

	PepsiCo, Inc.	Effective Date: May 15, 2014 Last Revision: October 1, 2024
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PepsiCo is committed to protecting individuals who act in good faith to maintain PepsiCo’s culture of ethics and integrity from any form of retaliation.

SCOPE

This Global Non-Retaliation Policy applies to all PepsiCo Associates, defined as all employees, including employees of PepsiCo’s consolidated subsidiaries, as well as contractors when providing services to PepsiCo.

RETIALIATION IS PROHIBITED

PepsiCo strictly prohibits Associates from retaliating, directly or indirectly, against individuals or organizations that support PepsiCo’s culture of ethics and integrity. Individuals or organizations support PepsiCo’s culture of ethics and integrity when, in good faith, they:


- Report, express an intent to report, and/or assist another individual or organization to report, an actual or suspected violation of PepsiCo’s Global Code of Conduct (“Code”), policies, or the law either through one of the reporting mechanisms described in our Code or to government authorities;
- Cooperate in an internal or government investigation or participate in an internal or government proceeding concerning an actual or suspected violation; or
- Raise a question or concern or seek advice about a particular business practice, decision, or action.

DEFINITION OF RETALIATION

For purposes of this Policy, retaliation means any conduct intended to discourage or penalize an individual or organization from supporting PepsiCo’s culture of ethics and integrity. This includes:

- any intentional action that deprives an individual of employment opportunities or otherwise negatively affects the individual’s current or future status as a PepsiCo employee or the terms or conditions of employment with PepsiCo.
- any intentional action that deprives a contractor or a supplier of the opportunity to provide services or goods to PepsiCo or otherwise negatively affects the terms or conditions of the provision of those services or goods.
- any legal action, or intentional business or economic retaliation, reputational harm, threats, intimidation or violence against any individual or organization that has raised a good-faith concern to PepsiCo or to a government agency or has participated in an investigation.

This Policy does not restrict the Company’s normal, lawful, business practices, such as actions based on a PepsiCo employee’s work performance.

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REPORTING VIOLATIONS

You are required to report suspected violations of this Policy to your Human Resources representative, or any member of the Law Department or Compliance & Ethics Department. Alternatively, you may report suspected violations through the Speak Up hotline (<http://www.pepsicospeakup.ethicspoint.com>).

NO RESTRICTIONS ON REPORTING INTERNALLY OR TO GOVERNMENT

Nothing in this Policy or elsewhere prohibits Associates from raising concerns about potential Code or legal violations within the Company or to government agencies, either during or after their employment or contractor service.

Further, nothing in this Policy or any other PepsiCo policy or agreement restricts the ability of employees, either during or after their employment, to communicate with government agencies about possible violations of the Code or applicable law, provide information to government agencies, file a complaint with government agencies, or participate in a government agency investigation or proceeding.

CONSEQUENCES OF POLICY VIOLATIONS

Any PepsiCo employee who violates this Policy may be subject to discipline, up to and including termination of employment. In some instances, prohibited retaliation may also be against the law and subject an employee to criminal or civil penalties.

Any contractor who engages in prohibited conduct may be subject to removal from providing contractor services to the Company.

QUESTIONS

For additional information regarding Speak Up, please see [Speak Up Frequently Asked Questions](#). You can direct any questions concerning this Policy to your Sector, Region or Business Unit Compliance & Ethics Officer. Alternatively, you can send an email to the Compliance & Ethics Department at PepsiCoComplianceandEthics@pepsico.com.