

## **The Code of Ethics**

Integrity and honesty constitute the basis of the continuance of the sustainable business success and outstanding reputation of Coca-Cola İçecek A.Ş. (“**CCI**” or the “**Company**”).

The Code of Ethics (the “**Code**”), which guides us in improving our high moral standards relating to honesty and integrity, both of which are of the essence, have been revised.

The Code guides our Company, managers and employees in relation to the responsibilities to comply within this framework.

Acting in line with the social responsibility principle, our Company complies with all applicable laws throughout its geography while conducting its operations, designates company procedures to be followed on a given issue, and ensures that its employees comply with the same.

Our Company is committed to ensure that our employees conduct their activities with integrity at all times.

All employees are expected to have strong understanding of the Code and to operate with high level of ethics and integrity as well as full compliance with laws and policies.

The Code is revised to ensure consistency in how employees conduct their activities within the company, and in their relations outside of the Company. It is not possible for the Code to cover all circumstances; the Code, therefore, may be amended so as to ensure the compliance with the local laws.

The Code consists of the main principles and procedures for handling matters related to ethics. The Code also provides available sources to be used by everyone.

Details and real life examples related to the main principles stated below can be found in the Code of Ethics Handbook.

“Guidelines for Handling Code of Ethics Matters” provides detailed information on the administration of the Code matters.

### **Main Principles of the Code of Ethics:**

#### **1. Act with Integrity and Honesty:**

- Be ethical: Do the right thing.
- Consider your actions, ask for guidance.
- Promote a culture of ethics and compliance.
- Raise your concerns in the event of any potential breach of the Code.
- Listen carefully and pay attention to people when they ask a question or raise a concern related to the Code. Ask for help when needed.

- Obtain written approval, if necessary, for such matters as the use of company assets for non-business related purposes and/or in case of certain conflicts of interest.
- It is your right to keep your identity confidential while using the Code Communication Channels.
- No retaliation (any adverse employment action including discrimination, degradation, suspension, loss of benefits, threat or harassment) may be directed against employees who have raised concerns about any problem honestly and in good faith.
- The Company values the assistance provided by the employees contributing to the solution of a problem. If a person against whom an investigation that will have a negative influence upon him/her has been initiated makes report after such investigation, such reports shall be considered as mitigating circumstances in his/her favor under the provisions of the Code of Ethics Handbook. This shall apply to those who report a case which is not known to anyone, or who report with the aim of contributing to the resolution of an ongoing investigation.

**2. Safeguard Business & Financial Records and Keep Them Accurate, Complete and Correct**

- Ensure that all business and financial records of the Company are accurate, correct and complete.
- Protect the Company assets and use them in common sense for non-business related matters, if necessary. Consult with the relevant Ethics Officer to understand whether written approval is required.
- Protect all non-public information owned by the Company, and, do not share them with people from outside of the Company.
- Do not use any Company information for your personal benefit. Comply with CCI policies and laws.
- Respect the information privacy of employees, business partners and consumers. Manage personal information responsibly and in accordance with all applicable privacy laws.

**3. Safeguard Interests of CCI and Avoid any Conflicts of Interest:**

- A conflict of interest arises when your personal activities or relationships interfere, or appear to interfere, with your ability to act in the best interest of the Company.
- Avoid outside investments that could affect, or appear to affect, your decision making on behalf of the Company.
- Do not accept gifts, meals or entertainment, or any other favor from customers or suppliers if doing so might prevent, or appear to prevent, you from making objective decisions in the best interest of the Company.

#### **4. Deal with Everyone We Encounter Fairly and In Accordance With Laws:**

- Treat all external parties fairly and lawfully.
- Take particular care when evaluating a third party who might interact with a government authority on behalf of the Company.
- No pecuniary or non-pecuniary interest may be offered to a government official.
- Bribes are prohibited.
- The Company is not involved in employees' affiliation with political processes.
- Business decisions must not be affected by personal political views.
- Comply with all applicable trade restrictions imposed by the Government of Turkey as well as other applicable laws that the Company must comply with.
- Comply with all competition law rules in the countries where we operate.
- Pay special attention while dealing with competitors and gathering information about competitors. Respect the non-public information of other companies.

#### **Procedural Rules & Available Sources:**

- Corporate Governance Committee of CCI ensures full implementation and enforcement of the Code.
- Implementation of the Code is under the responsibility of the Ethics & Compliance Officer and Local Ethics & Compliance Officers.
- All investigations concerning Code violations shall be handled by the Internal Audit Department.
- All decisions about Code violations shall be made by Ethics & Compliance Committee. Certain categories of decision may be delegated to the local management in accordance with the Guidelines for Handling Code of Ethics Matters.
- Alternative communication channels are available for consultation and raising concerns:
  - o **Your Managers**
  - o **Local Ethics and Compliance Officers**
  - o **Ethics and Compliance Officer**
  - o **CCI Ethics and Compliance Internet Site: [www.cciethicsline.com](http://www.cciethicsline.com)**
  - o **CCI Ethics Line +90-212-371 0732**
  - o **CCI Ethics Line E-Mail: [cci@ethicsline.com](mailto:cci@ethicsline.com)**
  - o **CokePort CCI Ethics and Compliance Page**

- CCI Ethics lines are operated by an independent third party to provide confidentiality of identity, if desired, while raising concerns and reporting a potential Code violation.

“Code of Ethics Handbook” and “Guidelines for Handling Code of Ethics Matters” are available for everyone for their further review and understanding of Code of Ethics at CCI’s website ([www.cci.com.tr](http://www.cci.com.tr)), Ethics and Compliance page on CokePort and CCI Ethics and Compliance Internet Site.

All CCI employees are expected to have solid understanding of the Code of Ethics and act accordingly.

Coca-Cola İçecek AS.

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