

Procedural Guidelines for Grievance Management in respect of Human Rights and Environmental Impacts in the Supply Chain

1 January 2024

The protection of human rights and the environment are important to Mondelēz International. Our own actions and the actions of our suppliers are both important contributors to protecting people and planet.

We have therefore implemented procedures designed to respond to complaints in a fair, objective, and confidential manner.

WHAT KINDS OF CASES FOLLOW THIS PROCESS?

Our grievance procedure covers cases raised to us relating to potential human rights or environmental risks or alleged violations in our own operations and within our value chain. The procedure is not limited to suspected occurrences and potential risks can also be raised through these channels.

Potential human rights risks and alleged violations that may be within the scope of the grievance procedure include:

- Child labor¹
- Forced labor and all forms of modern slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association and the right to collective bargaining
- Unequal treatment in employment
- Failure to pay a living wage
- Intentional and unjust withholding of wages
- Unlawful violation of land rights
- Hiring or using private/public security forces that may cause undue harm due to lack of instruction or control
- Other action or omission capable of particularly serious impairment of a protected legal position, i.e. other human rights matters

¹ According to the International Labor Organization (ILO), 'Child labor' refers to work which deprives children of their childhood, their potential and dignity and that is harmful for their physical and mental development. [What is child labour \(IPEC\) \(ilo.org\)](https://www.ilo.org/gateway/topics/child-labour)

Potential environmental risks and alleged violations that may be within the scope of the grievance procedure include:

- Alleged violations of restrictions set forth in the Minamata Convention, Stockholm Convention, and Basel Conventions.
- Alleged violations of forest-related rules including rules relating to deforestation and forest degradation.
- Other environment risks and alleged violations relating to production, use, or disposal of materials that may be hazardous to human health and/or the environment.

WHO CAN REPORT?

Anyone – including our own employees and those in our value chain – has the right to report tips or cases regarding potential human rights or environmental risks and alleged violations. Concerns relating to human rights and environmental risks can be reported using the channels below by external parties including non-employee workers in our value chain (e.g. temporary workers and employees of external service providers), business partners, farmers, local communities, and other third parties.

CHANNELS FOR REPORTING CASES/TIPS

Tips and cases relating to human rights and environmental risks and alleged violations can be reported to Mondelēz International via established channels. The contact options include the possibility to raise a concern anonymously and can be found under our [Compliance and Integrity Program](#). We treat all information with care and confidentiality, regardless of communication channel or elected anonymity.

By Mail:

Compliance Department
Mondelēz International, Inc.
905 West Fulton Market, Suite 200
Chicago, IL 60607
USA

By e-mail: compliance@mdlz.com

Weblines: mdlzethics.com

Cases can be raised in the language of the grievance raiser via the above channels. The Weblines provides a guided platform (specific clarifying questions) in multiple languages.

COSTS OF THE PROCESS

Grievance raisers may utilize the channels set forth above to report information and cases free of charge.

PROCEDURAL FAIRNESS

Procedures will be carried out in a fair and objective manner, considering confidentiality concerns of grievance raisers and those participating in the process. Designated personnel are impartial, independent in the performance of their specific tasks and bound to confidentiality.

MAINTAINING ANONYMITY

Confidentiality will be properly managed for all tips or cases received. No attempts will be made to identify any person having raised a case anonymously. We are obligated to comply with legal requirements which may require sharing certain information, but the identities of grievance raisers will remain confidential.

Anonymous grievance raisers can choose to identify themselves at their own discretion at any stage of the process but will otherwise remain anonymous.

NO RETALIATION

Anyone raising a case in good faith will be protected from adverse action in relation to having raised the grievance. If you feel you are being retaliated against for raising a concern or supporting an investigation, please contact Mondelēz Compliance via the channels above. Allegations of retaliation will be properly investigated.

WHAT HAPPENS AFTER I SUBMIT A REPORT?

Receipt: Once the tip or case is received, the nature of the matter will be checked for reference to possible human rights or environmental risks or concerns. The case is documented internally within the company. The person or persons providing the information will receive a corresponding confirmation of receipt within one week of receipt.

Process to Clarify Facts of the Case: Cases and additional information are forwarded to the appropriate personnel for further handling. Designated personnel will attempt to contact the person(s) raising the grievance to discuss the underlying information and to gather additional details. While our reporting tools allow for cases to be reported anonymously, it is important for anonymous grievance raisers to continue engaging through these tools for purposes of sharing and receiving information. The aim of ongoing dialogue is to gain a better understanding of the matter and measures to be taken.

Designated personnel will engage other stakeholders as necessary and appropriate to assess the case. This may include contacting suppliers, civil society, experts, auditors, rights holders groups, and others. Designated personnel may utilize other tools and resources as applicable to the situation.

Feedback to Grievance Raiser: Upon conclusion, results will be shared with the person(s) who raised the case the case via provided contact details of if he/she/they have disclosed identity or via our anonymous reporting channels. The duration of the grievance procedure depends on the complexity of the respective case. Generally, feedback will be provided to the grievance raiser within three months. If the procedure takes longer than three months, the grievance raiser will be informed accordingly

Developing Actions: If an investigation reveals risks or opportunities, corrective measures may include consideration in risk assessments and other actions such as creation of new processes/protocols or adaptation of existing preventative measures. In situations where actions cannot be aligned with or properly executed by business partners, additional actions may arise, up to including suspension of the relationship. Action implementation may include matters across differing time horizons based on the complexity of the action. Where possible and reasonable, the grievance raiser will be involved in the development of actions.

EFFECTIVENESS OF THE PROCESS

The appropriateness and effectiveness of the grievance procedure is inclusive monitoring of reports and actions identified, which are shared with our internal governance bodies at least annually.