

KEURIG DR PEPPER

BRAZILIAN COFFEE PURCHASING POLICY

STATEMENT OF POLICY

Keurig Dr Pepper, Inc., including its subsidiaries, (the “Company”) is committed to conducting business throughout the world ethically and with the utmost integrity. In light of the Company’s awareness of the Brazilian Ministry of Labor and Employment’s Dirty List (the “Dirty List”), which publishes the names of Brazilian estates found to be profiting from conditions of forced labor, the Company has created a Brazilian Coffee Purchasing Policy (the “Policy”). The Company expects all relevant employees, agents, representatives, Suppliers¹, and their upstream supply sources to become familiar with, and comply with, the Policy.

Our intention is to take advantage of credible data that is available in order to progress our Responsible Sourcing goals together with our Suppliers. It is NOT our intention to penalize Brazilian Suppliers unduly for the supply chain transparency that exists in Brazil and that is lacking in many other origins.

This Policy supports, and does not contradict or override, the Company’s existing KDP Supplier Code of Conduct, specifically the expectations for Suppliers related to Freely Chosen Employment.

PURPOSE

The purpose of this Policy is to outline and communicate the prohibitions against coffee purchasing from Brazilian estates that appear on the Dirty List, to explain the compliance and due diligence requirements related to all Brazilian coffee purchases, and to reinforce the Company’s commitment to conducting business ethically and with integrity.

SCOPE

This Policy applies to all purchases of Brazilian coffee made by the Company, including purchases made by its international operations and subsidiaries. It also applies to all Suppliers and their upstream sources which are part of the Company’s supply chains for Brazilian coffee.

CERTIFICATION OF DUE DILIGENCE

Suppliers of Brazilian coffee shall provide relevant traceability information regarding purchases through the Company’s standard certified/verified traceability or Farm ID traceability process. In addition to the Farm ID process, up to twice annually, Suppliers shall be responsible for cross-checking their upstream sources against the latest Dirty List to ensure that coffee purchased on behalf of the Company is not sourced from any Brazilian estates listed therein. The Company will provide Suppliers, via its online platform, the updated Dirty List as published by the Ministry of Labor and Employment.

Suppliers are responsible for obtaining all necessary information from their appropriate upstream supply sources (e.g. the cooperative, exporter, estate or group of farms) to complete and submit a signed Certification of Due Diligence against Transparency List within the online platform no later

¹ For the purposes of this Policy, the term ‘suppliers’ refers to direct vendors to the Company (or a “Tier 1” supplier).

than 30 days upon receipt of the updated Dirty List. Failure to submit the Certification of Due Diligence will result in the Company ceasing to award future contracts to the Supplier.

CONSEQUENCES OF A MATCH TO THE DIRTY LIST

If a Supplier's due diligence process, or an audit conducted by the Company, indicates a match to the Dirty List, the consequences are as follows:

- If the estate appeared on the Dirty List before the Supplier signed the contract, the Supplier's due diligence process should have uncovered and identified the match. This means that the Supplier either knowingly supplied coffee from the estate or failed to conduct proper due diligence.
- If the match is discovered before delivery of the coffee, the Company will refuse to accept the coffee and will make a case by case decision regarding whether to allow any further purchases from the Supplier. If discovered after delivery of the coffee, the Company will make the same case by case decision regarding any further purchases from the Supplier.
- If the estate appeared on the Dirty List after the Supplier signed the contract, but before the delivery of the coffee, the Company will refuse to accept the coffee and will require that the Supplier fulfill the contract from another source, investigate their supply base and support remediation of the issue with the estate.
- Finally, if the estate appeared on the Dirty List after the Supplier had signed the contract and after delivery of the coffee, the Company will continue to conduct business with the Supplier but will require it to investigate its supply base and use its best efforts to support remediation of the issue.

Policy Owner: Coffee Procurement

Department Sponsor: Cyrille Jannet

Effective: 7 May 2020