



**Company Engagement Questions:**  
**KnowTheChain Food & Beverage benchmark**

**Name of company: The Coca-Cola Company**

**Name of respondent: Jennifer Ann Ragland**

**Position of respondent: International Government & Public Affairs Director**

**Respondent's contact information (email): jeragland@coca-cola.com**

*Note: For companies with vertically integrated supply chains, any reference to 'suppliers' in the following questions includes manufacturing and production sites owned by the company.*

**Documents**

1. Please share links to any policy statements, reports, or other documents that you would like to be taken into account in a review of your company's approach to managing forced labor risks in the supply chain.

*Note: You may be aware that the [Corporate Human Rights Benchmark \(CHRB\)](#) is analyzing companies' broader human rights policies and performance. Where the KnowTheChain benchmark indicators are related to [indicators of the CHRB](#), this is indicated under each engagement question.*

*We welcome that some companies have disclosed information on their human rights policies and practices for the [Corporate Human Rights Benchmark \(CHRB\)](#). Where companies have disclosed information on specific CHRB indicators, as well as any links available from the company website, these will be considered in the KnowTheChain analysis. Third party information and links to third parties' websites will not be considered.*

The foundation of our corporate commitment to respect human rights is grounded in two overarching policies that apply to our operations globally: our Human Rights Policy and our Supplier Guiding Principles. These policies provide a consistent approach to human and workplace rights, including forced labor, across our system and embed the expectation as an integral part of our culture, strategy and day-to-day operations. The Human Rights Policy and Supplier Guiding Principles are translated and shared on our [public website](#) as well as with company-owned operations and supplier partners.

As part of our sustainability efforts, we have developed human and workplace rights policies that we demand all of our suppliers and vendors abide. In order to meet the responsibility to respect human and workplace rights, we have in place policies and processes to address labor issues, including:

**Human Rights Policy**

Supplier Guiding Principles, which communicate our values and expectations of compliance with all applicable laws and emphasize the importance of responsible workplace practices that respect human rights. All suppliers to The Coca-Cola Company are required to meet our Supplier Guiding Principles.

We respect international human rights principles. In our workplaces and the communities in which we operate, we believe a serious commitment to human rights is fundamental to the way we conduct our business.

- **Our Approach to Human and Workplace Rights:** <http://www.coca-colacompany.com/our-company/human-workplace-rights>
- **Our Progress: Human and Workplace Rights:** <http://www.coca-colacompany.com/stories/our-progress-human-and-workplace-rights>
- **Human Rights Policy:** <http://www.coca-colacompany.com/our-company/human-rights-policy>
- **Human Rights Policy PDF:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/11/human-rights-policy-pdf-english.pdf>
- **Human Rights Policy Poster:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/2014/11/Human-Rights-Policy-Poster-English-us.pdf>
- **Human Rights Brochure for All Employees:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/human-rights-brochure-for-employees/TCCC-Human-Rights-Brochure-Employees-English.pdf>
- **Human Rights Brochure for Leaders:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/human-rights-brochure-for-leaders/TCCC-Human-Rights-Brochure-Leaders-English.pdf>
- **Human Rights Policy Manager's Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Coca-Cola's Agricultural Supply Chain Journey:** <http://www.coca-colacompany.com/stories/coca-colas-agricultural-supply-chain-journey>
- **Safety & Health:** <http://www.coca-colacompany.com/our-company/safety-health>

### **Commitment and governance**

Awareness and commitment

2. Has your company made a formal commitment (e.g. adopted a policy) to address human trafficking and forced labor? Please include a link to the commitment.

*Related to indicator A.1.2 of the CHRB*

In addition to the strict prohibition on forced labor and human trafficking outlined in our Human Rights Policy and Supplier Guiding Principles, we published a supplemental document articulating supporting policy requirements. Recognizing that migrant workers are particularly vulnerable to exploitation and human trafficking, we undertook a review of policies and due diligence activities with the aim of better

protecting such workers throughout our supply chain. As a result, we publically committed to three principles related to the recruitment and employment of migrant workers:

- 1) Employment terms are represented in a truthful, clear manner and in the language understood by workers prior to employment
- 2) Worker does not pay recruitment, placement or transportation fees (including transportation to and from host country)
- 3) Worker has access to personal identity documents

- **Human Rights Policy PDF:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/11/human-rights-policy-pdf-english.pdf>
- **Issue Guidance:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf> (p 11-12)

### Supply chain standards

3. Does your company have a supply chain standard that requires suppliers to uphold workers' fundamental rights and freedoms, including the elimination of forced labor? Please include a link to the standard, and provide information on how frequently the standard is updated.

#### *Related to indicator A.1.2 of the CHRB*

Our [Supplier Guiding Principles \(SGP\)](#) communicate our values and expectations of suppliers and emphasize the importance of responsible workplace practices, including the elimination of forced labor. The Supplier Guiding Principles are a part of all contractual agreements between The Coca-Cola Company and its direct and authorized suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the Supplier Guiding Principles. SGP was updated in 2012 and again in 2014 and is reviewed/updated as needed. We anticipate that our review of salient human rights will lead to further revisions in 2017.

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Supplier Requirements:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- **Supplier Diversity:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-diversity>
- **About Our Suppliers:** <http://www.coca-colacompany.com/our-company/suppliers/suppliers>
- **Supplier Code of Business Conduct:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-code-of-business-conduct>
- **Addressing Global Issues:** <http://www.coca-colacompany.com/our-company/addressing-global-issues>
- **Commitment Land Rights and Sugar:** <https://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/11/proposal-to-oxfam-on-land-tenure-and-sugar.pdf>
- **Human and Workplace Rights Issue Guidance:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>

- **Workplace Rights Program Implementation Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- **Hours of Work Improvement Guide:** [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2010/01/Hours\\_of\\_Work\\_Improvement\\_Guide\\_May2011\\_external.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2010/01/Hours_of_Work_Improvement_Guide_May2011_external.pdf)
- **Human Rights Due Diligence Checklist - Background and Guidance:** <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>
- **Human Rights Due Diligence Checklist for Plant Siting:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/plant-siting-due-diligence-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Micro-Distribution Centers:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/mdc-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Pre-sourcing Design:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/pre-sourcing-human-rights-checklist.9.13.pdf>
- **Human Rights Due Diligence Checklist for Child Labor in Agriculture:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>
- **Human Rights Due Diligence Checklist for Non-trademark Activation:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/non-trademark-activation-due-diligence-checklist.pdf>

## Management

4. Who within your company is responsible for the implementation of your company's supply chain policies and standards relevant to human trafficking and forced labor? Please indicate the committee, team or officer, and describe the scope of their responsibility and how they interact with other internal teams, groups or departments.

### *Related to indicator B.1.1 of the CHRB*

Global Workplace Rights is responsible for policy development and oversight. Policy implementation is owned by the appropriate relationship owner. The relationship owner ensures our requirements are communicated to facilities, contracted into agreements, checked through audits and compliance is achieved. Quarterly scorecard metrics at the regional level track implementation and compliance performance. The Global Workplace Rights is part of the Human Resources function and reports semi-annually to The Coca-Cola Company Board of Director's Public Issues and Diversity Review Committee.

- **2013/2014 Sustainability Report:** <http://assets.coca-colacompany.com/77/4c/2a44a5234a3ca65d449d174a0ded/2013-2014-coca-cola-sustainability-report-pdf.pdf> (Please refer to the Human and Workplace Rights section -starting page 27)
- **Public Issues and Diversity Review Committee Charter:** <http://www.coca-colacompany.com/investors/public-issues-and-diversity-review-committee-charter>
- **2014/2015 Sustainability Report:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/2014-2015-sustainability-report-gwr-pages-20-26.pdf> (Please refer to pages 23 and 24)
- **Brent Wilton: How Respecting Human Rights Protects Our Brands:** <http://www.coca-colacompany.com/stories/brent-wilton-how-respecting-human-rights-protects-our-brands/>
- **What Respect for Human Rights Means to Me: A Q&A with Coke's Brent Wilton:** <http://www.coca-colacompany.com/stories/business/2015/what-respect-for-human-rights-means-to-me--a-q-a-with-cokes-bren>

## Training

5. Does your company conduct training programs for internal decision-makers and suppliers' management teams on risks, policies and standards related to human trafficking and forced labor (this may include training on elements such as passport retention, payment of wages, and vulnerable groups such as migrant workers)? Please describe.

*Related to indicator B.1.5 (internal training) and B.1.7 (training of suppliers) of the CHRB*

Each year we train thousands of Company associates on our Human Rights Policy, which includes reference to the prohibition on forced labor. This training has now been incorporated as a standard training module for all employees.

- **2014/2015 Sustainability Report:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/2014-2015-sustainability-report-gwr-pages-20-26.pdf> (Please refer to report starting page 22)
- **About Our Suppliers:** <http://www.coca-colacompany.com/our-company/suppliers/suppliers>

## Stakeholder engagement

6. In the last three years, has your company engaged on human trafficking and forced labor, especially as it relates to the supply chain a) with local stakeholders such as NGOs, trade unions or policy makers or b) in multi-stakeholder initiatives? Please describe with whom your company has engaged, the purpose of the engagement and how it relates to forced labor and human trafficking in the supply chain, and your company's role and level of engagement.

*Related to indicator A.1.4 of the CHRB*

The Company was one of five companies that launched a new collaboration, the Leadership Group for Responsible Recruitment, focused on promoting ethical recruitment and combating the exploitation of migrant workers in global supply chains across industries.

<http://www.ihrb.org/news-events/news-events/the-leadership-group-responsible-recruitment/>

Global Workplace Rights Director, Brent Wilton, sits on the Social Sustainability Committee of the Consumer Goods Forum (CGF). As work stream co-lead, we help to scope and promote the implementation of the Forced Labor Resolution of the CGF.

- **SSC:** <http://www.theconsumergoodsforum.com/strategic-focus/social-sustainability/social-sustainability-committee>
- **Forced Labor Resolution:** <http://www.theconsumergoodsforum.com/strategic-focus/social-sustainability/our-social-sustainability-work>
- **Engaging Stakeholders Webpage:** <http://www.coca-colacompany.com/our-company/stakeholder-engagement/>
- **Joint Statement of The Coca-Cola Company and the International Union of Foodworkers:** [http://assets.coca-colacompany.com/e9/c2/9e3041dc4a3ea1af4ca8dcebe57b/global\\_union\\_relations.pdf](http://assets.coca-colacompany.com/e9/c2/9e3041dc4a3ea1af4ca8dcebe57b/global_union_relations.pdf)
- **Addressing Global Issues:** <http://www.coca-colacompany.com/our-company/addressing-global-issues>

Agendas from the conferences hosted by TCCC to engage business on Human Rights issues

- [Demonstrating Respect for Human Rights in Business \(2015\)](#)
- [Integrating Respect for Human Rights in Business \(2014\)](#)
- [Addressing the Hard Issues: Myanmar, Human Trafficking, Conflict Minerals, Supply Chain, Guiding Principles Best Practice \(2013\)](#)
  
- **Human Trafficking: The Global Issue in Your Backyard:** <http://www.coca-colacompany.com/stories/human-trafficking-the-global-issue-in-your-backyard>
- **On the Road to Sustainable Sugar in Brazil:** <http://www.coca-colacompany.com/coca-cola-unbottled/on-the-road-to-sustainable-sugar-in-brazil>
- **Building a Framework for Action: Progress on Coca-Cola's Country Studies:** <http://www.coca-colacompany.com/coca-cola-unbottled/building-a-framework-for-action-progress-on-coca-colas-country-studies>
- **On the Road to Sustainable Sugar in Brazil:** <http://www.coca-colacompany.com/coca-cola-unbottled/on-the-road-to-sustainable-sugar-in-brazil>
- **Coca-Cola's Agricultural Supply Chain Journey:** <http://www.coca-colacompany.com/stories/coca-colas-agricultural-supply-chain-journey>
- **Around the World:** <http://www.coca-colacompany.com/stories/around-the-world>
- **Leading through Change: Child Labor, Forced Labor and Land Rights:** <http://www.coca-colacompany.com/coca-cola-unbottled/leading-through-change-child-labor-forced-labor-and-land-rights>
- **Progress on Country Studies to Identify and Address Child Labor, Forced Labor and Land Rights Issues:** <http://www.coca-colacompany.com/coca-cola-unbottled/sustainability/2015/building-a-framework-for-action-progress-on-coca-colas-country-studies/>
  
- Land Rights Country Study – Brazil: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/TCCC-Brazil-Report.pdf>
- Land Rights Country Study – Colombia: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/colombia-sugar-industry-situational-analysis.pdf>

- Land Rights Country Study – Guatemala: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/review-on-child-and-forced-labor-and-land-rights-in-guatemalas-sugar-industry.pdf>
- Land Rights Country Study – El Salvador: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_ElSalvadorTCCCReport\\_FNL4.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_ElSalvadorTCCCReport_FNL4.pdf)
- Land Rights Country Study – Honduras: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_HondurasTCCCReport\\_FNL3.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_HondurasTCCCReport_FNL3.pdf)

## **Traceability and risk assessment**

### Traceability

7. Please describe your company's supply chain tracing processes.

Does your company publicly disclose a) the names and locations of first-tier suppliers, and b) some information on suppliers beyond the first tier? If yes, please provide a URL.

*Related to indicator D.1.3 of the CHRB*

As part of The Coca-Cola Company's commitment to Oxfam on Land Rights and Sugar, we will disclose within three years all sourcing countries for cane sugar and publish the names of all of our direct cane sugar suppliers. This will take place before the end of 2016. Please refer to the following links.

- **The Coca-Cola Company Commitment Land Rights and Sugar:** <https://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/11/proposal-to-oxfam-on-land-tenure-and-sugar.pdf> (Please refer to commitment in 2<sup>nd</sup> page)
- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>
- **Sustainable Agricultural Guiding Principles (June 2013):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf>

Additional Requirements for Specific Ingredients:

- **Coffee:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFEE.pdf>
- **Tea:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>

### Risk assessment

8. Please describe your companies' risk assessment processes. Please include specific examples of when your company has conducted forced labor risk or impact assessments focused on a particular commodity, region or group (e.g. migrant workers in a specific context), as well as the forced labor risks identified through these risk assessment processes (e.g. high risk commodities or high risk sourcing countries).

For examples of commodities where forced labor risks have been identified - such as tomatoes from Italy, rice from India or strawberries from the United States - see Verite (2016) – [“Strengthening protections Against Trafficking in Persons in Federal and Corporate Supply Chains Research on Risk in 43 Commodities Worldwide”](#).

Related to indicator B.2.1 of the CHRB

- Progress on Country Studies to Identify and Address Child Labor, Forced Labor and Land Rights Issues: <http://www.coca-colacompany.com/coca-cola-unbottled/sustainability/2015/building-a-framework-for-action-progress-on-coca-colas-country-studies/>
- Land Rights Country Study – Brazil: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/TCCC-Brazil-Report.pdf>
- Land Rights Country Study – Colombia: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/colombia-sugar-industry-situational-analysis.pdf>
- Land Rights Country Study – Guatemala: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/review-on-child-and-forced-labor-and-land-rights-in-guatemalas-sugar-industry.pdf>
- Land Rights Country Study – El Salvador: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_ElSalvadorTCCCReport\\_FNL4.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_ElSalvadorTCCCReport_FNL4.pdf)
- Land Rights Country Study – Honduras: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_HondurasTCCCReport\\_FNL3.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_HondurasTCCCReport_FNL3.pdf)
  
- Human Rights Due Diligence Checklist for Migrant Works: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- Human Rights Due Diligence Checklist for Contract Labor: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>
- The Coca-Cola Company Responsible Investment in Myanmar Report: <http://photos.state.gov/libraries/burma/895/pdf/TCCCStateDepartmentResponsibleInvestment%20in%20MyanmarReport121213.pdf>
- Supplier Guiding Principles: <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- Workplace Rights Program Implementation Guide: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- Supplier Requirements: <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- Human and Workplace Rights Issue Guidance: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- Human Rights Due Diligence Checklist - Background and Guidance: <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>



- **Human Rights Due Diligence Checklist for Plant Siting:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/plant-siting-due-diligence-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Micro-Distribution Centers:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/mdc-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Pre-sourcing Design:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/pre-sourcing-human-rights-checklist.9.13.pdf>
- **Human Rights Due Diligence Checklist for Child Labor in Agriculture:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/child-labor-rights-checklist.pdf>
- **Human Rights Due Diligence Checklist for Non-trademark Activation:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/non-trademark-activation-due-diligence-checklist.pdf>

## **Purchasing practices**

### Purchasing practices

9. Does your company make an effort to avoid purchasing practices that increase the risk of human trafficking and forced labor in the supply chain (e.g. short-term contracts, excessive downward pressure on pricing, sudden changes of workload?) Please elaborate.

*Related to indicator D.1.2 of the CHRB*

- The consistent product line and local business model of The Coca-Cola Company helps alleviate some risks associated with forced labor. Because ingredients do not fluctuate dramatically and product lines are consistent over time the Company is able to pursue longer term relationships with suppliers. Furthermore the business is local in nature – often we source, produce and sell locally – thereby reducing the export driven model which can put excessive pressure on pricing. As an example of our local presence, unit case volume outside the United States represented 81 percent of the Company’s worldwide unit case volume for 2015. (Source: **The Coca-Cola Company 10-k (February 2016)**: <http://ir.thecoca-colacompany.com/phoenix.zhtml?c=94566&p=irol-SECText&TEXT=aHR0cDovL2FwaS50ZW5rd2l6YXJkLmNvbS9maWxpbnmcueG1sP2lwYWdlPTwNzcwODk0JkRTRVE9MCZTRVE9MCZTUURFU0M9U0VDVEIPTI9FTIRJkUmc3Vic2lkPTU3> (Refer to page 5)
- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>

- **Sustainable Agricultural Guiding Principles (June 2013):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf>

Additional Requirements for Specific Ingredients:

- **Coffee:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFEE.pdf>
- **Tea:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>

Supplier selection

10. Does your company assess risks of forced labor at potential suppliers prior to entering into contracts with them (this may include aspects such as passport retention and payment of wages)? Please describe.

*Related to indicator B.1.7 of the CHRB*

Suppliers are required to complete a SGP audit as part of the authorization process which includes a review of forced labor and human trafficking indicators.

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Supplier Requirements:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- **Addressing Global Issues:** <http://www.coca-colacompany.com/our-company/addressing-global-issues>
- **Human Rights Due Diligence Checklist - Background and Guidance:** <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>

11. How does your company take into consideration the capacity of suppliers to meet fluctuating demands (to reduce the risk of undeclared subcontracting)?

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Supplier Requirements:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>

- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>

12. Does your company integrate its supply chain standards addressing forced labor and human trafficking into supplier contracts?

*Related to indicator B.1.4.b of the CHRB*

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Supplier Requirements:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- **Supplier Diversity:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-diversity>
- **About Our Suppliers:** <http://www.coca-colacompany.com/our-company/suppliers/suppliers>

Cascading standards

13. Does your company have a process to cascade standards on forced labor down the supply chain (e.g. requiring first-tier suppliers to ensure that their own suppliers implement standards that are in line with the company's standards)? Please describe.

*Related to indicator A.1.2 of the CHRB*

- **Purchase Order Terms and Conditions for Coca-Cola Refreshments USA, Inc:** [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2012/11/ccr\\_po\\_t-c.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2012/11/ccr_po_t-c.pdf)
- **2013/2014 Sustainability Report:** <http://assets.coca-colacompany.com/77/4c/2a44a5234a3ca65d449d174a0ded/2013-2014-coca-cola-sustainability-report-pdf.pdf> (Please refer to the **Pass it Back** program page 31)
- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>
- **Sustainable Agricultural Guiding Principles (June 2013):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf>

Additional Requirements for Specific Ingredients:

- **Coffee:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFEE.pdf>
- **Tea:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>

## Recruitment

Recruitment approach

14. Please describe your company's recruitment approach, including a) whether your company requires recruitment agencies in its supply chain to uphold workers' rights (this may include aspects such as written contracts, access to passports, and regular payment of wages), b) whether it has a policy on direct employment (i.e. a policy prohibiting suppliers in its supply chain from using recruitment agencies), and c) whether it requires suppliers to disclose to the company the recruiters that they use.

*Related to indicator D.1.5.b of the CHRB*

The Issue guidance articulates our recruitment policy and the SGP audit process reviews compliance to these requirements.

- **Issue Guidance:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Supplier Requirements:** <http://www.coca-colacompany.com/our-company/suppliers/supplier-requirements/>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>

## Recruitment fees

15. Please describe your company's approach to recruitment fees in the supply chain, including whether your company requires that no fees be charged to supply chain workers during recruitment processes, and whether and how your company ensures that fees paid by workers are reimbursed.

*Related to indicator D.1.5.b of the CHRB*

- **Issue Guidance:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- **Implementation Guide:** <http://www.cocacolacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf> (P-24)

- **2014/2015 Sustainability Report:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/2014-2015-sustainability-report-gwr-pages-20-26.pdf>
- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Human Rights Due Diligence Checklist for Migrant Works:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/migrant-worker-human-rights-checklist.8.13.pdf>
- **Human Rights Due Diligence Checklist for Contract Labor:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/02/contract-labor-human-rights-checklist.8.13.pdf>

Recruitment audits:

16. Does your company audit recruiters used in its supply chain, to assess risks of forced labor and human trafficking, and/or require suppliers to audit their recruiters?

All contract labor agencies with full-time employees on-site are included in-scope for audits. They are sampled separately, records are reviewed and workers interviewed.

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>
- **Addressing Global Issues:** <http://www.coca-colacompany.com/our-company/addressing-global-issues>
- **Human Rights Due Diligence Checklist - Background and Guidance:** <http://coke-journey.s3.amazonaws.com/ae/0b/a56c2d2646f88a09b749da959d5e/human-rights-self-assessment-checklists.10.2014.pdf>

## **Worker voice**

Communication of policies to workers

17. Please describe how your company communicates its human trafficking and forced labor related policies and standards to workers in its supply chain, and whether your company makes its policies and standards available in the languages of suppliers' workers (including migrant workers).

*Related to indicator B.1.4.b of the CHRB*

- **Human Rights Policy:** <http://www.coca-colacompany.com/our-company/human-rights-policy>

Human Rights Policy PDF, posters, brochures for all employees and brochures for leaders are available in the following languages: Arabic, Burmese, Chinese, Chinese (Simplified), English, French (Canada), French (France), German, Italian, Japanese, Portuguese (Brazil), Portuguese (Portugal), Russian, Spanish, Thai, Turkish, and Vietnamese.

- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>

Available in the following languages: Arabic, Burmese, Chinese, English, French, German, Italian, Japanese, Portuguese, Russian, Spanish, and Turkish.

Implementation guides are available in the following languages: Arabic, Chinese, English, French, German, Japanese, Portuguese, Russian, and Spanish.

- **Building a Framework for Action: Progress on Coca-Cola's Country Studies:** <http://www.coca-colacompany.com/coca-cola-unbottled/building-a-framework-for-action-progress-on-coca-colas-country-studies>
- **Growing and Learning in Myanmar:** <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>

Worker voice

18. Please describe how your company engages with workers in its supply chain on labor related issues and rights outside of the context of the factories/farms in which they work? (Whether directly or in partnership with stakeholders).

[Example available here](#)

*Related to indicator B.1.8 of the CHRB*

- **The Coca-Cola Company Commitment Land Rights and Sugar:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/11/proposal-to-oxfam-on-land-tenure-and-sugar.pdf>
- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>
- **Sustainable Agricultural Guiding Principles (June 2013):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf>

Additional Requirements for Specific Ingredients:

- **Coffee:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFEE.pdf>
- **Tea:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>
- **Progress on Country Studies to Identify and Address Child Labor, Forced Labor and Land Rights Issues:** <http://www.coca-colacompany.com/coca-cola-unbottled/sustainability/2015/building-a-framework-for-action-progress-on-coca-colas-country-studies/>
- Land Rights Country Study – Brazil: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/TCCC-Brazil-Report.pdf>
- Land Rights Country Study – Colombia: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/colombia-sugar-industry-situational-analysis.pdf>

- Land Rights Country Study – Guatemala: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/review-on-child-and-forced-labor-and-land-rights-in-guatemalas-sugar-industry.pdf>
- Land Rights Country Study – El Salvador: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_ElSalvadorTCCCReport\\_FNL4.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_ElSalvadorTCCCReport_FNL4.pdf)
- Land Rights Country Study – Honduras: [http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL\\_HondurasTCCCReport\\_FNL3.pdf](http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/UL_HondurasTCCCReport_FNL3.pdf)

## Worker empowerment

19. Please explain how your company encourages its suppliers to ensure workplace environments where workers are able to organize, including through alternative forms of organizing, where there are regulatory constraints on freedom of association.

*Related to indicator D.1.6.b of the CHRB*

For additional information on worker empowerment, see context in “[Responding to Challenges of Freedom of Association](#)” chapter of Ethical Trading Initiative’s practical guide on “[Freedom of Association in Company Supply Chains](#)”, and related company example on page 35

- **Human Rights Policy Manager’s Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- **The Coca-Cola Company Commitment Land Rights and Sugar:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/11/proposal-to-oxfam-on-land-tenure-and-sugar.pdf>
- **Sustainable Agriculture Guiding Principles (SAGP):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2013/07/sustainable-agricultural-guiding-principles.pdf>
- **Sustainable Agricultural Guiding Principles (June 2013):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/SAGP-2013.pdf>

## Additional Requirements for Specific Ingredients:

- **Coffee:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/COFFEE.pdf>
- **Tea:** Code of Conduct regarding supply of sustainable agricultural products from Supplier to TCCC: <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/sagp/TEA.pdf>
- **Growing and Learning in Myanmar:** <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>

## Grievance mechanism

20. Please describe your company's grievance mechanism, and clearly indicate whether it is available to workers in the supply chain, and how it is communicated to workers in the supply

chain. Please also note whether you require your suppliers to establish a grievance mechanism, and to convey the same expectation to their suppliers.

*Related to indicator C.1 and C.5 of the CHRB*

An operational level grievance mechanism is a requirement checked as part of the SGP audit. An overview of a Grievance Mechanism is provided in the *Workplace Rights Implementation Guide*. Access points directly to The Coca-Cola Company include Journey website comments, Facebook and directly via email to [humanrights@coca-cola.com](mailto:humanrights@coca-cola.com).

- **Human Rights Policy Manager's Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>
- **Growing and Learning in Myanmar:** <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>
- **Workplace Rights Implementation Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- **Human and Workplace Rights Issue Guidance:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2014/02/issuance-guidance.pdf>
- **Supplier Guiding Principles:** <http://www.coca-colacompany.com/our-company/supplier-guiding-principles>

Available in the following languages: Arabic, Burmese, Chinese, English, French, German, Italian, Japanese, Portuguese, Russian, Spanish, and Turkish.

Implementation guides are available in the following languages: Arabic, Chinese, English, French, German, Japanese, Portuguese, Russian, and Spanish.

- **Workplace Rights Program Implementation Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>



## Monitoring

### Auditing process

21. Please describe your company's supplier auditing process including whether the process includes a) scheduled and non-scheduled visits, b) a review of relevant documents (documents may include wage slips, information on labor recruiters, contracts, etc.), and c) interviews with workers.

For further details on document reviews see Verite – [Fair Hiring Toolkit. Conducting a Review of Documentation.](#)

Related to indicator B.1.6 of the CHRB

- **Implementation Guide (p 13-15):** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>

While we reserve the right to conduct unannounced audits, our audits are generally scheduled in collaboration with our supplier partners.

- **Our Progress: Human and Workplace Rights:** <http://www.coca-colacompany.com/stories/our-progress-human-and-workplace-rights>
- **Human Rights Policy Manager's Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>

### Audit disclosure

22. Does your company disclose

- a) the percentage of suppliers audited annually
- b) the percentage of unannounced audits
- c) information on who carried out the audits (this may include further information on the expertise of auditors such as relevant certifications, in cases where third-party audits are used, the names of the auditors, and in cases where internal auditors are used, details on department/team/group within which the auditor(s) sits), and
- d) a summary of findings, including details of any violations revealed?

Please provide a URL with the relevant information.

Related to indicator B.1.6 of the CHRB

- **Audit firms listed in the Mutual Recognition section on P11:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- **2013/2014 Sustainability Report:** <http://assets.coca-colacompany.com/77/4c/2a44a5234a3ca65d449d174a0ded/2013-2014-coca-cola-sustainability-report-pdf.pdf> (Please refer to page 30)
- **2014/2015 Sustainability Report:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/2014-2015-sustainability-report-gwr-pages-20-26.pdf> (Page 23 and 24)

## Remedy

### Corrective action plans

23. Does your company have a process for creating corrective action plans when violations are discovered through an auditing process? Please describe this process and the elements of a corrective action plan.

*Related to indicator B.1.6 of the CHRB*

- **Workplace Rights Implementation Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
- **Human Rights Policy Manager's Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/2015/08/human-rights-policy-managers-guide-2015.pdf>

## Remedy

24. Does your company have a process to provide remedy to workers in its supply chain in cases where violations are discovered, including for responding to instances of forced labor and human trafficking? If yes, please provide examples of outcomes.

*Related to indicator C.7 of the CHRB*

- **Workplace Rights Implementation Guide:** <http://www.coca-colacompany.com/content/dam/journey/us/en/private/fileassets/pdf/human-and-workplace-rights/spg/Workplace-Rights-Implementation-Guide-ENG.pdf>
  - **Growing and Learning in Myanmar:** <http://www.coca-colacompany.com/coca-cola-unbottled/growing-and-learning-in-myanmar>
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