

## **KDP Chemicals Management Policy**

### **June 2021**

#### **Overview**

Keurig Dr Pepper's (KDP) Chemicals Management Policy ("Policy") establishes our position with respect to the responsible management of chemicals and the identification of opportunities to reduce or eliminate certain chemicals in our products or packaging where feasible. This Policy applies to all raw materials including water, ingredients and food contact packaging materials related to our food and beverage products. At a minimum, all of KDP products are formulated and manufactured so that they are safe to consume as intended. We ensure our products and packaging comply with all applicable regulatory standards and laws and require our suppliers to meet or exceed these standards as well through this Policy and our [Supplier Code of Conduct](#).

#### **Evaluation and Continuous Improvement**

KDP utilized a cross-functional approach to form a team made up of representatives from Corporate Affairs, Food Safety, and Regulatory & Scientific Affairs to develop our Policy. This Policy is reviewed on an annual basis to help identify opportunities for continuous improvement. We strive to go beyond the regulatory compliance to provide exemplary responsible chemicals management. Our safety assessment section below outlines how we evaluate, and review chemicals used in our products and packaging and assesses the need and feasibility of alternatives, where appropriate.

#### **Safety Assessment**

To guide our chemical management decisions, KDP reviews its products against a comprehensive catalog of authoritative and regulatory bodies that identify chemicals of concern, which sources include but are not limited to the resources listed [here](#). The list is updated on a periodic basis or as the landscape evolves.

We assess the presence of chemicals in three different areas: water, ingredients and food contact packaging. The risk of exposure (e.g. migration from packaging to product) and potential hazard classification (e.g. level of chemical present) are evaluated to determine overall use recommendations. We evaluate alternatives with similar functionality and, where appropriate, make recommendations to transition away from specific packaging or ingredients. If transitioning is not feasible in the short-term, a risk mitigation strategy will be developed.

#### **Supply Chain**

KDP monitors and assesses supplier compliance to our Policy. Suppliers are required to provide declarations that all materials used in manufacturing of the packaging/ingredient meet all applicable regulatory and policy requirements. If supplier declarations indicate the presence of a chemical that KDP is no longer using or has identified on a transition plan, then further information will be required, and suppliers will be required to move to an approved alternative.

#### **Selected Chemical Classes and Chemicals**

##### **Trace Contaminants**

Trace contaminants are unintentional impurities that can be present at low levels in products either because they are naturally occurring, or the result of the manufacturing process. If present in our products, these contaminants are within regulated levels. Furthermore, we complete comprehensive

water quality testing to ensure any trace contaminants in the water we use are within safe levels set by regulators.

### **Agrochemicals**

KDP requires its agricultural suppliers to incorporate the universal standards outlined in our Supplier Code of Conduct when conducting business with KDP. For our coffee and cocoa supply chains, we also stipulate product-specific sustainable sourcing programs, such as Fair Trade USA, Fairtrade International, and Rainforest Alliance, that provide auditable standards and required mechanisms to ensure compliance. Each standard ensures that we, through our supply chain partners, are minimizing adverse impacts of pesticides and other agrochemical products on water ecosystems and human health.

We employ a risk-based monitoring program to ensure our ingredients comply with regulations. For fruit and vegetable ingredients this includes monitoring for pesticide and herbicide residues, heavy metals, and patulin in apple and pear materials. Further, we also have a monitoring program for herbicide residues on our green coffee beans.

### **Phthalates**

Phthalates are a group of chemicals that make plastic more flexible and durable. In the beverage industry they can be found in the small plastic liners of bottle caps, particularly those caps made of metal. While the U.S. Food and Drug Administration considers certain levels of phthalates safe, we know some consumers and stakeholders are seeking phthalate-free liners in their beverage packaging. We are no longer purchasing metal closures containing phthalates from suppliers. Our move to alternatives for closures that are free of intentionally added phthalates occurred in 2020 and is expected to be fully transitioned by the end of 2021 as existing inventory is exhausted.

### **Bisphenol A (BPA)**

BPA is a chemical used in the production of containers for consumer goods, including food and beverage containers. All our plastic packaging, including our Keurig® K-Cup pods and PET bottles are BPA free. A portion of our aluminum cans are BPA non-intentional (NI) in jurisdictions where it is required, and we are working with suppliers to attain national coverage in the future as BPA-NI coating supply becomes more readily available.

We want consumers to be confident in the safety of KDP products and are committed to ensuring that the ingredients including water, and food contact packaging are safe for use as intended. This Policy is the basis of our chemicals management program.