March 16, 2012

Dear Stacie, City Councilor Pamela Schwartz and City Councilor Paul Spector, Faculty, Administration, Students, and Smith College Association:

On behalf of Coca-Cola Refreshments, thank you for giving us the time to present our local business story in the State of Massachusetts and locally in Northampton.  We also appreciate addressing questions from the committee.

As promised, please find attachment addressing the concerns of the committee as it relates to workplace and human rights.  This document covers and speaks to the inquiries from our meeting.

All suppliers are required to follow the Supplier Guiding Principles.  In addition, we require independent, third-party audits of our suppliers every three years at a minimum.  If issues are identified, the supplier is given an opportunity to correct the problems and demonstrate compliance.  More frequent audits may be required if a supplier has not complied fully with the *Supplier Guiding Principles*.  If issues are not addressed properly, the Company reserves the right to discontinue the relationship with the supplier.

Thanks again for allowing us an opportunity to share our company sustainability and community initiatives in Northampton. We appreciate the opportunity to participate in the upcoming RFP process for Smith College.  If there are additional questions, please contact us.

Best personal regards,

Harriet Tolve

Harriet Tolve

Public Affairs & Communications

Coca-Cola Refreshments

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**WORKPLACE & HUMAN RIGHTS OVERVIEW**

* Workplace and human rights are a high priority for The Coca-Cola Company. We are committed to fostering open and inclusive workplaces where workplace rights are respected and all employees are valued and inspired.
* Around the world, Coca-Cola workers are free to exercise their rights to union membership and collective bargaining, without pressure or interference. In fact, we are one of the most-highly unionized multinational business systems in the world, and we keep working to improve our labor relations and workplace rights practices.
* The Company has also established Supplier Guiding Principles to ensure that the companies supplying us with goods and services adhere to the same recognized workplace standards that we require of ourselves.

**Supporting Points**

During the past five years, we have made the following systemic changes:

**Business Leaders Initiative on Human Rights (BLIHR)**

* In 2007, we joined the Business Leaders Initiative on Human Rights (BLIHR), a group of 12 leading multinational companies -- including ABB, General Electric, Hewlett-Packard and Novartis -- focused on identifying practical ways of applying human rights principles within the business context.
* BLIHR was founded in 2003 by seven companies and was chaired by Mary Robinson, former president of Ireland and former United Nations high commissioner for Human Rights.
* In 2009, BLIHR released a human rights matrix of essential steps that companies must examine and address as part of their social license to operate. Our Company used the matrix to identify and address any global policy gaps, with the help of the Danish Institute for Human Rights.
* BLIHR concluded its mandate in March 2009.

**Global Business Initiative on Human Rights (GBIHR)**

* In 2009, our Company became a founding member of the Global Business Initiative on Human Rights (GBIHR). GBIHR is a business-led project that aims to bring more companies based in emerging markets into the dialogue on respect for human rights in business.

**Workplace Rights Policy and Human Rights Statement**

* In 2007, we adopted our Workplace Rights Policy, which serves to reconfirm that we apply a consistent approach to workplace rights worldwide. The policy contains the Company’s principles on freedom of association, human trafficking, forced labor, child labor, discrimination, work hours and wages, safe and healthy workplaces, workplace security, and community and stakeholder engagement.
* We also adopted a Human Rights Statement in 2007, which communicates our Company’s pledge to manage our business around the world in accordance with the highest standards of integrity, with a specific emphasis on respect for human rights in the communities and countries in which we operate.
* We conduct training globally on our Workplace Rights Policy, and the Policy includes a confidential reporting mechanism for associates to raise questions about the policy or report a potential violation.
* In 2009, we took our work with Business Leaders Initiative one step further when we engaged the Danish Institute for Human Rights to review our global Company policies and identify the gaps between those policies and the practical steps identified by the Business Leaders Initiative. It is with the Danish Institute’s guidance that we set out to refresh our Human Rights Statement and Workplace Rights Policy guidance in 2010.
* In 2011, we rolled out updated guidance on the Human Rights Statement and Workplace Rights Policy to our associates worldwide. This updated guidance included suggestions made by the Business Leaders’ Initiative and Danish Institute. It also takes into account guidance from the United Nations Secretary-General’s Special Representative on business and human rights, who has articulated the government’s responsibility to protect against human rights abuses and provide a remedy when such abuses occur and – importantly for our purposes – businesses’ responsibility to respect the human rights of their workers and the people in the communities in which they operate.

**U.N. Global Compact**

* In 2006, the Company joined the U.N. Global Compact, pledging that we will promote and continually strive for improvements in human rights, labor standards, the environment and anti-corruption. Participation in the Compact requires that we demonstrate our commitment through actions and by incorporating socially responsible practices into our business plans.
* In January 2011, we committed to participate in the UN Global Compact LEAD program that establishes a blueprint for corporate sustainability leadership.

**International Organization for Food & Beverage Unions**

* In 2005, The Coca-Cola Company signed a joint statement with the IUF (the International Organization for Food and Beverage Unions) confirming that
Coca-Cola workers are “allowed to exercise rights to union membership and collective bargaining without pressure or interference.” This agreement established an ongoing working relationship with the IUF, including meeting twice a year to discuss workplace practices and issues.

**Multi-Stakeholder Convenings**

* The Coca-Cola Company has hosted representatives from business, government, civil society, advocacy groups, academia and others annually for the past five years to discuss human rights and workplace challenges and solutions.
* We have focused sessions on child labor, the U.N. Guiding Principles on Business and Human Rights, human trafficking and other topics. In fact, our most recent convening occurred on Feb. 14, 2012, at our Company headquarters in Atlanta.
* Learnings from these sessions have been incorporated into our own Workplace Rights Policy, Human Rights Statement, Supplier Guiding Principles and the many local programs that we support

**Supplier Guiding Principles**

* In 2002, The Coca-Cola Company implemented The Supplier Guiding Principles Program. As part of this program, we regularly conduct third-party on-site audits of our suppliers’ and bottler facilities. These audits are conducted by independent third party auditors.
* The independent auditors follow an assessment protocol that is comparable to the protocols that are followed by the Fair Labor Association, the International Labor Organization, the Workers’ Rights Consortium and Social Accountability International. If violations are found, the facility is required to develop a time bound corrective action plan to address findings. Depending on the situation and severity of the findings, subsequent audits and/or termination of the licensing agreement may be mandated. The IUF is involved to ensure corrective actions are taken.
* To date we have audited 500 bottlers and they have made all the necessary changes when corrective action was required. These audits are managed by Ed Potter’s Global Labor Relations Workplace Accountability unit.

In addition:

* In 2005 we signed a joint statement with the IUF (the International Organization for Food and Beverage Unions) confirming that Coca-Cola workers are “allowed to exercise rights to union membership and collective bargaining without pressure or interference”.
* Last year the Company entered into the U.N. Global Compact, pledging that we will promote and continually strive for improvements in human rights, labor standards, the environment and anti-corruption. Participation in the Compact requires that we demonstrate our commitment through actions and by incorporating socially responsible practices into our business plans.
* Our top six bottlers, representing two-thirds of our global volume, have also signed a statement of commitment to our citizenship platform, which clearly articulates the system’s values regarding workplace practices that reflect dignity, fairness and respect and that demonstrate our fundamental commitment to human rights.