitled to conduct the proceedings, and if there are reasonable grounds to believe that the reporter has unlawfully caused damage or other legal harm to another person by the bad faith report, the Company will transfer the personal data of the whistleblower to the body or person entitled to initiate the proceedings, at the request of this body or person.

Host in Hungary of reported misconduct:

Under Hungarian Law, in addition to those listed in section 6 of the Policy, reports of misconduct can be made to the Legal Director. The Legal Director is the impartial person authorized under Hungarian law in Hungary to receive and handle reports of misconduct, including contacting the whistleblower, requesting the whistleblower for further information and informing the whistleblower of the outcome of the investigation. If the whistleblower reports misconduct related to CCHBC Hungary through the independent whistleblower line or by telephone as indicated in Section 6 of the Policy, such reports will be received by the Legal Director.

Please note that if you report to the Legal Director by e-mail, we cannot fully guarantee the anonymity of the report, as your e-mail address will appear in our system.

Specific rules on investigation of the reports

We will ensure that persons concerned by a whistleblowing and persons possessing information in relation to a whistleblowing have the opportunity to express their views on the whistleblowing themselves or through a legal representative.

We will endeavor to investigate the whistleblower's report within 30 days of acknowledgement of receipt of the report in accordance with section 8 of the Policy. If more time is needed for the investigation, we will inform the whistleblower before the expiry of this period to extend the time limit for the investigation for a maximum total of 3 months.

Within the above time limit, we will inform the whistleblower whether or not we have carried out an investigation, the outcome of the investigation and whether and what action we have taken on the basis of the report.

Specific confidentiality, data protection requirements:

In addition to section 7 of the Policy, we will ensure that personal data of the whistleblower, the person concerned by the whistleblowing and the person possessing information about the whistleblowing will be transmitted to the independently operated whistleblower line (online at www.coca-colahellenic.ethicspoint.com and/or by telephone), and to our Corporate Audit Department's employees whose involvement in the investigation of the whistleblowing is strictly necessary. These personnel may work in a country outside the European Economic Area, in which case our Data Privacy compliance program applies.

In addition, we will not allow either the person concerned by the whistleblowing or any other data subject to become aware of the personal data and identity of the whistleblower during the exercise of their data protection rights.

Availability of the Policy

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