

Keurig Dr Pepper Conflict Minerals Policy

Keurig Dr Pepper (KDP) and its subsidiaries are committed to sourcing components and materials from companies that share our values regarding respect for human rights, ethics and environmental responsibility. Suppliers are expected to comply with all applicable local, country and international laws regarding material content for the materials supplied to KDP.

We support ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region,” which is situated in the eastern portion of the Democratic Republic of the Congo (“DRC”) and surrounding countries. The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”). The Dodd-Frank Act requires that all publicly traded companies subject to SEC rules report annually on the presence of “conflict minerals” in the products they manufacture or contract to manufacture, and demonstrate the proper level of due diligence in determining whether these minerals originated from the DRC or an adjoining country or from scrap or recycled sources.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold.

We support these requirements to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

KDP is committed and responsible to:

- Support the aims and objectives of the U.S. legislation on the disclosure of “conflict minerals”.
- Not knowingly procuring “conflict minerals” that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
- Ensure compliance with these requirements.

Our suppliers shall be committed and responsible to:

- Undertake reasonable due diligence with their supply chains to assure that “conflict minerals” are being sourced only from mines and smelters outside the “Conflict Region” or mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.
- Provide written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to KDP, originate from outside the “Conflict Region” or if they originate from within the “Conflict Region”, that the mines or smelters be certified as “conflict free” by an independent third party.
- Provide diligence requests to KDP in a timely manner.

The aim is to ensure that only “conflict free” materials and components are used in products that we procure. Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. We advocate supplier use of existing and internationally vetted resources such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

If we discover the use of these minerals produced in facilities that are considered to be “non-conflict free”, in any material, parts or components we procure, we will take appropriate actions to transition product to be “conflict free”.