

NON-FINANCIAL DECLARATION

We acknowledge the importance of corporate social responsibility in our own operations and in our supply chains. In 2017, Refresco complied with the requirements for disclosure of non-financial information and diversity information with the exception of the diversity policy for the composition of the Executive Board and the Supervisory Board, as described in the Corporate Governance declaration on page 45.

Prevention of bribery and corruption and related results

Our policy regarding prevention of bribery and corruption as laid out in this paragraph is based on the Refresco Code of Conduct and the Refresco Supplier Code of Conduct. Both documents are available at our website www.refresco.com. The company pays special attention to exposure to fraud risks in its internal audit plan.

At Refresco

Refresco expects all its employees, including the Executive Board, to conduct their business with integrity in accordance with good business practice and the Refresco Code of Conduct. Each employee must exercise good judgment and avoid any circumstance that would violate the letter or spirit of the Refresco Code of Conduct. Refresco organizes Code of Conduct training to ensure the code is embedded in the organization. In 2018 the company plans to launch an e-learning training around the Code of Conduct to involve the entire workforce.

Refresco recognizes that in dealing with third parties (e.g. suppliers and customers) responsibility, reliability and integrity are essential preconditions. Therefore Refresco will always act in good faith and expects from its employees to refrain from acts that may damage these preconditions.

Summary of Refresco's anti-bribery and anti-corruption principles:

1. **Comply with laws and regulations:** Refresco complies with laws and regulations of the countries in which the Group operates.
2. **Business integrity:** We work with honesty, integrity and respect to others.
3. **Bribes:** Any form of bribes or inappropriate advantages are prohibited and reported immediately.
4. **Gifts:** Any gifts or invitations to third party events which exceed usual business conduct are prohibited.
5. **Conflicts of interests:** Refresco employees are expected to act in the best interest of the company at all times and disclose any personal interests which could influence business judgement and damage Refresco's integrity. Our employees are asked to avoid taking material financial stakes in any unlisted competitor or supplier and to ensure invitations for outside Directorships are approved by the Executive Board.

Any demand for, or offer of a bribe or improper advantage must be immediately rejected and reported to the Compliance Officer or in case it relates to the Executive Board to the Supervisory Board. No gifts or other benefits including entertaining may be offered to third parties with whom Refresco does business, which could reasonably be expected to render advantage to Refresco. Refresco employees

should not expose themselves to a potential conflict of interest by accepting benefits, gifts, favors or entertainment offered by supplier, tenant or other third party which exceeds the common practice associated with usual business conduct. If there is any doubt, an employee should share its concern with the immediate line manager and seek guidance. In 2017 no incidents regarding bribery were reported to the Compliance Officer or the Supervisory Board.

Our supply chains

Refresco expects its suppliers to conduct their business with integrity and shall compete fairly. Suppliers will not offer gifts and/or hospitality of any value, directly or indirectly, in order to obtain any improper benefit or advantage. Also, suppliers are not allowed to offer any hospitality or transfer any gift of value to Refresco employees that exceeds usual business conduct in their country of operation. Suppliers shall have a zero tolerance policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes).

Suppliers are expected to ensure that the sourcing of the products supplied do not finance or benefit armed groups. Any violations of the above described policy are to be reported to the Compliance Officer of Refresco. No violations were reported in 2017.

Prevention of the violation of human rights and fundamental principles and rights at work

Our human rights policy as laid out in this paragraph is based on the Refresco Code of Conduct and our People agenda. We adhere to local legislation in all countries of operations pertaining human rights and rights at work.

At Refresco

Our size brings economies of scale, but it is the ability of our highly skilled people to seize market opportunities and streamline operational processes that makes the difference. We are committed to develop our people capabilities, engage with our employees and their representatives and we strive for a physically and mentally health workplace.

We respect our employee's right for freedom of association in all countries of operations. It is our policy to provide employment equality to all irrespective of age, gender, origin, religion or belief and we are opposed to all forms of unlawful and unfair discrimination. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against any of the above grounds.

Refresco has a whistle blowing procedure in place that allows employees raise concerns if they may arise in a confidential manner.

Our supply chains

Refresco sources raw materials and packaging materials from across the globe. In sustainable sourcing main topics include focus on human rights and labour conditions in risk countries. Refresco expects that the organizations and supply chains of its suppliers provide for healthy and incident free working environments for their

employees and neighbors. Suppliers must implement appropriate controls and working procedures preventing and controlling hazards and risks related to their specific industry. As a minimum, suppliers shall provide portable drinking water, adequate restrooms, appropriate emergency procedures and first aid assistance. Refresco expects its suppliers to insist on "safety first" within the work environment.

Suppliers wishing to secure a long term business relationship with Refresco need to respect the UN Universal Declaration of Human Rights and the eight fundamental Conventions of the International Labour Organisation (ILO). In particular, suppliers must ensure that in their respective organizations and supply chain they:

- Meet the minimum employment age limit defined by national law, adhere to the applicable regulation and relevant fundamental convention of the ILO
- Prohibit compulsory or forced labor and meet or exceed the national legal standards for wages and working hours
- Do not tolerate discrimination and harassment of any kind and ensure freedom of association

Refresco requires its suppliers to sign the company's Supplier Code of Conduct and commit to continuously improve their overall social performance. We were not aware of any violations to the code in 2017. Should a supplier fail to uphold the principles set out in the Supplier Code of Conduct, Refresco has the right to either propose corrective actions or to terminate the relevant agreement.

Whistle Blowing

Our whistleblowing procedure details the process to be followed if an irregularity is identified. Refresco will regard any relevant violation of its Code of Conduct and frauds as serious and these will be treated as such. Reports of any violation of this Code will be treated with severity. Any offender should expect to be disciplined. This may include dismissal and where appropriate prosecution. The position of an employee who reports a violation of this Code shall not be disadvantaged in any way whatsoever as a result of making such a report.

The table below indexes the 2017 Executive Board Report against the disclosure requirements according to the Decree Disclosure of non-financial information.

	Page reference
Business model	
- A general description of the core processes and activities of the organization	10 – 11
Environmental matters	
- Policy pursued	34 – 35
- Results	34 – 35
- Principal risks and risk management	47 – 49
- KPIs	32
Social and personnel matters	
- Policy pursued	34
- Results	34
- Principal risks and risk management	47 – 48
- KPIs	32
Respect for human rights	
- Policy pursued	38 – 39
- Results	38 – 39
- Principal risks and risk management	47 – 48
- KPIs	38 – 39
Anti-corruption and bribery	
- Policy pursued	38
- Results	38
- Principal risks and risk management	50
- KPIs	38
Diversity policy	
Supervisory Board and Executive Board	45