

FREQUENTLY ASKED QUESTIONS

Our culture of ethics and integrity relies upon every employee acting ethically and following our Global Code of Conduct.

If you see or hear something you believe is illegal or a violation of our Code of Conduct, Speak Up!

Some of these questions contain links to other resources, some of which are only accessible if logged into SodaStream's network.

[What does it mean to Speak Up at SodaStream?](#)

Speaking up at SodaStream is defined by candid conversations where employees are comfortable:

Raising issues when faced with ethical dilemmas

Seeking guidance when a course of action is unclear

Reporting misconduct or potential violations of our Code or the law without fear of reprisal

[Why is it important to report Code violations?](#)

We expect all employees to speak up and report suspected violations of Code of Conduct, our policies of law. Reporting suspected wrongdoing helps maintain our culture of ethics. It allows SodaStream to address issues that could harm our reputation and prevent future occurrences of misconduct.

[What types of Code violations must be reported?](#)

Every employee has the responsibility to report any matter that violates our Code of Conduct. Examples include:

- Financial, accounting or audit irregularities
 - Falsification of documents or records
 - Fraud or theft
 - Conflicts of interest
 - Bribery or corruption
 - Discrimination
 - Harassment
 - Safety or environmental hazards
 - Human Rights violations
 - Misuse of confidential information
 - Criminal activity
- Individual work related concerns, such as scheduling, pay or co-worker issues, can be reported to your supervisor, next level manager or Human Resources manager.

[How can I speak Up and report a Code violation?](#)

There are several channels available for reporting Code of Conduct violations. You can contact any of the following:

- Your direct supervisor or next level manager
- Human Resources representative
- SodaStream's Legal Department or PepsiCo's Global Compliance and Ethics
- Speak Up hotline, available by phone or by web

Our culture of ethics and integrity relies upon every employee acting ethically and following our Global Code of Conduct. If you see or hear something you believe is illegal or a violation of our Code of Conduct, Speak Up! What if I am uncomfortable speaking to someone at my location?

If you are uncomfortable approaching your manager or others to raise your concern in person, you should contact SodaStream's Speak Up hotline. With Speak Up, you can remain anonymous where permitted by law.

What is the Speak Up Hotline?

Speak Up is a 24-hour ethics hotline operated by an independent third party vendor that provides SodaStream employees, consumers, business partners and community members with a 24/7, anonymous and confidential means of reporting suspected violations of our Code. Speak Up is accessible anywhere in the world with dedicated toll-free phone lines in over 60 countries and 38 languages and by web in many languages.

How do I contact Speak Up?

From the main page, please select the country in which you are located. The phone number for your location will be displayed. Or, you may choose to file a report online via this portal.

Am I protected against retaliation?

Yes. Retaliation against an employee for reporting an issue in good faith is a violation of our **Global Code of Conduct** and our **Non-Retaliation Policy**. Under these policies, you will be protected from retaliation when you:

- Report what you believe is a violation of our values, our Code, our policies or the law
- Raise a compliance question or seek guidance about a particular business practice, decision or action
- Cooperate in an investigation of a potential violation
- Report a violation of law to government authorities

How can I recognize retaliation when it occurs?

Retaliation occurs when you experience negative work-related consequences as reprisal for reporting an issue. It can come from your manager or others in your work group, and take many forms, including:

- Termination
 - Demotion
 - Negative performance evaluation without justification
 - Exclusion from meetings and flow of communication
 - Use of negative body language
 - Show of disrespect in private or at team meetings
- If you experience any retaliation after speaking up, or witness it occurring, you should report it immediately so the matter can be addressed.

What type of disciplinary action arises from retaliation?

An employee who is found to have engaged in retaliation against any employee, or threatened retaliation, will be subject to appropriate disciplinary action as determined by the company, up to and including termination.

How is my Speak Up report confidential?

All Speak Up reports will be handled confidentially. The identity of the person making the report, the nature of the report itself, and the name(s) of individuals involved and/or participating in the investigation will be kept confidential and only shared on a limited need-to-know basis as necessary to conduct a full and fair investigation, or as legally required by law.

Should I be worried about breaching confidentiality by submitting a report?

An obligation of confidentiality regarding the nature of your complaint should not prevent you from reporting misconduct through any of means available to you. This includes reporting violations of law to government authorities.

How is Speak Up anonymous?

When making a report through the Speak Up hotline, you have the option to remain anonymous. Our third party vendor does not use any recorders or other tracking mechanisms for phone or web to determine your identity, nor will investigators attempt to identify callers. In some cases, however, it may be helpful or necessary to provide your name and/or work location in order for a meaningful investigation to commence.

What happens when I contact Speak Up by phone?

When you contact Speak Up by phone, a trained Interview Specialist, employed by the Speak Up vendor, will answer your call. If you speak a language other than English or Spanish, a translator will join the call for a three-way conversation.

What type of questions will the Interview Specialist ask?

You will be guided through a series of questions concerning the issue you are reporting, such as: who are the individuals involved; who is responsible for the situation; when did the incident occur; has the incident happened more than once; how do you know of the incident. When you speak to the interview specialist, it is important to provide as much factual information as possible so the matter can be properly addressed or investigated.

Is the process different by web?

When you contact Speak Up by web, you can type your concern in your own words, providing as much detail as possible.

What happens after I contact Speak Up?

All Speak Up reports submitted to the vendor will be initially reviewed and evaluated by the SodaStream's Legal Department together with the PepsiCo's Compliance and Ethics Department. Each matter will be assigned to the appropriate party for investigation or follow-up in accordance with internal incident management processes and the [SodaStream Code of Conduct Escalation Policy](#). Depending upon the nature of the allegation, the investigation may be conducted by a professional from the SodaStream Human Resources, Finance, Legal, or PepsiCo's Compliance & Ethics Department or by an outside firm. With respect to Code Violations, SodaStream's Legal Department will provide oversight for consistency of the investigative process, discipline and appropriate corrective actions.

Who has access to my Speak Up report?

Information contained in a Speak Up report, regardless of whether it is anonymous, is only shared on a strict need-to-know basis. The information will be kept confidential, except as needed to conduct a full and fair investigation or comply with law.

How long does it take to resolve a Speak Up matter?

The time to review and investigate each call varies depending upon the nature of the allegation. Some situations take longer to investigate than others. Our goal is to close out average routine cases within 60 days.

Why do I receive a case number?

Each matter reported to the Speak Up hotline is assigned a unique case number that allows you to follow-up and furnish additional information. If you remain anonymous, the case number will allow us to maintain communication with you. If we need more information, we will instruct the Speak Up vendor to ask those questions when you call back using the unique case number.

What can I learn about the progress being made on my case?

When you call back using the unique case number, you may learn that the matter is currently being investigated or that it has been closed. Please understand that we cannot provide specific details on the investigation, such as with whom we have spoken, the outcome or any, disciplinary or other corrective action that has occurred. We restrict this information due to privacy concerns and to preserve the integrity of our investigations.

What if my suspicions of misconduct were not proven to be correct?

It does not matter if your report was shown to be unfounded, or your suspicions did not turn out to be true, provided you made the report in good faith. You will not be retaliated against if you report in good faith what you sincerely believe to be violation of our Code.

Are there limitations in some countries?

In certain countries and regions, local laws may prohibit or discourage anonymous reporting through employee hotlines or permit only certain types of reports, such as accounting, financial, auditing and bribery matters. Employees from these countries will be advised of such limitations when contacting the Speak Up hotline. If necessary, they should report their concern through one of the other available reporting channels.

Who can I contact with questions?

If you have additional questions about Speak Up, you may contact the SodaStream Legal Department at Complianceðics@sodastream.com.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our stated Code of Conduct, or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX Global. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..." .

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX Global can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.