



Supplier Code of Conduct

Updated: April 10, 2018

Purpose and Scope

At Dr Pepper Snapple Group (DPS), we are accountable to our stakeholders for acting with integrity, openness and responsibility, and for obeying the laws and regulations of the countries where we do business. This Supplier Code of Conduct (**Supplier Code**) extends that accountability to suppliers with whom DPS does business and outlines our expectations of our supplier partners to act in a professional, ethical, and legal manner in all of their dealings. DPS policies are referenced throughout this Supplier Code. Those DPS policies are accessible via the links set forth in this policy.

Requirements for Suppliers

1. **Comply with all applicable laws.**
 - a. Comply with all applicable laws in the jurisdictions in which you provide goods or services to DPS and in which you are located and conduct business.
 - b. Comply with all applicable antitrust laws and all other laws regarding fair business conduct in the jurisdictions in which you do business or provide goods or services to us.
 - c. Comply with domestic and foreign bribery laws, including the Foreign Corrupt Practices Act. See the **DPS Bribery and Foreign Corrupt Practices Act Policy at the following link:** [www.drpeppersnapplegroup.com/files/Bribery and FCPA Policy.pdf](http://www.drpeppersnapplegroup.com/files/Bribery_and_FCPA_Policy.pdf) for DPS requirements in this regard.
2. **Avoid conflicts of interest with respect to DPS and its employees.** Do not provide any "significant" gifts or entertainment to DPS employees and directors. Significant gifts are those over \$300 in value, and significant entertainment is that which is over and above what could be considered reasonable and customary under the circumstances of the relationship. Subject to the foregoing, any reasonable gifts and entertainment you provide to any DPS employee(s)/director(s) must not be provided to such employee(s)/director(s) to influence business decisions, compromise independent judgment, or with the expectation that you will be rewarded in any way for the gift and/or entertainment.
3. **Maintain books and business records in accordance with applicable laws and regulations.** Ensure that you perform all business and commercial dealings with transparency and accurately record them in your books and records.
4. **Do not use or disclose DPS' confidential information without appropriate authorization from DPS.** Do not use such information for your own purposes or gain and take reasonable steps to protect the information.

5. **Maintain fair employment practices that respect and enforce human rights and comply with local laws in ensuring the following:**
- a. Employment is freely chosen. There is no forced, bonded, or involuntary prison labor. You prohibit mental and physical coercion, slavery and human trafficking and comply with all applicable laws related thereto, including, if applicable, the California Transparency in Supply Chains Act.
 - b. You respect freedom of association and the right to collective bargaining. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively, all in accordance with applicable laws.
 - c. You maintain safe and hygienic working conditions. You take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 - d. The minimum age of your workers is consistent with applicable laws and regulations for the type of labor and working conditions in your facilities.
 - e. Wages and benefits that you pay for a standard working week meet, at a minimum, applicable legal standards and industry benchmark standards.
 - f. Working hours comply with applicable laws.
 - g. You provide regular employment. Work performed is on the basis of a recognized employment relationship established through applicable law and practice.

6. **Do not allow discrimination or harassment.**

- a. You do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on sex, race, color, national origin, ancestry, religion, creed, age, marital status, gender, gender identity or expression, disability, medical condition, covered veteran or military status, sexual orientation, genetic information, or any other status protected under federal, state or local law.
- b. You do not allow harsh or inhumane treatment. You prohibit physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

See the **DPS Equal Employment Opportunity and Non-Harassment Policy at the following link:** www.drpeppersnapplegroup.com/files/EEO_Non_Harassment_Policy.pdf for more detailed guidance.

7. **Do not source materials that are comprised of or associated with conflict minerals.** As defined in Rule 13p-1 under the Securities Exchange Act, which is commonly referred to as the Conflict Minerals Rule, conflict minerals consist of: gold and cassiterite, columbite-tantalite (also known as coltan), wolframite and the three specified derivatives tin, tantalum and tungsten. To the extent that you provide DPS with any goods or materials that are made with conflict minerals, you will notify DPS in writing and otherwise fulfill your legal reporting obligations.
8. **Use environmentally sound practices and meet or exceed laws, rules, and regulations governing your business.** Actively pursue operational improvements designed to improve environmental performance and reduce environmental impact. If you are an agricultural supplier, actively pursue the sustainability of

soil, water resources, natural habitats, the air, the climate and the overall living conditions in the areas you farm. **See the DPS Sustainable Agriculture Policy at the following link:** <https://www.drpeppersnapplegroup.com/company/agriculture-policy> for more information.

9. **Apply rigorous safety and quality standards throughout the supply chain.** Comply with all product quality and safety standards, including current Good Manufacturing Practices, laws, and regulations. Immediately report and address any product or safety issues.
10. **Market your products responsibly.** Be especially careful and responsible in marketing and advertising products to children, including, where applicable, honoring any commitments you have made regarding advertising and marketing, including, without limitation, responsible marketing to children. In all applicable jurisdictions, follow applicable local laws with respect to marketing to children.
11. **DPS does not allow subcontracting or assigning any agreement, service, or obligation to or with DPS without DPS' prior written consent.** Any permitted subcontractor or assignee or any such agreement, service, or obligation must agree to comply with this Supplier Code prior to any subcontracting or assignment and you remain responsible for all subcontractors' actions.
12. **You must promptly report any suspected or actual violation of this Supplier Code or any related DPS policy.** DPS will review and investigate reports promptly, thoroughly and fairly, taking appropriate action whenever necessary. DPS reserves the right in its sole discretion to disclose and/or retain any reports or other information obtained during an investigation to any third party, including any federal or state agency.

You may report in the following ways:

- a. Write to DPS at the following address:

Dr Pepper Snapple Group
5301 Legacy Drive
Plano, TX 75024
Attn: General Counsel

- b. Call the anonymous Speaking Up! hotline any time:

24 hours a day, 365 days a year:
U.S. and Canada: 1.800.349.4248
Mexico: 001.888.243.8076

- c. Submit anonymously to the Speaking Up! website:

<https://www.integrity-helpline.com/dps.jsp>

