

The Coca-Cola Company

ONE COCA-COLA PLAZA
ATLANTA, GEORGIA

EDWARD E. POTTER
DIRECTOR
GLOBAL LABOR RELATIONS

ADDRESS REPLY TO:
P.O. BOX 1734
ATLANTA, GA 30301
404-676-2379

November 16, 2005

Terry Collingsworth, Esq.
Executive Director
International Labor Rights Fund
733 15th Street, NW Suite 920
Washington, DC 20005

Dear Terry:

For someone I have known for more than a decade, and with whom I have had most cordial dealings, I find your November 14, 2005 letter to me to be an astonishingly misleading and self-serving letter that has total disregard for the facts and the integrity on which ongoing relationships are based. In short, your letter highlights the breathtaking lengths that you and your clients and associates are prepared to go to manipulate a good faith effort by university administrators to assess current conditions in Coca-Cola bottling operations in Colombia and the lengths that you are prepared to go in your defamatory communications campaign against The Coca-Cola Company and its bottlers.

As you very well know, we never discussed this past Friday, nor have we ever discussed in the past, Coca-Cola's internal investigations of the allegations in the Miami complaint. Contrary to the representations in your letter, The Coca-Cola Company and its bottlers have interviewed witnesses to the matters in question and are confident in the sufficiency of these investigations. These investigations found no evidence that Coca-Cola bottling plant managers in Colombia conspired with paramilitaries to threaten or intimidate trade unionists, and no evidence that Coca-Cola bottling plant managers had any role in the death of Isidro Gil.

Your clients chose to file a lawsuit in U.S. court against The Coca-Cola Company and its bottling partners. It has been our consistent position that matters currently the subject of this lawsuit should be handled within the litigation process chosen by your clients. As you are fully aware, contrary to the discovery process in the Miami litigation, the university commission assessment process and materials would not be subject to basic due process safeguards, such as the ability to cross-examine witnesses and authenticate documents, required by U.S. federal law. SINALTRAINAL has been aware of Coca-Cola's position on this issue for quite some time. It is telling that neither you nor they expressed to us or the commission any objections or concerns regarding this position prior to your letter to me.

Your claim that we are attempting to "bury" relevant information under the inadmissibility agreement is completely false and disingenuous. As you know, the agreement specifically states that, if information is otherwise discoverable or admissible, the mere fact that the information constitutes assessment information will not preclude its introduction in the litigation. If, as you

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claim, you already have such facts and information, the draft agreement provides that you will still be able to introduce such evidence in the litigation. Your response confirms our conclusion that you do not have any such evidence. It is clear that the only basis for your client's refusal to agree to inadmissibility of assessment materials is that you and SINALTRAINAL intended from the beginning to manipulate the commission's assessment process as an improper discovery tool that is not subject to standard due process requirements.

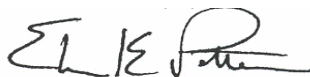
In your letter, you indicate that you and your client, SINALTRAINAL, absolutely refuse to have any dialogue whatsoever with The Coca-Cola Company in order to enable the assessment commission to accomplish a fair and balanced assessment of current human and labor rights practices at Colombian bottling facilities. Your claim that the ILRF and plaintiffs will cooperate fully in an assessment is disingenuous in view of your refusal to engage in a discussion with us on the inadmissibility agreement.

The ILRF and SINALTRAINAL's refusal to engage in any dialogue is in stark contrast to the open manner that The Coca-Cola Company has engaged with the assessment commission on this issue. As you know, it was The Coca-Cola Company that initiated the formation of the working group on May 6 in Washington, DC with representatives from various colleges and universities to examine the feasibility of conducting an independent third party assessment on current labor conditions in Colombia. As requested by the students in the group, however, we are not members of the commission itself but rather have been responding to its questions and proposals. Throughout this process we have actively supported the commission's work, and have been working with the commission in good faith toward a complete, impartial, independent assessment.

For example, during a meeting with the commission last week, we suggested that the commission expand the proposed protocol to increase the number of bottler locations to be assessed and to increase the categories of current and former employees to be interviewed. Moreover, as you and your clients are well aware, we have met all deadlines for response, input, and information requested by the commission. It is clear that the refusal of the ILRF and SINALTRAINAL to even discuss, much less agree to an inadmissibility agreement thwarts the very purpose of the commission.

As I have indicated to you, I firmly believe that communication is essential to problem resolution. It is evident that you and your clients would rather be obstructionists rather than constructive participants. Nonetheless, I remain open to constructive input from you on the inadmissibility agreement, should you choose to provide it.

Sincerely yours,



Edward E. Potter
Director, Global Labor Relations