

Company Name Mondelez International
Industry Agricultural Products (Supply Chain only)
Overall Score 21.5 out of 100

Theme Score	Out of	For Theme
2.2	10	A. Governance and Policies
9.8	25	B. Embedding Respect and Human Rights Due Diligence
5.5	20	C. Remedies and Grievance Mechanisms
2.7	25	D. Performance: Company Human Rights Practices
1.3	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	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: General HRs commitment: The Human Rights policy states that 'we are committed to making our snacks the right way, protecting the planet and respecting the human rights of people in our value chain'. [Human Rights Policy, N/A: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The HR policy states that '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'. However, 'using it as framework' is not considered a formal statement of commitment according to CHRB wording criteria. The Company also provides extra feedback to CHRB from its HRDD Report. However, CHRB is looking for an explicit commitment to respecting the UN Guiding Principles on Business and Human Rights (UNGPs) in policy documents (not reports). [Human Rights Policy, N/A: mondelezinternational.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	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: Company has a commitment to the ILO Core: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Human Rights Policy, N/A: mondelezinternational.com] Met: Company has a explicit commitment to All four ILO Core: The Company's Human Rights Policy covers child labour, non-discrimination and forced labour. In

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	Principles and Rights at Work		<p>relation to freedom of association and collective bargaining, the Company states the following: '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'. [Human Rights Policy, N/A: mondelezinternational.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Company's Supplier Code of Conduct covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] • Met: Company explicitly list All four ILO for suppliers: According to the Supplier Code of Conduct, suppliers are expected to 'Never use or tolerate the use of human trafficking, forced labor (including forced or involuntary prison labor), or child labor as defined by the International Labor Organization (ILO); Foster an inclusive and ethical work environment that is free of harassment and discrimination and provides equal chances of success to all their employees; Respect employees' rights to organize and bargain collectively'. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [CSR Policies for suppliers, N/A: mondelezinternational.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: It indicates that 'We use internal and external expertise to provide a safe work environment'. The code of conduct states that 'we are committed to providing a respectful and safe working environment'. [Human Rights Policy, N/A: mondelezinternational.com] & [Code of Conduct, 2019: mondelezinternational.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: In its feedback to CHRB the Company indicates that it supports the principles of the ILO Core Conventions, and its commitments are reflected in its Human Rights Policy. However, no evidence found that the Company commits to respecting the ILO conventions on labour standards on working hours or the company publicly states that workers shall not be required to work more than 48 hours in a regular work week or 60 hours including overtime and that all overtime work must be consensual and paid at a premium rate. [Human Rights Policy, N/A: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: It indicates, on its Supplier Code of Conduct, that 'We expect our suppliers and partners to: (...) Comply with or outperform all applicable regulations ((...) health and safety) relative to their business'. CSR policies state that 'supplier shall (i) endeavor 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'. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [CSR Policies for suppliers, N/A: mondelezinternational.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: Regarding working hours, it indicates that 'Within the bounds of normal seasonal and other fluctuations in business requirements, Supplier shall (i) maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms; (ii) pay fair and timely compensation, including any required premium payments for overtime work; and (iii) advise new employees at the time of hiring if mandatory overtime is a condition of employment'. In its feedback to CHRB the Company indicates that it supports the principles of the ILO Core Conventions, and it is reflected through its Supplier Code of Conduct. However, no formal requirement about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring commitment to a 48 hours regular working week, and consensual overtime paid at a premium rate. [CSR Policies for suppliers, N/A: mondelezinternational.com] & [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural	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: Respect land ownership and natural resources as set out in VGGT: The HR Policy states that 'In our operations, we respect the ownership and use of land and natural resources such as water that local communities depend on'. However, it is not clear it respects legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests

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	resources and indigenous peoples' rights (AG)		<p>in the Context of National Food Security (VGGT). No further evidence found. The Company has provided additional comment/source to CHRB regarding this indicator but the evidence was already in use. [Human Rights Policy, N/A: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards: It indicates that 'In our operations, we respect the ownership and use of land and natural resources such as water that local communities depend on'. However, it is not clear it respects land ownership and natural resources as set out in the IFC Performance Standards. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: It indicates that 'In our operations, we respect the ownership and use of land and natural resources such as water that local communities depend on'. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Company's policy commits to obtain FPIC: The Company indicates, in its Palm Oil Action Progress: 'We are concerned about the potential negative long-term environmental and social impacts of palm oil production, including deforestation and human rights. In 2013, we set out principles for palm oil production for our suppliers to follow and committed to deliver an action plan to ensure a sustainably sourced palm oil supply. We are updating these principles, which will continue to provide the framework for implementing our Palm Oil action plan: [...] No exploitation of workers or communities, respect human rights as well as land rights, no forced labor, no child labor, or gender-based discrimination. a. On land rights adhere to the principles of Free, Prior Informed Consent (FPIC)'. However, this information was found in a document that is not considered a formal policy by CHRB standards. For this subindicator, the Company is expected to provide a publicly available policy statement committing it to respecting ownership/use of land and natural resources also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Palm Oil - Action Progress, 09/2020: mondelezinternational.com] • Not Met: Expecting suppliers to make these commitments : It expects its suppliers to 'Respect human rights relevant to communities' livelihoods and health, such as the ownership and use of land and natural resources such as water, in relation to their operations'. However, it is not clear it expects suppliers to commit to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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 HR policy states that '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'. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Expects suppliers to respect at least one of these rights: The Supplier Code of Conduct states that 'We expect our suppliers and partners to: [...] Never use or tolerate the use of human trafficking, [...] or child labor as defined by the International Labor Organization (ILO)'. However, it is not clear the Company expects its suppliers to respect the children's rights. No further evidence found. The Company has also provided additional sources, but the supplier expectation respect the children's rights could not be found in any formal policy statement. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: It indicates that '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'. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Expecting suppliers to respect these rights

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A.1.4	Commitment to remedy	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: The Company commits to remedy: The HR policy indicates that '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'. However, 'acknowledge our responsibility to provide access' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Company expect suppliers to make this commitment: The Company has provided additional comment/source to CHRB regarding efforts to tackle different human rights issues within its supply chain. However, it is not clear the Company expects its suppliers to commit to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: The previous assessment was based on the Company's Tackling Child Labor - Cocoa Life which is no longer considered a suitable source for policy statements under CHRB's revised approach. No further evidence found. • Not Met: Work with suppliers to remedy impact: Although the Company discloses information that indicates it works with suppliers to tackle human rights issues, no policy statement found of a commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): It indicates that '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'. [Human Rights Policy, N/A: mondelezinternational.com] • Not Met: Company expect suppliers to make this commitment: The Supplier Code of Conduct indicates: 'We expect our suppliers and partners to: Have a publicly available Human Rights policy, outlining their commitment, in line with the Mondelez International Human Rights policy, [...]'. Although the Company's HR policy has a commitment to respect rights of human rights defenders, no evidence found that this same policy is made extensive to suppliers. The Company should expect suppliers to make a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [Human Rights Policy, N/A: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

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	<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: Board level responsibility for HRs: The 2020 ESG Report indicates that 'Our Human Rights Working Group defines our human rights due diligence strategy and drives its implementation throughout our organization. The Board has ultimate accountability for governance'. Also, it notes, that The Mondelez International Human Rights Working Group (HRWG) is a cross-functional team and it 'reports (...) annually to the Board of Directors' Governance, Membership & Public Affairs Committee (GMPAC)'. [2020 ESG Report, 2021: mondelezinternational.com] & [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	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: Board/Committee review HRs strategy: The Mondelez International Human Rights Working Group (HRWG) is a cross-functional team and it 'reports (...) annually to the Board of Directors' Governance, Membership & Public Affairs

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			Committee (GMPAC)'. However, no further information found on the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] <ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
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 HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: 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: How it assigns 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'. [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not Met: Day-to-day resources and expertise allocation in own ops: The business integrity staff ensures employees know what is expected of them with regards to compliance and integrity. However, it is not clear how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its own operations beyond compliance and integrity (not clear if this team embeds human rights or focuses in grievance and risk management). As indicated above, although there is a Human Rights Working Group with responsibilities, it meets monthly. Not clear if there's a team working day-to-day on these matters. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] • Not Met: Resources and expertise allocation in the supply chain: The Company has provided additional comment to CHRB regarding this indicator based on a 2015 report which is considered outdated according to the CHRB three-reporting-year timeframe policy.
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 HR risk, beyond employee H&S

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	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: 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. Nothing further could be found in the latest version of the Modern Slavery report. [Human Rights Due Diligence and Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] & [Human Rights Due Diligence and Modern Slavery Report 2018, 14/05/2019: mondelezinternational.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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: Score of 1 on A.1.2.a: See A.1.2 • Met: Communicates its policy to all workers in own operations: The Company has 'developed two new global trainings: 1) a Human Rights module to raise all our employees' awareness of our commitments and policies and the role they need to play in ensuring individual rights are respected; 2) a module on Forced Labor Risk Mitigation to build the capability of our colleagues in key functions (Plant Leaders, Human Resources, Procurement, Corporate & Legal Affairs) and empower them to take concrete actions on our sites and with our suppliers'. Training is assumed to take place in local languages. [Human Rights Due Diligence and Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] <p>Score 2</p> <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"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: The Supplier Code of Conduct indicates: 'We require all Suppliers & Partners acting on MDLZ behalf and/or providing goods or services to MDLZ for compensation to comply with this Supplier & Partner Code of Conduct. This includes, but is not limited to, our direct and indirect Suppliers, External Manufacturing Partners, and co-packers, labor providers, logistic providers, subsidiary, or affiliate entities. Sub-contractors of Suppliers are also expected to adhere to the Supplier & Partner Code of Conduct'. However, it is not clear the steps it takes to communicate its human rights policy down its supply chain. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] • Not Met: Requires suppliers to communicate policy requirements: The Company's Terms and Conditions for Suppliers include a reference to Corporate Social Responsibility requirements, that include forced labour, child labour, diversity and inclusion, health and safety and third-party representation among others (supplier requirements). In addition, on its Human Rights website it states that 'Our Palm Oil Action Plan (and update) requires suppliers to respect the labor rights of all workers, including migrant workers within both their own operations and through their supply chains.' However, no further information found describing how it communicates its human rights policy commitments down its supply chain, or requires its suppliers to do so globally, beyond the Palm Oil sector. [Terms and Conditions, 01/2020: mondelezinternational.com] & [CSR Policies for suppliers, N/A: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company's Terms and Conditions for Suppliers include a reference to Corporate Social Responsibility requirements, that include forced labour, child labour, diversity and inclusion, health and safety and third-party representation among others (supplier requirements). The Company also notes in its feedback to CHRB that as part of its Terms and Conditions suppliers 'will ensure that you and the goods and services comply with: [...] (ii) the MDLZ Code of Conduct'. The Supplier Code of Conduct indicates: 'We expect our suppliers and partners to: Have a publicly available

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			Human Rights policy, outlining their commitment, in line with the Mondelez International Human Rights policy'. [Terms and Conditions, 01/2020: mondelezinternational.com] & [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See A.1.2 • Met: How workers are trained on HR policy commitments: The Company has 'developed two new global trainings: 1) a Human Rights module to raise all our employees' awareness of our commitments and policies and the role they need to play in ensuring individual rights are respected; 2) a module on Forced Labor Risk Mitigation to build the capability of our colleagues in key functions (Plant Leaders, Human Resources, Procurement, Corporate & Legal Affairs) and empower them to take concrete actions on our sites and with our suppliers.' [Human Rights Due Diligence and Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] • Met: Trains relevant managers including procurement: See above [Human Rights Due Diligence and Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2 • Met: Meets both requirements under score 1: See above • Not Met: Trains suppliers to meet company's HR commitment: Although the Company describes some specific trainings for suppliers, no evidence found of general human rights training (policy commitments) conducted for suppliers. [2020 ESG Report, 2021: mondelezinternational.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See A.1.2 • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates: 'The Sedex Member Ethical Trade Audit (SMETA) protocol evaluates our internal manufacturing sites and suppliers against a common set of corporate social responsibility standards for the consumer goods industry. This process supports the identification of potential risks and helps guide our approach for impact mitigation and monitoring'. [Human Rights (web), N/A: mondelezinternational.com] • Not Met: Proportion of supply chain monitored: The Company indicates that 38% of 'manufacturing sites completed SMETA audit within the past 3 years'. It also discloses the percentage of 'prioritized supplier sites completed SMETA audit within the past year': 49%. However, although the Company discloses these two figures, it is not clear they make reference to the entire supply chain, as 'manufacturing sites' seem to refer to the Company's own operations and 'prioritized supplier sites' appear to be related to a specific segment of its supply chain. The Company is expected to provide the proportion of the supply chain that is monitored. [2021 ESG Report, 2022: mondelezinternational.com] • Not Met: Describe how workers are involved in monitoring Score 2 <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2 • Not Met: Describes corrective action process: Terms and conditions document states that 'If you have violated this PO [Purchase Order], you will immediately take corrective actions that MDLZ reasonably requires, and MDLZ or its representative may audit your facility or records as often as reasonably necessary to verify correction. [...] If you refuse any audit, MDLZ can withhold payment and/or MDLZ may cancel the PO.' However, no further details found. [Terms and Conditions, 01/2020: mondelezinternational.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects 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 2019, 13/05/2020: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: It indicates: 'At MDLZ, we aim at building trust-based relationships with Supplier Partners who share our values, support our ambitions, and follow this Code of Conduct. We expect our Suppliers and Partners to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to engage with the Supplier or Partner and work together on solutions. We may be able to help identify possible improvements. However, when an issue cannot be corrected or a Supplier or Partner is unwilling to engage, we reserve the right to end our relationship'. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: It indicates that 'We are committed to meaningful engagement with all potential and actually impacted rights holders, particularly those who are traditionally excluded or marginalized'. However, it is not clear how it has identified, and engaged with affected stakeholders, including workers or local communities in its supply chain, in the last two years. [2020 ESG Report, 2021: mondelezinternational.com] • Not Met: Discloses stakeholders that HRs may be affected: It indicates that 'We 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 peoples'. However, it is not clear how it is determined these are the stakeholders whose human rights have been or may be affected by its activities. [Human Rights (web), N/A: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with stakeholders • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates on its website Human Rights: 'One example of how we identify potential human rights impacts is through AIM-PROGRESS of which we are a founding member. The Sedex Member Ethical Trade Audit (SMETA) protocol evaluates our internal manufacturing sites and suppliers against a common set of corporate social responsibility standards for the consumer goods industry. This process supports the identification of potential risks and helps guide our approach for impact mitigation and monitoring'. The 2020 HRDD and Modern Slavery Report indicates: 'In 2018, as part of our ongoing due diligence activities, the HRWG [Human Rights Working Group] undertook a broad assessment of our human rights risks and due diligence systems with support of the specialized human rights consultancy twentyfifty ltd. 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'. The 2021 Human Rights Due Diligence and Modern Slavery Report also mentions the SMETA system: 'For our own operations and prioritized strategic tier 1 suppliers, we use the SMETA audit 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 addition, 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 (web), N/A: mondelezinternational.com] & [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: See above. The Sedex Member Ethical Trade Audit (SMETA) protocol includes the evaluation of suppliers and is used, among other tools, to identify risks and impacts. In addition, the Company, in 2016, '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 2019, 13/05/2020: mondelezinternational.com] & [Human Rights (web), N/A: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, through the compliance monitoring the Company informs the risk identification process. The 2020 MSA indicates: 'In 2018, as part of our ongoing due diligence activities, the HRWG [Human Rights Working Group] undertook a broad assessment of our human rights risks and due diligence systems with support of the specialized human rights consultancy twentyfifty ltd. 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'. However, it is not clear that the system involves consultation with affected external stakeholders. No further evidence found. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] • Met: Triggered by new circumstances: It indicates: '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'. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com] • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The 2020 MSA states 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. 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. It reconfirmed the need to focus on salient risks that are shared across the food industry such as child labor, forced labor, health and safety, freedom of association and collective bargaining, land rights, water and sanitation, and women's rights'. The 2021 Human Rights Due Diligence and Modern Slavery Report also mentions the SMETA system: 'For our own operations and prioritized strategic tier 1 suppliers, we use the SMETA audit 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. [...] These systems support the identification of potential risks, help guide our approach for impact mitigation and monitoring, and inform our procurement practices'. It also notes: 'Our ongoing risk assessment is based on social audit results, grievance mechanism data, interviews with internal stakeholders in key roles and geographies, and an analysis of external studies'. As indicated, it takes into account geographies. [Human Rights Due Diligence and Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] & [2021 ESG Report, 2022: mondelezinternational.com] • Met: How process applies to supply chain: See above, the process also applies to its supply chain. The 2021 Human Rights Due Diligence and Modern Slavery Report also indicates: 'In 2021, we started a new auditing cycle using Sedex's Radar risk assessment tool to prioritize suppliers based on human rights related risk'. As indicated above the process includes consultation with people in key roles and geographies. [Human Rights Due Diligence and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Modern Slavery Report 2019, 13/05/2020: mondelezinternational.com] & [2021 ESG Report, 2022: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of the results of HR assessment: The 2021 Human Rights Due Diligence and Modern Slavery Report notes: 'Our ongoing risk assessment is based on social audit results, grievance mechanism data, interviews with internal stakeholders in key roles and geographies, and an analysis of external studies. It confirms the need to focus on salient risks that are shared across the food industry such as child labor, forced labor, living wage/income, health and safety, freedom of association and collective bargaining, land rights, water and sanitation, and women's rights'. It also discloses different results of a human rights assessment, published by Embode. However, the reports provided for Cote d'Ivoire, Ghana and Indonesia outdated according to the CHRB three-reporting-year timeframe policy. In the 2020 The Road to Worthy Work and Valuable Labour Report on palm oil migrant labour in Malaysia, the Company discloses the results of its assessment. Some of the issues found are: recruitment costs, passport retention, safety concerns, forced contract renewal. [2021 ESG Report, 2022: mondelezinternational.com] & [The road to worthy work and valuable labour, 2020: drive.google.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain: The Company provided in its feedback to CHRB extra evidence of the work done with cocoa suppliers in West Africa. However, no description found of how its global system applies to the entire supply chain. [Addressing child labor in the cocoa supply chain, 06/2020: cocoalife.org] • Met: Example of actions decided on at least 1 salient HR issues: The Company indicates that 'In 2019, ICI [International Cocoa Initiative] launched an innovation project to develop practical ways to identify and mitigate forced labor risks, put in place preventive measures, and allow people in situations of forced labor to raise the alarm and access support. The innovation project is currently ongoing in ten cocoa-growing communities in Côte d'Ivoire and Ghana. Working models are being developed to identify forced labor risks, based around the International Labor Organization's indicators of forced labor. These risk factors fall into two main groups: signs that work that has been undertaken involuntarily, and that work is carried out under the threat of a penalty. The project is developing measures to respond to forced labor risks and identified cases. These may include the provision of tailored assistance to at-risk workers or victims of abuse, for example through ensuring workers have written employment contracts, supporting workers to obtain due income, and allowing victims to raise the alert (such as through a toll-free hotline)'. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective: The Company provides, in its feedback to CHRB, information on how the grievance mechanism is managed in its palm oil supply chain. However, no description found of a system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. • Met: Lessons learnt from checking system 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: In the document Palm Oil - Action Progress, the Company discloses a series of supplier expectations. On the webpage section Our Progress, it discloses information on the development of its project Cocoa Life. However, no examples found of how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. [Palm Oil - Action Progress, 09/2020: mondelezinternational.com] & [Our Progress (web), N/A: cocoalife.org] Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: It indicates: 'Consistent with applicable local law, we have a toll-free and in some countries a collect call/reverse charge telephone Helpline and an online version WebLine so our employees can confidentially and, if they wish, anonymously report instances of suspected wrongdoing or ask questions about compliance matters. Our Helpline operates in more than 90 countries. 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 (web), N/A: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The grievance channel 'Integrity WebLine' is available in 46 different languages, including some indigenous languages - such as Suomi. Moreover, according to its 2020 MSA: 'We are also committed to non-retaliation, and we reinforce our "speaking up" and "non-retaliation" expectations through regular compliance training'. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] & [EthicsPoint Mondelez, N/A: secure.ethicspoint.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates it expects its suppliers to 'Make grievance channels and/or other mechanisms available, where workers may raise issues without fear of retaliation'. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <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 WebLine) 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. Also, the Human Rights Policy indicates: 'We believe it is fundamental to ensure the availability of accessible grievance mechanisms for all employees and people outside Mondelez International who want to raise a concern'. [EthicsPoint Mondelez, N/A: secure.ethicspoint.com] & [Human Rights (web), N/A: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Integrity Helpline is accessible 24 hours a day, every day, and language interpreters are available. There are 46 languages listed on the Integrity WebLine. However, it is not clear how all affected external stakeholders at its own operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>are made aware of it. [Compliance and Integrity (web), N/A: mondelezinternational.com] & [EthicsPoint Mondelez, N/A: secure.ethicspoint.com]</p> <ul style="list-style-type: none"> • Not Met: Communities access mechanism direct or through suppliers: The Company human rights webpage states that the company grievance mechanisms (e.g. Integrity helpline and WebLine) 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'. However, it is not clear the mechanism is also available to external individuals and communities of its supply chain. [Human Rights (web), N/A: mondelezinternational.com] • Not Met: Expect supplier to convey expectation to their own suppliers
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: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed: It indicates: 'Mondelez International has established this site, which is operated by an independent company, EthicsPoint, to provide an electronic method to report allegations of non-compliance confidentially and, if desired, anonymously. All reports submitted using this website are received directly by EthicsPoint and then routed to the appropriate persons within Mondelez International, who will ensure that each report is handled in a professional and confidential manner. When you submit a report, you have the choice to remain anonymous or identify yourself. Either way, the more detail you provide in your report, the more effectively Mondelez International can address your concern'. However, no further description found of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [EthicsPoint Mondelez, N/A: secure.ethicspoint.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • 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 or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome. [Compliance and Integrity (web), N/A: mondelezinternational.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company states in the Employee Code of Conduct: 'Mondelez International has zero tolerance to retaliation. Anyone who retaliates against someone for raising a concern in good faith will face discipline, which may include termination. If you report a concern, Mondelez International will fully support you, and conduct an independent and appropriate investigation'. In addition, the Code include some references to human rights: '[...] we do not tolerate discrimination, harassment, bullying, intimidation, or any disrespect to human rights, including child and forced labor'. Finally, the Human Rights Policy, indicates: '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'. [Our way of doing business, 2019: mondelezinternational.com] & [Human Rights Policy, N/A: mondelezinternational.com] • Met: Practical measures to prevent retaliation: It indicates: 'Mondelez International has established this site, which is operated by an independent company, EthicsPoint, to provide an electronic method to report allegations of non-compliance confidentially and, if desired, anonymously'. [EthicsPoint Mondelez, N/A: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct requires suppliers to: 'Make grievance channels and/or other mechanisms available, where workers may raise issues without fear of retaliation'. However, it is not clear it includes a prohibition to retaliate against other stakeholders. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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"> • Met: Says how it would provide remedy for victims if no adverse impact identified: 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 Community Child Protection Committees to become the focal point within the community and primary liaison to school and district authorities; Identify vulnerable children, particularly those who are out of school, who are either at risk or in a situation of child labor, through household and children interviews; Engage vulnerable children's parents and support children through collective and/or individual remediation; Share all data with the authorities and refer identified cases for remediation whenever needed; Use government-developed tools to support national policies and avoid the development of parallel systems; Take a broader lens to consider child rights beyond child labor and cover all children in the community, whether their parents grow cocoa or not, Based on learning from CLMRS and wider Cocoa Life program, advocate with government for measures to obtain universal access to quality education for children in cocoa growing communities and beyond'. [Tackling Child Labor - Cocoa Life (web), N/A: cocoalife.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved: It indicates that 'In 2020, our business integrity group received more than 2,800 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 which of these grievances were related to human rights. [Compliance and Integrity (web), N/A: mondelezinternational.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The supplier code expects suppliers to 'Provide fair and timely compensation'. However, the Company is expected to include requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. The Supplier Code of Conduct also indicates: 'We expect our suppliers and partners to: Have a publicly available Human Rights policy, outlining their commitment, in line with the Mondelez International Human Rights policy'. The Human Rights Policy states: 'Our goal is to pay our employees a living wage and provide equal opportunity for advancement to all our employees'. However, it is not clear the has a timebound target for requiring its suppliers to pay all workers a living wage or that the Company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. Finally, in its 2021 Human Rights Due Diligence and Modern Slavery Report, the Company indicates: 'Building on our ongoing commitment to pay our employees a living wage, we joined the Sustainable Trade Initiative (IDH) Living Wage roadmap to help advance living wage and income in global supply chains, and we are also working with peers in the AIMProgress Living Wage working group. We will work with our suppliers with the goal of having all our strategic suppliers engaged on a living wage roadmap by 2030'. However, it is not clear if 2030 is the timebound target for requiring its suppliers to pay all workers a living wage (it is not clear what suppliers are considered to be strategic). [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [Human Rights Policy, N/A: mondelezinternational.com] • Met: Improving living wage practices of suppliers: It indicates, in the document Living Income Challenge, that 'At Mondelēz International, we've been walking this path nearly ten years through the Cocoa Life program, where we've committed 400 million \$USD to drive positive change for 200,000 farmers in cocoa farming communities, measuring our impact and verify our supply chain along the way. We've seen improved cocoa farmers livelihoods by addressing root cause through targeted activities or income generating opportunities. In addition to paying program premium and the West African Living Income Differential'. However, no further details found of the work done to support the payment of a living wage by its suppliers. Moreover, the 2021 Human Rights Due Diligence and Modern Slavery Report notes: 'Building on our ongoing commitment to pay our employees a living wage, we joined the Sustainable Trade Initiative (IDH) Living Wage roadmap to help advance living wage and income in global supply chains, and we are also working with peers in the AIMProgress Living Wage working group. We will work with our suppliers with the goal of having all our strategic suppliers engaged on a living wage roadmap by 2030'. Although no details have been found in relation to actual work conducted in this last piece of evidence, the Company has started this process. [Living Income Challenge, 17/11/2022: cocoalife.org] & [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with 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: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing 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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates, in its 2020 MSA, that 'For our own operations and tier 1 suppliers, on an ongoing basis we seek to identify potential human rights issues, and monitor compliance with our policies through independent audits. We use the SMETA audit protocol to evaluate our internal manufacturing sites and direct suppliers against a common set of corporate social responsibility standards. (...) In 2020, 100 percent of our 2019 target group of highest priority suppliers—completed the SMETA audit'. However, it is not clear the Company identifies all its suppliers, including direct and indirect suppliers. Previous assessment was based on the Disclosure to CHRB, which is now out of the three-year timeframe that the methodology requires. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses the 2021 list of Tier 1 and Tier 2 cocoa suppliers, however, it does not contain the specific locations of these suppliers. It also indicates, in its 2020 HRDD and Modern Slavery Report, that: 'we have achieved the traceability of 98% of our palm oil to the mill'. It also discloses the list of palm mills. It contains the name of the mill and its latitude and longitude. However, it is not clear whether those suppliers make up the most significant parts of its supply chain (whether an why it is the most significant part of the supply chain is to be defined by the Company). [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] & [Cocoa Life Tier 1 and Tier 2 Suppliers 2021, 2021: mondelezinternational.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: The Company's webpage section Supply Chain Expectations 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 mandatory terms and conditions in areas such as corporate social responsibility, ethics, integrity, and safety'. The requirement found in the Companies Terms and Conditions regarding child labour indicates: 'You will not directly (or indirectly through the use of your subcontractors) employ any children under the age of 18 years of age unless legal, necessary, and the following are met: (i) You will comply with the minimum employment age limit defined by national law or by International Labor Organization ("ILO") Convention 138, whichever is higher. [...] (ii) You will ensure that employees working in facilities that are manufacturing or packaging MDLZ's finished products, serving as temporary employees to MDLZ, or present at MDLZ's facilities, are at least 15 years of age (and no exceptions allowed by the ILO or national law will apply).(iii) You must demonstrate that their employment does not expose them to undue physical risks that can harm physical, mental, or emotional development'. However, although the Company indicates it prohibits suppliers from using child labor and requests suppliers to ensure they verify the age of their employees, no further evidence found regarding the requirement of remediation programmes. [Supply Chain Expectations (web), N/A: mondelezinternational.com] & [Terms and Conditions, 01/2020: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on child labour: It indicates: 'We are working with local authorities and partners to roll-out community-based Child Labor Monitoring and Remediation Systems (CLMRS). (...) we focus on building the capacity of the communities themselves, as well as that of public authorities to support them and fulfil their duty to protect human rights. That means, as part of our CLMRS, we: Set up and train Community Child Protection Committees to become the focal point within the community and primary liaison to school and district authorities; Identify vulnerable children, particularly those who are out of school, who are either at risk or in a situation of child labor, through household and children interviews; Engage vulnerable children's parents and support children through collective and/or individual remediation; Share all data with the authorities and refer identified cases for remediation whenever needed; Use government-developed tools to support national policies and avoid the development of parallel systems; Take a broader lens to consider child rights beyond child labor and cover all children in the community, whether their parents grow cocoa or not; Based on learning from CLMRS and wider Cocoa Life program, advocate with government for measures to obtain universal access to quality education for children in cocoa growing communities and beyond'. [Tackling Child Labor - Cocoa Life (web), N/A: cocoalife.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made: The Company discloses an analysis of trends for the last three reporting years of its 'Child Labor Monitoring & Remediation Systems (CLMRS) coverage in Cocoa Life communities in West Africa' and 'Child Labor Monitoring & Remediation Systems (CLMRS) coverage in Cocoa Life communities in Ghana'. However, this analysis of trends covers the efforts to tackle child labor in its supply chain, going beyond a specific ingredient. [2021 ESG Report, 2022: mondelezinternational.com]
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (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: Debt and fees rules in codes or contracts: According to the Supplier Code of Conduct, the Company expects suppliers to 'Never use or tolerate the use of human trafficking, forced labor (including forced or involuntary prison labor), [...] as defined by the International Labor Organization (ILO)'. The webpage section Supply Chain Expectations 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 mandatory terms and conditions in areas such as corporate social responsibility, ethics, integrity, and safety'. The requirement found in the Companies Terms and Conditions regarding forced labor indicates: 'You will not use any forced labor, which means any work or service performed involuntarily under threat of physical or other penalty. You shall respect the freedom of movement of your 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. If workers enter into employment agreements with you, workers should do so voluntarily'. However no provision prohibiting any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs found. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [Terms and Conditions, 01/2020: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on debt & fees • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition of forced labour: Wage practices (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: Suppliers to pay workers in full and on time in codes or contracts: The Supplier Code expects suppliers to 'Never use or tolerate the use of human trafficking, forced labor (including forced or involuntary prison labor), [...] as defined by the International Labor Organization (ILO)'. The Company explains in its webpage section Supply Chain Expectations 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 mandatory terms and conditions in areas such as corporate social responsibility, ethics, integrity, and safety'. The requirement found in the Companies Terms and Conditions regarding forced labor indicates: 'You will not use any forced labor, which means any work or service performed involuntarily under threat of physical or other penalty. You shall respect the freedom of movement of your 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. If workers enter into employment agreements with you, workers should do so voluntarily'. However no provision requiring suppliers to pay workers in full and on time found. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] & [Terms and Conditions, 01/2020: mondelezinternational.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: The Company's CSR Policies for suppliers indicates: 'Supplier shall not use any forced labor, which means any work or service performed involuntarily under threat of physical or other penalty. 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. If workers enter into employment agreements with Supplier, workers should do so voluntarily.' [CSR Policies for suppliers, N/A: mondelezinternational.com] • Not Met: How working with suppliers on free movement: It indicates: 'we have also developed a Forced Labor Risk Mitigation Toolkit centered around the three Priority Industry Principles against Forced Labor, to further equip the teams with best practice guidance. The trainings and toolkit were made available globally during 2020 with a more focused rollout in 2021'. However, it is not clear how the Company works with suppliers to eliminate retention of worker's documents or other actions to physically restrict movement. [2020 HRDD and Modern Slavery Report, 19/05/2021: mondelezinternational.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (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: FoA & CB rules in codes or contracts: According to the Supplier Code of Conduct, the Company expects suppliers to: 'Respect employees' rights to organize and bargain collectively'. However, no prohibition to intimidation, harassment, retaliation and violence against trade union members and trade union representatives found. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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: Sets out clear Health and Safety requirements: The Company's CSR Policies for suppliers states: 'Supplier shall (i) endeavor 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'. [CSR Policies for suppliers, N/A: mondelezinternational.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Fatalities rate for lasting reporting period: In its feedback to CHRB, the Company indicates it discloses information on fatalities, however, the figures seem to be related to its own operations. This subindicator focuses on quantitative information on fatalities for workers at the supply chain. [2021 ESG Report, 2022: mondelezinternational.com] • Not Met: Occupation disease rate for last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (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: Rules on land & owners in codes or contracts: The Supplier Code of Conduct indicates: 'Respect human rights relevant to communities' livelihoods and health, such as the ownership and use of land (...), in relation to their operations'. However, no further requirement found to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on land issues • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (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: Rules on water stewardship in codes or contracts: The Supplier Code of Conduct indicates: 'Respect human rights relevant to communities' livelihoods and health, such as the ownership and use of (...) water, in relation to their operations'. [Supplier Code of Conduct, 10/01/2021: mondelezinternational.com] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on water stewardship issues • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts: The webpage section Supply Chain Expectations 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 mandatory terms and conditions in areas such as corporate social responsibility, ethics, integrity'. The Terms and Conditions indicates: 'You 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). You will not discriminate based on a person's [...] sex [...] Harassment and Abuse. You will provide a workplace free from harassment, which can take many forms, including sexual, verbal, physical or visual behavior that creates an offensive, hostile, or intimidating environment'. However, no provisions specifically regarding women's rights found, such as requiring suppliers to provide introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Supply Chain Expectations (web), N/A: mondelezinternational.com] & [Terms and Conditions, 01/2020: mondelezinternational.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: It indicates: ' Following our global strategy, we have women's empowerment action plans in place for Ghana, Côte d'Ivoire, Indonesia and the Dominican Republic, which have been developed based on learnings from our on-the-ground experience, as well as insights from international and in-country partners. (...) Here are some concrete actions we are taking: Increasing women's access to farm inputs, land ownership and membership in farmer organization; Promote leadership positions for women as part of the Community Development Committees and Community Action Plan processes including a target of 30% of women representatives in the process; Aiming to ensure participation of 50% of young women (age 15+) in youth-oriented programming; Helping women improve their livelihoods through access to finance, entrepreneurial skills and more. [Cocoa Life - Women's Empowerment (web), N/A: cocoalife.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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E(1).0

Serious
allegation No 1

- Area: Child labour

- **Headline:** Mondelez International among others to face child slavery lawsuit in the US

- **Story:** On February 12, 2021, eight children who claim they were used as slave labour on cocoa plantations in Ivory Coast have launched legal action against the chocolate companies. They accuse the corporations of aiding and abetting the illegal enslavement of “thousands” of children on cocoa farms in their supply chains.

Mondelez International, Cargill, Nestlé, Barry Callebaut, Mars, Olam International and The Hershey Company have been named as defendants in a lawsuit filed in Washington DC by the human rights firm International Rights Advocates (IRA), on behalf of eight former child slaves who say they were forced to work without pay on cocoa plantations in the west African country.

The plaintiffs, all of whom are originally from Mali and are now young adults, are seeking damages for forced labour and further compensation for unjust enrichment, negligent supervision and intentional infliction of emotional distress.

It is the first time that a class action of this kind has been filed against the cocoa industry in a US Court. Citing research by the US state department, the International Labour Organisation and Unicef, among others, the Court documents allege that the plaintiffs’ experience of child slavery is mirrored by that of thousands of other minors.

The lawsuit also accuses the companies of actively misleading the public in their 2001 promise to “phase out” child labour. The original deadline for achieving the commitment, made as part of the voluntary Harkin-Engel Protocol, was 2005. The World Cocoa Foundation, an industry body to which all the defendants belong, now aims to achieve the target by 2025.

In the claim, all eight plaintiffs describe being recruited in Mali through trickery and deception, before being trafficked across the border to cocoa farms in Ivory Coast. There, they were forced to work – often for several years or more – with no pay, no travel documents and no clear idea of where they were or how to get back to their families.

The Court papers allege that the plaintiffs, all of whom were under 16 years old at the time of their recruitment, worked on farms in major cocoa-producing areas of the country. The defendants’ apparent influence in these markets is described as “dominant” by the plaintiffs’ counsel. The lawsuit claims one plaintiff was only 11 years old when a local man in his home town of Kouroussandougou, Mali, promised him work in Ivory Coast for XOF 25,000 (approximately USD 46) a month. The legal documents allege that the boy worked for two years without ever being paid, often applying pesticides and herbicides without protective clothing. The documents claim another child named as a plaintiff in the suit had visible cuts on his hands and arms from machete accidents. Speaking of his experience of forced labour between 2009 and 2011, he recalls being constantly bitten by insects. As with most of the plaintiffs, he claims in the lawsuit that he was promised payment after the harvest, but it never came.

On November 1, 2021, seven of the world’s largest cocoa companies have been accused of using child labour so they can “continue to benefit from cheap cocoa” in new legal papers. The lawsuit has been brought by eight Malian citizens who claim they were trafficked as children to the Ivory Coast to work on cocoa plantations.

Mondelez International, Nestle, Cargill, The Hershey Company, Olam International, Mars, and Barry Callebaut were named as defendants in the case, brought in Washington DC, and a newly filed opposition brief alleged that they formed a “venture to allow them to continue benefitting from cheap cocoa harvested by forced child labour”. The cocoa industry has faced allegations that young children are being used to work on farms harvesting cocoa beans.

A 2020 study by the University of Chicago found that 1.56 million children are harvesting cocoa, with the main countries for production being the Ivory Coast and Ghana. The Ivory Coast is responsible for producing around 40% of the global supply of cocoa.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Major cocoa companies have all made pledges to tackle the issue of child labour within their supply chains. They argue that there is not sufficient evidence to connect them to the abuse allegedly suffered by the eight plaintiffs. However, lawyers are arguing that the companies banded together to make it look like they were trying to tackle the problem, but they continued to profit from forced child labour instead.</p> <p>Terence Collingsworth, from International Rights Advocates, the lawyer who is bringing the civil action against the cocoa companies, told The Independent: "These companies are running a war on two fronts. They are telling the public; we are working with cocoa farmers, we are giving them schooling and money, we have got this under control. Then they stand up in court and say we are just buying chocolate, we do not have anything to do with what is going on there. In their most recent filing, they say they are no different from a consumer of a chocolate bar."</p> <p>Court papers filed in October 2021 alleged that the plaintiffs, all of whom were under 16 at the time of their recruitment, "were trafficked from Mali and forced to work on cocoa plantations in Ivory Coast that supplied to defendants". Legal documents describe the workers being constantly bitten by insects, wounded from machete accidents, and some working for years without being paid. The case is being brought under the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2017. This act includes a "should have known" negligence standard, which means organisations can be held accountable for trafficking if it can be shown that they should have known that abuse was occurring, even if they did not directly know about it. International Rights Advocates have proposed a broader reading of the TVPRA than the chocolate companies accept.</p> <p>[Wion, 13/02/2021, "Children sue Nestlé, Mars and Hershey for child slavery in Ivory Coast": wionews.com] [Complex, 13/02/2021, "Mars, Nestlé, and Hershey Facing Major Child Slavery Lawsuit": complex.com] [The Guardian, 12/02/2021, "Mars, Nestlé and Hershey to face child slavery lawsuit in US": theguardian.com] [The Independent, 01/11/2021, "Nestle, Mars and Hersey accused of 'using child labour to get cheap cocoa' in new court papers": independent.co.uk]</p>
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: A response by the company is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: A response by the company is not publicly available.
E(1).2	The company has investigated and 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: Engaged with stakeholders: On its website the company claims "As a large purchaser of cocoa products for decades, we have undertaken various initiatives and entered into several partnerships to address the sustainability of the cocoa supply chain. Since 2012, we have leveraged Cocoa Life, a holistic sustainability program backed by a \$400 million investment, to address human rights risks associated with labor in the cocoa supply chain. Cocoa Life aims to create empowered cocoa farmers in thriving communities. We partner with farmers, communities, local governments, suppliers and NGOs and invest directly in cocoa communities to promote women's empowerment, child protection and education, and improve livelihoods. To strengthen our approach, we commissioned human rights consultancy Embode to undertake child labor assessments within cocoa sourcing communities in Cote d'Ivoire, Ghana and Indonesia. Based on Embode's recommendations, we are working together with government authorities, suppliers and NGOs to harness the strengths of Cocoa Life's community model and bolster our approach to child protection." However, there is no information available on what "partnering" with famers, communities, etc. entails. Furthermore, there is no information provided on the timeframe of the company's involvement with Embode; the Embode report for Cote d'Ivoire was published in 2016. <p>For the reasons given, the CHRB did not find sufficient evidence for engagement with the affected stakeholders in the investigation of the allegation. [ESG Topics, N/A: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. It states in its Human Rights Due Diligence & Modern Slavery Report 2021 that "Child labor is a symptom of underlying systemic issues in the cocoa supply chain such as poverty and slow

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>rural development." However, it does not present which were the underlying causes in the case of the recent lawsuit. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: As the initiatives described on the company website have all been in place before the filing of the lawsuit, there is no evidence that the company made changes to its management systems following the events and their human rights impacts. <p>According to the HRDD&Modern Slavery Report 2021, the company's Child Labor Monitoring and Remediation System (CLMRS) has made significant progress in 2021. However, this does not change the fact that this program was established before the allegation came to light an cannot be considered for this indicator. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken: As the initiatives described on the company website have all been in place before the filing of the lawsuit, there is no evidence that the company made changes to its management systems following the events and their human rights impacts. <p>According to the HRDD&Modern Slavery Report 2021, the company's Child Labor Monitoring and Remediation System (CLMRS) has made significant progress in 2021. However, this does not change the fact that this program was established before the allegation came to light an cannot be considered for this indicator. [2021 Human Rights Due Diligence and Modern Slavery Report, 18/05/2022: mondelezinternational.com]</p>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: FoA/CB <ul style="list-style-type: none"> • Headline: Workers at Tate's Bake Shop, owned by Mondelez International, threatened with deportation if they voted to unionise <ul style="list-style-type: none"> • Story: On March 12, 2021, press sources reported that workers at famed Long Island cookie company Tate's Bake Shop, owned by Mondelez International, have claimed management threatened to call immigration authorities and have them deported if they joined a union. Employees said they were warned of repercussions including being 'sent back' to their countries if they voted in favour of unionising in April 2021. <p>Through an interpreter, employees told a press source that they are being harassed at work, and that management has threatened to call Immigration and Customs Enforcement. The employees asked to remain anonymous for fear of retaliation.</p> <p>"They began threatening people based on their immigration status, telling them that if their documents are not in order and they attempted to join the labour union they would get deported," Cosmo Lubrano, president of Eastern States Joint Board union, told the press source. According to the press, Tate's has about 450 employees, most of which are undocumented immigrants.</p> <p>According to the National Labour Relations Act, harassment in response to unionisation efforts is illegal, and workers are protected under the act regardless of their immigration status. Union organisers told the press source that Tate's also hired an anti-union consultant to thwart their unionisation efforts.</p> <p>[DailyMail Online, 12/03/2021, "Workers at famed Long Island cookie company Tate's Bake Shop claim management threatened to call immigration authorities and have them deported if they joined a union": dailymail.com] [Business Insider, 12/03/2021, "Workers at an iconic New York cookie company said they were threatened with deportation if they voted to unionize": businessinsider.in]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, the Company denied the situation and stated: "Any allegation that the company has violated any aspect of the National Labor Relations Act is untrue". [DailyMail Online, 12/03/2021: dailyadvent.com] Score 2 <ul style="list-style-type: none"> • Not Met: Detailed response: The company spokesperson stated: "Tate's prides itself on treating all its employees with respect, and we have fostered over many years an inclusive, supportive, caring work environment and culture with our employees". However, the company refers to the allegations only in general terms and fails to address the human rights violations that occurred. [DailyMail Online, 12/03/2021: dailyadvent.com]
E(2).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: The company denies the allegation, claiming "Any allegation that the company has violated any aspect of the National Labor Relations Act is untrue". However, this is not sufficient evidence to prove the affected stakeholder did not suffer the alleged impacts. [DailyMail Online, 12/03/2021: dailyadvent.com] Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: The company denies the allegation, claiming "Any allegation that the company has violated any aspect of the National Labor Relations Act is untrue". However, this has not been proven by an independent process.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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