

## PIVARA SKOPJE AD COMMUNITY CONTRIBUTIONS POLICY

### Context

Pivara Skopje is determined to create value for all stakeholders by supporting the socio-economic development of the society in which our business operate. As a subset of Pivara Skopje AD community engagement strategy, charitable contributions are an integral part of that value creation. Over the years, Pivara Skopje AD charitable donations and other community investments have evolved from standalone philanthropic initiatives to long-term, group-wide programmes closely linked to the business priorities and material issues. While Pivara Skopje AD continues to work on issues of local relevance in our market, particularly emergency relief, it has prioritised three programme areas that are of critical importance across our market, i.e.

- Empowering youth and women;
- Achieving a World Without Waste;
- Establishing water stewardship initiatives

This policy has been established to reflect scope, processes and controls that are to be employed to ensure charitable actions are carried out with fairness and due diligence and are reflective of Pivara Skopje AD core values and community approach.

### Scope

This policy establishes principles and requirements for making charitable contributions in the prioritised programme areas above and applies to Pivara Skopje AD as a company and as well as employees of it. The term "charitable contributions", as used in this policy, refers to monetary or inkind (product) donations, grants, and pro-bono support. Any charitable contribution must comply with the Pivara Skopje AD Code of Business Conduct, Anti-Bribery Policy, The Coca-Cola Company's Responsible Marketing Policy and with all other applicable rules and regulations.

This policy does not cover commercial sponsorship requests and cause-related marketing activities, other donations which fall under our gift & entertainment policy, or charitable contributions made by employees in their personal capacity.

### Objective

We, as Pivara Skopje AD, recognise the diversity of people, culture, and social needs. With charitable contributions, we aim at inspiring a better quality of life by means of long-term, sustainable support for chosen beneficiaries. Moreover, we support the involvement of our employees in charitable contributions and community engagement as such.

### Selection criteria

All recipients of Pivara Skopje AD charitable contributions must be a registered non-profit organisation, certified school, hospital, or other academic or social institution. Preferable are organisations which

- Have long-term goals and objectives that are publicly communicated;
- Are committed to sustainable development;
- Are renowned experts in the area for which the charitable contribution is made;
- Encourage stakeholder engagement and volunteerism; and
- Are transparent about their activities and report on those publicly.

Pivara Skopje AD will not make charitable contributions to:

- Individuals, religious, political or legislative organisations;
- Organisations that discriminate on the basis of race, colour, ethnicity, creed, religion, gender, gender identity and/or expression, national origin, citizenship, ancestry, sexual orientation, age, pregnancy, disability, or political affiliation;
- Organisations that do not fully respect human as per the UN Guiding Principles on Business and Human Rights and the resolutions of ILO Conventions;

- Organisations that are directly involved in gambling, armaments, tobacco and recreational or illegal drugs, with the exception of those organisations specifically dedicated to tackling addiction or drug abuse;
- Professional local sports, family reunions, beauty contests or commercial shows;
- Organisations that conflict with business principles of Pivara Skopje and Code of Business Conduct;
- Projects with a detrimental effect of environment or biodiversity;
- Entities without good standing and a clean record with authorities; or
- Projects which create the appearance of a bribe, kickback, other corrupt practice or projects which require any confidentiality about the contribution.

All charitable contributions are made at the discretion of Pivara Skopje AD. Pivara Skopje AD reserves the right to deny any request for support.

### **Governance**

In accordance with Pivara Skopje AD Anti-Bribery Policy, charitable contributions by Pivara Skopje are authorised by the General Manager or Members of the Leadership Team. Any decision for a charitable contribution will be approved in accordance with the Pivara Skopje AD Chart of Authority.

Before agreeing to donate any charitable contributions, the Pivara Skopje AD Ethics and Compliance Officer must be informed in writing to review if the specific contribution is associated with or entails any interaction with any Public Officials. In this case the prior approval of the charitable contribution and the relevant agreement by the Ethics and Compliance Officer is also required. In case of any doubt about the compliance of charitable contributions with this policy, the written prior approval by the Ethics and Compliance Officer must be obtained.

All contributions must be documented in writing, including the purpose and objectives the contribution, the intended recipient, eligibility criteria, the amount and payment terms as well as any other relevant information.

Pivara Skopje AD has standard terms for payments which extend to charitable contributions. All payments must be properly recorded in the company's Anti-Bribery General Ledger Accounts.

### **Evaluation**

Pivara Skopje ensures applicants (continue to) comply with the terms and objectives of Pivara Skopje Corporate Contributions Policy. The company maintains a regular dialogue with the recipient organizations to evaluate the effectiveness and impact of its charitable contributions, to improve the management of existing projects and to identify future opportunities.

Pivara Skopje AD is also committed to communicating its charitable contributions and the broader community outreach to employees and the public at large in order to encourage employee and stakeholder engagement in volunteering initiatives.

This policy is reviewed at least once a year in order to integrate latest developments, stakeholder feedback or other lessons learned.

Skopje, 18 December 2020

Lambro Patce



Public Affairs and Communication Manager  
Pivara Skopje AD