

MONDELÉZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

A WORD FROM OUR CPO

At Mondelēz International, we are inspired to go the extra mile to lead the future of snacking around the world. On this journey of empowering people to snack right, we focus on building strong and mutually beneficial partnerships with our suppliers.

As a dynamic and innovative Global Supplier Management organization, our goal is to ensure the highest standards of ethics, safety, quality, and collaboration within our Supply Chain, to guarantee and enhance our customers' delight. To do so, we expect from our suppliers and partners a commitment to cost leadership, value delivery and mutual growth, based on the below foundational principles:

- Abide by our Supplier Code of Conduct and the highest standards of ethics and integrity
- Comply with all local, regional, and global regulatory requirements
- Bring innovation that delivers competitive advantages
- Provide safe goods and services of the highest quality, on time, in full, at a most competitive price
- Support and contribute to our efforts in diversity, economic inclusion, and sustainability

This Supplier & Partner Code of Conduct summarizes the 10 principles that we expect our Suppliers and Partners to follow to guarantee a trustworthy, ethical, safe, fair, and high-performing relationship with Mondelez International.

Sincerely,

Quentin Roach
Senior Vice President and Chief Procurement Officer.

INTRODUCTION

Our Supplier & Partner Code of Conduct, published in December 2021, and as may be amended from time to time, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain.

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.

We expect our Suppliers and business partners to comply with and communicate these expectations throughout their supply chain – including their own suppliers and partners –

MONDELÉZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

O
u
r
S
u
p
p
l
i
e
r
&
P
a
r
t
n
e
r
s

by adopting efficient management systems, policies, procedures and training to uphold the standards and expectations set forth in this Supplier & Partner Code within their own business operations. Ultimately, it is our expectation that our Suppliers and Partners will avoid any situation that may adversely affect MDLZ' business interests or reputation.

We require our Suppliers to abide by all applicable national, state and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier & Partner Code of Conduct, we expect our Suppliers to comply with the most stringent standards and principles.

In the spirit of continuous improvement, MDLZ is committed to working with and supporting our Suppliers and Partners to meet, and when possible, exceed, the requirements in this Code.

By its acceptance of any purchase order from MDLZ, the Supplier or Partner acknowledges its acceptance of the Supplier & Partner Code of conduct and intention to comply with its requirements.

WHY DO WE HAVE A SUPPLIER & PARTNER CODE OF CONDUCT?

What makes MDLZ the biggest snacking company in the world is not only our iconic brands and products but also the trust we have built with our consumers and stakeholders. This trust is maintained by the integrity of our everyday actions, doing things the right way. Our suppliers and partners are an integral part of our ecosystem and success and help us build and maintain our reputation. Therefore, it is essential for us that all the Suppliers & Partners involved with MDLZ commit to and uphold the highest standards of ethics and integrity, values, and operating principles.

Our Supplier & Partner Code of Conduct contains 10 overarching principles to guide our suppliers and partners to operate and perform in the right way. We expect from our Suppliers and Partners that they use all these important principles to guide their decisions as they do business. They enable us to achieve mutual success in the right way.

- 1) **COMPLY WITH APPLICABLE LAW, REGULATIONS, PLEDGES AND MDLZ POLICIES**
- 2) **DEAL HONESTLY WITH THE GOVERNMENT**
- 3) **TREAT PEOPLE FAIRLY AND RESPECT HUMAN RIGHTS**
- 4) **EMBRACE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY**
- 5) **MAKE HIGH QUALITY FOOD THAT IS SAFE TO EAT**
- 6) **MEET RELEVANT ANIMAL WELFARE STANDARDS**
- 7) **KEEP ACCURATE BOOKS AND BUSINESS RECORDS**
- 8) **MARKET RESPONSIBLY**
- 9) **COMPETE FAIRLY AND CONDUCT BUSINESS WITH INTEGRITY**
- 10) **PROTECT AND RESPECT PRIVATE AND PROPRIETARY INFORMATION**

MONDELÉZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

1. Comply with applicable law, regulations, pledges and MDLZ contracts

We expect our suppliers and partners to:

- Know and follow global and local laws that apply to them and their business
- Comply with or outperform all applicable regulations (business, environmental, social, quality and food safety, health and safety) relative to their business
- Treat legal requirements as a minimum standard
- Alert MDLZ to any material issue with the goods and services they supply
- Fulfil all MDLZ contractual commitments.

2. Deal honestly with the Government

We expect our suppliers and partners to:

- Prohibit all types of bribery, corruption, lies and money laundering
- Forbid gifts to private or public officials that aim at influencing business decisions
- Implement adequate controls to prevent the above activities from occurring
- Comply with all anticorruption laws and regulations that govern operations in the countries in which they do business.

3. Treat People fairly and respect Human Rights

We expect our suppliers and partners to:

- Have a publicly available Human Rights policy, outlining their commitment, in line with the Mondelēz International Human Rights policy
- Respect internationally recognized human rights, as set out in the Universal Declaration of Human Rights, as well as support the principles concerning fundamental rights at work as set out in the International Labor Organization Core Conventions the International Bill of Human Rights, and adopt the United Nations Guiding Principles on Business and Human Rights (UNGPs) as framework of reference for conducting human rights due diligence
- Provide fair and timely compensation and ensure safe and healthy working conditions
- 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
- Make grievance channels and/or other mechanisms available, where workers may raise issues without fear of retaliation
- Comply with ethical audit requirements (for example, SMETA audits)

4. Embrace Social and Environmental Responsibility

We expect our suppliers and partners to:

MONDELÉZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

O
U
R
S
U
P
P
L
I
E
R
&
P
A
R
T
N
E
R
C
O
D
E
O
F
C
O
N
D
U
C
T

- Make all possible efforts to include small and diverse suppliers (minority-owned, women-owned, veteran-owned, disabled-owned, disadvantaged or HUB-certified businesses) in their active supplier base and partnerships [Visit our [Economic Inclusion & Supplier Diversity Website](#) for more information]
- Support MDLZ priorities to reduce carbon emissions, waste generation and water consumption, therefore strive to reduce environmental impact through efficient use of resources and environmentally friendly technologies, as well as efforts such as ending deforestation, minimizing greenhouse gas emissions and waste, and using resources efficiently
- Ensure packaging design and material selection adhere to Mondelēz' packaging sustainability strategy; minimizing virgin plastic usage and ensuring materials detrimental to recycling are not used (e.g. PVC, PVDC, PS, carbon black plastics, and oxidegradeable plastics)
- 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
- Work with MDLZ to implement sustainable processes and correct problems to drive continuous improvement and social value.

5. Make high quality food that is safe to eat

We expect our suppliers and partners to:

- Follow the highest standard of food manufacturing, packaging, storage, and transportation to guarantee our products' and consumers' safety (check our [Supplier Quality Expectations](#))
- Meet or exceed the agreed specifications to grant committed quality to our customers
- Report to MDLZ in a complete, accurate and timely manner any concern about product safety or quality
- Abide by the requirements listed in the [Supplier Performance Expectations letter](#)

6. Meet Relevant Animal Welfare Standards

We expect our suppliers and partners to:

- Be aware and comply with all applicable national laws on animal welfare and, where legislation does not exist, follow the guidelines of the World Organization for Animal Health (OIE)
- Support national standards and assurance schemes, and engage in continuous improvement to promote better standards in quality, safety and animal welfare respecting the following Five Freedoms:
 - Freedom from hunger, thirst, and malnutrition
 - Freedom from physical and thermal discomfort
 - Freedom from pain, injury, or disease
 - Freedom from fear and distress
 - Freedom to express normal behavior

MONDELÉZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

7. Keep accurate books and business records

We expect our suppliers and partners to:

- Maintain books and records that reflect all transactions in an accurate, honest, complete and timely way
- Employ appropriate quality audit and compliance processes for matters such as product and food safety, worker health and safety, financial statements and labor and employment
- Not engage in fraud, theft, or misuse of assets, obscure any record, or circumvent any policy or process for personal gain
- Disclose, on request, the location of facilities and known origins of materials to enable traceability

8. Market responsibly

We expect our suppliers and partners to:

- Not engage in misleading marketing
- Have clear guardrails that their claims are substantiated
- Not advertise directly to children.

9. Compete fairly and conduct business with integrity

We expect our suppliers and partners to:

- Compete fairly and ethically for MDLZ' business
- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with MDLZ' business
- Avoid business practices such as arrangements that unlawfully restrain competition, improper exchange of information, spying, price fixing, etc.
- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate.

10. Protect and respect private and proprietary information

We expect our suppliers and partners to:

- Protect any of MDLZ' confidential information to which they have access, including its suppliers, employees or consumers' information, intellectual property, trade secrets, patents, or financial information
- Safeguard any property belonging to MDLZ while under their control
- Comply with insider trading laws and take steps to prevent their employees from trading our securities while in possession of material MDLZ non-public information.

MONDELĒZ INTERNATIONAL

SUPPLIER & PARTNER CODE OF CONDUCT

SCOPE

Our Supplier & Partner Code of Conduct, outlines Mondelēz International's (MDLZ) expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain

PRINCIPLES

- Comply with applicable law, regulations, pledges and MDLZ Policies
- Deal Honestly with the Government
- Treat People fairly and respect Human Rights
- Embrace Social and Environmental Responsibility
- Make High Quality Food That is Safe to Eat
- Meet relevant Animal Welfare Standards
- Keep Accurate Books and Business Records
- Market Responsibly
- Compete Fairly and Conduct Business with Integrity
- Protect and Respect Private and Proprietary Information

TRUST-BASED RELATIONSHIP

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.

By working closely with our Suppliers and Partners, we believe we can achieve mutual success while helping our consumers, communities and employees thrive.

MDLZ employees are prohibited from having personal interests that conflict with those of MDLZ or use their position with the company for any advantage or gain to themselves or their relatives and close friends. For the same reason, MDLZ employees may not accept gifts from any type of business partners, since it could affect their objectivity to pursue MDLZ best interest, and, finally, MDLZ employees will never accept a bribe or kickback or engage in any illegal practice with the suppliers and partners.

If you see or suspect any conduct or business practices that you think could violate this Supplier & Partner Code of Conduct, please contact MDLZ directly. You may raise a concern or get help by:

- Contacting your Mondelēz International representative
- Calling our secure Mondelēz International Integrity Helpline at **1.877.781.2421** or **Webline (www.mdlzethics.com)**

USEFUL LINKS

- [Mondelēz International – Human Rights Policy](#)
- [Mondelēz International – Environmental & Social Responsibility](#)
- [Mondelēz International – Economic Inclusion & Supplier Diversity](#)
- [Mondelēz International – Animal Welfare](#)
- [Mondelēz International – Supplier Information Center](#)
- [Supplier Quality Expectations](#)
- [Supplier Performance Expectations](#)