



EMPLOYMENT PRIVACY POLICY

Effective Date

This policy is effective on or after July 1, 2024.

1. Applicability

This policy applies to all PepsiCo Canada ULC, which operate the PepsiCo Beverages Canada and PepsiCo Foods Canada businesses and The Pepsi Bottling Group (Canada), ULC (together, referred to as PepsiCo) employment candidates, employees and former employees ("Personnel") working in the Province of Québec.

2. Principle

PepsiCo respects Personnel's need and legal right to privacy.

We are committed to abiding by all relevant legislation pertaining to privacy including Québec's *Act respecting the protection of personal information in the privacy sector* (the "Privacy Act").

3. Policy

A. Consent

In general, when an employee accepts an offer of employment, they consent to the collection, use and disclosure of their personal information for all of the uses listed below.

Personal information means identifiable information about you, but does not include work product information or contact information.

The Privacy Act describes employee personal information as information about you that is collected and used to establish, manage or terminate any employment relationship.

B. Purposes of Collecting, Using and Disclosing Personal Information

Our goal is to help ensure that all personal information collected, used and disclosed has a clear and legitimate purpose that relates to the working relationship. The personal information required to administer the working relationship varies with each individual employee. The length of the working relationship, career choices, and individual performance are among the factors that will influence the nature and extent of the personal information that may become relevant. Personnel can reasonably expect that we require personal information for purposes including:

- establishing and managing your employment relationship with PepsiCo.
- determining eligibility for initial employment or contract work, including the verification of references and qualifications and physical and/or mental fitness for work
- managing post-employment related activities, such as providing references
- administering pension and benefits plans, and payments
- considering promotions or changes in jobs
- considering salary, bonus, and other incentive-based compensation
- providing uniforms and safety equipment
- conducting performance reviews and determining performance requirements
- assessing qualifications for a particular job or task
- monitoring attendance
- remunerating you for your services
- recording significant events during your employment relationship
- maintaining workplace safety
- monitoring use of our facilities, equipment, and other company resources, including email and Internet access
- operating and managing IT and communication systems, including disaster recovery systems
- performing audit processes
- ensuring compliance with internal policies and procedures
- investigating suspected misconduct or non-performance of duties
- establishing a contact point in the event of an emergency (such as next of kin)
- facilitating part of a potential business or commercial transaction
- complying with applicable labour or employment statutes
- compiling directories and telephone lists
- ensuring the security of company-held information
- establishing training and development programs
- administering corporate travel and processing expense reimbursements
- attending to matters related to illness or injury that affects your work, including workers' compensation claims
- such other purposes as reasonably required by us

No employee of PepsiCo is authorized to share Personnel personal information except in accordance with the Privacy Act. Generally, this means that no employee may share any information without the consent or deemed consent of the individual unless there are extenuating circumstances such as legal requirements or medical emergencies. No one should share Personnel personal information except as authorized by PepsiCo's Privacy Officer.

C. Sources of Information

Personal information may be collected from the following sources: resumes, job applications, interviews, reference checks and other background checks, information you provide us, security checks, performance appraisals, medical certificates from attending physicians, emails, computer records, telephone, faxes, application for company-provided benefits, leave of absence requests, vacation or maternity and parental leave requests and investigations into complaints.

D. What Personal Information is Collected

Personal information collected by PepsiCo includes the following information about employees:

- name, photograph, home address and telephone number, email address, emergency contact, severe allergies or medical conditions that require our awareness, next of kin, dependents, marital and family status
- age/date of birth, sex, gender or gender identity, education, training, work experience, employment history, educational background, reference language and other job-related skills, military or veteran status, service, including breaks in service
- letters of offer or acceptance of employment or contract opportunities, interview notes, resume, CV or related employee or contract application materials
- years of employment records, salary and benefits, performance evaluations, bonus, discipline records, promotion/demotion, attendance, vacation and leaves of absence
- information required for the administration of payroll, group insurance plans and RSP group plan, including social insurance number
- workplace accidents
- passport, visa information, Nexus card or other enhanced entry document
- information regarding immigration status and eligibility for work
- information regarding the use of company resources
- driver's licence number or other photo-identification
- payroll, salary and financial account information, pension and benefit information, including employee health and welfare benefits, short- and long-term disability, life insurance, optional life insurance, accidental death & dismemberment, medical and dental care

- in some instances, health status information (including information on disability), medical examinations, drug tests, and information respecting fitness for work
- any information required by law

E. Who is your Personal Information Shared With

We may share your personal information with third parties where necessary for the purposes for which it was collected.

In connection with such sharing of personal information, your personal information may be accessed, collected, stored and processed in jurisdictions outside of Quebec, including the US and other jurisdictions, by our affiliates or third-party service providers. For information about our policies and practices relating to our use of service providers outside of Quebec, please contact us using the contact information set out under Section F, "Questions/Concerns", below.

Where personal information is shared with our affiliates or third-party service providers that process or store personal information on our behalf, we will require that such affiliates and/or third parties have agreed to safeguard personal information and use the information only for the purpose(s) for which it has been provided.

We will not disclose Personnel personal information to any third party without your consent except as set out below or as otherwise permitted or required by law.

- **Service Providers:** We may transfer your personal information to third party service providers (including affiliates) who process employee personal information on our behalf for the purposes above. For example, we may use service providers to administer payroll and benefits. We will use contractual or other means to ensure that our service providers security measures that are reasonable given the sensitivity of the personal information, purpose for which the information is to be used, the quantity of the information and the medium on which it is stored. We do not authorize such third parties to use the information for any other purpose.
- **Legal Requirements:** We or our affiliates and third party service providers may disclose your personal information in response to a search warrant or other legally valid inquiry or order, to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies).
- **Business Transactions:** Your personal information may also be disclosed where necessary in connection with a prospective or completed sale of assets, merger or other

corporate restructuring. If we acquire new companies, we may obtain information about you from your previous employer in order to establish our employment relationship.

F. Questions/Concerns

If you have any questions or concerns regarding the manner in which PepsiCo collects, uses or discloses personal information, please contact your local Human Resources Manager.

You can also contact our Privacy Officer at:

Privacy Officer
PepsiCo Foods Canada
2095 Matheson Boulevard East
Mississauga, ON L4W 0G2
Email: pfc-privacyofficer@pepsico.com

Privacy Officer
PepsiCo Beverages Canada / The Pepsi Bottling Group
2095 Matheson Boulevard East
Mississauga, ON L4W 0G2
Email: pbcc-privacyofficer@pepsico.com

G. Access

If you wish to review the personal information collected by us, please see your local Human Resources Manager. If you require assistance in preparing your request, we will assist you. You will receive a response to any request within thirty (30) days.

We will gladly inform you about how the personal information has been used.

If you are denied access to any information, you will be told why.

If there is any incorrect information about you, we will change it once advised.

Additionally, you may withdraw consent to our collection, use or disclosure of your personal information, request that we cease dissemination of your personal information, if certain conditions are met.

H. Updating your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes by contacting your local Human Resources Manager.

I. Security

We are committed to the secure storage of personal information. The Human Resources Department and the Account Department keep personnel files. We maintain reasonable physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to help prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure. We have taken steps to help ensure that your personal information is only authorized to be accessed by personnel and third-party service providers on a “need-to-know” basis.

In some instances, Personnel personal information may be shared with our affiliates and/or third party service providers of administration services, such as benefit administration or payroll. Such information may physically reside or be securely stored or accessible on servers located outside of Quebec. In such cases, we ensure that all such affiliates and/or third party service providers of administration services meet our security standards and that the personal information will not be used for purposes not relevant to the purpose for which the information was collected.

J. Complaints

Employees have the rights to make a complaint about improper collection, use or disclosure of personal information by PepsiCo. You have the right to lodge a complaint with the local Human Resources Manager and to receive a response to such complaint within thirty (30) business days. The complaint will be investigated and, if justified, appropriate measures will be taken. Further, you have the right to appeal the decision of the local Human Resources Manager, and to receive a timely response to any appeal.

K. Retention

We will retain certain personal information in order to satisfy the purpose for which it was collected, to satisfy our legal obligations and to protect the interests of PepsiCo. Any personal information that has been collected and is no longer required will be destroyed, disposed of or rendered anonymous following the expiry of an appropriate retention period.