

 **Keurig  
Dr Pepper**  
CODE OF CONDUCT

# A MESSAGE FROM OUR CEO

KDP Team:

At Keurig Dr Pepper, everything we do is anchored in our purpose to Drink Well. Do Good., and we accomplish this by deeply embedding our ethics, integrity and values – **Team First, Deliver Big, Think Bold, Be Fearless and Fair** – into the way we do business. We consider the long-term effects of our decisions and the impact of those decisions on our company's goals and performance, our communities and the environment. It's up to all of us to live our values, always be truthful and treat each other with respect.

Our Code of Conduct illustrates how to integrate our purpose, vision and challenger culture into our daily work. It demonstrates our company's commitment to our stakeholders – including you, our team members – to be responsible corporate citizens and good business partners.

We are all accountable for reading, understanding and complying with our Code of Conduct. Together with individual responsibility and good judgment, it guides us in making the right decisions about how we work and what we do. Remember, if you see something that does not seem right, say something. You can seek help from your manager, the head of your business unit, Human Resources, Legal Department or any member of KDP's leadership team. You can also raise your concerns anonymously through the KDP Speaking Up ethics line. There is additional information on KDP's Speaking Up program in this Code of Conduct.

Thank you for your dedication to KDP and your commitment to upholding the standards set forth in our Code of Conduct. Join us as we go forward with excellence, focused on winning in the marketplace, operating our company in a principled manner and challenging each other to bring our very best to KDP every day.

Best regards,

Tim Cofer



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# INTRODUCTION

**Keurig Dr Pepper's Code of Conduct exists to help guide us to do the right thing at all times, providing a clear road map to act in a professional, ethical and legal manner in all our dealings.**

Our Code outlines the commitments we have made for ethical practices in all areas of our business:

## **A Safe and Ethical Workplace**

We strive to create a respectful, diverse and inclusive workplace that is free from discrimination and harassment.

## **Deal Fairly With Others**

We value and respect our customers, suppliers and competitors. In our dealings with them, we always act in an ethical and legal manner while striving to compete and win in our business.

## **Responsibility to Our Stakeholders**

We are committed to the utmost integrity in our accounting and financial reporting and the manner in which we engage with the investment community, while maintaining a steadfast focus on upholding good stewardship of company resources.

## **Our Brands, Consumers and Communities**

We are committed to ensuring that our products are made to high standards of quality and safety and that they are appropriately marketed to our consumers. We strive to help ensure that our actions leave a positive impact.



## Our responsibility to act ethically and with integrity

Doing the right thing starts with each of us, and we are responsible for:

- Understanding and complying with our Code and related policies
- Familiarizing ourselves with and following the laws and regulations that apply to our business and our job
- Acting with the highest standards of ethics and integrity
- Reporting violations and misconduct

Failure to comply may lead to disciplinary action, including potential termination for cause.

## Road map for making ethical decisions

We expect you to use good judgment and common sense in complying with the letter and spirit of our Code and our other policies and to avoid even the appearance of improper or unethical behavior. When an issue is not directly addressed, we can use the Code as a road map for making ethical decisions. In all cases, ask:

- Is this compliant with our policies and/or well within the spirit of our policies?
- What might be the impact of my action? Could it hurt the company's reputation or my professional reputation?
- Would I be comfortable telling my team or manager about my decision or seeing my actions or decision reported in the news media?

If there is any doubt, ask for help. See the FAQ and Resources section at the end of our Code for more information.

“At the heart of every successful team is the belief that we can count on each other to operate in a responsible manner, act in the best interest of the team and make appropriate decisions for ourselves and on behalf of the company.”



# SEE SOMETHING, SAY SOMETHING: SPEAKING UP!

## We value openness and honesty

### Reporting Concerns and Potential Violations

We have a duty to report a breach or a potential breach of our Code, laws or KDP policies. To assist us in investigating, we encourage you to provide all the information you are comfortable with providing. Our Speaking Up policy provides a way for you to report anonymously, if you choose, and without concern for retaliation. There are multiple ways to file a report and the options are available 24 hours a day, 365 days a year.

### Write to KDP at the following address:

Keurig Dr Pepper Inc.  
6425 Hall of Fame Lane  
Frisco, TX 75034  
Attn: Chief Legal Officer



### Submit online at:

[kdrp.ethicspoint.com](https://kdrp.ethicspoint.com) or scan the QR code for a mobile-optimized web experience.

### Report via telephone:

From the U.S. and Canada, dial 800.349.4248.

From outside of the U.S. and Canada, dial your country's AT&T Direct Access code, available from <https://www.business.att.com/collateral/access.html>.

Then, once prompted, dial 800.349.4248.

### Investigation

We will review and investigate reports promptly, thoroughly and fairly, taking appropriate action whenever necessary. You are expected to participate in an investigation when asked. KDP conducts investigations without regard to a suspected wrongdoer's length of service, position/title or relationship to the company. If you are not satisfied with our actions taken in response, you may report the matter to the Chairman of the Audit and Finance Committee of the Board of Directors at the address above.

### Confidentiality

Every reasonable effort will be made to maintain the confidentiality of information reported. An investigation will not be disclosed or discussed other than with those with a legitimate need to know. We reserve the right in our sole discretion to disclose any information obtained during an investigation to any third party, including any federal or state agency.

### Retaliation/Obstruction

KDP will not tolerate retaliation in any form against any person for reports made in good faith. Any retaliation or attempt to deter or obstruct an employee from providing such information or participating in an investigation will be treated as a serious disciplinary offense.

“A good-faith report means that you have provided all of the information you have and believe it to be true. We prohibit retaliation against anyone who makes a report in good faith.”

# PROMOTE A SAFE AND ETHICAL WORKPLACE

## Safety is everyone's responsibility at KDP

### Preserve a Safe Workplace

We promote health and safety in the workplace by following all health, safety and environmental rules and regulations that relate to our jobs. We must also familiarize ourselves with our company's policies and procedures that address safety protocols and environmental standards.

Because substance abuse limits our ability to do our work safely, it puts us all in jeopardy. We must never:

- work while under the influence of alcohol or illegal drugs
- misuse prescription drugs or over-the-counter medications
- use, possess, transfer or sell illegal drugs
- distribute or sell alcohol while on company premises, including parking lots

We are committed to working with you to maintain a work environment free from violence, threats or potential threats of violence. Acts of violence or threats of violence, including but not limited to the possession of a firearm or other weapons in the work environment, violation of restraining orders, fighting, verbal abuse, stalking or similar activity, are prohibited. Similarly, any conduct that creates an intimidating, hostile, offensive or threatening working environment through unwelcome words, actions or physical contact will not be tolerated.

We take the time and care necessary to do our jobs safely. We consistently promote safe work practices and avoid risk to our fellow employees, our communities and the environment. This means that employees should immediately report any unsafe conditions or activities to supervisors, Human Resources or the Speaking Up hotline. This includes:

- violations of safety laws, local safety rules or security procedures
- threats or acts of violence or vandalism against company property, employees or customers
- the presence of weapons or prohibited substances on company premises

All reports of violent incidents or incidents that could lead to violence will be taken seriously and will be dealt with discreetly and in an appropriate manner. Additional guidance can be found in KDP's Workplace Violence Policy and U.S. Drug and Alcohol-Free Workplace Policy: Not Applicable to Employees Governed by DOT Regulations.



# PROMOTE A SAFE AND ETHICAL WORKPLACE (CONT'D)

## Foster Respect, Diversity and Inclusion

Just as each of our products brings its own flavor to our product portfolio, each KDP employee brings their own unique set of experiences, perspectives and voice to our business. We know that when all these voices are welcomed and heard, we can achieve better outcomes. Consistent with our values, we expect that every employee will always assume good intent and aim to tackle issues, share opinions, listen and disagree in a respectful, fair and fearless way. When every voice is welcomed and heard, we will achieve great things together.

Having a workforce that represents the consumers and communities we serve is not just the right thing to do; it is essential to the success of our business. We are excited to build a future of possibilities we cannot yet imagine and know we can only achieve this vision when everyone has an equal opportunity to thrive. Inclusion is a daily practice of incremental change and bold moves in which every employee has a role to play. We are determined to uphold a culture of belonging where all employees feel physically and psychologically safe to be their best and full selves, a culture that sees and welcomes the participation of all people and benefits from the creativity, innovation and connection this brings.

KDP believes that each person brings their own unique qualities and deserves respect. Therefore, we are committed to diversity and inclusion. When we take action at KDP, we do so without regard to:

- sex, race or color
- national or ethnic origin
- ancestry, religion or age
- marital/civil union status
- gender identity or expression or transgender status
- physical or mental disability
- place of birth or pregnancy
- membership or application for membership in a uniformed service
- sexual orientation or genetic information
- or any other personal characteristic protected by law

Discrimination or harassment based on any protected characteristic is forbidden. This includes conduct that creates an intimidating, offensive or hostile environment. This conduct can take many forms, including physical actions, spoken or written comments and multimedia. Regardless of the form it takes, harassment negatively impacts individual work performance, team performance and our workplace as a whole and will not be tolerated at KDP.

More details can be found in KDP's Equal Employment Opportunity Statement and the Respectful Workplace and Non-Harassment Policy.



**We are committed to building and fostering a diverse team and creating a positive and inclusive workplace that is free from discrimination.**



# OUR RESPONSIBILITY TO DEAL FAIRLY WITH OTHERS

**We value and respect our customers, suppliers and competitors**

## **Comply With Competition and Antitrust Laws**

We strive to compete fairly and are committed to complying with antitrust laws, including those that relate to pricing, promotion, distribution, purchase and sale of our products, as well as our relationships with manufacturers, suppliers, distributors, customers and competitors. Violations of these laws may result in fines and imprisonment. Some activities may be illegal and should be avoided, such as agreements between competitors to set prices or allocate territories or customers. In order to avoid the appearance of impropriety, you should also generally avoid any discussion of prices, terms, distribution, production, customers or territories with a competitor.

Antitrust and competition laws may also restrict the tying of the purchase of one product with another, certain exclusive dealing arrangements, setting of resale prices and other activities. The laws and their application to individual circumstances are complex. As some of our bottlers are owned by brand owners, we must be aware of those relationships and ensure that our discussions and any confidential information we share are appropriate. Similarly, we must be aware of protecting confidential information as it regards our partners who also sell coffee.

Employees with responsibility for the sale or marketing of our products should familiarize themselves with relevant laws and our U.S. Antitrust Policy and always consult with the legal department with questions. KDP's U.S. Antitrust Policy contains further guidance on antitrust laws and additional discussion of proper behavior in dealing with competitors.

**While we always strive to compete vigorously, our dealings with our customers, suppliers, competitors and government authorities should always be carried out in an ethical and legal manner.**

# OUR RESPONSIBILITY TO DEAL FAIRLY WITH OTHERS (CONT'D)

## Prevent Money Laundering

We are committed to taking steps to prevent money laundering, which occurs when individuals or organizations filter “dirty” money from criminal activities through a series of transactions so the funds are “cleaned” to look like proceeds from legal activities.

U.S. and international laws prohibit financial transactions that involve the proceeds of illegal activities and that are designed to conceal the source, ownership or control of those proceeds. U.S. law also prohibits the movement of funds across a U.S. border with the intent to promote illegal activity, conceal proceeds from illegal activity or avoid a transaction reporting requirement.

When we are dealing with suppliers or others that KDP makes payments to, we must be aware of suspicious activities and look for red flags that may help us identify money laundering schemes. Examples of red flags include, but are not limited to, cases where:

- A supplier is reluctant to provide complete information about the nature and purpose of its business, prior banking relationships, names of its officers and directors or information on its business location
- A supplier’s background differs from that which would be expected based on their business activities
- A supplier requests to transact in cash
- A supplier wants to be paid to or from a third-party account that has no clear relationship to the supplier
- A supplier requests to process a transaction in a way that circumvents the normal procedures
- There are significant changes in volume or value of business

If there are any red flags, speak up and report the activity to your manager or the Chief Legal Officer.

## Prohibit Bribery

We conduct our business with integrity and strictly prohibit any sort of bribery, including by any person acting directly or indirectly on our behalf and including our domestic and foreign subsidiaries. Employees should be mindful of the appearance of impropriety and our policies on gifts and entertainment as explained below in “Avoid Conflicts of Interest.”

In any dealing with government officials, additional laws and policies apply. Various national and local laws make it a crime to bribe government officials. In addition, under U.S. law, it is illegal to give anything of value to a foreign official, whether directly from our employees or persons acting on our behalf. Violations can result in criminal and civil liability for you and the company. Even an offer, promise or authorization of a bribe or a nominal payment or gift may violate law.

KDP’s Bribery and Foreign Corrupt Practices Act Policy includes further explanation of the legal requirements and our strict rules, including on gifts and entertainment, with which all employees must comply in dealing with local and foreign government officials.

**We expect you always to use good judgment and common sense to avoid even the appearance of improper behavior.**

## OUR RESPONSIBILITY TO DEAL FAIRLY WITH OTHERS (CONT'D)

### Avoid Conflicts of Interest

We are accountable for ensuring that our personal interests do not impact our ability to make sound business decisions for KDP, whether the conflicts are related to relationships or outside activities and investments. Conflicts may arise when we have personal or family interests that may interfere with KDP or may affect our objectivity and effectiveness when we receive or give improper personal benefits or business courtesies. Do not:

- engage in any activity that creates a conflict of interest, or the appearance of one, between you and the company
- use KDP property, position or information for your personal gain
- compete with KDP

Given the potential for conflicts of interest and the inherent risks such relationships could pose to effective working relationship, you may not supervise a family member, and you must not have an intimate or similar close relationship with any person you supervise. Moreover, a family member of an officer or director may not be hired, regardless of position, without approval from both Human Resources and the Legal Department.

For these purposes, you are considered "supervising" an employee if:

- You have supervisory responsibility or effective control over any aspect of an employee's job
- You audit, review, or oversee any aspect of an employee's job
- An employee reports to you, directly or indirectly, within our organizational structure.

### Disclose Actual and Potential Conflicts

Having a conflict of interest is not automatically a violation of our Code. However, failing to disclose the conflict is a violation. KDP's Conflicts of Interest Policy provides guidance on disclosing and/or obtaining proper approvals for potential conflicts. It is always better to be on the safe side to avoid even the appearance of wrongdoing.

### Gifts and Entertainment

Regardless of the motive or actual influence on independent judgment, you may not accept or provide lavish gifts or entertainment, whether from or to an existing customer, supplier or anyone attempting to develop a business relationship with us, without the proper approvals. Modest gifts and reasonable entertainment are acceptable, but must not create an expectation or appearance of special treatment and should be appropriate and consistent with all our policies. We expect you to use good judgment and common sense and avoid even the appearance of improper behavior. More details and approval guidelines and procedures can be found in our Gifts and Entertainment Policy.

**No gift or entertainment should be accepted or given if it obligates or appears to obligate the recipient or if it might be perceived as an attempt to influence a business decision.**



# OUR RESPONSIBILITY TO OUR STAKEHOLDERS

## Promote sound accounting and financial reporting

We are committed to providing full, fair, accurate, timely and understandable disclosure of relevant information to investors and the Securities and Exchange Commission. We have clear legal obligations and it is important to remember that fraudulent or misleading reporting or improper transactions can result in civil or criminal penalties to the individuals involved and to the company. All transactions must be properly approved and accurately reflected in our books and records, accounting and financial reporting. Estimates and guidance on future performance, though subject to many uncertainties and risks, should be based on good-faith views at the time made. Employees should also report any error, deficiency or noncompliance with internal accounting controls to their manager or through another source as provided in the Resources section below.

Our responsibility to be accurate, honest and complete also applies to day-to-day recordkeeping, such as time clock entries and expense requests. It is never acceptable to take any part, no matter how small, in any activity that involves theft, fraud, embezzlement or misappropriation of property. Employees' participation in fraud occurs any time that they help conceal, alter, falsify or omit information in records, either for their benefit or at the direction of others.

We must work to prevent fraud and loss to our business. The following actions are strictly prohibited:

- Forgery, alteration or falsification of documents, records or transactions, including expense reports
- Off-the-record trading, accounts or transactions
- Fraud, regardless of amount, including deceptive or manipulative conduct or violation of corporate loyalty, trust or confidence, whether intentional or reckless
- Attempt to mislead, deceive, manipulate, misstate or engage in deliberate error, including any false or misleading representation or concealment of a material fact
- Reporting of false or misleading information in internal or external financial reports
- Theft, destruction, removal or inappropriate use of company property or information
- Receiving property, loans or gifts from the company, except under company service, award or benefit plans

We are committed to the utmost integrity in our accounting and financial reporting and the manner in which we engage with the investment community, while maintaining a steadfast focus on upholding good stewardship of company resources.



## OUR RESPONSIBILITY TO OUR STAKEHOLDERS (CONT'D)

### Promote Fair Disclosure to Investors

We must ensure fair disclosure to our investors. Applicable laws govern how and when we disclose material information to the public market and you must strictly comply with our obligations under law and our Disclosure Policy. Only the CEO, CFO and designated investor relations representatives are authorized to speak with members of the financial community. Internally, material nonpublic information should be controlled on a need-to-know basis. Formally approved news releases and SEC filings are the primary means of disclosing such information. If you believe such information has been inappropriately disclosed, notify the Legal Department immediately. KDP's Disclosure Policy contains further information on the requirements.

### Comply With Insider Trading Laws

Employees are prohibited from trading illegally in securities or providing insider tips to others. Insider trading laws are vigorously enforced and penalties can be severe, including million-dollar fines and multiyear jail terms. If you are aware of material nonpublic information relating to KDP or its securities, you may not directly (or indirectly through family or others):

- buy or sell KDP securities or otherwise take an action to take personal advantage
- provide the information to any outside party, including family and friends

In addition, certain employees, officers and directors may only trade during designated trading windows and must never trade when aware of material nonpublic information or when any other trading blackout is imposed. KDP's Insider Trading Policy includes further guidance, including examples of material nonpublic information; how transactions under stock plans are treated; additional prohibitions on speculating, short-selling and trading in companies with which we may do business; obligations if an employee leaves the company; and additional trading and reporting obligations for directors and executive officers.

### Avoid Prohibited Transactions (Related Persons)

We are accountable for ensuring that our personal interests do not impact our ability to make sound business decisions. In addition to the conflicts of interest issues applicable to all our employees detailed in this Code, all employees are required to be in compliance with additional prohibitions on loans and other transactions between the company and "related persons," including directors, officers and material shareholders. KDP's Related Person Transactions Policy provides further information.

**Only the CEO, CFO  
and designated  
investor relations  
representatives are  
authorized to speak  
with members of the  
financial community.**

## OUR RESPONSIBILITY TO OUR STAKEHOLDERS (CONT'D)

### At KDP, we believe privacy is part of everyone's job

#### Protect Confidential Information

You may become aware of confidential information, including company information about our business plans, transactions, finances, sales, products, employees or third parties with which we do business, including our partners. Everyone is responsible for taking reasonable steps to protect confidential information. Unauthorized or inappropriate disclosure or use of confidential information is prohibited.

- Do not use such information for personal gain
- Do not provide it to other parties, except for proper business purposes with proper confidentiality agreements

These confidentiality obligations continue after your work with KDP ends.

#### Privacy and Cybersecurity

At KDP, we are committed to protecting the personal information entrusted to us by our consumers, customers, employees and business partners. We take our responsibility seriously to collect, use and process personal information only for legitimate business purposes and protect our systems and preserve the confidentiality and integrity of personal information in our care from possible loss, misuse or disclosure.



**DATA PRIVACY:** KDP's Privacy Program is designed to help ensure that our collection, use and sharing of personal information is in compliance with applicable privacy laws and as reflected in our privacy notices and policies, reinforcing the trust and confidence individuals place in us every day. Individuals may exercise their privacy rights via our privacy portal, found on all company and brand websites.

We understand the importance of following our policies and protecting personal information that is entrusted to us, using it only in the way it is meant to be used and not sharing it with anyone inside or outside of the company in an unauthorized manner.

**CYBERSECURITY:** We strive to ensure the reliability, safety and security of our products and company infrastructure. Our security processes include following our security policies and standards, system upgrades, vulnerability testing and monitoring. We reinforce the importance of privacy and cybersecurity with annual and ongoing education and training programs, helping to ensure that we remain vigilant against the various and emerging threats that exist and stay informed on how to reduce the risk of cyberattacks or other security incidents.

We understand that information security needs evolve rapidly. We adapt to ongoing changes and regularly update our internal processes and controls. We protect our own information, as well as the information of others in our possession, against the threat of cyberattacks. KDP's Information Security and Acceptable Use policies include additional guidance.

“Our commitment to data privacy reinforces the trust and confidence that our customers, employees and partners put in us every day.”

## OUR RESPONSIBILITY TO OUR STAKEHOLDERS (CONT'D)

### Safeguard Our Company Resources and Information

We should be good stewards of company resources. Our use of company resources, such as spending company dollars and using company assets and IT systems, should always have proper business purposes and required approvals and be backed with proper documentation. Travel and expenses should be limited to those that are essential in completing business objectives. KDP expects you to use common sense and good judgment, including following the rules of reimbursement for business-related travel and expenses. Additional guidance is available in the Travel and Expense Policy.

### Use Our Company Assets and Information Security Systems Appropriately

We must use our computers (including laptops, smartphones and tablets) and network systems appropriately at all times. This means we must take care to compose all emails, text messages and other electronic communications in the same professional manner as our other written correspondence. Be aware that KDP maintains the right to access, review and monitor any information transmitted, received or stored using company-provided technologies and personal electronic devices used to perform work for the company. There is no expectation of privacy when using company resources or when using your personal device for company business. Remember our values when using these resources and never use them to transmit offensive, inappropriate, harassing or unprofessional messages.

### Abide By Political Contribution Laws

KDP encourages voluntary personal participation with the political process on the employee's own time and in a manner that is consistent with relevant laws and company guidelines. Employees should speak as individuals and avoid the appearance that they are speaking as our representative, unless authorized as described below in Speak With One Voice and Use Social Media Responsibly. Personal political donations will not be reimbursed, whether through an expense account, bonus or otherwise. Employees may not use company funds, facilities and other assets (including nominal contributions of our products) to support, directly or indirectly, any political candidates without advance written approval from the government affairs team and the Legal Department.

The government affairs team manages all company and political action committee contributions and matters of public policy. In certain states, KDP may make political contributions within specific limits and reporting requirements, such as through a state beverage association. However, the company may not make direct contributions or gifts of any kind, whether money, property, goods or services, to any political candidate, campaign committee or other organization in connection with any federal election. Our Political Contributions Policy provides further information.



# WE CARE FOR OUR BRANDS, CONSUMERS AND COMMUNITIES

**We are committed to ensuring that our products are made to high standards of quality and safety and are appropriately marketed to our consumers**

## **Produce Products Consumers Can Trust**

At KDP, quality and safety are integral to our values and we are committed to producing products that our consumers can trust. To that end, we employ a rigorous quality management process to ensure we produce high-quality products that meet our specifications and comply with regulatory requirements. Our process includes the review and monitoring of our own plants and production, as well as quality verification of our suppliers, co-packers and bottlers. We also actively listen and regularly respond to the quality expectations of our consumers.

## **Market Our Products Responsibly**

As a leader in hot and cold beverages, our products have been enjoyed by families for generations. We respect our consumers and appreciate the trust they have in our company and our products. To garner that trust, we market and advertise our products in a truthful manner in compliance with all applicable laws.

We also market our products in a manner appropriate for the intended audience. Our soft drinks, juices and juice drinks are loved by all ages and can be consumed as part of a balanced and active lifestyle. We encourage families to make the right choices for themselves by providing:

- clear calorie labels on the front of our products
- smaller portion sizes
- numerous regular, low-calorie and no-calorie options
- our nutrition and ingredient website

When it comes to children, we believe that parental involvement is the key to choosing how and where we promote our family of products, and we have developed a policy to help guide you about how and where we market our brands. Our Responsible Marketing Policy provides further information.

**We expect all of our personnel to be accountable to apply rigorous quality standards throughout our supply chain and business and report any product safety concerns immediately.**



## WE CARE FOR OUR BRANDS, CONSUMERS AND COMMUNITIES (CONT'D)

### Speak With One Voice and Use Social Media Responsibly

As a public company, we share news and information following all applicable regulations and our policies help ensure we speak with one voice in an approved and consistent manner. To help ensure this consistency, keep the following in mind:

- KDP has authorized a limited number of trained employees who may speak to the media on the company's behalf; no other employees may do so without prior approval from the Corporate Communications team.
- If you as an employee are contacted by the media, advise them that you are not an authorized spokesperson and refer them to the Corporate Communications team.

KDP's Media Policy and External Speaking Engagement Policy contain additional information.

KDP uses a wide variety of social media to listen, learn and engage with our stakeholders. However, we believe it is in our stakeholders' best interests that we speak with one voice about our company and that only designated, trained employees may make public statements on behalf of our company or brands.

KDP's Employee Social Media Policy provides more information on the requirements.

### Protect the Environment

Our commitment to delivering high-quality products goes hand in hand with our efforts to preserve and protect the natural resources we use to create them. We strive to use environmentally sound practices and meet or exceed the requirements of environmental laws, rules and regulations governing our business. We actively pursue operational and product improvements designed to reduce our environmental impact. If you know of a practice that does not comply with environmental laws or our policies, you have a duty to report it.



## WE CARE FOR OUR BRANDS, CONSUMERS AND COMMUNITIES (CONT'D)

### Source Responsibly and Respect Human Rights

We recognize that we are part of a global community and we respect human rights both at home and in our supply chains. In keeping with this commitment, we take measures to ensure that our products are grown or manufactured under conditions that comply with our responsible sourcing standards and demonstrate respect for the people who grow or make them. We also respect the rights of people living in communities around our facilities and in our supplier communities who could be indirectly affected by our operations. Our Supplier Code of Conduct and Human Rights Position Statement include further information.

### Give Back to Our Communities

KDP's commitment to creating meaningful social impact in the areas in which we live and work allows us to enrich communities and engage employees. Our Engage for Good campaign has previously raised donations for more than 750 nonprofit organizations around the world and runs throughout the year. Additionally, we collaborate with our Employee Resource Groups to support activations with specific causes and organizations tied to their mission. Our beverages, especially water, provide hydration and comfort to communities in need amid crises and natural disasters. We continue to donate beverages in the wake of natural disasters resulting from snowstorms, wildfires, floods and hurricanes.

In addition, we provide grants to KDP employees through our Employee Relief Fund. This fund, a 501(c)(3) nonprofit, provides financial assistance to KDP employees and their family members who experience a disaster or emergency hardship.

Our Corporate Responsibility Report is available at <https://www.KeurigDrPepper.com/en/our-company/corporate-responsibility>.



# FAQ AND RESOURCES

## Frequently Asked Questions

### TO WHOM DOES THIS CODE APPLY?

Our Code applies to all employees, officers and directors of KDP and its subsidiaries in all of our locations. We also expect our consultants, vendors, contractors and other third parties with whom we do business to abide by the portions of our Code that are applicable to our relationship. Note that in certain cases, the policies may apply to an employee's family members and other persons who are part of their household.

### DOES THIS CODE COVER ALL MY OBLIGATIONS?

In this Code, we provide guidance but cannot list all activities or behaviors that may be inappropriate or unethical. This guidance is not intended to cover all potential situations and the examples provided here do not limit the generality of the Code or other policies.

### DO OTHER POLICIES APPLY?

Yes. Our Code is a starting point for understanding your obligations. Other policies apply, some of which are referenced in this Code. These other related policies may be provided to you or are available on the Corporate Policy Portal.

### WHO REVIEWS AND APPROVES THE CODE?


The Board of Directors reviews and approves our Code of Conduct. The Audit and Finance Committee of the Board of Directors and the Legal Department monitor compliance with this Code and take appropriate actions to promote accountability and address misconduct. Please note that we reserve the right to amend or modify this Code or other referenced policies at any time.

### WHO MUST APPROVE A WAIVER?

If circumstances are unclear and an employee believes that a waiver of any provision of this Code is warranted, the employee must disclose all relevant facts and submit a request through the Legal Department. Waivers for employees, other than executive officers and the principal accounting officer or controller, may only be made by the Chief Legal Officer. Waivers for executive officers and the principal accounting officer or controller shall only be made by either the Audit and Finance Committee of the Board of Directors or the Board of Directors. Waivers for a board member shall be made only by the Board of Directors.

### WHO DO I ASK IF I HAVE A QUESTION?

If you have questions about how to interpret this Code, you may ask your manager, the head of your business unit, Human Resources, Legal Department or through our hotline reporting channels noted below. Please note that full compliance responsibility ultimately rests with you.

TOPIC/ISSUE	RESOURCE/CONTACT
Reporting Concerns or Potential Violations of the Code of Conduct 	Your manager, head of business unit, Legal Department or contact the Ethics Line:  <b>WRITE:</b> Keurig Dr Pepper Inc. 6425 Hall of Fame Lane Frisco, TX 75034 Attn: Chief Legal Officer  <b>VISIT:</b> <a href="http://kdrp.ethicspoint.com">kdrp.ethicspoint.com</a> or scan the QR code  <b>CALL: 800.349.4248</b> <small>International callers must dial your country's AT&amp;T Direct Access code first (find yours at <a href="https://www.business.att.com/collateral/access.html">https://www.business.att.com/collateral/access.html</a>). All calls are toll-free, confidential and handled by an independent third-party specialist.</small>
General Code of Conduct Questions	Your manager
Written Exception or Waiver From the Code of Conduct	Chief Legal Officer, the Audit and Finance Committee or the Board of Directors, depending on the requestor.
Conflict of Interest Questions	Your manager or HR Compliance
Gifts and Entertainment Questions	Your manager
Other Legal Questions	Legal department
Accounting and Finance Policy Questions	Your primary finance support team
HR Policy Questions	Your primary HR support team