

c&c group plc



OUR CODE

OF BUSINESS CONDUCT



01

INTRODUCTION	WELCOME FROM ROGER WHITE , Chief Executive Officer	03
	MESSAGE FROM KAREN BATES , Chief People Officer	04
	PURPOSE, VISION AND VALUES	05
	OUR CODE	05
	PERSONAL AND LEADERSHIP RESPONSIBILITIES	06
	CODE AS A BASIS FOR DECISION MAKING	07
	REPORTING CODE VIOLATIONS – How do I raise a concern?	08

02

WE ALWAYS ACT WITH BUSINESS INTEGRITY: <i>Complying with the Law</i>	ANTI-BRIBERY AND CORRUPTION	10
	GIFTS AND HOSPITALITY	12
	COMPETING FAIRLY	14
	CONFLICTS OF INTEREST	16
	INSIDE INFORMATION (Insider Dealing)	18
	POLITICAL LOBBYING AND DONATIONS	19
	CHARITABLE DONATIONS	20

03

WE ALWAYS ACT WITH FINANCIAL INTEGRITY	ANTI-FRAUD	21
	SANCTIONS AND MONEY LAUNDERING	23
	FINANCIAL ACCOUNTING AND REPORTING	23
	BUSINESS EXPENSES	23

04

WE RESPECT OUR PEOPLE, PLANET AND WORKING ENVIRONMENT	SUSTAINABLE BUSINESS	24
	HEALTH AND SAFETY	25
	HUMAN RIGHTS	29
	MODERN SLAVERY	30

05

WE MAKE SURE EVERYONE IS WELCOME	DIVERSITY, EQUITY AND INCLUSION	31
	ANTI-DISCRIMINATION/HARASSMENT	33

06

WE PROTECT OUR ASSETS	AMBASSADORS OF OUR BUSINESS	34
	INFORMATION SECURITY	35
	PHYSICAL ASSETS	36
	INTELLECTUAL PROPERTY	36
	DATA PROTECTION	37

07

SUPPLIER CODE OF CONDUCT	SUPPLIER CODE OF CONDUCT	39
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INTRODUCTION

C&C Group plc ('C&C', 'C&C Group' 'the Company') is a leading premium drinks company which manufactures, markets and distributes branded beer, cider, wine, spirits and soft drinks across the UK and Ireland. We are the number one distributor to the UK and Ireland hospitality sectors.



At C&C, integrity is not just a word - it's the foundation of everything we do. Our Code of Conduct ('Code') is a reflection of the values that guide us: respect, accountability, transparency, and a commitment to doing the right thing, even when it's hard.

This document isn't about rules for the sake of rules. It's about empowering each of us to make decisions that uphold our reputation, protect our people, and strengthen the trust we've built with our customers, partners, and communities. Whether you're working in one of our production sites, leading a team, or supporting customers, your actions matter - and they shape who we are as a company.

As Chief Executive Officer, I take this responsibility seriously, and I expect every member of our team to do the same. Please read this Code carefully. Use it as a compass. And if you ever face a situation where the right path isn't clear, **SPEAK UP**. We're in this together, and together, we set the standard.

Thank you for your integrity, your courage, and your commitment to our shared purpose.

Roger White
Chief Executive Officer
C&C



At C&C, our culture is built on trust, respect, and a shared commitment to doing what's right. Our Code of Conduct is more than a set of rules - it's a reflection of our values and a guide to help each of us navigate the complexities of our work with integrity and confidence.

As Chief People Officer, I believe that how we treat one another, how we make decisions, and how we show up - especially when no one is watching - defines who we are. This Code is here to support you in making ethical choices, fostering an inclusive environment, and ensuring that our workplace remains a safe and empowering space for all.

Whether you're new to the team or a seasoned leader, please read this Code carefully, ask questions, and **SPEAK UP** if something doesn't feel right. Upholding these standards is a shared responsibility, and together, we can continue to build a company we're proud to be part of.

Thank you for your commitment to living our values every day.

Karen Bates

Chief People Officer
C&C



Purpose ◀



To play a role in **every drinking occasion, delivering joy** to our customers and consumers with **remarkable brands and service.**

Vision ◀



To be the **pre-eminent brand-led drinks distribution platform**, serving the UK and Ireland drinks markets, generating **stable margins**, delivering **strong free cash flow and returns** for our Shareholders.



▶ Our Values

Our values underpin everything we do

We **RESPECT** people and the planet

We bring **JOY** to life

QUALITY is at our core



▶ Our Code

In order to achieve our vision, we need to build an environment where our people can live our values and operate in a safe, compliant and respectful way.

Our Code sets out the standards of ethical, sustainable and responsible behaviours that underpin our business. Our Code applies to C&C Group, all its subsidiary companies, and all of our colleagues. We want to work with business partners that share our values, and we require our business partners to adhere to the principles set out in our [Supplier Code of Conduct](#).





► Personal and Leadership Responsibilities

Everyone at C&C Group has a role in upholding our Code; it applies to everyone, whatever your role and wherever you work, from our offices, breweries and warehouses to the boardroom. On a day-to-day basis this means you should:

- **Be aware:** Know, respect and follow our Code
- **Be empowered:** No one has the authority to make you do something that violates our Code. Do not be pressured into doing things that you know are wrong
- **Be safe to SPEAK UP:** If something doesn't feel right **SPEAK UP**, we will support you

All our colleagues need to follow our Code, but we expect our leaders to go further by:

- Making choices that **reflect our values and Code** – even when you're under pressure
- **Talking to your teams** about our Code regularly in team meetings, one-to-ones and performance reviews
- **Addressing non-compliance** with our Code or policies consistently and fairly, regardless of seniority
- **Recognising and rewarding** behaviour that aligns with our Code
- **Creating an environment where people feel safe to SPEAK UP** and voice their opinions and concerns without fear of retaliation
- **Asking for help** if a problem or decision is outside of your expertise/comfort zone



Our Code is designed to keep our colleagues and our business safe. Failure to follow our Code, or any applicable laws, regulations or company policies can lead to serious consequences - for both the individual, you and C&C. This might include disciplinary action or referral to external regulatory or law enforcement agencies.



► Code as a Basis for Decision Making

We want everyone to feel comfortable spotting and speaking up about anything that seems wrong. It's not always easy to know what's right, but the guidance below should help you decide when something doesn't feel appropriate or when to ask for help.

Can I do it?

Is it legal? Does it go against any of our policies?

Should I do it?

Is it consistent with our values and Code? Does it feel right? Would I feel comfortable explaining my actions to someone else?

Can I be sure that it won't put myself, other people or C&C at risk?

Am I confident that it won't hurt our reputation if it was published in a news article or on a social media post?

IF THE ANSWER TO ANY OF THE ABOVE IS **NO** THEN DO NOT PROCEED WITHOUT GETTING FURTHER HELP/ADVICE.

If something doesn't feel right it is your responsibility to ask questions, seek further guidance or raise your concerns. There are a number of ways you can get further help and support. No matter how you choose to report a concern, if you do it honestly and in good faith, we'll take it seriously - and we won't allow retaliation of any kind for speaking up.



► Reporting Code Violations - How do I raise a concern?

SPEAK TO YOUR LINE MANAGER

Most of the time, your line manager is the best person to go to first. They can help with questions about your job, problems with co-workers, or other issues at work. If they don't know the answer, they should be able to connect you with someone who does - like HR or Health and Safety - or pass your concern to a senior leader if it's urgent.

CONSULT A SUBJECT MATTER EXPERT

You can report a health and safety concern or incident via our [Safety Hub site](#).

If you have any concerns about your personal working environment that can't be solved by your Line Manager consult the HR Advice Team (HRAdvice@candcgroup.ie; [+44] 1275 890 200, choosing option 1) if you need further support.

For issues that involve actual or potential Code of Conduct, legal or regulatory violations you should contact the Legal and Compliance teams or via speakup@candcgroup.com.

Examples include:

- Fraud, improper accounting practices or false travel claims and expenses

- Any potential corruption including conflicts of interest, kickbacks or bribery

- Anti-competitive behaviours or insider trading

- Actions that pose serious environmental risk or harm

- Breaches of data protection, confidentiality, privacy or IT security

- Breaches of economic sanctions, trade or other financial controls

- Dangerous behaviour including acts of violence

- Any other conduct that could breach or encourage other colleagues to breach the law, Code of Conduct or policy



CONTACT THE INDEPENDENT SPEAK UP LINE

If, for whatever reason, you feel that you can't use the resources above you can also raise concerns by contacting our **SPEAK UP** whistleblowing service. **SPEAK UP** is a 24-hour a day, 7 days per week free service and is hosted by third-party provider Navex to ensure reporter anonymity (if you wish to remain anonymous). Reports can be taken by phone message or via a secure online portal and is available to all C&C colleagues, contractors, customers, suppliers and third parties.

All reported incidents or potential Code of Conduct, legal, regulatory or policy violations will be reviewed by the Legal and Compliance teams who will then decide on the most appropriate means of investigation. Any information you provide will be kept confidential except as needed to conduct a full, fair investigation or as otherwise required by law.

[C&C Group Whistleblowing Policy](#)



You can also call and leave your message anonymously via our telephone answering service provided by WhistleB. Your voice will be anonymised.

 UK 0207 660 1375
Ireland 1800 901 634

Code: 939118



WE ALWAYS ACT WITH BUSINESS INTEGRITY

- COMPLYING WITH THE LAW

We believe in complying with all laws which apply to our business.

This means that you must comply with our Code, and all our internal policies and procedures which have been specifically designed to make sure we comply with the law. Breaches of our Code or policies may result in disciplinary action being taken, up to and including dismissal (in addition to potential civil and criminal liability).

► **Anti-Bribery and Corruption**

We have a
ZERO-TOLERANCE
approach to bribery
and corruption.

WHAT IS IT?

Bribery and corruption, in any form, is not only illegal but also harms our company, its reputation and confidence in our business. Whilst it is impossible to outline every example where it might occur, you need to be particularly aware of any situation where someone appears to be personally rewarded for a business decision that they make which favours or advantages one individual or company over another.

Examples include:

Corruption - when someone uses their position or power to get unfair benefits for themselves or others, often by breaking rules or laws

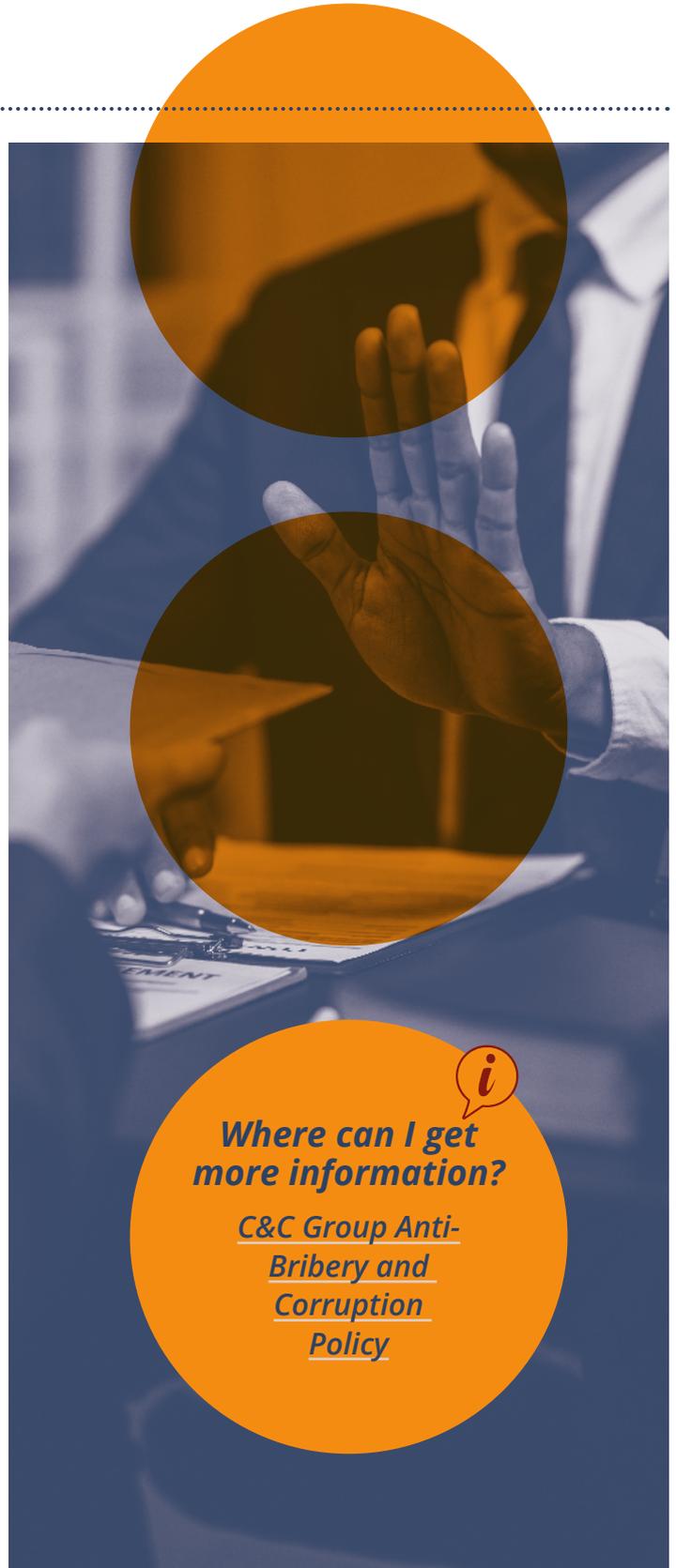
Bribery – when anything of value is offered or received in exchange for a business advantage or decision (for example, giving a customer expensive or over-the-top hospitality during a tender process to try to influence who they choose); and

Kickbacks - Giving or receiving a reward for agreeing a contract or making a decision that benefits a person or company (for example agreeing to enter into a contract with a supplier if you will receive a percentage of the contract value personally)



WHAT CAN I DO?

- Corruption, bribes and kickbacks of any kind are **unethical, violate our Code** and are **illegal**.
- **Do not** (either directly or indirectly through another party) offer, promise, give or **accept a bribe**, and don't allow anyone else to offer or accept one for you.
- Be aware that **anything of value could be construed as a bribe** (e.g. the offering of an internship, the promise of employment or the making of a charitable donation).
- Bribery offences are still committed even if the bribe or kickback is routed through a **third party** such as an agent / consultant.
- Be extra cautious if you are ever dealing with our business and a **public official**. For example, if you are dealing with a local city official in relation to licences and payment or reward to speed up an administrative process, such as the issuing of a permit or licence by a local authority, or approval by a customs official for the release of goods could be considered a facilitation payment. Facilitation payments are prohibited under our policies.
- Always ensure that gifts or hospitality are given and received in-line with our **Gifts and Hospitality Policy**.
- If you become aware of any instances of corruption or bribery in our business contact the **Legal Team** immediately.



Where can I get more information?

C&C Group Anti-Bribery and Corruption Policy



► Gifts and Hospitality

We only offer and accept gifts and hospitality in a **REASONABLE**, **PROPORTIONATE**, and **TRANSPARENT** manner, and never in a way that could be construed as a bribe or an attempt to otherwise influence the recipient.

WHAT IS IT?

Gifts and Hospitality relate to anything of value this is offered to you or that you offer to a customer, supplier or third party as part of your role at C&C. **Gifts and Hospitality** can be a valid means to show gratitude, build goodwill or further business relationships as long as there is no expectation of receiving anything in return. However, if something is offered or could be perceived to be in order to achieve some kind of benefit in return, it could be considered a bribe. It's really important that you consider carefully anything that you are offered or are offering and whether there could be any real or perceived attempt to influence behaviour in any way.

Gifts and Hospitality that are high value or given or offered during certain times could put you in an awkward position especially if it could be seen to influence or persuade you to do something for the company or the individual that has given it. Our **Gifts and Hospitality Policy** provides guidance on the giving and accepting of gifts and hospitality to enable us to develop these important relationships without any perception of improper conduct or breaking the laws of the countries in which we operate. As such, all gifts and hospitality must be given, received and recorded and **registered** in line with our **Gifts and Hospitality Policy**.





WHAT CAN I DO?

Before you offer or accept any gifts or hospitality, please consider:

Intention: gifts and hospitality should never be given with the intention to influence the recipient to perform their function improperly.

Timing: the timing that a gift or hospitality is given may be relevant in assessing the perceived intention of the gift or hospitality (for example, gifts and hospitality should not be given or accepted during a contract tender process).

Transparency: gifts and hospitality should always be given in a transparent manner (and not disguised as something else).

Proportionality: gifts and hospitality should always be proportionate in the circumstances, which means you should consider carefully the monetary value of the gifts or hospitality.

Self-awareness: always consider how the gift or hospitality may look to others (for example, how would you feel if the gift or hospitality was reported in a newspaper?).

C&C's Values and Reputation: gifts and hospitality should always be considered in light of C&C's values of doing business fairly, ethically and in compliance with all applicable laws. Gifts and hospitality should never be offered or received in a way which could damage the reputation of C&C or any of our colleagues.

Remember

All gifts and hospitality offered and received over £150 or €150 **MUST** be logged on our Gifts and Hospitality register for transparency.

Q&A

Q. Do I only need to register gifts and hospitality that I am offered?

A. No - the register exists to keep a record of all gifts and hospitality that is either offered to us or that that we offer to others. We should also record gifts and hospitality offered to us that we decline.

Q. Should I register the total amount of the gifts and hospitality or the amount per person? For example, if a restaurant bill is £200 for two people, do I count it as £100 each (which is under the limit), or do I register it because the total is over £150?

A. You should look at the total value the customer received. In this case, the hospitality was worth £200, so it needs to be recorded in the register - but you can enter it as one single record.



Need more information?



Please read our [Gifts and Hospitality Policy](#)

To register G&H please visit the [Gifts and Hospitality Register](#)



► Competing Fairly

We believe that competitive success is built on providing **GOOD CHOICE, PRICE** and **SERVICE**, and competing vigorously but in a **FAIR** and **ETHICAL** way.

WHAT IS IT?

Competition law is designed to make sure that businesses compete fairly and are protected from others acting unfairly. It's against the law for businesses to make arrangements with each other that undermine open and fair competition or that disadvantage customers.

WHAT CAN I DO?

We want C&C to succeed and we want to win but we will always do it in a way that is honest and fair to our customers, our suppliers and our competitors.

This means:

- We do not agree with competitors to reduce competition between us;

- We do not receive or share confidential, commercially sensitive information with competitors;

- We do not receive confidential, commercially sensitive information about a competitor from one of our suppliers;

- We do not share one supplier's confidential information with another supplier;

- When setting retail prices: (i) we focus on cost prices during price negotiations with suppliers;

- and (ii) we act independently when setting the retail price.





Where can I get more information?
[C&C Group Competition Policy \(and associated guidance notes\)](#)

Q&A

Q. You are attending an industry awards event and a Sales Manager from a competitor is at your table, the conversation begins by discussing general market trends but then the Sales Manager asks you details about our upcoming pricing review. What should you do?

A. Whilst it may feel awkward to do, it is very important you bring the conversation around pricing to a stop and do not engage in the discussion. When you're back in the office you should contact the Legal Team for further guidance.

Q. You are working on a tender project, and accidentally send an attachment with the pricing information of one of the potential suppliers to another potential supplier in the tender. What should you do?

A. Contact the Legal Team who will provide you with wording to be issued to the supplier who received the email making them aware of the confidential nature of its contents, and that they must delete the email without reviewing it.



► Conflicts of Interest

WHAT IS IT?

A conflict of interest is any potential tension between what is best for you personally and what is best for the role that you do at work. If your activities outside of work, your involvement in other companies or your personal relationships could interfere with, or appear to interfere with, your ability to do your job and make unbiased decisions on behalf of the company then you could have a conflict. You should not allow your personal interests to affect your ability to act in the best interests of our business. Bear in mind that conflicts of interest apply whether they are real (the conflict would impact your decision making) or perceived (if they could give the appearance of impacting your decision making).

We always act in the **BEST INTERESTS** of our business.

WHAT CAN I DO?

It's important that you are able to recognise potential conflicts. Examples can include:

Personal relationships – Do you have a close personal relationship with a friend, family member or partner that could impact your business decisions? For example, do you work closely with them at C&C or do they work for one of our customers, suppliers or competitors?

Financial - Do you have any financial interests such as significant shares or investments in our customers, competitors or suppliers that could impact your decision-making at work?

Outside employment or activities - Do you have any relevant external business interests with our customers, competitors or suppliers? This includes:

- Any other employment (paid or non-paid);
- Board memberships or other management positions; or
- Any other form of benefit including sponsorships.



Having a conflict of interest ISN'T necessarily WRONG but failing to disclose it IS.

In the vast majority of cases, conflicts can be managed by putting some sensible controls in place to protect both you and the business. In order to make sure we can do this you must promptly disclose any actual or potential conflicts to your line manager and make an entry on the Conflicts of Interest register. If you or your line manager are unsure of whether a conflict is appropriate or how to manage it effectively please speak to the Legal or Compliance Teams for further support.

***Where can I get
more information?***

***C&C Group Conflicts
of Interest Policy***

HOW DO I KNOW IF I HAVE A CONFLICT?

Ask yourself:

Could I benefit personally from the situation or could a friend, family member or partner benefit from my involvement?

Could this interfere with my ability to do my job or impact my ability to remain unbiased?

Am I putting my own interests ahead of C&C's interests?

How would the situation look to others? If it became public would I be embarrassed or could it embarrass the company?

Am I using company assets or resources like information, equipment or property for personal gain?

If the answer to any of these questions is **yes**, please consult the Conflict of Interest policy for more information or speak to a member of the Legal and Compliance Teams.



► **Inside Information** (Insider Dealing)

You must **NOT USE INSIDE INFORMATION** for your own benefit or the benefit of others. Breaches of the regulatory requirements relating to Inside Information may have serious consequences, including civil fines and criminal charges.

WHAT IS IT?

Insider information is information, which is of a precise nature, and would, if it were public, be likely to have a significant effect on our share price. The UK Market Abuse Regulations (UKMAR) govern the disclosure of such inside information and applies to all employees of C&C. C&C Group plc shares are listed on the London Stock Exchange.

During your employment and, depending on your

role, you may acquire knowledge of confidential information about C&C Group plc which is not in the public domain. All confidential information must be protected, but some information is particularly sensitive.

However, 'Inside information' includes information about C&C Group plc and its performance that may affect an investor's decision whether to buy, sell or hold

shares or other securities in the Company. This could include details of a new contract that has been awarded, financial performance or information about an acquisition. There are strict rules around how this information can be used and what activities people can undertake if they are aware of it and these are included in our **C&C Group plc Dealing Code**.



WHAT CAN I DO?

Employees will be notified by the Company Secretariat team if the C&C Group plc Share Dealing Code Policy applies to them, but if you have any concerns please contact the Company Secretary or Company Secretariat team at CompanySecretary@candcgroup.ie for more information. It is illegal to use inside information for your own benefit and/or sharing with others so they can benefit so please ensure you comply with the policy.

You must comply with the [Dealing Code Policy](#) and adhere to any restrictions placed on you.



Where can I get more information?

CompanySecretariat@candcgroup.com

CompanySecretary@candcgroup.ie

[C&C Group plc Dealing Code](#)



► **Political Lobbying and Donations**

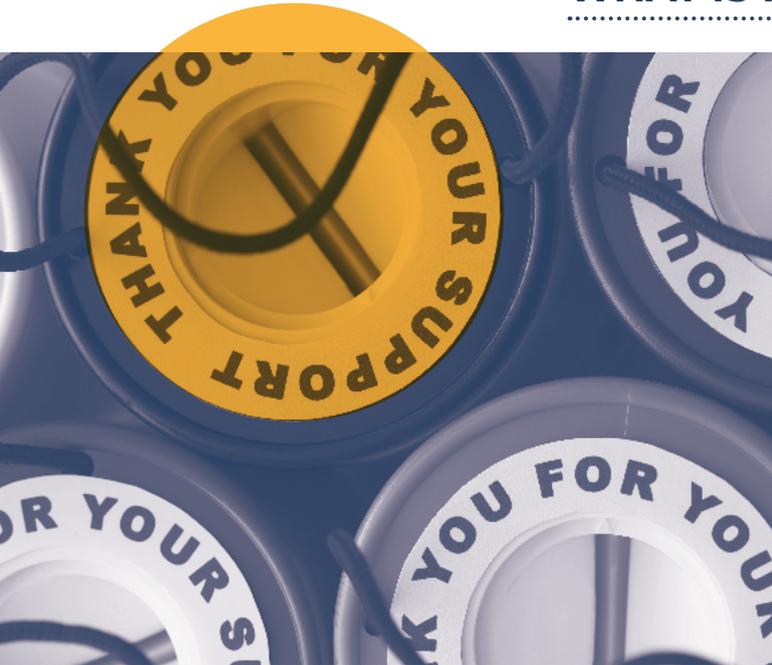
C&C maintains a neutral stance on political matters. We respect the diverse views of our colleagues, customers, and stakeholders, and do not hold or express any political affiliations. We do not make political contributions either directly or through the use of other Group resources and do not seek to influence legislation, regulation, or public policy through indirect lobbying efforts. We may choose to express our views on particular matters of government policy in a way that does not directly or indirectly indicate support for any particular political party. Any engagement with government or regulatory bodies will be compliance-related, regarding operational requirements or otherwise in line with applicable laws and ethical standards and all interactions of this nature will be appropriately recorded for audit and transparency purposes. Only colleagues authorised to do so will engage in discussions with political representatives or regulatory bodies on behalf of C&C. Colleagues should refrain from making statements or engaging with representatives in a personal capacity in a manner that suggests endorsement by C&C in contradiction of the code of conduct.



► Charitable Donations

We may provide charitable donations, but we always do so in a **TRANSPARENT** and **PROFESSIONAL** manner.

WHAT IS IT?



Charitable donations whether in the form of money or donations in kind, such as time, products or services are an important part of our commitment to social responsibility. Donations, however, may cause reputational harm to us if they are made to inappropriate causes or not applied correctly.

WHAT CAN I DO?

- All community investments or charitable donations must have gone through the proper authorisation process
- Donations should never be made with the expectation of something in return
- Donations cannot be claimed as personal expenses, they must go through the correct finance channel
- If you want to undertake any form of fundraising that might request money from C&C Group or our colleagues you must have authorisation first
- We are apolitical and do not make political donations
- In extreme cases, a charitable donation that is made in order to obtain a benefit for us will be considered a bribe.

Need more information?

C&C Community Investment Policy

Contact
communitydonation@candcgroup.com



WE ALWAYS ACT WITH FINANCIAL INTEGRITY

► Anti-Fraud

We are ***honest, transparent*** and ***responsible*** in all of our financial dealings and do not tolerate any kind of financial mismanagement including fraud, breach of sanctions regulations, money laundering or tax evasion. We take personal responsibility to manage our finances seriously including accurately recording all of our financial reporting and business expenses.

WHAT IS IT?

Acting with financial integrity covers a wide range of subjects including:

Fraud – any attempt to benefit from a dishonest act such as making false claims or deliberately withholding information

Sanctions compliance – not working with individuals or companies on international Sanctions lists

Money Laundering - putting money that has been produced by criminal activity through legitimate company processes or activities in order to make it appear lawful

Tax evasion - the deliberate non-payment or under-payment of taxes. We are committed to full compliance with all applicable tax laws and regulations in every jurisdiction where we operate. Tax evasion is illegal and unethical, and we maintain a zero-tolerance policy towards any form of deliberate misrepresentation or concealment of information to reduce tax liabilities

Financial recording and reporting – making sure our key management information including; accounts, financial information and legal agreements are complete and accurate

Business expenses – ensuring we only incur and claim expenses that are legitimate, reasonable and necessary for business purposes

Speaking out when something doesn't look or feel right – refer to our [Whistle-blowing Policy](#)



WHAT CAN I DO?

Fraud or financial mismanagement of any kind can have both significant financial and reputational impacts on our company.

Being accurate, clear and transparent in our financial dealings allows us to make responsible business decisions and provide truthful and timely information to the market.

You should never participate in any form of fraudulent or dishonest behaviour and report any potential risks immediately. It is essential that we work together to prevent fraudulent behaviour.

THE QUICK SELF-CHECK

Is it legal and within policy?

Would you be comfortable if it were on the front page news or online media tomorrow?

Does it respect our values and stakeholders?

FRAUD

- Never give in to pressure to falsify, hide or to not report certain information
- Don't create false documents or alter legitimate documents with false information such as incorrectly back-dating records or deliberately recording transactions in the wrong period or against the wrong account
- Never bill or pay for products or services that haven't been provided
- Be alert and report any potential suspicious activity or transactions generated internally or by third parties. Do not confront the individual or alter records. Preserve evidence and notify in accordance with our [***Whistleblowing Policy***](#)
- Follow proper procedures to verify the authenticity of requests to change customer or supplier information such as bank account details or names and addresses to prevent invoice fraud



► Sanctions and Money Laundering

Make sure all our customers and suppliers are correctly on-boarded through our KYC (*Know Your Customer*) policies and procedures

Complete risk based KYC and enhanced due diligence for higher risk parties

Never set up or maintain for any purpose cash funds, other assets or liabilities that are secret or unrecorded

Decline or pause suspicious transactions and escalate immediately

Red flags:

Requests for payments via complex chains, shell entities, or unrelated accounts

Transactions with no clear business rationale; over / under invoicing

High risk jurisdictions or politically exposed persons (PEPs)

Need more information?



[C&C Group Fraud Policy](#)

[C&C Group Travel and Expenses Policy: UK | ROI](#)

[C&C Group Whistle-blowing Policy](#)

[C&C Group Records Management Policy](#)

► Financial Accounting and Reporting

- Record all assets, liabilities, revenues, expenses and business transactions completely, accurately, in the proper period and in a timely manner using approved systems only
- State facts; not opinions – any statement made should be able to be backed up by data, we should be careful not to exaggerate or underplay subjects through the language we use and we should never comment on something professionally that is beyond our level of expertise
- Never hide or destroy documents, records or data that could be needed for internal or external investigations or required for regulatory or legal compliance
- Store all documents in line with our records management and retention policies

► Business Expenses

- Expenses must always be claimed for legitimate business purposes and approved by your manager, supported by receipts and submitted in accordance with our [Travel and Expenses Policy](#)
- Treat company money with the same respect that you would your own. Make sure any spend is proportionate and represents good value for our business and stakeholders



WE RESPECT OUR PEOPLE, PLANET & WORKING ENVIRONMENT

► Sustainable Business

We aspire to **GROW** a sustainable business and to **MINIMISE** our effect on the environment.

As a premium drinks company which owns, manufactures, markets, and distributes products, we know the integral role that our environment and natural resources play in our business. We are committed to reducing greenhouse gas emissions across our operations and supply chain and producing and sourcing resources sustainably to play our part in reducing negative impacts of climate change. We strive to minimise our impact on the environment and the communities in which we operate and ensure compliance with environmental legislation as standard.

WHAT IS IT?

Our starting point should always be to reduce the environmental impact of our business.

WHAT CAN I DO?

- **SPEAK UP** if you are asked to, or see someone else perform a task that you consider harmful to the environment
- You are aware of inaccurate or misleading sustainability information being published or provided
- Consider whether you have to travel to a meeting or whether it can be conducted virtually
- If you are travelling can you minimise the need to fly and drive and use train or other public transport instead
- Minimise the amount of printing we do and try to use electronic copies where possible

*Where
can I get more
information?*

*C&C Group
Environmental Policy*



► Health & Safety

We are committed to a **PEOPLE FIRST** culture, developing the **HIGHEST STANDARDS** of Health & Safety as our top priority; **EMPOWERING EMPLOYEES** in achieving our mission that everyone is Safe Home Every Day.

The provision of a safe environment for our colleagues, customers, contractors and visitors is paramount for our company.



WHAT IS IT?

Safety is our top priority and applies both to the physical places that we work in and the environment and culture that we create. You are responsible for your own safety and the safety of others whilst at work.

We ensure our people are consulted, informed, trained in their role and are provided with what they need to carry out their role safely, and you are responsible for following all site safety rules as well as specific safe work procedures that have been set out for your role and place of work such as within our breweries, distribution network, at events or customer premises, office based or on the road.

Through our health & safety management and risk control standards, we have set out clearly defined roles and responsibilities, creating accountability for individual actions. You are encouraged to act if you have any safety concerns. These will be taken seriously and thoroughly investigated. We do not tolerate retaliation against people who raise health and safety issues in good faith.



WHAT CAN I DO?

Follow the site rules and safe work procedures set out for your role

Familiarise yourself with Health & Safety notice boards and the Safety Hub on the My C&C intranet

Keep up-to-date with your mandatory safety training

Use the appropriate equipment and PPE for your role

Ensure equipment has been inspected and any defects reported straight away

Report any accidents, incidents, near misses, hazards or unsafe behaviours promptly

Make sure you know what to do in the event of an emergency and fully participate in any practice drills

Do not say or do anything that threatens the safety or security of others

Provide feedback on how we can improve



If you spot a potential health and safety problem and need more information or are unsure what to do, speak to your line manager or consult a member of the health and safety team. Details can be found on H&S Notice boards.

It's not possible to list out every possible health and safety scenario you might come up against, but you should **SPEAK UP** if:

You are asked to perform a task that you are not properly trained to perform or that you consider unsafe

Someone else is behaving in an unsafe way or has brought unsafe items in to work

A vehicle or piece of equipment may not be maintained or operating properly and could be unsafe

Previously reported safety issues have not been addressed



Q&A

Q. An incorrectly stacked keg fell off a lorry when it was being loaded and nearly hit an employee walking by. Do I need to report this even though no one was hurt?

A. Yes, this is a near miss; these are warnings that something is not as safe as it should be and allows us to put controls in place to reduce the risk of it happening in the future. The more near misses and hazards we report, the more we can reduce the future risk to ourselves and our colleagues. You can report an accident, hazard or near miss via the safety hub or QR code displayed on notice boards

Q. I work in a logistics Depot and I'm taking prescription medication that might cause drowsiness. I make sure I take it at night so it doesn't impact my role during the day, do I have to report this?

A. It's important to let your line manager know if you are taking any medication that might impact your role, even if you are taking steps to mitigate the impact of it as there may be other factors that need to be considered that you may not have thought of. We will treat any personal medical information that you share with us sensitively and make sure it is not shared with others unless strictly necessary.

**Where
do I get more
information?**

[Safety Hub](#)





DRUGS AND ALCOHOL

Part of working in a safe and healthy environment is making sure that we are fit to do our jobs safely. Our Responsible Drinking Policy and Substance Misuse Policy sets out the standards that we expect of our colleagues in detail.

As a drinks company, we proudly manufacture, market, and distribute a wide range of alcoholic drinks and have a responsibility to our colleagues and consumers to ensure alcohol is enjoyed safely and within healthy limits.

Our approach to alcohol consumed on work premises, at work organised functions includes:

- ▶ Ensuring all colleagues understand their responsibilities regarding alcohol and drug consumption
- ▶ Not accepting colleagues arriving at work under the influence of drugs or alcohol, or whose ability to work is impaired by drugs or alcohol. Working under the influence of any of these not only poses a risk to you personally but also places an unacceptable risk on those around you
- ▶ Never bringing illegal drugs or other uncontrolled substances onto company property or participate in the buying or selling of them at work. Taking drugs (other than prescribed or over-the-counter medication as directed) on our premises is not allowed and will result in disciplinary action in line with the Disciplinary Policy



Where do I get more information?

[C&C Group Substance Misuse Policy](#)

[C&C Group Responsible Drinking Policy](#)

- ▶ Having mechanisms and support in place to make colleagues aware of the effects of alcohol and drug misuse and its likely symptoms
- ▶ Encouraging colleagues with alcohol or drug related problems to seek help confidentially at an early stage
- ▶ Making sure colleagues with alcohol or drug related problems affecting their work are treated sympathetically, fairly, and consistently

You should immediately raise to your line manager if you think someone is under the influence of drugs or alcohol at work. There may be events that you attend where alcohol is served and we would expect you to exercise good judgement and only drink in moderation. If you feel that you or someone you work with may be impacted by this there is support available, speak to the ER team or your HR Business Partner for more advice.



► Human Rights

We are committed to doing business with **RESPECT** for human rights.

We commit to respect and support the dignity, wellbeing and human rights of our colleagues, all parties in our supply chain and the communities in which we operate.



WHAT IS IT?

There are many definitions of human rights but in general terms it applies to ensuring that people can live with dignity, freedom and respect. So much of our time is spent at work that it clearly has a powerful influence on our lives and so we must ensure that our human rights principles are upheld by committing to the following principles:

Employment is freely chosen –

this means we don't use any form of forced labour, child labour or human trafficking

No discrimination or harassment –

this includes any unwelcome conduct of any kind that causes others to feel uncomfortable or creates an intimidating or hostile work environment

Our working environments will be **safe**, and we will be **respectful** to our planet

We will respect individuals' **privacy** and **confidentiality**

WHAT CAN I DO?

Make sure you are familiar with our Human Rights Policy and report any potential instances of:

Harassment or discriminatory behaviour

Unsafe working practices, equipment or behaviours

Employee sensitive personal information that is not being protected or stored securely

Forced labour of any kind



► Modern Slavery

Modern slavery is a broad term used to describe situations where individuals are exploited for commercial gain and includes forced labour, child labour and human trafficking. It's a sophisticated crime that can exist in organisations without their knowledge and is often incredibly hard to detect. However, we have a legal and moral obligation to manage the risk within C&C Group and to work collaboratively across our supply chain partners to reduce the chance of this happening.



We publish an annual [Modern Slavery Statement](#) that sets out the activities we have taken within the year to combat modern slavery but it takes all of us to be aware of the warning signs. Be aware of:

**Where
do I get more
information?**

[C&C Group Human
Rights Policy](#)

[C&C Group Modern
Slavery Statements](#)



Make sure we are never paying colleagues or temporary workers below minimum wage – not only is this against the law and our policy, it is a sign that people may be exploited by a third party

Only use the approved recruitment processes and channels for permanent and temporary workers. This ensures all the correct pre-employment checks are completed

Isolated or vulnerable workers – are there individuals who appear withdrawn or fearful of others? Do they show signs of injury or tend not to have food to eat at lunch?

Individuals or groups of individuals who appear to be controlled by one person – for example, are groups of people dropped off at a site together and collected again at the end of the day?



AT C&C GROUP EVERYONE IS WELCOME

We strive to ensure everyone feels safe and confident to bring their whole selves to C&C. Respecting the principles of Diversity, Equity and Inclusion (DE&I) means treating everyone with fairness, respect, honesty, and creating an environment where everyone, from any background, can be at their best.

► Diversity, Equity and Inclusion

WHAT IS IT?

At its most basic and practical level this means we must not treat people unfairly because of reasons protected by discrimination law, such as:



Race



Age



Religion

Sexual
OrientationMarriage or Civil
Partnership
StatusPregnancy
or Maternity
StatusGender
Reassignment

Disability

We believe that a diverse and inclusive workplace broadens our perspectives, drives innovation, and enhances our competitive edge by bringing together people with a wide range of experiences, skill sets and viewpoints. We are committed to the following principles:

Promoting an inclusive culture that respects and values differences

Ensuring equal opportunity for all colleagues and prospective colleagues

Creating a work environment where everyone feels safe, supported, and empowered to bring their authentic selves to work

Complying with UK and Irish equality laws, including the Equality Act 2010 in the UK and the Employment Equality and Equal Status Acts in Ireland

Supporting DE&I in our workplace isn't just a legal obligation; it's the right thing to do, makes good business sense and creates a better working environment for everyone.



WHAT CAN I DO?

- ▶ Treat everyone with the dignity and respect that you would like to receive yourself
- ▶ Appreciate that not everyone's background, experience and perspective will be the same as yours
- ▶ Stay open to different views by; asking questions, listening with respect and creating an environment where people can share their opinions and experience without fear
- ▶ Make business decisions about people based on their qualifications, experience and performance – not for any other reason
- ▶ Be conscious of how your actions and words could be interpreted or misunderstood by others
- ▶ Avoid doing or saying anything that could make another person feel unsafe. Never use physical or verbal threats
- ▶ Don't let offensive, derogatory, sexist or racist remarks pass as a 'joke' – it's not banter, it's bullying
- ▶ Report any behaviour or action that isn't compliant with the law or our ***Diversity, Equity and Inclusion Policy***



► Anti-Discrimination / Harassment

Part of making sure our colleagues feel safe at work is making sure we take action where discrimination or harassment occurs. Our Code prohibits harassment of any kind or any other offensive or disrespectful conduct. Harassment includes any unwelcome verbal, physical or conduct of any kind that causes others to feel uncomfortable or creates an intimidating or hostile work environment.

Where do I get more information?

C&C Group plc Diversity, Equity and Inclusion Policy

Sexual Harassment Policy

If you are concerned that you have experienced or witnessed behaviour that isn't in line with our policy please speak to your line manager or HR Business Partner.

If you would like to report a concern anonymously this can be done via **SPEAK UP**

SEXUAL HARASSMENT

Sexual harassment may consist of any unwelcome verbal, visual or physical conduct of a sexual nature.

It can take **many forms** including:

- Unwelcome sexual advances or remarks
- Sexually oriented materials including pictures, texts or other media
- Derogatory or sexually themed 'jokes' or gestures (either explicit or innuendo)
- Explicit or degrading comments about appearance
- Making allegations of sexual harassment maliciously or in bad faith
- Behaviour that happens at work related events even if they are outside of the usual workplace such as Christmas parties or external events

We have a legal duty to actively prevent sexual harassment, this means **our leaders should:**

- Conduct a risk assessment for their areas considering where sexual harassment could happen in their teams
- Ensure their teams are aware of the relevant laws and policies and consider whether additional training is required

All **our people should:**

- Be aware of the relevant laws and policies
- Promptly report any behaviour that they believe could be sexual harassment



WE PROTECT OUR ASSETS

► **Ambassadors of Our Business**

We communicate **RESPONSIBLY** and in a **PROFESSIONAL MANNER** when representing our company

WHAT IS IT?

We hope that all of our colleagues are proud to be ambassadors for our business. But it is important that you are mindful that anything you do or say can affect our reputation. This is especially true in the world we live in whereby a single comment, picture or video can travel the world in an instant and create a permanent and lasting impact. It is important that you stop and think before you put anything out into the public domain about our business (this could include online communications such as commenting on news articles, social media or blog posts).

WHAT CAN I DO?

We always expect you to act in a responsible and professional manner when representing our business externally.

This includes:

Reporting any issues that you find on our social media channels (including fake accounts that have been made to look like C&C Group or any of our brands or content that may have been published by accident)

Respecting our policy on how you can use social media at work or accessing it using company assets. Remember that when using corporate devices your internet access and browsing, telephone calls, email and Teams 'chats' are logged and can be monitored in accordance with applicable laws and regulations

Making sure you have read and understand our **Social Media Policy** that sets out further detail on how you can use social media as part of your role or at work or how you can refer to C&C Group on your personal social media channels

Carefully consider any communications that you make on behalf of the company in a professional capacity or even on your own social media channels if you can be identified as an employee of the Group. For example:

- * Avoid anything that could bring the company into disrepute (for example, by 'liking' or sharing inappropriate content or making defamatory comments about individuals or organisations)
- * Don't breach confidentiality by sharing sensitive company information or sharing new product developments or sales promotions ahead of time
- * Never using discriminatory comments, language or content

Where do I get more information?

Our **Social Media Policy**



► Information Security

WHAT IS IT?

Information security is about protecting the confidentiality, integrity, and availability of our company's data and systems. This includes safeguarding customer, employee, and business information from unauthorised access, loss, or misuse. Strong security practices help maintain trust, comply with legal and regulatory requirements, and protect our reputation.

Where do I get more information?

Refer to the [Information Technology Policies](#) and [C&C Group Records Management Policy](#).

For advice or to report an incident, contact the Cyber Security Team at cyber@candcgroup.com

WHAT CAN I DO?

Handle data responsibly:

Only access, use, or share company information for legitimate business purposes

Protect your credentials:

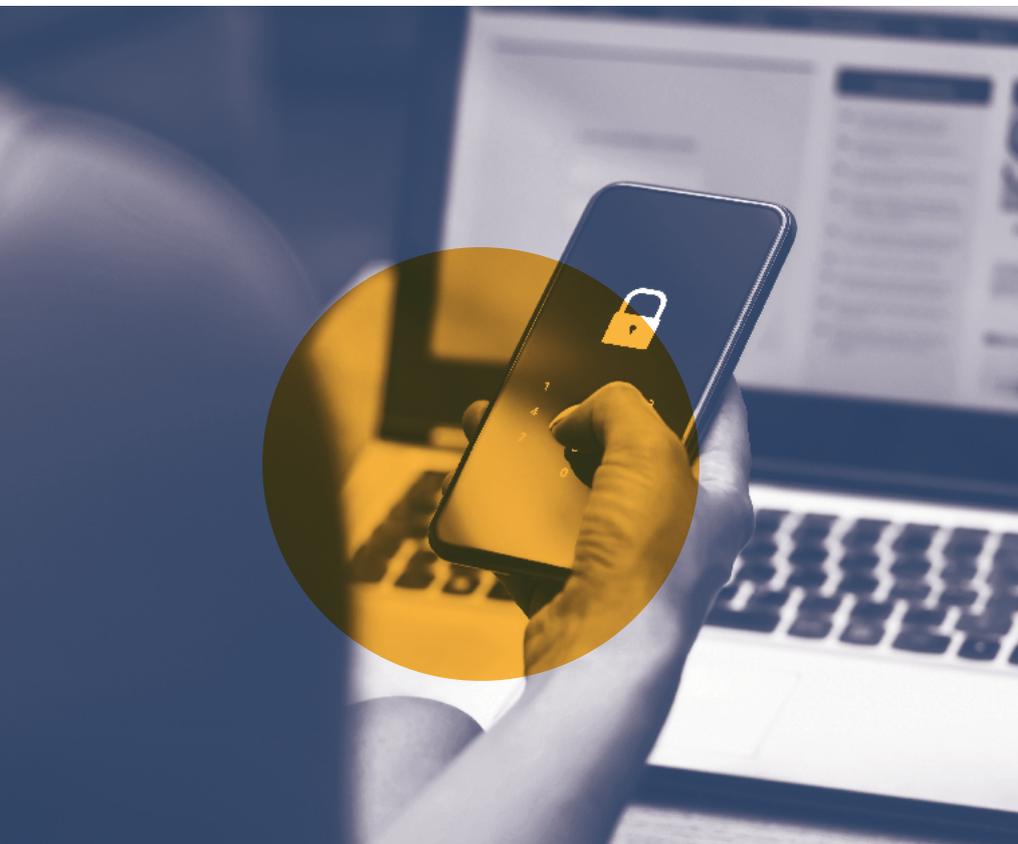
Use strong, unique passwords and never share them. Enable multi-factor authentication where available

Secure devices: Lock your screen when away, keep software updated, and avoid using unauthorised devices or applications

Be alert to threats: Watch out for phishing emails, suspicious links, or unusual system behaviour. Report anything suspicious immediately

Follow policies: Adhere to our Information Technology Policies at all times

Keep up to date: Complete the relevant Information Security training that is assigned to you





► Physical Assets

We **RESPECT**
and **PROTECT**
our property

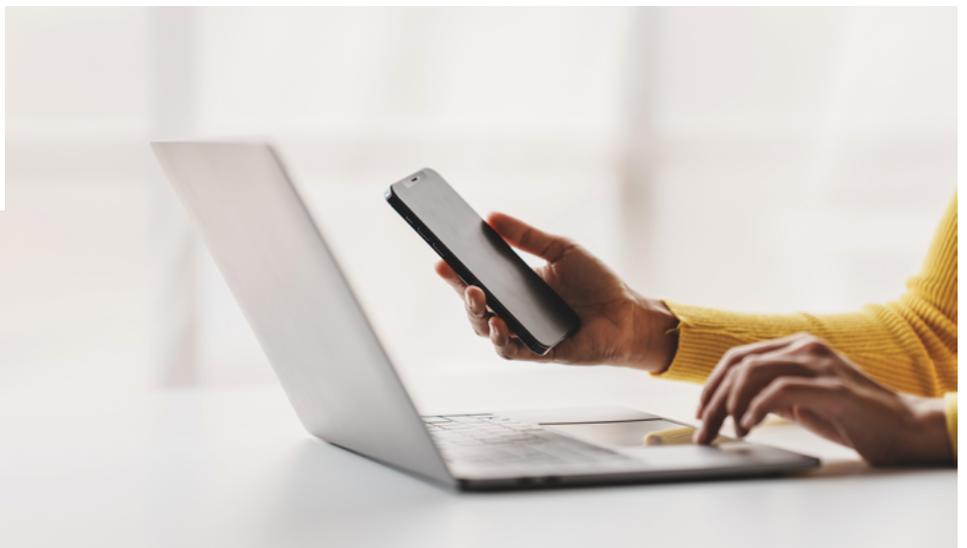
To perform your role you will be entrusted and/or have access to company assets. This may include physical assets such as the Company's property; machinery; materials; parts; products; electronic equipment such as laptops, phones and printers; and vehicles. The Company has trusted that you will take care of the assets and protect them as if they were your own. Everyone has an obligation to ensure that company assets are used responsibly and lawfully, and for the purpose which was intended. Ownership of the assets remains with the Company and you should never attempt to sell or give them away and should protect them from any damage, theft, or misuse.

► Intellectual Property

Our intellectual property is a **VALUABLE ASSET** that we always **PROTECT**

Our brands occupy cherished positions in the hearts and minds of drinkers across the world. Our reputation in these brands and our other intellectual property rights in these brands such as trademarks, logos, copyright and trade secrets must be protected.

You should never allow a third party to use our intellectual property without first seeking approval from the Legal team. If you become aware that our intellectual property is being wrong-fully used by a third party (e.g. counterfeit products or merchandise), please inform the Legal Department immediately. It is also important that we respect the rights of any third parties where we use their intellectual property rights and only use such rights where we have a licence to do so.





► Data Protection

We **RESPECT** personal data that we are entrusted with

WHAT IS IT?

As part of your role, you may process the personal data of colleagues, and third parties such as customers, consumers, and suppliers. This data must be handled with care, integrity, and respect. Failure to do so could result in serious consequences, including:

- * Harm to individuals, such as identity theft, financial loss, or emotional distress.
- * Damage to trust and reputation, both personally and for the Company.
- * Legal and regulatory penalties, including fines and enforcement action.

Examples of personal data include:

- Names
- Dates of birth
- Email addresses
- Identification numbers
- Location data
- Online identifiers (e.g. IP addresses)
- HR records, health information, and financial details

If you can use the data to identify someone directly or indirectly, it is personal data.

WHAT CAN I DO?

All colleagues must:

Comply with the requirements of our Data Protection Policy and its supporting processes.

Complete all data protection training that is assigned to you, or that you are asked to attend.

Use personal data lawfully, fairly, and transparently.

Respect individuals' rights, including their right to access, correct, or delete their data.

Only collect the minimum amount of personal data needed for a legitimate business purpose, and make sure it's accurate and kept up to date.

Only keep personal data for as long as it strictly necessary and in line with our data retention schedules.

Report any personal data breaches (including 'near misses') immediately to the Data Protection Officer (GDPR@candcgroup.com).

Keep personal data secure – for example, by following the requirements of our information security policies, using encryption or password-protection when emailing sensitive data, and applying appropriate data access controls on systems.

Seek support from our Data Protection Officer if personal data will be shared with a third party, transferred outside of the EU or UK, or if a new activity is going to involve people's data. We may need to put a Data Processing Agreement in place, or conduct a Data Protection Impact Assessment first.



Q&A

Q. A colleague needs access to customer personal information but don't have the relevant system access. Can I send them the information they need until they get the appropriate access permissions agreed?

A. No. You have been given systems access in order to let you undertake your specific role at work and not to share with other people. If the individual has the right to access the information for their role then this will be given to them but it's important to follow the correct procedures to make sure we limit the risk of people accessing information that they are not entitled to.

Q. A customer has asked for a copy of their personal data held by C&C. What should I do with their request?

A. Forward it to GDPR@candcgroup.com as quickly as possible so it can be logged and actioned.

Q. What is a personal data breach, and what should I do if I discover one?

A. It's where personal data is accidentally or unlawfully destroyed, lost, altered, disclosed or accessed without authorisation. Examples include sending an email containing personal data to the wrong recipient, unauthorised access to our CCTV systems, or personal data being exposed through a phishing attack.

If you think you've fallen victim to a phishing email, report it to the IT Service Desk immediately. Otherwise, if you spot an incident – even a minor one - report it to our Data Protection Officer by emailing GDPR@candcgroup.com. If you're unsure whether an incident qualifies, email the same address for guidance.

Q. When might we need to complete a Data Protection Impact Assessment?

A. If we're introducing a new system or process that will involve people's data, and particularly if new technology will be used, Special Category data is going to be processed (such as data relating to employees' health), or a large amount of personal data is in scope.



Where do I get more information?

[C&C Data Protection Policies](#)



SUPPLIER CODE OF CONDUCT

Trading responsibly goes beyond how we operate internally and includes how we work with third parties such as suppliers and other representatives. We expect that our suppliers and representatives will seek to comply with and support the principles set out in our Code of Conduct and to encourage their own suppliers, employees, sub-contractors, and third parties acting on their behalf to work to these principles as well.

The provisions of the Code constitute minimum and not maximum standards, and the Code should not be used to prevent you from exceeding these standards. The Code, and any application of the provisions, must be interpreted to comply with national and other applicable laws and regulations.

C&C Group reserves the right to visit and assess our suppliers' commitment to the Code or to request other forms of evidence that the standards are being upheld.

In the event of non-compliance, we expect our suppliers to be committed and engaged in corrective actions within a reasonable timescale. We may reserve the right to terminate any agreements should a supplier decide that compliance with this Code is impossible, where comparable policies or measures are not in place or where a supplier shows repeated disregard for the provisions of this Code and/or any applicable laws or regulations.





► Compliance With the Law

We believe in **COMPLYING WITH ALL LAWS** which apply to our business



We expect our suppliers and representatives to comply with the following:

ANTI-FRAUD, BRIBERY AND CORRUPTION

We have a zero tolerance approach to fraud, bribery and corruption. The offering, paying, soliciting or accepting of any form of bribe or kickback, including facilitation payments, is strictly prohibited. We do not tolerate any form of fraud.

Suppliers, representatives and their employees must:

- Comply with all applicable financial crime laws including, but not limited to: anti-bribery and corruption, anti-money laundering, anti-fraud laws and any relevant international trade and sanctions restrictions.
- Have in place measures to pro-actively identify and prevent employees or persons associated with their business from committing offences of fraud, bribery or corruption.
- Regularly review these measures to ensure that they are operating effectively.

CONFLICTS OF INTEREST

Our colleagues are expected to make decisions in the best interest of the business and we expect our suppliers and representatives to operate a comparable policy within their own organisation. This should include bringing to our attention any situation where an employee of their organisation has a potential conflict of interest in relation to their work with C&C Group in order that this can be appropriately managed.

HANDLING INFORMATION RESPONSIBLY

We expect any information that is shared with our suppliers and representatives to remain confidential. This includes, but is not limited to: financial, commercial and personal data. The information should only be used for the exact purpose for which it has been shared and should never be used to engage in insider dealing.



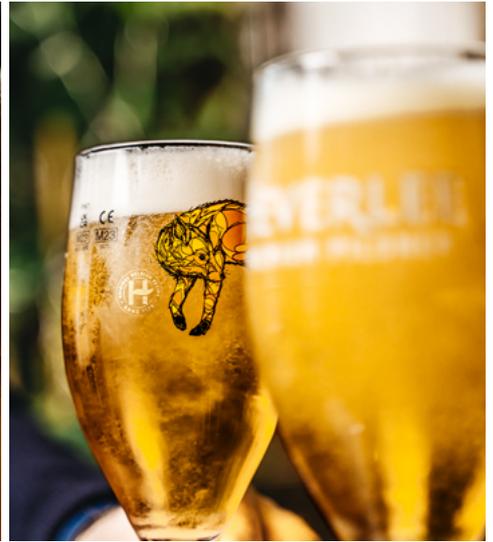
We are committed to doing business with **RESPECT FOR HUMAN RIGHTS**

► Fair Working Practices

We expect our suppliers and representatives to respect and support the dignity, wellbeing and human rights of their employees colleagues, all parties in their supply chain and the communities in which they operate.

This means:

- Not using any form of forced labour, child labour or human trafficking
- Not treating people unfairly because of any of the reasons protected by discrimination law
- Employing a high standard of health and safety management that complies with local health and safety laws
- Respecting the rights of workers to join organisations and associations of their choice and to bargain collectively without retaliation
- Ensuring that working hours, pay and overtime comply with applicable wage, work hours, overtime and benefits laws and regulations and local labour agreements regulations and requirements
- Safeguard confidential information and comply with all laws on personal data and privacy protection applicable to customers, consumers, and employees



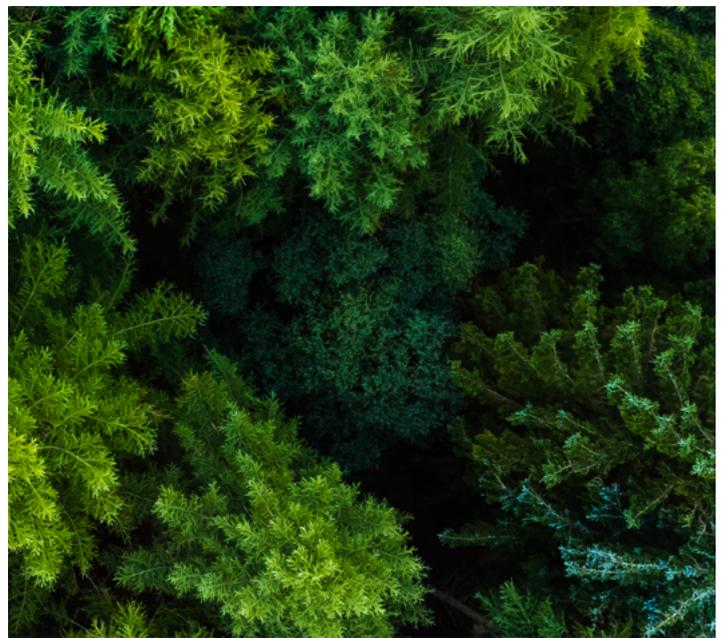
► Environment and Sustainability

Operate with sustainability and social responsibility at the **FOREFRONT**

We strive to grow a sustainable business and to minimise our impact on people and the planet.

We expect that our Suppliers and representatives will:

1. Manage, measure, and report the environmental impacts of their activities in accordance with national environmental legislation and the regulations of the country within which the Supplier operates
2. Think about how they can reduce the environmental impact of their day-to-day operations and consider if these can be improved over time - for instance, by including environmental or climate protection goals as part of their own internal objectives



► Consumer Issues and Product Quality

All suppliers and representatives must ensure that their products and services meet the applicable quality and food safety standards and legal obligations and to report immediately any potential issues that could impact the quality of C&C products. Suppliers and representatives must comply with the relevant clauses on consumer protection and product quality contained within their agreed terms and conditions.



► Reporting Violations

WE SPEAK UP when we see something that's not right

Suppliers should have their own adequate procedures for raising any grievances or compliance related issues internally. In addition to this, C&C Group expects that its suppliers and representatives will raise any possible violation of the Code of Conduct or other applicable laws and regulations at the first opportunity. All suspected violations will be investigated thoroughly by C&C Group and will be carried out in line with legislative requirements. This could include engaging law enforcement or regulatory agencies as appropriate and/or necessary.

If you do not feel able to report potential violations directly you can raise a report anonymously to speakup@candcgroup.com or via our online reporting service



You can also call and leave your message anonymously via our telephone answering service provided by WhistleB. Your voice will be anonymised.



UK 0207 660 1375
Ireland 1800 901 634
Code: 939118



► Maintaining Our Code

At C&C Group we are committed to fostering a culture of integrity, respect, and accountability. This Code of Conduct serves as a guide to help each of us make decisions that will uphold the applicable legal and regulatory standards as well as the values that define who we are. Our Code will be reviewed annually by the Sustainability Management Committee to make sure it reflects and includes any relevant legal, regulatory or business change. Any proposed changes to our Code will be raised to the Executive Committee for agreement and to the Board for approval. Thank you for your commitment to maintaining our Code to keep our colleagues and our business safe.



POLICY LIBRARY

LEGAL

WHISTLEBLOWING (**SPEAK UP**)
ANTI-BRIBERY AND CORRUPTION
GIFTS AND HOSPITALITY
COMPETITION
CONFLICTS OF INTEREST
SHARE DEALING
CHARITABLE DONATIONS
DATA PROTECTION

FINANCIAL

FRAUD
TRAVEL AND EXPENSES: UK | ROI

HEALTH AND SAFETY

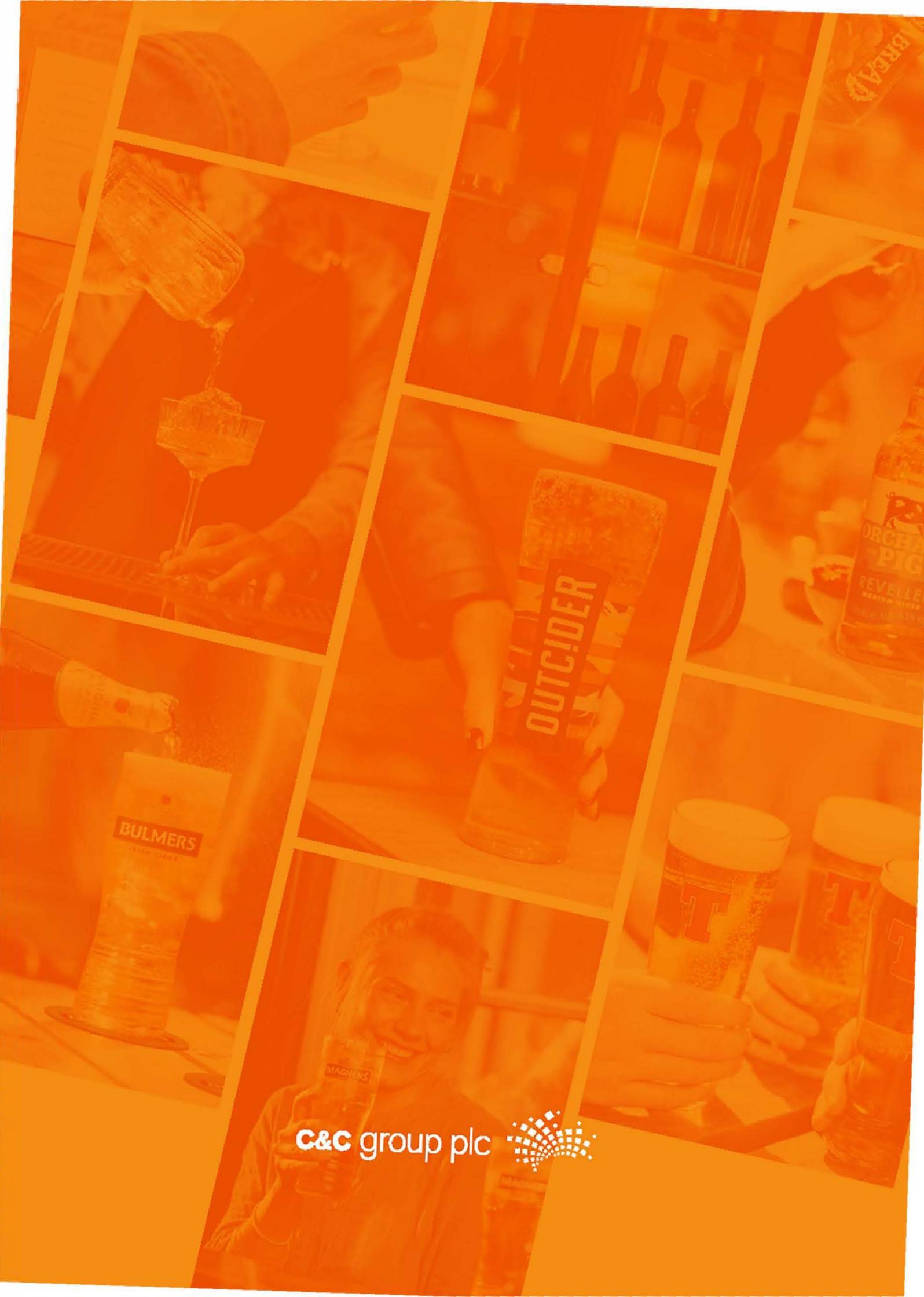
ALL SAFETY POLICIES
RESPONSIBLE DRINKING
SUBSTANCE MISUSE
HUMAN RIGHTS

PEOPLE

DIVERSITY, EQUITY AND INCLUSION
SEXUAL HARASSMENT
SOCIAL MEDIA

ASSETS

INFORMATION SECURITY



C&C group plc 