

**Corporate Human Rights Benchmark
2019 Company Scoresheet**

Company Name Mondelez International
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 30.6 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
11.8	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
5.8	20	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations
2.4	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company has a statement supporting human rights on their website that states "Mondelez International is committed to do business the right way and to its responsibility to respect human rights. We comply with all applicable laws in the jurisdictions where we operate." [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> Met: UNGPs: On the Company website, it states that the company 'subscribe in principle to the United Nations Guiding Principles on Business and Human Rights (UNGPs). The company states that "In line with the UNGP framework of 'Protect, Respect and Remedy', we have the appropriate policies in place, and we acknowledge our responsibility to respect human rights by avoiding the infringement of the rights of others, addressing negative impacts with which we may be involved, and providing access to effective remedy if violations have occurred." [Compliance and Integrity: mondelezinternational.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core: The Company's corporate responsibility guidelines include forced labor, child labor, diversity and inclusion, third-party representation. Also, it prohibits the unlawful employment or exploitation of children in our workplace, in accordance with the conventions of the International Labor Organization (ILO).

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			<p>However, a publicly available statement of policy committing it to respect the human rights that the ILO has declared to be fundamental rights at work was not found (or explicit commitment in relation to each ILO core area). [Compliance and Integrity: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 [Compliance and Integrity: mondelezinternational.com] • Not met: Explicitly list All four ILO for AG suppliers: The Company indicates that 'In addition to complying with all laws and regulations, Supplier must comply with the following in connection with the goods and services provided to Mondelez International: Forced Labor; Child Labor; Diversity and Inclusion; Third-Party Representation (meaning supplier will respect the decision of its employees to join and support a union as well as their decision to refrain from doing so where legally permitted). However, it is not clear it expects its suppliers to commit to respecting collective bargaining. [Compliance and Integrity: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company's corporate responsibility guidelines include forced labor, child labor, diversity and inclusion, third-party representation. Also, it prohibits the unlawful employment or exploitation of children in our workplace, in accordance with the conventions of the International Labor Organization (ILO). However, no evidence found of a public commitment to each ILO core area, including collective bargaining. [Compliance and Integrity: mondelezinternational.com] • Met: Respect H&S of workers: The Company indicates that 'We use internal and external expertise to provide a safe work environment. Specifically, we: (i) provide safety training for all employees as required for their work; (ii) establish first aid and medical treatment procedures to provide employees with appropriate care; (iii) conduct careful investigations of accidents to avoid recurrence, and study the safety and health features of any new equipment, materials or process; and (iv) solicit employee involvement and support through safety committees or other avenues for employee input'. In addition, the Company states that 'We keep our colleagues safe. Because workplace safety is fundamental to our success. In fact, we include it as part of our business plans. Our safety policies and practices are designed to provide a safe workplace for our employees, and we're proud of our safety performance'. [Compliance and Integrity: mondelezinternational.com & Ensuring a safe working environment, 20/08/19: mondelezinternational.com] • Met: H&S applies to AG suppliers: As part of the supplier contract provisions, the Company indicates that 'Supplier will endeavor to provide safe working conditions, provide its employees with appropriate protection from exposure to hazardous materials, and provide its employees with access to potable water and clean sanitation facilities'. [Compliance and Integrity: mondelezinternational.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respect land ownership and natural resources: The Company indicates that 'we believe that conserving the land and forests is a promise to future generations. Under this key area, we focus on maintaining cocoa ecosystems by protecting the land and forests'. Also, although the Company indicates that land rights is one of its salient human rights risks, no formal commitment to respecting ownership/use of land and natural resources found. [Cocoa Life Annual Report 2018, 04/2019: d1lx47257n5xt.cloudfront.net & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights: The Company indicates that land 'rights is part of the framework for implementing MDLZ's Palm Oil Action Plan. MDLZ expects suppliers 'On land rights, adhere to the principles of Free, Prior Informed Consent (FPIC)'. However, it takes place in the palm oil context. It is not clear that the Company expects all its suppliers to obtain the FPIC in all relevant activities. [PO Action 2019, 04/2019: mondelezinternational.com]
A.1.3.AG.b	Commitment to respect human rights particularly	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The Company signed the UN Women's Empowerment Principles in April 2013. This is considered a proxy for women's rights.

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry – people’s rights (AG)		<ul style="list-style-type: none"> • Not met: Children's rights: The Company Code of Conduct states that 'child labour....and the like erode trust these and other forms of unfair treatment are exactly the opposite of what Mondelez International stands for'. The Company refers to children's rights as part of the Cocoa Life Program. However, this is not considered a company wide commitment to children's rights. [Our Way of Doing Business, 01/10/2012: mondelezinternational.com] • Not met: Migrant worker's rights: The Company states that they are 'committed to meaningful engagement with all potential and actually impacted rights holders, particularly those who are traditionally excluded or marginalized, including women, children migrant workers and indigenous people.' However, this does not cover migrant workers rights and is not included in a policy commitment. • Not met: Expects suppliers to respect these rights: In its Palm Oil Action Plan 2019, the Company states that it expects its suppliers to 'Assure protection of the rights of all workers, including migrant workers, in their own operations and engage upstream suppliers to do the same'. However, it is not clear this expectation applies to all its suppliers (evidence seems to refer to palm oil context). [PO Action 2019, 04/2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The Company has signed the Women's Empowerment Principles. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company indicates that 'We take seriously our commitment to ongoing dialogue with partners and stakeholders in our supply chain and in the communities where we operate, as well as continuing to maintain active discussions with those who invest in our Company on topics across the environmental, social and governance space'. [Impact Progress Report 2018, 2019: mondelezinternational.com] • Met: Regular stakeholder engagement: The Company is members of various organisations that cover a range of material issues for the business. This includes Consumer Goods Forums. The Company publishes a 'Progress Report' yearly (from 2013 to 2018) that reports on social impact progress against the companies goals. Engagement through the Cocoa Life program includes engagement with local communities and potentially affected stakeholder. [Impact Progress Report 2018, 2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states that they participate in collaborative efforts with NGOs and community based groups. The Company states that many of these groups serve as advisers to key programs, such as the 'Cocoa Life external advisory panel'. However, this information is not in a public policy. [Mondelez Reporting our Progress, 09/05/2018: mondelezinternational.com] • Met: Regular stakeholder design engagement: The Cocoa Cola Life Advisory Members include external experts who find solutions to human rights issues. Also Cocoa Life has partnered with Embode an independent human rights consultancy, who analysed the environment and national child protection infrastructure in key cocoa producing countries and published these assessments for Cote D'Ivoire and Ghana.
A.1.5	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company indicates that 'we are setting up a Child Labor Monitoring and Remediation System (CLMRS) in all 1,123 Cocoa Life communities'. However, CHRB is looking for a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies: The Company states that they are committed to ensuring that they don't 'unreasonably inhibit access to other forms of remedy for potentially and actually impacted rights holders.' However this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			information is not in a public policy. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com]] <ul style="list-style-type: none"> • Met: Collaborating with other remedy initiatives: In the context of tackling child labor in the cocoa communities, the Company indicates that 'We are working with local authorities and partners to roll-out community-based Child Labor Monitoring and Remediation Systems (CLMRS). When we say 'community-based', we mean that like Cocoa Life, the CLMRS is centered on communities'. [Tackling Child Labor - Cocoa Life, 20/08/2019: cocoalife.org] • Not met: Work with AG suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states that they do not tolerate anyone who raises a concern in code faith through their grievance mechanism. However, there is no information regarding zero tolerance on attacks of human rights defenders. [Our Way of Doing Business, 01/10/2012: mondelezinternational.com]] Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company indicates that it Human Rights Due Diligence and Modern Slavery Report 'has been reviewed and approved by the Board of Directors of Mondelez International' and signed by the Chairman and CEO of Mondelez International. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Board level responsibility for HRs: The Company indicates that 'the Governance Committee also oversees compliance with political contributions laws and regulations, reviews public affairs priorities, and monitors significant developments in the regulatory environment. Its responsibilities are set forth in the Governance, Membership and Public Affairs Committee Charter'. However, CHRB is looking for evidence that Board member or Board committee is tasked with specific governance oversight of one or more areas of respect for human rights. No further information found. [Standing Committees, 20/08/2019: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: The President of Mondelez EU spoke on child labour/ forced labour at Consumer Goods Forum's Sustainable Retail Summit in Oct 2016, however the President of Mondelez EU is not a board member.
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: The company indicates that 'we undertake practical, business minded, proactive, 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 through our supply chain to achieve the same. In 2018, as part of our ongoing due diligence activities, the HRWG undertook a broad assessment of our human rights risks and due diligence systems with support of the specialized human rights consultancy twentyfifty ltd'. However, the process the Company has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company's salient human rights issues is not clear. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Examples or trends re HR discussion: Although it disclosed its salient human rights issues, no example found of specific human rights issues discussed or examples of trends in types of human rights issues discussed at Board level or a Board committee during the Company's last reporting period. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process

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A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: Human Rights working Group defines strategy and implementation. Cross-functional group made up of senior representatives. It reports quarterly to Impact Steering Committee and bi-annually to a Board Committee. It meets monthly to 'maintain the company's due diligence strategy', 'oversee the implementation of the strategy and embedding human rights due diligence throughout the organization and our business relationships', etc. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: See above, in addition, the HRWG includes representatives from impact, human resources, business integrity, procurement and manufacturing'. The business integrity staff ensures employees know what is expected of them with regards to compliance and integrity. They also bear responsibility for the grievance mechanism and for reporting to senior management and the board of directors any 'potentially significant matters'. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Day-to-day responsibility for AG in supply chain: As indicated above, the HRWG includes procurement function. However, no details found in relation to how day-to-day responsibility for managing human rights issues within its supply chain is allocated. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: The Company states 'We undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts within our own operations, and work with our business partners through our supply chain to achieve the same.' The Company also states they identify potential human rights impacts through AIM-Progress. However, it is not clear how human rights is integrated in the companies broader enterprise risk management system. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations: The Company has a set of employment policies that cover ethical and legal practices - which are communicated to nearly every employee and translated into 32 languages around the world. However, it is not clear whether these cover general human rights. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy down the whole AG supply chain [Compliance and Integrity: mondelezinternational.com] • Not met: Requiring AG suppliers to communicate policy down the chain: The Company indicates that 'Once we determine a good fit with a supplier or business partner, we develop a contract that not only provides the core commercial terms but specifically incorporates our corporate responsibility expectations'. The expectations include forced labor, child labor, diversity and inclusion, health and safety and third-party representation among others (supplier requirements). However, it is not clear how it communicates its human rights policy commitments down its supply chain, or requires its suppliers to do so. [Compliance and Integrity: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company indicates that 'Once we determine a good fit with a supplier or business partner, we develop a contract that not only provides the core commercial terms but specifically incorporates our corporate responsibility expectations'. The expectations include forced labor, child labor, diversity and inclusion, health and safety and third-party representation among others. [Compliance and Integrity: mondelezinternational.com] • Not met: Including on AG suppliers
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Trains all workers on HR policy commitments: The Company states that 'we promote honesty and integrity in our business conduct by raising ethical awareness among our employees and providing direction and education on ethical issues'. It further states that 'Mondelez International provides specialized training for procurement employees.' However, it is unclear whether the company's ethical training covers collective bargaining. • Not met: Trains relevant AG managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company's Compliance and Integrity Program monitors compliance with the company's human rights statement. However, the Company's human rights commitments does not cover the core ILO. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Monitoring AG suppliers: The Company's Compliance and Integrity Program monitors compliance with the company's human rights statement, and the company uses a third party audit system to monitor suppliers. However, the Company's human rights commitments does not cover the core ILO. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AG selection of suppliers: The Company indicates that 'before engaging in new business relationships – and during the course of business, we conduct appropriate and risk-based due diligence, which includes screening potential suppliers against restricted party lists from authorities worldwide, which may include human rights related information. These systems support the identification of potential risks, help guide our approach for impact mitigation and monitoring, and inform our procurement practices'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: HR affects on-going AG supplier relationships: The Company states that 'strive to ensure that human rights are respected within our own operations and our upstream supply chains. We also seek to do business with partners who share the same commitment.' The Company uses the Sedex Member Ethical Trade Audit (SMETA) protocol to evaluate suppliers. With regards to child and forced labour, the company states ' If the supplier does not resolve the issues of concern in a timely and satisfactory manner, Mondelez International reserves the right to take more drastic action, such as termination of the business arrangement. ' [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The Company states that they undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts. Through the cocoa life program, the companies commit to listening to farmers and their communities to design interventions that lift people out of poverty. The program is also committed to partnerships with NGOs, farmer organisations, governments and supply chain partners. [Cocoa Life Program, 43231: cocoalife.org] • Not met: Frequency and triggers for engagement • Met: Workers in AG SC engaged: The Cocoa Life program is also committed to partnerships with NGOs, farmer organisations, governments and supply chain partners. [Cocoa Life Program, 43231: cocoalife.org] • Met: Communities in the AG SC engaged: Through the cocoa life program, the companies commit to listening to farmers and their communities to design interventions that lift people out of poverty. [Cocoa Life Program, 43231: cocoalife.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: Regarding cocoa farming communities, the Company indicates that 'through the use of planning and advocacy tools, our communities have been able to attract the funding and resources needed for them to develop. In the process, they have taken ownership for steering their own development — an important step because sector change will only be sustained if local actors feel empowered to do so. By 2019, 92% (1,355) of all 1,476 Cocoa Life farming communities have developed Community Action Plans (CAP), which enable them to advocate for their own development and secure funding to achieve their priorities'. However, CHRB is looking for summary analysis of the input/views given by the stakeholders on human rights issues and how the Company took those views into account. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company discloses that 'we undertake practical, business minded, proactive, 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 through our supply chain to achieve the same'. For the Company's own operations and direct suppliers, potential human rights issues are identified and monitored for compliance with the company's policies through AIM-PROGRESS. AIM-PROGRESS is a forum of consumer goods manufacturers and suppliers which has a focus on responsible sourcing practices and knowledge sharing. The Company is a founding member of AIM-PROGRESS. The Company also utilises the SMETA Protocol to evaluate internal manufacturing sites against a common set of CSR standards developed for the consumer industry. These two processes then 'supports the identification of potential risks and helps guide our approach for impact mitigation and monitoring.' [Mondelez Human Rights, 09/05/2018: mondelezinternational.com & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks in AG suppliers: Mondelez partnered with WWF in 2016 to assess the long-term sustainability risks of the agricultural and commodities chain. The Company has clarified that this assessment covered human rights in their Modern Slavery Statement. The prioritized risk assessment run by WWF examined agricultural commodities by source country based on publicly available, secondary data, covering the Company's largest raw materials volume and spend. The assessment confirmed cocoa and palm oil as top priorities from a human rights risk perspective. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] Score 2 • Met: Ongoing global risk identification: As indicated above, through the compliance monitoring the Company informs the risk identification process. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: In consultation with stakeholders: The Company indicates that the assessment included 'interviews with internal stakeholders in key roles and geographies'. However, is not clear if external stakeholders were consulted. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Met: In consultation with HR experts: The Company indicates that in 2018 it continued due diligence activities with the support of the specialized human rights consultancy twentyfifty ltd. Also, as indicated above, the Company interviewed internal stakeholders in key roles and geographies. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Triggered by new circumstances: Regarding its cocoa supply chain, the Company states that 'when a new community joins the program, our NGO partners conduct a thorough participatory needs assessment on focus areas including labor risks such as forced and child labor. Based on this assessment and with support from our partners, community members develop a Community Action Plan, which provides a detailed roadmap for community activation. Based on this plan, and as part of the program's holistic approach, our partners then implement a range of activities that address the issues identified'. However, this is a product specific procedure, no evidence found on how the systems are triggered by new circumstances in different products/areas of business. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company states 'We undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts within our own operations, and work with our business partners through our supply chain to achieve the same.' The Company states that they provide specialised training for procurement employees, which helps them identify and mitigate labour related sourcing risks. It also adds that, in 2018, as part of due diligence activities, the HRWG (Human Rights Working Group) under undertook a broad assessment of human rights risk and due diligence systems with an external human rights consultancy. 'The assessment included an analysis of previous social audit results and grievance mechanism data, interviews with internal stakeholders in key roles and geographies, and an analysis of external studies'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Met: Public disclosure of salient risks: The Company indicates that 'through human rights assessments of our own operations and supply chain, we have identified the following salient human rights risks: child labor; forced labor; health and safety; freedom of association and collective bargaining; land rights; water and sanitation; women's rights'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company states that 'we use Sedex Member Ethical Trade Audit (SMETA) protocol to evaluate our internal manufacturing sites and indirect suppliers'. However, this refers to compliance monitoring in own operations rather than a broad action plans to prevent or mitigate salient issues within own operations. In relation to upstream supply chains (raw materials) 'our efforts have primarily focused on cocoa and palm oil because this is where we know that we can make the biggest difference from an

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>environmental and social perspective. In the Cocoa and palm oil supply chains we have developed comprehensive approaches to identify potential human rights impacts through our signature Coca Life program and our Palm Oil Action Plan'. The Company describes how it faces different issues in these supply chains. In relation to other supply chains, it indicates that 'we're seeking more transparency, raising expectations of our suppliers and seeking to catalyse sector-wide change. Through this work we are addressing cross cutting themes such as good agricultural practices, deforestation, human rights (including labor rights such as forced and child labor), land rights, gender and environmental footprint'. However, as indicated, it is not clear whether there are action plans to mitigate risks at own operations, as evidence seems to focus in monitoring compliance. [Impact Progress Report 2018, 2019: mondelezinternational.com & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Met: Including in AG supply chain: As indicated above, the Company has actions plans the different issues at its different supply chains. [Cocoa Life Program, 43231: cocoalife.org & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Met: Example of Actions decided: The Company states that 'Child labor is a symptom of underlying systemic issues in the cocoa supply chain such as poverty and slow rural development'. In the context of cocoa-growing communities, the Company's approach to eliminating child labor is three-pronged. It focuses on prevention, through increasing income from cocoa farming as well as additional sources; empowering communities to advocate for their own development; empowering women at household and community level. Also, in Cote d'Ivoire and Ghana, on monitoring and remediation, working through industry and multi-stakeholder platforms, we also call for industry and governments to join forces to create comprehensive, systemic solutions. In order to be effective, we need strong public private partnerships and widespread recognition that child labor is a symptom of deeper underlying issues, such as poverty and lack of rural development. In order to make true and long-lasting positive change, these issues must be addressed at their core. [Impact Progress Report 2018, 2019: mondelezinternational.com & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: Although the Company has a action plan to tackle child labor in cocoa production, it is not clear the Company has a global system to take action to prevent, mitigate or remediate its salient human rights issues. [Impact Progress Report 2018, 2019: mondelezinternational.com]
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: Although there are examples of product-specific tracking action (Coca Life), it is not clear that there is a general, global system(s) for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results (including the different salient issues and action plans). [Impact Progress Report 2018, 2019: mondelezinternational.com & Cocoa Life Annual Report 2018, 04/2019: d1lx47257n5xt.cloudfront.net] • Met: Lessons learnt from checking effectiveness: The Company indicates that 'making cocoa farming a prosperous business also involves supporting farming families in increasing their resilience and ability to withstand the impacts of crop seasonality, small land size, and changes in weather patterns. Village Savings and Loan Associations (VSLAs or savings and loan groups), which allow community members to actively save and take small loans, have proven a trusted institution for community members to cope with volatility. By 2019, with Cocoa Life's support, 1,817 savings and loan groups have been established across all our origin countries, with over 70,000 members (73% of members are women). Evaluation shows that over three years in the Cocoa Life program, cocoa farmers in Ghana managed to increase their total savings by about 24%. Our partner Wahana Visi Indonesia found that in Indonesia 87% of members have built a savings buffer to cover essential needs such as food, clothing and education for three months or more. Some savings and loan groups have been so popular that they are unable to take on additional members, creating the demand and opportunity to scale and improve the program'. [Impact Progress Report 2018, 2019: mondelezinternational.com & Cocoa Life Annual Report 2018, 04/2019: d1lx47257n5xt.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above, although the Company provides some examples, particularly in cocoa supply chain, no evidence of how it

Indicator Code	Indicator name	Score (out of 2)	Explanation
			has a system for tracking actions taken generally in response to human rights risks and impacts and for evaluating the effectiveness of the action plans. [Impact Progress Report 2018, 2019: mondelezinternational.com & Cocoa Life Annual Report 2018, 04/2019: d1lx47257n5xt.cloudfront.net]
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company has communicated its system to identify human rights risks and impacts including own operations and supply chain (see B.2.1). [Mondelez Human Rights, 09/05/2018: mondelezinternational.com & Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Met: Comms plan re assessing risks: The Company has communicated its system to assess risks and impacts identified(see B.2.2). [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com & Mondelez Human Rights, 09/05/2018: mondelezinternational.com] • Not met: Comms plan re action plans for risks: It is not clear how the Company has a system to take action to prevent, mitigate or remediate its salient human rights issues including own operations, although it has provided an example of it (see B.2.3), and system covers supply chain generally, including specific plans for specific supply chains.. [Impact Progress Report 2018, 2019: mondelezinternational.com & Cocoa Life Program, 43231: cocoalife.org] • Not met: Comms plan re reviewing action plans: It is not clear the Company has a system to track actions taken in response to human rights risks and impacts, and evaluating whether the actions have been effective, although in this disclosure, it communicates examples of lessons learned (see B.2.4). [Impact Progress Report 2018, 2019: mondelezinternational.com] • Met: Including AG suppliers: As indicated above, the Company's due diligence systems covers supply chain. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company has a grievance mechanism toll-free call line and a collect/call/reverse charge telephone Helpline (dependent on the country). The Company also has an online grievance mechanism 'Web line' which is independently operated by Ethics Point. There is a clause on the Ethics Point Webline that states that if you're in certain countries of the EU you can only report financial, accounting or auditing practices of the company, fraud or bribery allegations - therefore excluding human rights issues. However, the Company website states that they are committed to 'ensuring the availability of accessible grievance mechanisms (e.g. Integrity HelpLine and WebLine) for our own employees, contractors and subcontractors, as well as anyone to use for raising any concerns and to better enable Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company indicates that 'In 2018, our business integrity group received more than 2,600 contacts from around the world through our "Speaking Up" channels. These contacts included questions about our compliance policies and program or matters that we referred to other departments for handling. We received reports of misconduct that required investigation. Some of these matters resulted in disciplinary action, including the separation of people from the company when appropriate'. However, it is not clear whether any of these grievances related to human rights. [Compliance and Integrity: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages: The grievance channel 'Integrity Weblines' is available in 46 different languages, including some indigenous languages - such as Suomi. Also, the Company indicates that 'Our Integrity HelpLine is a toll-free and/or reverse charge service operated for Mondelez International by a third-party. The HelpLine is accessible 24 hours a day, every day, and language interpreters are available. These toll-free numbers and dialling instructions can be found by selecting the country you are calling from on the Integrity WebLine page'. [Compliance and Integrity: mondelezinternational.com] • Not met: Expect AG supplier to have equivalent grievance systems • Not met: Opens own system to AG supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states that external reports of wrong doing can be reported by mail (and provides an address in the USA) or via email through compliance@mdlz.com. The Company also states that the Integrity Helpline can be accessible through language interpreters to the community. The Company human rights webpage states that the company grievance mechanisms (e.g. Integrity helpline and Weblines) can be used by their own employees, contractors and subcontractors 'as well as anyone to use for raising any concerns and to better enable Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' [EthicsPoint Mondelez, 43234: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Integrity HelpLine is accessible 24 hours a day, every day, and language interpreters are available. There are 46 languages listed on the Integrity Weblines. • Met: AG supplier communities use global system: The Company human rights webpage states that the company grievance mechanisms (e.g. Integrity helpline and Web line) can be used by their own employees, contractors and subcontractors 'as well as anyone to use for raising any concerns and to better enable Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' This is assumed to extent to the agricultural supplier communities. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: A third party provider, EthicsPoint, handles the Integrity WebLine which operates in 46 languages. These are then routed to the appropriate persons within Mondelez International 'who will ensure that each report is handled in a professional and confidential manner.' <p>For the Integrity WebLine, the Company has a Follow Up System. However, it is not clear what the timescales are for addressing complaints. [EthicsPoint Mondelez, 43234: secure.ethicspoint.com]</p> <ul style="list-style-type: none"> • Met: How complainants will be informed: For the Integrity WebLine, the Company has a Follow Up System where users are provided a report key and a password to follow-up on the report, provide additional information and upload any relevant documents. [EthicsPoint Mondelez, 43234: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company indicates that 'to make sure that senior management and the Board of Directors are aware of any potentially significant matters, our business integrity group reports investigations to members of our executive team and the Audit Committee of the Board of Directors'. However, it is not clear how complaints are handled to the senior committee or to an independent party to be addressed. [Compliance and Integrity: mondelezinternational.com]
C.5	Commitment to non-retaliation over	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company states in the Employee Code of Conduct, with regards to reporting grievances against the code

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns made		'maybe you're worried about retaliation. Mondelez International won't tolerate that. Anyone who retaliates against someone for raising a concern in good faith will face discipline, which may include termination...' However, the Code of Conduct does not cover human rights. Therefore this has resulted in a downgrade. [Our Way of Doing Business, 01/10/2012: mondelezinternational.com] <ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Won't impede state based mechanisms: The Company states that they are 'committed to ensuring we don't unreasonably inhibit access to other forms of remedy for potentially and actually impacted stakeholders.' [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not met: Complainants not asked to waive rights • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Says how it would remedy key sector risks: In the context of cocoa production, the Company indicates that 'we are working with local authorities and partners to roll-out community-based Child Labor Monitoring and Remediation Systems (CLMRS). When we say 'community-based', we mean that like Cocoa Life, the CLMRS is centered on communities. (...) That means, as part of our CLMRS, we: Set up and train Child Protection Committees to become the focal point within the community and primary liaison to school and district authorities; Use government-developed tools to support national policies and avoid the creation of parallel systems; Share all data with the authorities and refer identified cases for remediation whenever needed; Take a broader lens and consider child rights beyond child labor, for instance setting up child reading clubs to empower children to advocate for their own rights.' [Tackling Child Labor - Cocoa Life, 20/08/2019: cocoalife.org] Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The Company has information regarding keeping honest books and records in their employee code of conduct. However, this does not extend to living wage requirements. • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies suppliers back to manufacturing sites (factories or fields): In the CHRB Disclosure Program the company stated that they map tier 1 suppliers. The Company is also involved in the SEDEX Member Ethical Trade Audit (SMETA) which evaluates internal manufacturing sites and suppliers based on the ETI base code. The Company indicates that 'We use the Sedex Member Ethical Trade Audit (SMETA) protocol to evaluate our internal manufacturing sites and direct suppliers against a common set of corporate social responsibility standards developed for the consumer goods industry'. 'In 2018, 248 supplier sites—100 percent of our 2018 target group of highest priority suppliers—completed the audit, in addition to the 286 suppliers audited in 2015, 218 audited in 2016 and 330 suppliers audited in 2017'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com & Impact Progress Report 2018, 2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses significant parts of SP and why: The Company has the GPS mapping of close to 63% of the farms which are part of the program Cocoa Life, where it discloses the location (in coordinates). The names of the suppliers is not clear as most of them are called 'Cocoa Life Cocoa Farm'. Also, 'we have achieved the traceability of 96% of our palm oil to the mill and 99% of the palm oil we buy was sourced from suppliers with policies aligned to ours. The list of suppliers and mills that make up our palm oil supply is available on our website'. Finally, 'in 2016, we partnered with World Wildlife Fund (WWF) to assess the long-term environmental and social sustainability risks of our raw materials supply chain. The prioritized risk assessment run by WWF examined raw materials by source country based on publicly available, secondary data, covering our largest raw materials volume and spend. The assessment confirmed cocoa and palm oil as top priorities from a human rights risk perspective'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com & Cocoa Origin - interactive map, 21/08/2019: cocoalife.org]
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: In its Corporate Responsibility Expectations, the Company indicates that 'Supplier will not directly (or indirectly through the use of its subcontractors) employ any children under the age of 18 years unless legal, necessary, and appropriate and the following are met: Supplier will comply with the minimum employment age limit defined by national law or by International Labor Organization(...); Supplier will ensure that employees working in facilities that are manufacturing or packaging Mondelez International finished products, serving as temporary employees to Mondelez International, or present at Mondelez International facilities, are at least 15 years of age (and no exceptions allowed by the ILO or national law will apply)'. However, no requirement of a remediation programme found in its contractual arrangements or code of conduct. [Compliance and Integrity: mondelezinternational.com] • Met: How working with suppliers on child labour: Through the Cocoa Life program, the company works to eliminate child labour in the cocoa supply chain (through the Cocoa Life Child Labour Interventions). The Company also has third party audits to assess direct supplier's compliance with Mondelez's Corporate Responsibility Expectations (including child and forced labour) through Progress. The company is also working with civil society, government and industry to tackle child labour at the farm level. The Company does this through supporting the International Cocoa Initiative and through the Cocoa Life program. <p>The Company is a member of the Sedex Members Ethical Trade Audit (SMETA). Under SMETA audit reports an auditor must record how age is checked both at and prior to recruitment and how the records of age are maintained and monitored. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Met: Analysis of trends in progress made: The Company discusses the developments of the Cocoa-Life program and the trends amongst suppliers. [Cocoa Life Program, 43231: cocoalife.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Debt and fees rules in codes or contracts: The Company has indicated that a check on fees is performed as part of the SMETA audit. However, this is not sufficient information to be awarded this indicator. Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: The Company website states that part of the corporate responsibility expectations for supplier contract provisions states that a (supplier shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.' [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Met: How working with suppliers on free movement: The Company states that they have begun to assess direct suppliers' compliance with their corporate responsibility expectations (including child and forced labour) through PROGRESS - the Program for Responsible Sourcing. Two of the key objectives of PROGRESS are 'building supply chain capability so that member organisations and their suppliers are competent in executing robust responsible sourcing programs' and 'driving continuous improvement in member supply chains.' Failing to meet company standards on child and forced labour is a breach of corporate policy, and violators are subject to disciplinary action, up to and including termination of employment. [AIM Progress Website, 43231: aim-progress.com] Score 2 <ul style="list-style-type: none"> Met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: The Company meets freedom of association requirements. The Company states that they 'respect the interests of its employees to join (or not join) a union' in their corporate responsibility guidelines. However, collective bargaining is not addressed. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on FoA and CB: The Company meets freedom of association requirements in their corporate responsibility guidelines which are included in the supplier contract provisions. However, collective bargaining is not addressed. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Sets out clear Health and Safety requirements: The Company sets out their health and safety requirements. The Company has a Work Play Live Safe program and a goal of ZERO incidents. The programs put in place at Mondelez plants meet the Occupational Health and Safety Assessment Series (OHSAS) 18001 Series. Not met: Injury Rate disclosures: The company indicates that 'the global benchmark for a world-class Total Incident Rate (TIR) is defined as 0.5. We compare our performance against this benchmark and continue to perform well below the 0.5 level, currently operating at 0.24, with 67 percent of our facilities operating with a zero TIR in 2018'. However, it is not clear what those rates are for the Company's suppliers. [Impact Progress Report 2018, 2019: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> Not met: Lost days or near miss disclosures Not met: Fatalities disclosure

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S: The Company Corporate Responsibility Expectations (supplier contract provisions) states that a supplier will 'i) endeavour to provide safe working conditions (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities.' However, the company does not explicitly state how they are actively working with suppliers to improve health and safety. [Mondelez Human Rights, 09/05/2018: mondelezinternational.com] • Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues: The Company indicates that 'through Harmony, we work with farmers across Europe to grow wheat in a way that helps conserve water, cares for the soil, protects and promotes biodiversity, and reduces carbon emissions'. However, it is not clear how it improve their practices in relation to access to water and sanitation. [Impact Progress Report 2018, 2019: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts: The company indicates that 'In addition to complying with all laws and regulations, Supplier must comply with the following in connection with the goods and services provided to Mondelez International: (...)Supplier will hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual's performance and ability to do the job (except as required under collective bargaining agreements). Supplier will not discriminate based on a person's (...), gender(...), sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status'. However, it is not clear the Company includes measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with its suppliers or in its supplier code of conduct. [Compliance and Integrity: mondelezinternational.com] • Met: How working with suppliers on women's rights: The Company has signed the Women's Empowerment Principles. The Company has been working with suppliers in its Cocoa Life Program which has activities in four countries where Mondelez sources cocoa: Cote d'Ivoire, Dominican Republic, Ghana and Indonesia. As examples of the activities implemented in this Program we could list the following from the Ghana Action Plan: 'Train the Cocoa Life team and implementing partners on gender programming and mainstreaming; Tailor interventions to address gender gaps in areas such as training content, materials and methods.[...] Improve training approaches and content for female farmers and women working on cocoa farms; Increase women's documentation of sale of beans as a critical enabler to be recognized as cocoa farmer, and provide access to inputs and resources; Improve training approaches and content for female farmers and women working on cocoa farms; Increase women's documentation of sale of beans as a critical enabler to be recognized as cocoa farmer, and provide access to inputs and resources; Increase women's access to finance, farm inputs, land ownership and membership of producer groups and cooperatives; Increase women's access to finance, farm inputs, land ownership and membership of producer groups and cooperatives.[...] Ensure women are equally represented on all the committee levels such as chairperson and other key positions.' [Women's Empowerment Action Plans 2018, Oct 2018: cocoalife.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provides analysis of trends demonstrating progress: As part of the Company's strategy to boost off-farm income among cocoa farmers, it offers workshops. 'The majority (68% across all our origin countries) of participants in business start-up workshops were local women, often wives to or laborers for local cocoa farmers. As part of our holistic approach, we see that increasing the contribution women make to their household's income increases their share of financial decision-making significantly, and raises their community standing. It empowers them. We learned that 88% of women in Cote d'Ivoire who participated in business start-up workshops saw their income increase thanks to their new activities. The share of cash income generated by women increased 32% among participants in ABANTU's activities in Ghana. Importantly, 56% of women in Ghana also said that they are solely in charge of the income they earn themselves, and they typically invest it in family well-being and education'. However, no analysis of trends demonstrating progress related to women's rights found. [Cocoa Life Annual Report 2018, 04/2019: d1x47257n5xt.cloudfront.net]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Fire leads to death of 35 workers at Mondelez packaging supplier in Bangladesh, triggering renewed concerns over working conditions • Area: Health and Safety • Story: On September 10, 2016, 35 workers were killed and more than 50 others injured when a factory in the Tongi industrial zone in Bangladesh belonging to Tampaco Foils Limited collapsed following an explosion. Tampaco Foils Limited is a packaging supplier of Nabisco Biscuit & Bread, a unit of Mondelez International. <p>Officials suspect a gas leak and a boiler eruption caused the fire. Fire crews were reportedly unable enter the building as there were chemical containers and oil drums on various floors. The factory owner, a former member of parliament, claimed it was "fully compliant" with safety standards. However, police later said the factory owner and seven other top managers went into hiding as the death toll rose, Reuters reported. The factory's clients also include British American Tobacco and Nestlé.</p> <p>The global union confederation ITUC reported the Bangladesh government as saying global brands doing business with the factory shared responsibility for the deaths. Reuters quoted a government secretary with the ministry of labour and employment as saying that after checking the factory's design, it seemed that it was a one floor building to which floors were added later, similar to Rana Plaza. The father of one of the victims reportedly filed a lawsuit against the building's owner.</p> <ul style="list-style-type: none"> • Sources: [Reuters - 11/09/2016: reuters.com]
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved: The Company's expectations towards direct suppliers regarding health and safety are: 'In addition to complying with all laws and regulations, Supplier must comply with the following in connection with the goods and services provided to Mondelez International: (...) Supplier will (i) endeavour to provide safe working conditions, (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities'. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company doesn't disclose qualitative information on fatalities, injuries, or recordable incident rates and thus doesn't receive points for this requirement.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.38 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Mondelez International made data public that met one or more elements of the methodology in 25 cases, leading to a disclosure score of 2.38 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Mondelez International met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.