

Human Rights Policy

Our Human Rights Policy

At Mondelēz International, we are committed to making our snacks the right way, protecting the planet and respecting the human rights of people in our value chain, using the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#) as a framework for preventing and mitigating human rights risks.

This policy applies to all employees of Mondelēz International worldwide. We also expect temporary and contract employees, consultants, agents and any other third party who acts on behalf of Mondelēz International to follow the principles of this policy. This policy is aligned with our [Code of Conduct](#), other Mondelēz International policies and our [Supplier Code of Conduct](#) that set out human rights requirements applicable to our suppliers and business partners, regardless of whether they work at Mondelēz International-owned or independent facilities. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

In addition to abiding by applicable law and regulation, Mondelēz International endeavors to respect all internationally recognized human rights, as relevant to our operations and as set out in the Universal Declaration of Human Rights. We support the principles concerning fundamental rights set out in the International Labor Organization Core Conventions and the International Bill of Human Rights. Our commitment to this goal is demonstrated by our role as a signatory to the UN's Women's Empowerment Principles and our adoption of the Consumer Goods Forum's Forced Labor Priority Industry Principles that every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work.

At Mondelēz International, we undertake efforts on the following human rights areas, among others:

- **Child Labor and Forced Labor:** We explicitly prohibit child labor and forced labor in our operations
- **Diversity, Equity and Inclusion:** We value diversity, equity and inclusion and aim to promote cultural and individual differences
- **Harassment and Discrimination:** We will not tolerate any form of harassment in employment or employee treatment
- **Safety and Health:** We use internal and external expertise to provide a safe work environment
- **Compensation and Development:** Our goal is to pay our employees a living wage and provide equal opportunity for advancement to all our employees
- **Freedom of Association and Collective Bargaining:** We believe in a workplace where employees have the right to join (or not join) a union and we are committed to bargaining with employee representatives in good faith
- **Natural Resources, Environment and Sustainability:** In our operations, we respect the ownership and use of land and natural resources such as water that local communities depend on

1. Implementation of Our Human Rights Policy

Governance Structure for Human Rights

The Mondelēz International Human Rights Working Group (“HRWG”) is the cross-functional team that defines Mondelēz International’s human rights due diligence strategy and drives its implementation throughout our own operations and supply chains. The HRWG reports regularly to senior leaders in the Human Rights Council and a report on Mondelēz International’s human rights due diligence is provided at least annually to the [Board of Directors’ Governance, Membership & Public Affairs Committee \(GMPAC\)](#).

Human Rights Due Diligence

We undertake practical, proactive, and ongoing human rights due diligence to identify, mitigate and reduce the likelihood of potential and actual human rights impacts within our own operations, and work with our business partners in our supply chain to achieve the same. We strive to embed these due diligence practices at a central level, as well as at a local level in collaboration with our business units.

We recognize the importance of engaging with our stakeholders. We are open to dialogue, and where possible, we seek to engage with the communities where we operate to understand and address potential impact of our operations.

Employee Training

Training is an important factor in developing effective human rights practices. As part of our onboarding and ongoing compliance training program in 32 languages, we undertake efforts to build our employees’ awareness of our commitments and human rights policy, and to build our internal capabilities to continuously improve our due diligence practices.

Remedy & Grievance Mechanisms

We use the UNGPs as a framework for preventing and mitigating human rights risks. In line with this framework, we also acknowledge our responsibility to provide access to effective remedy if violations have occurred.

We believe it is fundamental to ensure the availability of accessible grievance mechanisms for all employees and people outside Mondelēz International who want to raise a concern. Our [Integrity HelpLine and WebLine](#) are made available to our employees and third parties to raise concerns and to better enable Mondelēz International to appropriately address potential human rights impacts.

We are committed not to interfere with the activities of human rights and environmental defenders, including those who campaign on issues that may be linked to our business operations, nor to tolerate or contribute to retaliation against them.

Monitoring & Reporting

We continually evaluate and review how best to strengthen our approach to addressing human rights. We believe that working through external and industry initiatives, with governments and non-

government organizations, suppliers, and other businesses, is often the best way to address shared and systemic challenges. We will track and publicly report on progress on an annual basis.

2. Report suspected misconduct

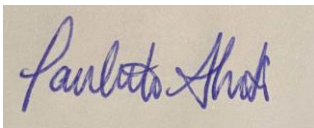
Mondelēz International encourages all employees to report any violations of this Human Rights Policy. If you believe that any provision within this policy may have been violated, you must report immediately via:

- your supervisor or your supervisor's supervisor;
- your People Lead;
- the [Legal Department](#);
- the [Compliance Team](#); or
- MDLZ [Integrity HelpLine](#) and [Integrity WebLine](#)

When you speak up and raise concerns or report wrongdoing in good faith, you are doing the right thing and Mondelēz International will not tolerate any retaliation against you.

Reports of suspected wrongdoing by people outside of Mondelēz International may be brought to our attention in three ways:

- By mail:
Compliance & Integrity Department
Mondelēz International
905 West Fulton Market, Suite 200
Chicago, IL 60607 - USA
- By e-mail: Compliance@mdlz.com
- Through our [Integrity HelpLine](#) and [WebLine](#)



Paulette Alvitti
Chief People Officer
Mondelēz International