

Conflict Minerals Policy

May 2019

PepsiCo is committed to ensuring that it conducts its business worldwide with respect for human rights and in compliance with all applicable laws, as evidenced by PepsiCo's Global Code of Conduct, Global Human Rights Policy, 2018 Modern Slavery and Human Trafficking Statement and Global Supplier Code of Conduct. That includes taking steps to ensure that we are not sourcing gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives as limited to tantalum, tin and tungsten (conflict minerals) that fund armed groups in the Democratic Republic of Congo and its adjoining countries (the covered countries).

For those products in our supply chain that include conflict minerals that are necessary to the functionality or production of the products, we follow due diligence procedures consistent with the processes and procedures set forth in the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We hold our suppliers to the same standards of integrity to which we hold ourselves and we are committed to working with our suppliers to ensure that we are not sourcing conflict minerals that fund armed groups in the covered countries. In addition to adhering to our Global Supplier Code of Conduct, we expect each of our relevant suppliers to:

- Source minerals only from facilities outside of the covered countries or that have been certified by an independent third party as conflict-free if mined in the covered countries;
- Adopt mineral sourcing policies and due diligence measures that are consistent with this policy; and
- Make available to us its due diligence information used in determining the source of any conflict minerals.

Interested parties can report concerns or ask questions regarding PepsiCo's Conflict Minerals Policy by sending an email to PepsiCoConflictMineralsinquiry@pepsico.com or by calling the PepsiCo "Speak Up" hotline at 1-866-729- 4888 in the United States or to dedicated phone lines in other countries throughout the world. The list of international hotline telephone numbers may be updated from time to time as reflected at <http://www.pepsico.com/about/global-code-of-conduct>.