



OUR WAY OF DOING BUSINESS

THE MONDELĒZ INTERNATIONAL CODE OF CONDUCT



Mondelēz
International
SNACKING MADE RIGHT

Dear Colleague:

Empower people to snack right. It's our purpose and it drives us every day.

Our three values work hand in hand to shape our culture and guide our actions and decisions. Love our consumers and brands. Grow every day. Two critical values that can fall flat if we do not simply DO WHAT'S RIGHT.

Each of us has a responsibility to do what's right by following legal requirements and respecting our consumers, our customers, our business partners and our fellow employees. It may seem like second nature, but it takes a conscious effort and a strong commitment by each of us to always do what we say we're going to do...and to do it in the right way. This is "Snacking Made Right."

Our Code of Conduct puts into words the actions and attitudes that guide us. It is our foundation and serves as a reminder of what it takes to sustain a legacy of trust. Mondelēz International embodies a collective heritage, comprising brands and operations with many decades of history, committed to doing business in a lawful and ethical manner.

The principles embodied in our Code guide us to do what's right anywhere we do business and sets out our integrity commitment to our stakeholders.

Please take these ten commitments to heart and live them every day.

Sincerely,



Dirk Van de Put
Chairman and Chief Executive Officer



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THE REASON WE HAVE A CODE

What makes Mondelez International the biggest snacking company in the world is not only our iconic brands and products but also the trust we have built with our stakeholders. This trust is maintained by the integrity of our everyday actions, doing things the right way.

Our Code of Conduct contains ten overarching principles to guide us to live our values in the right way. We must use all these important principles to guide our decisions as we do business. They provide us with the guardrails for our strategies, the support system for our values, and enable us to achieve success in the right way.

We love our consumers and brands – we will not intentionally mislead consumers in labeling or advertising; we will make food that is safe to eat. We grow every day – we will compete fairly. We do what’s right – we treat people fairly; we practice social and environmental responsibility; we deal honestly with the government. When gaining a business advantage means ignoring our values or violating our commitments, we won’t do it!

By following this Code, we will sustain our culture of integrity in Mondelez International, which should make us each proud to work here.

TO WHOM DOES THE CODE OF CONDUCT APPLY?

Our Code of Conduct applies to all our employees worldwide, regardless of location, role or level of seniority. We also expect temporary and contract employees, consultants, agents and any other third party who acts on behalf of Mondelez International to follow the principles of the Code. Every subsidiary and joint venture which the company controls must adopt and comply with the Code. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Code. The members of the Board of Directors must follow the Code of Business Ethics and Conduct for Non-Employee Directors, which has similar principles to those in this Code of Conduct, but tailored specifically for corporate governance purposes. Furthermore, our suppliers must comply with our Corporate Responsibility Expectations for Direct Suppliers, which encompass the principles of the Code.

THIS CODE GUIDES YOU TO...

- Understand what Mondelez International expects from you.
- Comply with the policies and legal requirements that apply to your work.
- Obtain guidance if you have questions.

OUR COMMITMENTS

We all have to obey applicable laws, rules, and regulations of the countries in which we operate —that’s the starting point. Also, we must follow our company policies. And if there is a difference between a legal requirement and our Code of Conduct or policies, we will always apply the higher standard. To help provide clarity, this Code sets out below the ten most important commitments to doing business with integrity that apply company-wide. Each has a cross-reference to the relevant Compliance Policy that contains more details on expectations.

[Click here to see our Compliance Policy Center](#)



WE...

- 1 TREAT PEOPLE FAIRLY.
- 2 MAKE FOOD THAT IS SAFE TO EAT.
- 3 KEEP ACCURATE BOOKS AND BUSINESS RECORDS.
- 4 MARKET RESPONSIBLY.
- 5 EMBRACE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY.
- 6 DEAL HONESTLY WITH THE GOVERNMENT.
- 7 COMPETE FAIRLY.
- 8 PROTECT AND RESPECT PRIVATE AND PROPRIETARY INFORMATION.
- 9 NEVER TRADE ON INSIDE INFORMATION.
- 10 AVOID CONFLICTS OF INTEREST.

TREAT PEOPLE FAIRLY



We value the authentic selves of the individuals that work hard every day to empower people to snack right. We see diversity and inclusion as imperatives to success. We are committed to providing a respectful and safe working environment, and we believe that everyone deserves an equal chance to succeed based on their hard work, talent, and commitment to the values of Mondelez International.

Laws and cultures may differ around the world, but the concept of treating others as you want to be treated is universal, regardless of race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any other legally protected personal characteristic or status. Likewise, we do not tolerate discrimination, harassment, bullying, intimidation, or any disrespect to human rights, including child and forced labor.

Click here to read more about expectations for living up to this commitment:

[Discrimination, Harassment, and Minimum Age of Employment Policy](#)

[Safety Policy](#)

[Security of People, Product and Premises Policy](#)

TREATING PEOPLE FAIRLY MEANS, FOR EXAMPLE, THAT:

In Mondelez International there is no room for discrimination.

We will practice civility in our workplace: we will treat our colleagues and partners with dignity and respect.

We will have fun while we work and grow, but not in a way that makes others feel excluded or offended.

Managers will lead by example – employees will have confidence that Mondelez International is a fair and safe place to work.

MAKE FOOD THAT IS SAFE TO EAT

We are a snacking company. Nothing speaks to “Snacking Made Right” more than our relentless focus on food safety. Our consumers must have the confidence to use our products, and to share them with their families and friends. Without that, we would risk the very existence of our business.

Therefore, we will always ensure that the food we make achieves our highest standards. We must each be aware of and follow our company policies and procedures to protect this commitment. Whenever we face challenges, we will resolve it with urgency and transparency.



LOVE OUR CONSUMERS & BRANDS

Click here to read more about expectations for living up to this commitment:

[Food Safety, Food Defense, and Regulatory Policy](#)

[Security of People, Product and Premises Policy](#)

[Special Situations Management Policy](#)

KEEP ACCURATE BOOKS AND BUSINESS RECORDS

Our financial statements must be complete, timely, accurate and fair, and comply with applicable accounting principles. We won't hide liabilities, overstate earnings, keep things off our balance sheets that belong there, or disguise our transactions. We will provide investors with accurate data they need to make informed investment decisions, since omissions and distortions would severely harm their trust.

We will not engage in fraud, theft or misuse of our assets. We will not obscure any record or circumvent a policy or process for personal gain.

We will manage all records and information securely and in full compliance with all applicable laws and regulations and business needs – everywhere we do business.



**GROW
EVERY
DAY**

Click here to read more about expectations for living up to this commitment:

[Financial Compliance and Anti-Fraud Policy](#)
[Records & Information Management Policy](#)
[Customs and Trade Laws Policy](#)



MARKET RESPONSIBLY

We take great care to market responsibly – to help consumers snack mindfully. Misleading marketing erodes consumers' trust in us and can ultimately hurt all our brands. We have clear guardrails to ensure our product claims are substantiated, and that we're not advertising directly to children – irrespective of a product's nutritional profile.



**LOVE OUR
CONSUMERS
& BRANDS**

Click here to read more about expectations for living up to this commitment:

[Advertising and Marketing Policy](#)
[Health and Wellness Policy](#)

EMBRACE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY



We believe strongly in our responsibility to create a meaningful, lasting and positive impact for people and our planet.

We care about our planet, so we work hard to prevent pollution, minimize waste, and reduce our use of natural resources.

We care about the lives we touch, so we respect the human rights of people in our value chain, from workers in our plants to smallholder farmers and their communities in our agricultural supply chains.

[Click here to read more about expectations for living up to this commitment: Environmental Policy Discrimination, Harassment, and Minimum Age of Employment Policy](#)



DEAL HONESTLY WITH THE GOVERNMENT

The general rules here are obvious and simple. We won't bribe. We won't lie. We won't deceive. We won't hide information from government inspectors or falsify documents. We will not offer anything of value to a government official to obtain an improper business advantage.

We will also maintain the highest level of integrity when advocating on behalf of the company via lobbying, or otherwise engaging with governmental entities.

The same is expected from our agents or service providers who interact with government officials on our behalf.

Click here to read more about expectations for living up to this commitment:
[Interacting with Government Officials Policy](#)
[Anti-Corruption Policy](#)



CONSIDER THIS:

We will not make any payments – directly or indirectly - to improperly obtain or expedite a permit – no matter what.

If a government official requests a bag full of products to avoid a fine to us, we will say no.

There is no “cultural aspect” more important than our ethical standards. Stop and speak up if you hear “that’s the way we do business in this country”.

We will ensure the third parties we hire are aware that we will deal honestly with the government – and expect the same of them.

COMPETE FAIRLY

We compete hard—but also fairly and equitably within the law. This means that we won't spy on our competitors or use their confidential information

and we expect our competitors to treat us the same. We won't engage in business practices or exchange information with our customers or competitors that reduces or limits competition. We implement fair & equitable pricing and promotional programs for our customers and we follow the law when competing for our customers' business. We won't interfere with free markets, but instead we allow competition to take its course for the benefit of our consumers.

Click here to read more about expectations for living up to this commitment:
[Antitrust and Competition Law Policy](#)



PROTECT AND RESPECT PRIVATE AND PROPRIETARY INFORMATION

Many of us have access to confidential, sensitive, private or other nonpublic information through our work and it is our obligation to safeguard it. At Mondelēz International we protect our employees', consumers', customers' and business partners' confidential and personal information we may have access to as part of our business relationship.



We also protect our own confidential information. That means we will not share this information with our family, friends, colleagues, or anyone who is not authorized to receive such information for business purposes – and this obligation continues even after we leave the Company.

At Mondelēz International we also understand and respect the importance of intellectual property rights (including trademarks, patents, and trade secrets) both for our company and for others. So, we protect the intellectual property rights of the Company and we do not knowingly violate the valid intellectual property rights of others.

Click here to read more about expectations for living up to this commitment:
[Intellectual Property Policy](#)
[Information Security and Privacy Policy](#)

NEVER TRADE ON INSIDE INFORMATION

Employees shall not trade MDLZ stock or options based on “inside” information. That means we, our family members, or anyone living in our household must not buy or sell company’ stock or exercise options while you know material things about the company that the public doesn’t know. It is not only basic fairness, it is a crime. Our investors should be able to trust that everyone trading in the market has the same information.

Click here to read more about expectations for living up to this commitment:
[Insider Trading Policy](#)



10 AVOID CONFLICTS OF INTEREST

Doing what's right goes both ways. The company works hard to earn our trust, and in turn expects our loyalty. Our work decisions must always be based on what's best for Mondelez International, not for us personally.

That means we won't have personal interests that conflict with those of Mondelez International, or use our position with the company for any advantage or gain to ourselves or our close friends and relatives. For the same reason we generally may not accept gifts from business partners, since it could affect our objectivity to pursue Mondelez International's best interest, and, of course, we will never accept a bribe or kickback.

If an employee has a potential or actual conflict of interest, he or she must report this per our Conflicts of Interest Policy.



Click here to read more about expectations for living up to this commitment:
[External Business Gifts and Entertainment Policy](#)
[Conflicts of Interest Policy](#)

SOME EXAMPLES THAT MIGHT INDICATE A POTENTIAL CONFLICT OF INTEREST ARE:

Hiring a firm owned by a close relative to do consulting work for Mondelez International.

Having a financial interest in one of our suppliers, customers, or competitors.

Serving on the board of directors of a competitor.

Having an outside job that could interfere with our work for Mondelez International.



NOT SURE WHAT WAY TO FOLLOW?

If the right thing to do is yet not clear, ask yourself:

- ✓ Is it consistent with our Code, policies and laws?
- 👍 Am I acting in the best interests of the company?
- 📣 Would I be comfortable if my actions were made public?
- 🔒 Will it protect Mondelez International's reputation as an ethical company?

If you answered "no" or even "maybe" to any of these questions, you should stop and get advice or ask questions, via any of these resources:

- Your manager or you manager's manager
- Human Resources
- Legal
- Business Integrity Team
- HelpLine or Weblines



RAISING A CONCERN

No set of commitments could address every issue we may face at work. So, if you ever feel that the Code of Conduct doesn't clearly address a particular situation, you should simply remember our mission of "snacks . . . made the right way."

If still not clear, we encourage our employees to ask questions to their managers, legal counsel, and Business Integrity team. External stakeholders should contact our Business Integrity team.

If you notice something about to go wrong at Mondelez International, you may address the issue directly and try to stop it. But when something has already gone wrong, and you think someone may have violated the law, this Code, or a Compliance Policy, you must let the business integrity team know immediately, so the company can act quickly. Our Speaking Up policy requires it.

In case you prefer, you can also report a concern anonymously. Just call our toll-free HelpLine or visit our WebLine at www.mdlzethics.com. A third-party representative will receive to your concerns and inform the right people in our Business Integrity team.

Violations of the Code and/or a Compliance Policy will result in disciplinary action, up to and including termination.

When we follow the commitments, ask questions if we're not sure, and report concerns, we are helping our company succeed. We are living our values and building trust. That's "Snacking Made Right". And it's our way of doing business the right way – with integrity.

[Click here to see our Speaking Up & Investigations Policy](#)

[Click here to see our Business Integrity Website](#)

NO RETALIATION!

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.



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www.mdlzethics.com