



KDP

Human Rights Position Statement

Context, Reference Standards, and Respect for Human Rights

At KDP, we are committed to acting responsibly and KDP's ambition is to ensure that all of our beverages make a positive impact with every drink. We focus on our greatest opportunities for impact in the environment, our supply chain, the health and well-being of our consumers, and with our people and communities. We recognize our responsibility to conduct business in a manner that respects the human rights and dignity of all people and communities impacted by our operations and business activities. This *KDP Human Rights Position Statement* outlines the core standards and expectations we have established for our employees, our communities, and our suppliers, in the area of human rights. These expectations are further elaborated in our Corporate Code of Conduct and Supplier Code of Conduct.

The standards in the *KDP Human Rights Position Statement* are guided by the principles set forth in the International Bill of Human Rights, which is composed of:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- ILO Declaration on Fundamental Principles and Rights at Work

In addition, our actions and policies are informed by, and aligned with, the principles and processes outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD's Guidelines for Multinational Enterprises. Our engagement on human rights is further informed by our participation in a number of international initiatives focused on sustainability and human rights, including the United Nations Global Compact, the Responsible Business Alliance (RBA), Fairtrade International, Fairtrade USA, Rainforest Alliance, and 4C.

Our Commitment to Human Rights

As stated in the United Nation's Universal Declaration of Human Rights, all human beings, regardless of sex, race, color, national or ethnic origin, ancestry, religion, or other status are entitled to the respect and protection of internationally recognized human rights.

The nature of KDP's business activities provides us the ability to focus on three interrelated areas of actual and potential human rights risks, impacts and opportunities: our employees, communities where KDP does business, and KDP supply chains.

Our Employees

Our business success, as well as our efforts to respect human rights, is driven by our employees¹. Therefore, we are committed to ensure that all KDP employees are treated in accordance with applicable laws and regulations, and international best practice standards. This commitment is outlined in KDP's corporate Code of Conduct, which covers significant workplace issues, such as employee health & safety, conflicts of interest, non-harassment, and a commitment to an inclusive workplace.

Our Communities

As a responsible employer providing dignified jobs that contribute to resilient communities, KDP is dedicated to upholding and respecting the human rights of people in the communities in which we operate. We engage with and support dialogue with local stakeholders in the communities where our operations are located to respect human rights, identify potential impacts, and identify ways to unite KDP's financial support with employee volunteerism in such communities. Our

¹ Our "employees" includes employees of KDP and of its wholly owned subsidiaries.

goal is to operate safe facilities and to avoid negative impacts on communities, and to actively engage with local communities to jointly identify solutions, as appropriate.

Our Suppliers

We expect our suppliers² to adhere to national laws and international standards in their treatment of workers, engagement with and support for communities, and managing their environmental impacts. Our commercial terms and standard agreements with suppliers require them to adhere to the principles in our *KDP Supplier Code of Conduct*, which contains specific expectations covering business ethics, health and safety, labor and human rights and environmental sustainability. Other policies directed at our supply chains that include human rights performance include the KDP Conflict Minerals Policy and KDP Brazilian Coffee Purchasing Policy. KDP has risk-based processes in place to identify and manage human rights impacts associated with our supply base, and in this way, KDP's approach aligns with internationally recognized management processes and standards.

Beyond KDP's relevant policies, our commitment to human rights in our supply chains is reinforced by direct engagement with selected suppliers to raise awareness of and strengthen respect for human rights generally and on specific issues such as modern slavery, migrant workers, and workplace health and safety. We aim to develop and strengthen relationships with suppliers who are committed to the principles set out in the *KDP Human Rights Position Statement* and take action to implement respect for human rights through their own activities and those of their own suppliers.

Our Human Rights Standards

Our respect for human rights encompasses, but is not limited to, the following key expectations, based on recognized international human rights standards.

1. **Legal compliance:** KDP requires compliance with all applicable local laws and regulations. If a situation arises where there is a conflict between a legal requirement and the *KDP Human Rights Position Statement*, we will apply the standard that supports the highest level of respect for human rights, as stipulated in the UN Guiding Principles on Business and Human Rights, in a manner that does not lead to a violation of domestic law. In addition, we will not follow customs of any kind that would lead to a violation of this statement and KDP's other policies, codes, and guidance related to human rights.
2. **Discrimination & Humane Treatment:** Wherever we operate, we seek to create and maintain productive and healthy workplaces that support respect and dignity for workers, and as such are free of harassment, intimidation, inhumane treatment, and discrimination based on sex, race, color, national or ethnic origin, ancestry, religion, age, marital/civil union status, gender identity or expression, transgender status,

² The term "supplier" means any person or entity that is the source for goods or services for KDP, back to the primary production level.

physical or mental disability, place of birth, pregnancy, veteran status, sexual orientation, genetic information, or any other personal characteristic protected by law. [Our Respectful Workplace and Anti-Harassment policy](#) is the foundation for our commitment to our workplace.

3. **Freedom of Association and Collective Bargaining:** We respect freedom of association and as such will not interfere in our workers' right to form and/or join a union. Where our employees are represented by trade unions or work councils, we will cooperate and negotiate in good faith with the bodies that our employees collectively choose to represent them and in situations where freedom of association is restricted or prohibited by law, we will be open to and supportive of engaging with alternative means of worker representation.
4. **Freely Chosen Employment:** KDP does not allow the use of forced labor in any part of our organization, and we make clear to suppliers that such activity is unacceptable and must be prevented. Forced labor encompasses all forms of modern slavery and exploitative labor, including trafficking in human beings. All labor must be voluntary, and we prohibit the withholding of wages or identity documents, and any actions forcing workers to pay for their jobs or become indebted to third parties as a result of the process of securing employment. Should any such violations of workers' rights occur, KDP will seek to mitigate the negative impacts on workers through remediation and take strong action to prevent a reoccurrence, as further described in our [Modern Slavery Statement](#).
5. **Child Labor:** KDP prohibits child labor in all its forms, a prohibition which extends to our supplier chain. All those working for KDP or its suppliers must be at least 15 years old, or the age must be aligned with the minimum working age and compulsory education age as required by laws in the respective location.
6. **Working Hours, Wages, and Benefits:** KDP is committed to providing our employees with wages and benefits sufficient to meet their basic needs. We expect all workers in our value chain to be paid in compliance with all applicable local laws governing the payment of wages and benefits, including wages meeting or exceeding the legal minimum wage.

For all KDP employees, regular and overtime working hours must comply with applicable law. Overtime must be compensated at the appropriate rate required by local law, and all wages must be paid on time and in full. Work schedules and rest periods must comply with applicable law and work hours should not be excessive or negatively impact employees' health or safety.

All KDP employees must receive a pay statement for each pay period that outlines the components of their compensation, including hours worked, and any deductions.

KDP prohibits the deduction of wages as a disciplinary measure and requires that all deductions be made in accordance with local law.

7. **Occupational Health & Safety:** The safety of our employees is of paramount importance, and KDP adheres to all national and local laws and regulations in the territories where we operate regarding the creation and maintenance of safe working conditions and a healthy work environment. Employees will not be disciplined for raising safety concerns and may refuse unsafe working conditions without fear of reprisal, intimidation, harassment, or retaliation. KDP has established procedures and systems to manage, track, address, and report occupational injury and illness, and such procedures and systems encourage employees to report any occupational injury or illness. KDP strongly encourages our suppliers to adopt stringent principles and standards on workplace health and safety.
8. **Access to Grievance Mechanisms and Remedy:** In line with the third pillar of the UN Guiding Principles, KDP recognizes the importance of providing all those who have suffered harms in connection with KDP and its operations access to an adequate remedy through judicial or non-judicial means. We are thus committed to ensuring that any group or individual that has suffered a violation of their human rights that has been caused or contributed to by KDP should have access to remediation through legitimate processes. Guidance on how to access KDP's grievance mechanisms are listed at the end of this document.
9. **Land Rights and Water Resources:** KDP recognizes the implications regarding respect for human rights that land use and water use across our value chain may have. We work to ensure that our business partners in our value chain respect the rights and titles to property and land of individuals, indigenous peoples and local communities. We additionally respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

As a beverage company, with water as a primary ingredient in our products, we have a particular responsibility to be good stewards of water use in our operations, communities and supply chain. KDP's approach to water is in support of SDG 6 – which seeks to “ensure availability and sustainable management of water and sanitation for all.” As part of our efforts to support water sustainability, KDP has committed to achieving Net Positive Water Impact by 2050, which builds on KDP's existing water stewardship commitments. More details are included in our [Water Policy](#).

Our Approach to Managing Human Rights

Our commitment to and management of human rights is informed by the UN Guiding Principles on Business and Human Rights. This includes the incorporation of specific management elements into the existing frameworks, processes, and policies that govern our business activities, such as workplace standards on health & safety and a commitment to an inclusive workplace; supplier assessment, selection, and ongoing evaluation; employee training programs; and enterprise risk management processes.

KDP conducts due diligence throughout our business to proactively assess, identify, prevent and mitigate actual and potential adverse human rights impacts to stakeholders across our value chain. We seek to use due diligence to identify where we can better support and promote individuals' ability to live and exercise their fundamental human rights. Some of the due diligence mechanisms that we utilize include, but are not limited to, our Codes of Conduct, training programs, risk assessments, performance monitoring, third-party assessments, supplier recognition as well as our participation in various industry collaborations, including the Sustainable Coffee Challenge and the Responsible Business Alliance.

To support KDP's management of human rights, every employee is responsible for respecting human rights in our operations. Each employee is required to participate in a comprehensive and mandatory employee training program to ensure that employees know and understand our policies and practices. This is furthered through the provision of explicit guidance to our operating units on identifying human rights impacts and issues, engaging with local stakeholders, and managing the process of receiving and responding to community complaints.

We consult regularly with international organizations, companies, and civil society groups to understand and respond to current and emerging human rights issues relevant to our business. In addition, we seek to ensure that our public positions on issues and related communications with governments, regulatory bodies, and public authorities are consistent with our human rights commitments, as established in this Statement as well as other public documents and reporting, including our annual Corporate Responsibility report and Modern Slavery statement. [Additional reports can be found here.](#)

It is now clear that climate change will pose significant new challenges to the achievement of the Sustainable Development Goals (SDGs) and, more generally, respect for human rights around the world. KDP is taking action to reduce its greenhouse gas emissions associated with our operations, reduce deforestation in our supply chains, improve access to water for individuals and communities, and provide support for regenerative agricultural processes helping to increase the resiliency of agricultural production. KDP's commitments to address and measure these impacts are elaborated on in our [Water Policy](#), [Environmental Policy](#), [Climate](#)

[Policy](#) and [Regenerative Agriculture and Conservation Guidelines](#) and our annual ESG disclosures (insert link).

Human Rights Governance

Responsibility and accountability for the management of human rights, including support for and review of due diligence efforts as well as actions to address impacts, is consolidated across various departments throughout KDP's management structure, including Human Resources, Corporate Affairs, Sustainability, Legal, and Procurement. A process exists for elevating human rights impacts to relevant senior executives through the KDP Sustainability Governance Committee which meets regularly throughout the year. In support of policy implementation generally, the Board of Directors of KDP oversees ESG strategy and goals and approves long-term commitments and monitors progress as outlined in the Corporate Governance Principles, and this covers various topics, including human rights as well as climate, water, circular economy, and supply chain sustainability.

The KDP Executive Policy Review Group (EPRG) annually reviews the *Corporate Code of Conduct*, *Supplier Code of Conduct* and *Human Rights Position Statement* to ensure consistency across policies. In addition, and aligned with our commitment to transparency, KDP will report annually to stakeholders on human rights risk, due diligence and performance in our Corporate Responsibility report.

Our Grievance and Remedy Process

KDP engages with a broad range of stakeholders, including suppliers, partners, customers, regulatory agencies, NGOs, consumers, employees, and community members and organizations. We maintain ongoing dialogue and collaboration with stakeholders as a means to leverage their expertise and insights in order to enhance our respect for human rights and to find new solutions to common challenges. These engagements occur through various channels, including KDP's grievance mechanisms which are open to employees, communities, and workers in our supply chain.

We expect all KDP employees (for the collective interest of the company) to report violations or raise ethical concerns without delay through the various grievance mechanisms outlined below. Our *Speaking Up* portal provides a way for those with grievances to report anonymously without concern for retaliation. Our suppliers are also expected to have systems in place to enable fair, confidential and anonymous grievance reporting and follow-up without fear of reprisal. This includes worker whistleblower protections. Violations can be reported through the following means:

- 1) Write to KDP at the following address:

Keurig Dr Pepper Inc.
6425 Hall of Fame Lane
Frisco, TX 75034
Attn: General Counsel

- 2) You can submit reports online 24 hours a day, 365 days a year.

Submit on the web at:
www.kdrp.ethicspoint.com

- 3) As an alternative you may call:

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.

If it is determined that KDP has caused or contributed to adverse impacts on human rights, we will provide for or cooperate in the remediation of the adverse impacts through legitimate processes. These processes will be informed by internal guidance as well as external expertise where necessary and are intended to deliver effective remedy while not preventing access to other forms of remedy if justified. In situations where KDP is indirectly linked to an adverse human rights impact through its business and other types of relationships, it will advocate for the provision of adequate remedy.