

Modern Slavery Act Statement 2022

June 2023

Table of Contents

1. Introduction	1
2. The Scope of Our Business	2
3. Scope of Disclosure	4
4. Policies and Governance	5
5. Our Human Rights Approach	6
<u>5.1 Salient Human Rights Issues and Prioritization</u>	6
<u>5.2 Due Diligence & Understanding Risk</u>	8
<u>5.3 Human Rights Due Diligence Regulation</u>	8
<u>5.4 The CARE Framework</u>	9
6. Mars Human Rights Strategy	10
<u>6.1 Responsible Workplace: Our Own Operations</u>	11
<u>6.2 Next Generation Supplier: First-Tier Suppliers</u>	13
<u>6.3 Sustainable Sourcing: Extended Supply Chains</u>	16
7. Stakeholder Engagement	25
8. Assessing Effectiveness and Performance Measures	28
9. Norwegian Transparency Act Disclosure	29
10. Conclusion	32

1. Introduction

At Mars, we believe everyone touched by our business should be treated with fairness, dignity, and respect.

We are a privately-held, family-owned company seeking to promote and advance respect for human rights across our value chain – from farms to suppliers’ factories to our own workplaces. We’ve sought to bring our [Five Principles](#) of Quality, Responsibility, Mutuality, Efficiency and Freedom to life every day, in pursuit of creating enduring benefits and opportunities across the communities we touch.

In 2017, we launched our [Sustainable in a Generation Plan](#), a set of interconnected ambitions and actions across the areas of Healthy Planet, Thriving People, and Nourishing Wellbeing, supported by an initial USD \$1 billion investment. Our Thriving People ambition is to meaningfully improve the lives of 1 million people across our value chain to enable them to thrive.

The core focus areas of this ambition are:



Increasing Income:

Our goal is for everyone working within our extended supply chains to earn a sufficient income to maintain a decent standard of living.



Respecting Human Rights:

Our goal is for everyone touched by our business to be treated with fairness, dignity, and respect.



Unlocking Opportunities for Women:

Our goal is to unlock opportunities for women in our workplaces, marketplaces, and sourcing communities so that they can reach their [full potential](#).

This report describes our approach to human rights due diligence, as required by the Norwegian Transparency Act, and also lays out our approach to the specific issue of modern slavery, as required under the UK Modern Slavery Act and the Australian Modern Slavery Act 2018. This disclosure represents our seventh Modern Slavery statement, in compliance with the UK Modern Slavery Act of 2015, and it is our third disclosure in compliance with Australia’s Modern Slavery Act of 2018. This disclosure also constitutes our first disclosure to comply with the Norwegian Transparency Act, which took effect in 2022. It contains relevant foundational context from previous disclosures, as well as updates on our efforts to address human rights, including forced labor, which is a core component of our global human rights strategy and programs. As noted in Section 11, the report was approved by relevant UK Boards, relevant Australia Boards, and relevant Norway Boards in June 2023.

2. The Scope of Our Business

For generations, we've been making many of the world's most loved and iconic brands – across confectionery, pet food, and food for people. More recently, we have grown our veterinary health services.

We know that as a global business, we have the responsibility to advance respect for human rights across our business and the supply chains we depend on. We have more than USD \$45 billion in annual sales from our business segments of Mars Petcare, Mars Wrigley, Mars Food, and Mars Edge. Across our diverse and expanding portfolio of confectionery, food, and pet care products and services, we produce some of the world's best-loved brands including Ben's Original™, CESAR®, Cocoavia®, DOVE®, EXTRA®, KIND®, M&M's®, SNICKERS®, PEDIGREE®, ROYAL CANIN®, and WHISKAS®; and take care of half of the world's pets through our pet health services AniCura, Banfield Pet Hospitals™, BluePearl®, Linnaeus, Pet Partners™, and VCA™.

Globally, more than 140,000 Mars Associates are working across our more than 381 sites including manufacturing facilities, offices and other workplaces, and more than 2,500 veterinary locations in 80 countries. [Read more about our global business here.](#)

In the United Kingdom: Our business employs almost 10,000 people in seven factories sites in locations including Slough, Melton Mowbray, Plymouth, Birstall, and King's Lynn. We also have numerous offices in the UK, including a regional HQ for Mars Wrigley in Paddington, the global HQ for Mars Food which is also in Paddington, and the Waltham Petcare Science Institute, a world leading scientific authority on pet nutrition. The majority of our UK Associate base work in our growing veterinary business, Linnaeus, which has more than 180 practices across the UK and Ireland and over 5,500 Associates. Covered companies include Mars Wrigley Confectionery UK Limited, Mars Petcare UK and Mars Food UK Limited, Crown Pet Foods Limited, and Linnaeus Veterinary Limited.

In Australia: Our business employs nearly 1,800 Associates across six factories and two office sites, spanning Mars Pet Nutrition, Mars Wrigley, Mars Food, and our Royal Canin division. We source a range of raw materials for products produced in these businesses, including cocoa, palm oil, sugarcane, and fish. The reporting entities in scope for purposes of this disclosure include Mars Wrigley Australia Holdings Pty Ltd. and Royal Canin Australia Pty Ltd.

In Norway: Mars Norge AS is a wholly owned subsidiary of Mars, Incorporated, employing almost 50 Associates with an office in Oslo, Norway. Mars Norway is part of the Mars Multisales North Europe business cluster, headquartered in Copenhagen, Denmark. The business consists of import and distribution of the group's products in Norway across the Mars Wrigley, Mars Petcare, and Mars Food portfolios – with brands such as MARS®, SNICKERS®, BOUNTY®, TWIX®, EXTRA®, HUBBA BUBBA®, WHISKAS®, KITEKAT®, PEDIGREE®, FROLIC®, BEN'S ORIGINAL™, and DOLMIO®.

Royal Canin Norge AS is part of the Royal Canin Nordics Cluster located in the Mars Norge AS office in Oslo, with HQ in Copenhagen, Denmark. Royal Canin Norge imports and sells our Royal Canin portfolio through pet stores, veterinarians and directly to breeders.

We also take care of Norway's pets through our veterinary care services business AniCura. AniCura has been part of the Mars group since 2018 and is headquartered in Stockholm, Sweden. In Norway, the banner operates through the legal entity AniCura Holding AS (subsidiary of AniCura AB, Sweden) and its direct and indirect subsidiaries. AniCura Norway has its office in Oslo, Norway, and employs in aggregate over 600 Associates across Norway. The business provides veterinary care services to companion animals in Norway through approximately 40 clinics distributed from the southernmost city of Mandal all the way to Tromsø in the North. The major referral clinics also provide specialist care and educational activities for veterinarians and veterinary nurses. AniCura Jeløy Dyresykehus AS, a legal entity holding one veterinary health hospital in Norway, is the only AniCura unit covered by the Norwegian Transparency Act.



As a global business, we want to ensure that work empowers people.

We believe that forced labor in any of its forms has no place in our operations or supply chains and that business, government, and civil society must work together to make progress on this complex issue.

Forced labor is defined in the ILO's Forced Labour Convention of 1930 as, "All work which is extracted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily." The ILO indicates that most situations of modern slavery and human trafficking are included in their definition of forced labor. In our human rights work, we place particular emphasis on tackling forced labor and hazardous child labor, given their potential impact on people across global supply chains, including in agriculture.



3. Scope of Disclosure

Our approach to understanding and addressing human rights risks, as outlined throughout this disclosure, is based on our global policies and frameworks for owned operations, Tier-1 supplier sites, and extended supply chains of our business segments and divisions. Aligned with international standards, we work to understand and address human rights risks relevant to a range of people - including our Associates, people in Tier 1 supplier facilities, smallholder farmers, fishers, and farm workers in extended supply chains.

The actions described are implemented on a global basis, in a framework inclusive of the reporting entities, with a risk-based approach to prioritization and deployment. The applicability of certain programs may vary based on the differences between consumer goods and veterinary health supply chains and their risk profiles. More recently acquired businesses are in the earlier stages of program rollout.

This disclosure describes our programs in our own workplaces, for our tier one suppliers, and in our extended supply chain.

4. Policies and Governance

Advancing respect for human rights is a cross-functional responsibility embedded within our global business and applied locally.

A dedicated global human rights team, working closely with our Ethics & Compliance function, establishes our human rights policies, strategies, and programs and provides expertise and guidance to colleagues around the world engaged in this work, as applicable to each business. In 2021, we increased the number of regionally based Associates who work within our procurement function across business segments to guide the implementation of our human rights programs with Tier 1 suppliers and in extended supply chains.

To govern the global application and implementation of our policies, our Human Rights Steering Committee meets regularly to review our progress, challenges, and opportunities. Our Board of Directors is periodically updated about our human rights plans and performance, as are the Boards of our businesses covered by human rights due diligence laws. A focus on the elimination of forced labor is a critical component of our overall human rights approach.

Our approach is aligned with frameworks laid out in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises and draws on the ILO's 1998 Declaration on Fundamental Principles and Rights at Work.

Our **Human Rights Policy** articulates our commitment to respect human rights across our value chain— including an initial, risk-based focus on our operations, and in sourcing where we can have the greatest impact, with a particular emphasis on people who are most vulnerable to human rights risks.



Our **Supplier Code of Conduct** (“the Code”) is informed by the same international human rights standards. It describes the human rights standards we expect our first-tier suppliers to uphold, including forced labor and modern slavery.

The Code prohibits the use of all forms of forced labor, including any form of prison, trafficked, indentured, or bonded labor.

We also provide supporting guidance in our **Supplier Code of Conduct Guidebook**, which provides examples of management systems that enable companies to more effectively address social, ethical, and environmental challenges, and meet our Code expectations across their supply chains.

We share our Supplier Code of Conduct with our suppliers as a condition of doing business with us, and we expect suppliers to engage in the aspects of our Next Generation Supplier program relevant to them as we continue to roll out this initiative.

5. Our Human Rights Approach

5.1 Salient Human Rights Issues and Prioritization

We review our assessment of salient issues on a regular basis to help ensure we identify the issues that present the greatest risk to people in our own business and supply chain. Our most recent review included more than 70 consultations internally and externally, as well as analyses of global trends and public data. The salience review confirmed five issues that may pose the most severe risk to people across our value chain: Lack of living income and wages, gender discrimination, mental and physical health and safety, forced labor, and child labor.

health and safety, forced labor, and child labor. It also identified three issues to watch: risks to human rights defenders, data privacy, and land rights.

As we work to advance respect for all rights, we place special emphasis on these salient issues, and we prioritize actions that reach the most vulnerable people. A variety of factors may increase someone's vulnerability to human rights risks, such as temporary or seasonal work status, lack of legal protections, poor enforcement of legal protections, or problematic laws that inhibit respect for rights, among others. Categories of stakeholder who may be vulnerable to forced labor and broader human rights risks include, migrant workers, women, and children.

Mars Salient Human Rights Issues



Lack of living income and wages



Gender discrimination



Mental and physical health and safety



Forced labor



Child labor

Issues to Watch



Risks to Human Rights Defenders



Data Privacy



Land Rights



Forced labor is among our salient issues and public data show rates of forced labor in global supply chains are increasing. The World Bank estimated that the global pandemic led to 97 million more people living in poverty - increasing their vulnerabilities to risks such as forced labor. We use additional risk screens to understand where this risk is present in our supply chain and target our human rights due diligence efforts accordingly.

**The global
pandemic led to
97M
more people
living in poverty**

5.2 Due Diligence & Understanding Risk

Our human rights due diligence approach begins with understanding potential adverse impacts to people touched by our business, across our supply chains. A foundational step is supply chain mapping to identify workplace locations in our first tier and in extended supply chains. As we increase our understanding, we work with partners such as Verité and Verisk Maplecroft to better understand human rights risk at the country and regional level and by material.

We use publicly available data from sources such as the U.S. Department of Labor, United Nations Development Programme, the ILO, public media and civil society reports, and proprietary analysis provided by Verisk Maplecroft's team of human rights risk analytics experts. This includes the identification of unique regional risks, such as the significant migrant labor workforce in the Middle East and Southeast Asia. This analysis drives the creation of human rights risk scorecards that inform the development of our human rights action plans.

Based on the specific risks identified, our global human rights team advises and supports

colleagues across the business on additional due diligence tools and approaches. This due diligence, often implemented with independent human rights experts, may include further desk research, validated self-assessment questionnaires, audits, human rights risk assessments at specific sites and supply sheds, and longer-term programs and collaborations. Our risk assessment includes service providers such as storage and handling and external manufacturing, in addition to our suppliers of goods and materials. This work helps us identify actual or potential risks which our business may cause, to which it may contribute, or to which it is directly linked through our supply chain or business partners. If human rights risks, including forced labor risks, are identified through this process, plans are developed to address them, to support supplier capabilities to address them, and to track progress over time. Our approach to remediation is discussed below, including specific examples for high-risk materials in our extended supply chains.

We use an internal human rights response protocol to respond to significant human rights issues that are brought to our attention across our supply chains – via grievance mechanisms, media coverage, stakeholder insights or other channels.

5.3 Human Rights Due Diligence Regulation

We believe we all need to take action to fix what is broken about global supply chains. National governments must enforce and strengthen their own labor laws, and companies have a responsibility to conduct due diligence to identify and respond to human rights risks.

We support [legislation mandating practical human rights due diligence](#). We are encouraged to see the European Union advancing harmonized regulation on this topic and on forced labor. We support their efforts to ensure human rights due diligence regulation and any future forced labor prohibition are designed to drive positive impacts for people. In the UK, in addition to legislation bringing in enhanced environmental due diligence measures, we are also advocating for mandatory human rights due diligence.

5.4 The CARE Framework

Drawing on the United Nations Guiding Principles on Business and Human Rights (UNGPs), we have developed a framework to guide human rights decisions and actions across our business. These actions include a focus on

forced labor. The CARE Framework informs our strategy, planning, and deployment through four key phases – Commit, Assess, Respond, Engage. We use this framework to develop Human Rights Action Plans for priority raw material supply chains. We have developed a [Practitioners' Guide](#) to the CARE Framework, and we train relevant internal teams in applying the framework, which includes the following steps.

Framework in Action



Commit to policies and practices and build governance capabilities

Form a cross-functional team with clear accountability and governance processes. Identify or create relevant policies, standards, and practices. Allocate appropriate resources to support successful activation of the agreed plan.



Assess impacts, listening, to the voices of impacted people

Conduct human rights due diligence in order to understand relevant human rights impacts including where possible, input from impacted people and local communities. Consult with human rights experts to understand structural dynamics, root causes, and relevant context.



Respond by preventing, addressing, and remediating impacts, in collaboration with industry, government, and civil society

Seek to prevent, address and/or remediate human rights impacts, either directly or in close collaboration with industry, government, and civil society. Such actions may include monitoring and verification systems, awareness raising and training, grievance mechanisms, remediation of individual cases, and addressing the enabling environment and root causes.



Engage transparently, through collaboration and communication to share our successes and challenges

Engage externally to learn from and collaborate with others and to share our own progress and challenges transparently. Seek to mobilize or join key industry coalitions and to drive collective action across sectors to meet shared goals.



6. Mars Human Rights Strategy

Our human rights strategy is focused on deploying programs in three areas, using an approach focused on risks to people – in our own operations, with our first-tier suppliers, and in our extended supply chains. As one of our salient issues, modern slavery and forced labor receive particular attention. We have developed customized human rights training and tools across our programs in all three areas.

Assess & Remediate:

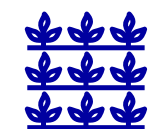
Across all three of our program’s areas, we use customized approaches to assess risk and where issues are identified, we have processes in place to support remediation – by Mars and through suppliers. Specific remediation approaches vary and are described across our three program areas: responsible workplace, next generation supplier and our extended supply chains through sustainable sourcing.



Our own operations



Our first-tier suppliers



Our extended supply chains

Mars has always prioritized creating and maintaining great workplaces where our Associates can thrive.

6.1 Responsible Workplace: Our Own Operations

Our Responsible Workplace program aims to ensure that the human rights of all workers in our workplaces are respected. We hold ourselves to clear standards and expectations in our own facilities, and we continue to demonstrate what we are learning and actions we are taking as a part of this program.

No company operating in the global economy today is immune to human rights risks, including forced labor. The Responsible Workplace program has focused on taking a deep look at our own manufacturing operations – helping us to better understand these risks and the types of safeguards needed to ensure that human rights are respected.

We continue to evaluate our facilities on a routine basis while expanding our efforts to address potential risks. To identify human rights risks and impacts at specific locations, we take a risk-based approach to prioritize where we

conduct assessments most frequently. We engage independent auditors with expertise in labor issues to assess our human rights performance in our workplaces. We work with our sites to address non-compliances that are identified. Our Responsible Workplace Standard and Site Implementation Guide details our human rights standards and expectations for our own workplaces, including a prohibition on forced labor. Responsible Workplace assessments focus particularly on service providers and contingent labor at our sites, given this group of workers is often more vulnerable to risks.

We seek to ensure that all Associates in Mars workplaces are aware of and have access to our accredited [Ombudsman program](#) (including a toll-free hotline and online portal) to confidentially and anonymously report any workplace issue. All Associates also participate in an annual survey focused on improving workplace conditions and management practices throughout the organization. Our Ethics & Compliance hotline also offers a way for Associates to anonymously report concerns. We expect our labor and service providers at our sites to have their own grievance mechanisms, but their associates can also contact us through our Ethics & Compliance hotline.

In 2018, we achieved a major milestone in the Responsible Workplace program – reaching 100% of our manufacturing sites for the first time. By the end of 2022, 90% of our manufacturing sites had been through the process multiple times, with locations in the most at-risk regions completing the program at least four times each.

Understanding risks in our own facilities generates important insights and has helped us ensure we are holding ourselves to the same standards we expect of our business partners. Through this work, we have identified the importance of addressing risk related to integrated facilities management and contract labor providers, in particular, where the majority of overall findings have been identified. Our global human rights partner, Verité, provides customized advice and guidance on program design and implementation.

We continue to focus on improving the practices of labor and service providers, including in regions with high levels of dependence on foreign migrant workers. In key countries with known forced labor risks associated with labor sourcing, we are updating contractual terms with labor providers to include specific guidance on recruitment fees, access to personal documents and other foundational elements of our Supplier Code of Conduct.

2022 Responsible Workplace Updates

We conducted new assessments at 46 manufacturing sites in 2022. We also assessed 37 retail stores including M&M'S World Stores and Turin Choco Boutiques and four cocoa agriculture and R&D sites were reached by the program for the first time.

In 2022, as part of our continued work on responsible recruitment in the Gulf Region, we convened a capability building and strategy session focused on responsible recruitment with our key labor suppliers, supported with deep technical expertise and coaching from Verité. We continue to take additional steps in the Gulf and other higher risk regions to support responsible recruitment, including a focus on robust grievance mechanisms to support worker rights and wellbeing.

As part of our overall due diligence efforts related to forced labor, we identified workers employed by a third party who had paid recruitment fees in their countries of origin. Mars supported repayment of fees to the affected workers. We are now focused on ensuring that service providers have appropriate policies and procedures in place to prevent this issue.

Moving forward, we are continuing to expand our Responsible Workplace focus beyond manufacturing and retail – with the goal of reaching all of our offices as well as distribution centers, research centers, and veterinary sites by 2025.

6.2 Next Generation Supplier: First-Tier Suppliers

Our success in growing our business while delivering positive social and environmental impacts depends on high performing suppliers and supply chains. We expect our first-tier suppliers to respect human rights, environmental standards, and ethics in their workplaces.

In addition to including our Supplier Code of Conduct in our purchase orders and contracts, we recognize that suppliers may need additional direction on how to implement the Code in their

workplaces. Our [Supplier Code of Conduct Guidebook](#) includes good practice examples for developing management systems to identify, remediate and prevent forced labor and other human rights risks.

In 2019, we launched our Next Generation Supplier program – an enhanced approach founded on our Code with a focus on not only understanding human rights risks, but also deeper engagement with our suppliers to address those risks in their workplaces. Our Next Generation Supplier program builds on years of experience and long-standing commitments while introducing new tools and technologies that we believe will deliver better results for our suppliers and the people who work in our supply chains.



Align

We continue to **align** our suppliers with our social, environmental, and ethical expectations through our Supplier Code of Conduct.



Assess

We **assess** the sustainability and social compliance performance of prioritized high-risk suppliers, including raw material suppliers as well as external manufacturing and storage and handling, using the EcoVadis online platform, leveraging this widely recognized supplier evaluation tool while also unlocking increased visibility and insights for Mars and our suppliers to put into action.



Advance

We support certain higher risk suppliers of our top 10 raw materials, and other strategic suppliers such as external manufacturing sites and storage and handling, as they **advance** their performance through a longer-term model focused on driving systemic change and worker engagement.

Through this program, third party experts assess supplier sites and build their capacity to address significant issues. The assessment includes their contingent labor and service providers. This model leverages the expertise of external advisors, including our global strategic human rights partner Verité.

We are assessing the impact of this work to understand the real difference it makes for people in our supply chains and the planet we all share. Our aim is for this program to help us achieve our goal of working with suppliers that share our values and commitments and cease work with those who are unable or unwilling to meet our expectations. Our Supplier Code of Conduct and Next Generation Supplier Program are periodically reviewed and revised to reflect our learnings.



Training

As part of our commitment to building supplier capability, we periodically engage suppliers in awareness raising and third-party training initiatives to drive continuous improvement. Our Mars Commercial Associates are expected to take our Next Generation Supplier training course, covering our human rights standards and expectations of our suppliers, including with regard to forced labor. More than 840 Associates have been trained in our Supplier Code of Conduct, our Next Generation Supplier Program and our overall approach to addressing human rights issues to date, including content related to forced labor risks and remediation. More than 100 Mars Associates participated in targeted live training sessions on human rights, including forced labor and responsible recruitment, in 2022. Verité also hosted training sessions with our growing internal human rights teams, reaching Associates across our business segments.

We continue to deepen our capability building and learning support to our direct suppliers and in specific supply chains. This includes funding new training by Verité for palm oil producers, cocoa suppliers, and launching new internal training at Mars to equip procurement leaders to understand and take action across our human rights programs.

2022 Next Generation Supplier Updates

Align

Since launching the program in 2019, we have put in place processes to ensure our Code of Conduct is part of contractual terms with our more than 50,000 suppliers.

Assess

As of 2022, more than 1,400 higher risk suppliers have completed EcoVadis, the third party-validated assessment of their sustainability performance that enables them to take targeted actions focused on informed and continuous improvements. We use a risk-based approach to prioritize EcoVadis roll-out across supplier sites globally.

Advance

We continued to progress Supplier Advance programs across supplier factories in eight countries designed to reach more than 19,500 people. These programs are intended to focus on issues such as responsible recruitment, health and safety, gender equality and addressing workplace discrimination. We measure the impact of Supplier Advance programs through changes in worker voice surveys conducted by a third-party, supplier-reported perspectives, as well as changes in EcoVadis scores. Examples of worker-reported impacts from select completed Supplier Advance programs include:

23%

increase in workers feeling respected at work. (India)

26%

increase in workers feeling valued and recognized for their work. (Philippines)

20%

increase in workers' reported ability to save and cover basic needs with their earnings. (Mexico)

57%

reduction in accident rates, 80% reduction in hospitalizations and 52% reduction in sick days. (Thailand)

Positive changes in the factory environment and in workplace communication are key outcomes of Supplier Advance that have tangible effects for workers. One supplier in Thailand that employs nearly 3,000 workers, including foreign migrants, saw a 16% improvement in workers reporting having a good relationship with their supervisor at the end of the program. More workers reported being listened to by their managers and that their personal safety was a priority for their management.



6.3 Sustainable Sourcing: Extended Supply Chains

At Mars, our sustainable sourcing efforts focus on addressing seven sustainability topics – climate action, water stewardship, land use, sustainable packaging, human rights, gender, and income. This work begins with better traceability of our supply chains, understanding risks, and developing and implementing strategies to drive improvements. Sustainable sourcing programming applies to the consumer goods portion of our business portfolio, based on relevant, higher risk and impact raw materials.

Human Rights in Sustainable Sourcing

We believe some of the highest risks to people may appear at the farthest end of supply chains, where we typically have little or no influence, visibility or control.

We focus on advancing respect for human rights in our extended supply chains, in close collaboration with our suppliers, their business partners, the industry, government, civil society organizations, and communities. We prioritize

work on supply chains in which the most severe human rights risks may be present, including, for example, cocoa, fish, palm oil, mint and sugar. This work addresses forced labor risk, where applicable. In 2018, we updated our *Practitioner's Guide to Human Rights in Sustainable Sourcing*, with detailed guidance on developing human rights action plans, including elements related to forced labor, where relevant. In 2019, we launched additional guidance focused on how procurement teams can engage suppliers as they develop approaches to address key risk factors. This material is supported by a [range of tools](#) and templates launched in 2020, including [a roadmap](#) to help understand supplier management systems and how they can be progressively strengthened. Tailored training is provided to relevant teams internally.

The United Nations Guiding Principles on Business and Human Rights outlines the role of government to protect human rights and the role of business to respect rights. The following pages outline examples of our human rights approach and efforts to advance respect for rights in extended supply chains in which human rights challenges are systemic. In each, we recognize the importance of collaboration to address root causes and structural barriers to progress. Our approach is grounded in supporting the capabilities of suppliers to address these risks, connecting them to guidance and capacity building from third-party experts.

Cocoa



Cocoa for Generations is our integrated approach to sourcing cocoa responsibly and working toward sustainable practices. By 2025, we aim to be 100% traceable (from the farmer to the first point of purchase) and are working with our suppliers and certifiers towards the goal of deploying child labor monitoring and remediation systems to 100% of our at-risk cocoa supply chain. Early indications show that these systems have the potential to halve the risk of hazardous child labor among participating families.

Through our collaborations with the ILO and the International Cocoa Initiative (ICI), and through our leadership role in the World Cocoa Foundation, we are seeking to drive impact and industry action. As founding members of ICI, we supported **research** conducted by Verité in 2017 and 2018 which found that while forced labor risk is present in the cocoa sector in Côte d'Ivoire, it appears to be limited primarily to a narrow group of people: recently arrived migrant workers.

These insights are valuable and build on research conducted by Tulane University and Walk Free Foundation, which estimated that 0.42 percent of adults working in cocoa experienced forced labor in Côte d'Ivoire between 2013 and 2017, and that 0.17 percent of children working in cocoa agriculture in Côte d'Ivoire were forced to work by someone other than a parent. Mars and other companies across the industry are designing approaches to address these forced labor risks and to support governments in their response, with technical input from Verité, ICI, and others.

This work includes forced labor training by third party experts – including awareness raising materials for suppliers, guidance on contracting, and integration of forced labor risk indicators into existing child labor monitoring systems.

In 2019, we issued our first annual Cocoa for Generations report on progress and in early 2020 we launched our **Protecting Children Action Plan**. In addition to publishing our Tier 1 supplier list in cocoa, we mapped and shared additional supply chain details to the **Tier 2 level in 2020 and updated the list in 2022**, mapping approximately 44% of our supply to farm boundaries.

In 2021, we worked with Verité to create guidance on the development of **forced labor response protocols**, a toolkit designed to support prompt and meaningful forced labor remediation.

In 2022, we worked with Verité to support our suppliers in finalizing their toolkits and followed up to ensure the supplier teams on the ground would be equipped with the necessary knowledge and capabilities to use these protocols. Verité conducted additional capacity building engagements, as part of a larger effort to provide ongoing support for Mars' suppliers and to help them better manage risk in their own supply chains. The 2022 training on Root Cause Analysis (RCA) of forced labor risks was conducted as a training of trainers (TOT), where approximately 30 participants representing all major Mars cocoa suppliers were equipped to conduct step-down training on these topics.

In 2022, we continued to work across the four mutually reinforcing areas outlined in our Protecting Children Action Plan:

1

Robust Child and Forced Labor Monitoring and Remediation Systems:

We are committed to taking steps to ensure suppliers have in place robust child and forced labor monitoring and remediation systems designed to identify, prevent and seek to remediate cases of child labor and forced labor, as relevant. In 2022, we continued to expand our coverage of Child Labor Monitoring and Remediation Systems (CLMRS) in sync with scaling our overall sourcing volumes in West Africa. In total 65% of our supply from Ghana, Côte d'Ivoire, Cameroon and Nigeria were covered by CLMRS, reaching 135,000 cocoa farming families. We maintained our coverage in Ghana and Côte d'Ivoire in line with our sourcing plans, while expanding coverage in Cameroon and Nigeria. We seek to ensure 100% of at-risk families in our cocoa supply chains are covered by Child and Forced Labor Monitoring and Remediation Systems by 2025 and anticipate that will include at least 180,000 cocoa farming households across Ghana, Côte d'Ivoire, Cameroon and Nigeria. We will also take action in other origin countries as appropriate. In 2021 and 2022, Verité leveraged the U.S. Department of Labor-funded **Forced Labor Indicators Project** (FLIP) to jointly implement Trainings of Trainers for cocoa supplier companies, building more awareness and practical capabilities among field staff to monitor, address, and prevent forced labor. Finally, we launched two new collaborative efforts with Save the Children in Indonesia and Côte d'Ivoire with the objective of protecting and promoting children's rights. These multi-year programs aim to change parents' and children's attitudes and behaviors and change norms to prevent children's engagement in hazardous tasks in cocoa production.

2

Women's Social and Economic Empowerment:

Poverty is often a root cause of human rights risks, including forced labor, and improving incomes is a core part of our strategy. Through our partnership with CARE, a leading international humanitarian agency, and our chocolate brand DOVE®, we are supporting **Village Savings and Loan Associations (VSLA)** in Côte d'Ivoire and Ghana. In 2020, we expanded our partnership with an additional \$10 million investment aimed to reach more than 50,000 women in Ghana and Côte d'Ivoire by 2025. As of year-end 2022, these groups created training and savings mechanisms for more than 77,000 VSLA members in Côte d'Ivoire and Ghana, with more than 60,000 members in communities linked to Mars' supply chain, with a focus on women and resulting in more than \$7.4 million in total savings. We worked with the Royal Tropical Institute (KIT) to better understand on-the-ground realities for women and girls in cocoa growing communities and have published our findings in two reports: the **Empathy Report** and the **Viability Report**. The results are informing our work on gender equality and empowerment.



3

Increasing Access to Quality Education and Development Opportunities for Children:

Since 2017, we have worked with the Transforming Education in Cocoa Communities program on insights into the powerful linkages between robust monitoring systems, women's empowerment and education interventions. In 2020, we committed to invest \$3.3 million in a **public-private collaboration** to increase access to quality education in Côte d'Ivoire and Ghana, led by the Jacobs Foundation. As part of CLMRS remediation actions our suppliers and their partners implement, we support the distribution of school kits, birth certificates, infrastructure building, and other actions focusing on keeping children in school.

4

Increasing Farmer Income:

We directly support farmer income through the premiums we pay them, and indirectly through the training and support we provide on productivity and income diversification. We are piloting models for increasing productivity and diversifying household income, through other cash crops and non-farm earnings – in collaboration with suppliers and expert implementation partners. Through the **Farmer Income** Lab we have launched **innovation pilots in 2022** that focus on access to finance, management systems, seeking to increase household and crop incomes for 14,000 farmers across Indonesia and Côte d'Ivoire. Mars was also the first chocolate company to publicly support the Living Income Differential fee enacted by the governments of Côte d'Ivoire and Ghana and require that this fee is included in all our contracts.

Fish

While the proportion of fish we use accounts for a small share of the global fish market, as a purpose driven business we believe we can make an important contribution to improving environmental and social impacts in fish supply chains. We are committed to sourcing fish in line with our Responsible Fish Sourcing Guidelines. Through our 10-year partnership with the World Wildlife Fund (WWF) and taking steps to ensure all of our fish supply meets our **Responsible Fish Sourcing Guidelines**, our aim is to drive improvement in environmental and social practices in the industry, while helping to promote biodiversity and protect endangered species.

In 2016, we launched our first Thai Fish Supply Chain Human Rights Action Plan which includes key performance indicators and uses the CARE Framework. As we advance this work, the sector continues to face complex challenges. Nonetheless, we are making progress. As we continue learning more about how best to collaborate with our suppliers, how to form and activate the right partnerships and how to contribute to driving industry-level change, we remain focused on driving positive impact. Additional details on this work are available [here](#).

In the first phase of our Human Rights Action Plan, we focused on increasing traceability, developing a better understanding of working conditions in our supply chain, and building relationships of trust across our supply chain and the sector. We mapped our Thai fish supply chain and launched Issara Institute's Inclusive Labor Monitoring (ILM) model during a four-year timeframe with our Tier 1 suppliers – opening access to a multi-lingual hotline and online application where workers could report issues and seek assistance as needed.

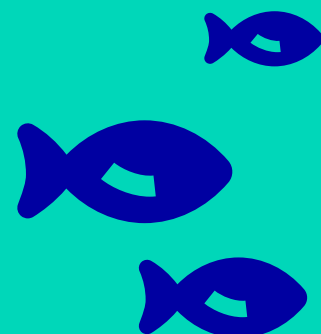
In 2019, we issued an update on progress and hired an additional senior leader based in Thailand, bringing deep expertise in human rights to guide this work.

We have continued to evolve our work in Thailand, and in 2022 we prioritized actions to better understand our supply chain; implemented our Next Generation Supplier Program with our Tier 1 suppliers; initiated multiyear collaborations designed to improve efforts to monitor, address, and prevent human rights risks for local and international fishing vessels; and engaged in more targeted advocacy on responsible recruitment with the Seafood Taskforce.

In 2022, we completed multi-year programs to improve workplace conditions at Thai fish supplier sites as well as advocated for the adoption of the Employer Pays Principle (EPP) among Tier 1 fish suppliers. We also plan to initiate a multi-year collaboration to improve human rights conditions on international fishing vessels, supported by third-party experts.

We completed our four-year collaboration with USAID on a Connectivity@Sea Technology and Ethical Recruitment to test and learn from digital solutions to strengthen worker voices while at sea and enhance transparency in recruitment processes. This work has informed government focus on expansion of the Connectivity@Sea technology across all coastal provinces of Thailand.

We are encouraged by the effectiveness of the fishing industry support centers we have supported since 2019. The centers connected more than 13,500 people—primarily migrant workers—to legal services, education and medical support since implementation. Together with Stella Maris, we've expanded our partnership to provide grievance support services to fishery workers on hundreds of fishing vessels at two major landing ports in Thailand.



Palm Oil



Since 2013, we have purchased 100% Roundtable for Sustainable Palm Oil (RSPO) certified palm oil, and we are working to go beyond certification as we seek to ensure that the palm oil we use is produced with respect for human rights. We expect our suppliers to meet our palm oil standards and to engage with their suppliers to advance respect for human rights in their extended supply chains, with a particular focus on risks facing vulnerable migrant workers.

In 2019, we announced our Palm Positive Plan, aiming to deliver 100% deforestation-free palm oil by the end of 2020 and advance respect for human rights across our suppliers' extended supply chains. Through the implementation of the Plan, we have been able to simplify our palm oil supply chain – which has led to a significant reduction in mills used. We publish our [Tier 1 palm oil supplier and mill lists](#), updating them as the Palm Positive Plan progresses.

With a shorter supply chain comprised of suppliers who are committed to driving improvements in management systems and working conditions, we can increase accountability, influence, and connectivity. This approach is focused on deeper relationships with suppliers that support their capabilities to monitor, address and prevent human rights risks in their supply chains.

In 2017, we began working with Verité and our supplier Wilmar to explore how businesses across the palm oil supply chain can better understand, address, and prevent human rights risks, with a focus on forced labor. Verité published a [detailed case study](#) of insights from this work in 2020. We funded additional work with Verité to launch a new, [customized online toolkit in 2021](#), equipping palm oil producers across the sector with practical guidance to design and manage their own due diligence systems. We are beginning to develop longer-term, supplier-driven initiatives to reduce human rights risks, including those related to forced labor, with other key suppliers in Malaysia and in Brazil, and will continue this approach across our supply chain.

As we continue this stepped-up engagement, we're committed to sharing our learnings along the way through regular public updates and engagement in industry forums. We continue to support the Consumer Goods Forum palm oil working group, which commissioned [research](#) to identify risks of forced labor in the palm sector in Indonesia and Malaysia in 2018. Insights from the report are informing where we prioritize action, including collaborative work on [human rights due diligence systems in the palm oil sector](#) and greater connections across the environmental and social agendas in the sector.

In 2022, we deepened our collaboration with suppliers to support their efforts to advance respect for human rights. In Malaysia, we are working on a multiyear collaboration with a palm oil supplier and Verité Southeast Asia focused on remediation of worker-paid recruitment fees and new recruitment practices moving forward. This work resulted in:



The repayment of approximately USD \$5.8 million to roughly 3,000 migrant workers.



An improved ethical recruitment model, shifting to more direct recruitment from lower-risk recruitment channels.



A new system to identify worker-paid fees prior to departure from sending countries.



An enhanced grievance mechanism and communication process with workers to understand the effectiveness of this new model.



Third-party verification of new recruitment and grievances.

Partnerships with third-party experts and industry groups supported our efforts in our palm supply chain in 2022. We took on a leadership role with CGF to co-author new **Guidance on the Repayment of Worker-paid Recruitment Fees and Related Costs**, which was informed by our experience working with suppliers to remediate worker-paid fees. This guidance is focused on making remediation practical, actionable and coherent across companies – to reduce debt bondage and forced labor risks. We believe it has the potential to drive faster and more sustained action, with a range of industry partners working through an aligned approach.

Mars remained an active member in RSPO's human rights working groups. Additionally, we have been nominated as a Consumer Goods Manufacturer representative to the RSPO Standards Review Task Force and are driving efforts to continue strengthening human rights and forced labor related aspects of the RSPO Certification standard during its current revision process. We are also active in other industry groups, such as the Palm Oil Collaboration Group (POCG) where we are co-convener of a working group leading the development of human rights due diligence tools.

Sugarcane

We are working to simplify our sugarcane supply chain with a focus on strategic, longer-term relationships with key suppliers in sourcing origins. A consolidated supply chain allows us to deepen support with suppliers as they implement human rights monitoring systems, and address issues identified.

In Mexico, a four-year **program** with a sugarcane supplier, in collaboration with implementing partners Verité and Proforest, has aimed to enhance supplier systems to manage key human rights risks in sugarcane fields. The supplier has improved due diligence processes to monitor, address, and prevent labor risks in its supply chain. Accident rates reduced by nearly 40%, as reported by workers. Through broader stakeholder engagement, key actors in the local sugarcane production system have increased capacity to manage labor risks. This program has driven reductions in child labor risks and improved health and safety for sugarcane workers. In particular, the program:



Established a state-of-the-art labor risk monitoring system, which now covers more than 3,500 sugarcane cutters and crew leaders (cabos) around two production mills.

Implemented operational linkages between the monitoring system and process for preventing and addressing labor risks, enabling our supplier and its supply chain partners to act if labor violations are identified.

Reduced child labor risks by nearly 70% as reported by workers.

Deployed a training program that offers families of young workers income alternatives to deter minors from work in sugarcane fields.

Improved personal protective equipment (PPE) access for more than 2,500 sugarcane cutters and cabos.

In 2022, we launched a second program with another sugarcane supplier, and now the majority of our sugar supply chain in Mexico has programs in place to address key human right risks.

To increase collaboration, momentum and sector-wide action, we helped to found Alianza por la Sustentabilidad de la Agroindustria de la Caña de Azúcar en México (ASACAM) - a coalition in Mexico bringing together sugarcane growers associations, global and local companies, sugarcane mills, and local governments. Through this platform, we are sharing learnings and supporting solutions across the sector.

With ASACAM we have catalyzed and supported industry-wide training on ethical recruitment in Mexico reaching 20 leading mills, growers associations and peer companies. More than 300 people attended ASACAM webinars related to responsible recruitment for cane cutters, human rights monitoring and management systems, and good health and safety practices. This work builds on existing efforts to deepen the capabilities of sugarcane suppliers to Mars in that region to monitor, address and prevent a range of human rights risks in their supply sheds.

Mint

Mint is an essential ingredient for many of our brands from Altoids® to Extra® and Orbit®. The Shubh Mint (Auspicious Mint) program was designed to improve mint farmer incomes for more than 20,000 farmers in Uttar Pradesh, India. In particular, **the program** focuses on the key priority areas of increasing farmer incomes, reducing our water footprint, and unlocking opportunities for women.

Since starting this program, more than 24,000 farmers have been trained on Good Agricultural Practices. In the first five years of the program, average yields increased by 20% and cost of

production was reduced by 20%, which led to incomes from mint doubling during the same period. Through our training, we have reduced the demand for water by 30%. We've also established four Farmer Producer Companies (FPCs), one of which is entirely women led.

In four years, we have engaged over 8,000 women through women farmer groups (WFGs) and self-help groups (SHGs). Approximately 4,800 women have been trained in their rights and entitlements, financial literacy, nutrition, health and sanitation, and more than 16,000 loans have been distributed through SHGs.

Other Supply Chains

We continue to work to better understand the nature of human rights risks, including forced labor, across other supply chains we rely on as a business and to identify how we can play the most appropriate role in driving change.

7. Stakeholder Engagement

A key component of our approach to human rights is engaging with credible third-party experts and stakeholders, deepening our awareness, and understanding of these complex issues and identifying partners to drive action. Our efforts include engaging workers and community members. The following are examples of our stakeholder engagement with a focus on forced labor.



Alliance 8.7 encourages businesses and other stakeholders to act on United Nations' Sustainable Development Goal 8.7 to eliminate forced labor and the worst forms of child labor. Mars is a founding member of the ILO's Child Labor Platform and an early supporter of the Business Network on Forced Labor, the two key business platforms of Alliance 8.7.



In 2015, Mars became a signatory of the Global Compact. We issue an annual communication of progress that outlines our efforts across the Compact's 10 principles, which include seeking to eliminate all forms of forced and compulsory labor.



In 2017, we joined IHRB's [Leadership Group on Responsible Recruitment](#), underscoring our commitment to this critical topic and recognizing that recruitment fees paid by migrant workers are a key contributor to forced labor. Through our participation in this group, we're joining collective action toward the vision of eradicating worker fees over the next ten years.

FARMER INCOME LAB

In 2017, we founded an industry-led collective, the Farmer Income Lab, to make supply chains work for farmers and businesses. In 2022, we published two reports: [Farmer Segmentation: A guide for procurement professionals](#) and, [Enabling Smallholder-Based Agricultural Transformation](#) which seek to address how business can build more equitable supply chains. The Lab's research seeks to advance thought leadership on how various actors, including businesses, can work to improve smallholder farmer incomes, which are linked to human rights risks in certain supply chains.



In 2019, Mars joined the [Business for Inclusive Growth coalition](#), together with other companies committed to taking action to ensure the benefits of economic growth are shared far more widely. The coalition is focused on advancing human rights in direct operations and supply chains, building inclusive workplaces and strengthening inclusion in company value chains and business ecosystems. We participate actively in the coalition's work to advance living wages, build inclusive workplaces, and improve social impact measurement.



Mars has been an active member of [AIM-Progress](#), a forum of consumer goods manufacturers and suppliers working together to share best practices and co-create solutions on human rights in our sector. In 2021, Mars held a secretariat leadership role in the group and continues to contribute through participation in the Human Rights, Mutual Recognition, Living Wage/Living Income, Responsible Recruitment, and Capability Building working groups, as well as the APAC Regional Hub.

VERITÉ

Fair Labor. Worldwide.

2022 marked the fifth year of our global partnership with Verité – a leading non-profit and global expert on labor rights with more than 25 years working to ensure people worldwide are in safe, fair, and legal working conditions.

Our comprehensive partnership is focused on due diligence, fostering new insights, and leading dialogue on critical global human rights challenges.

Our [first five years of work together](#) has included a focus on forced labor, with collaboration on initiatives across our full human rights program – in Mars operations, with our first-tier

suppliers and in high-risk extended supply chains. Our partnership has been critical in understanding and addressing risks across a number of supply chains including sugarcane, cocoa, rice, mint, fish, and palm oil.

Verité continues to advise Mars on our global human rights strategy, policies and practices, and together we are gathering insights, generating new research and promoting dialogue to inform action across the business and human rights community. More information about our work together is available [here](#) as well as our reflections on key [insights to date here](#).



For the past seven years, we've played a leadership role within CGF to champion the importance of business action against forced labor. Barry Parkin, our Chief Procurement & Sustainability Officer, previously co-

chaired CGF's Sustainability Steering Committee, and we are active members of the Human Rights Coalition – Working to End Forced Labor.

In 2018, former Mars, Incorporated CEO **Grant F. Reid spoke** at the Global Forum on Responsible Recruitment and Employment in Singapore, continuing to champion focus and action against forced labor. His remarks challenged business, government and civil society to focus on collaboration and demonstrate substantive progress to end forced labor in global supply chains. In 2019, **he reiterated this call to action** ahead of CGF's Global Summit in Canada and stressed the urgency of business and governments to demonstrate results.

We are taking action in our business and supply chains to advance **The Consumer Goods Forum's (CGF) Priority Industry Principles on Forced Labour** (the "Principles"). We played a leadership role in the development of these principles as co-chair of the CGF's Social Sustainability Committee, as we believe industry-wide focus and action on this issue is urgently needed.

The Principles align with our existing human rights approach and provide an opportunity for us to strengthen work that seeks to identify and address forced labor. They are straightforward and when applied by industries at scale, they may help stop situations that lead to forced labor – especially among vulnerable workers. CGF members have an agreed action plan to advance the Principles that includes a focus on own operations, engagement with suppliers across industries, and an emphasis on Southeast Asia.

Agricultural Supply Chain Forums and Certifications

We participate in a number of multi-stakeholder forums whose mandates include action on human rights and forced labor in global supply chains, such as the World Cocoa Foundation, the Sustainable Seafood Taskforce, the RSPO and others across our priority raw materials. We also work closely with the major global cross-commodity certification organizations: Rainforest Alliance and Fair Trade.



World Cocoa Foundation



8. Assessing Effectiveness and Performance Measures

Across our global human rights programs, from Mars workplaces to Tier 1 facilities to extended supply chains, we aim to understand if and how interventions are having the intended impact, and what we can learn through their deployment. For example, our Next Generation Supplier program incorporates worker voice tools to understand changes in worker sentiment over time, and our programs in extended supply chains are incorporating the same approach. We are finalizing updated metrics, tracking, and evaluation systems to better monitor early signals of progress or challenges so that we can adapt and adjust continuously.



9. Norwegian Transparency Act Disclosure

Our covered businesses are Mars Norge AS, Royal Canin Norge AS, and AniCura Holding AS with its subsidiaries.

Mars Norge AS is a wholly owned subsidiary of Mars, Incorporated, employing almost 50 Associates with an office in Oslo, Norway. Mars Norway is part of the Mars Multisales North Europe business cluster, headquartered in Copenhagen, Denmark. The business consists of import and distribution of the group's products in Norway across the Mars Wrigley, Mars Petcare, and Mars Food portfolios – with brands such as MARS®, SNICKERS®, BOUNTY®, TWIX®, EXTRA®, HUBBA BUBBA®, WHISKAS®, KITEKAT®, PEDIGREE®, FROLIC®, BEN'S ORIGINAL™, and DOLMIO®.

Royal Canin Norge AS is part of the Royal Canin Nordics Cluster located in the Mars Norge AS office in Oslo, with HQ in Copenhagen, Denmark. Royal Canin Norge imports and sells our Royal Canin portfolio through pet stores, veterinarians and directly to breeders.

We also take care of Norway's pets through our veterinary care services business AniCura. AniCura has been part of the Mars group since 2018 and is headquartered in Stockholm, Sweden. In Norway, the banner operates through the legal entity AniCura Holding AS (subsidiary of AniCura AB, Sweden) and its direct and indirect subsidiaries. AniCura Norway has its office in

Oslo, Norway, and employs in aggregate over 600 Associates across Norway. The business provides veterinary care services to companion animals in Norway through approximately 40 clinics distributed from the southernmost city of Mandal all the way to Tromsø in the North. The major referral clinics also provide specialist care and educational activities for veterinarians and veterinary nurses. AniCura Jeløy Dyresykehus AS, a legal entity holding one veterinary health hospital in Norway, is the only AniCura unit covered by the Norwegian Transparency Act.

Our covered businesses operate in Norway. However, they are included in our global human rights due diligence systems that are discussed in the longer report. To align our Norwegian businesses with our global approach, we briefed the leadership teams of each business on our human rights due diligence systems and how they apply to their business and have engaged with their compliance teams and corporate affairs function. The CEO and Board of each covered business unit signed the report.

Our Mars, Incorporated human rights due diligence process is aligned with the OECD Guidelines on Multinational Enterprises. Our Norwegian and Royal Canin Sales units in Norway sell products that are well integrated into our due diligence processes. Our covered veterinary health business, AniCura Jeløy Dyresykehus AS, is earlier on its journey as a newer Mars business, and its progress is described separately below.

Notification and Grievances:

We have several mechanisms to become aware of any concerns related to our Norwegian businesses. To report any issues, our Norwegian business can use our Human Rights Response Protocol, described in section 5.2. We also have grievance mechanisms in place, such as our Ombudsman line and Ethics & Compliance hotline, as described in section 6.1. We included our Ethics & Compliance hotline on our Norwegian business websites so that the public can access it and submit any questions they may have about our human rights impacts, consistent with the Right to Information in the Norwegian Transparency Act, and also have alerted our consumer affairs lead for Norway so that they know how to direct any questions from the public.

Due diligence processes:

As noted in section 5.1, we carry out a saliency exercise to define the most severe human rights risks to people in our global businesses, and then use additional risk screens focused on country and material to target our assessment tools and remediation efforts. Our risk analysis includes both our suppliers of goods and materials and service providers, such as storage and handling, logistics, labor providers, and external manufacturing, as discussed in sections 5.2, 6.1, and 6.2.

Our Responsible Workplace program enables us to assess and remediate human rights risk in our own sites and includes our labor and service providers in that assessment process (described in section 6.1). We are deepening our engagement with labor and service providers, where we see the most challenges to respect for labor rights in our operations.

For Tier One suppliers, we use Ecovadis's third party verified self-assessment questions and media alerts as a screen for suppliers based in high-risk countries and sectors, described in Section 6.2. We then ask suppliers to improve their management systems based on their scores and advice from EcoVadis. High risk, strategic suppliers in certain categories participate in Supplier Advance, a flagship program in which suppliers are assessed and receive third party expert support for approximately nine months to address challenging human rights issues.

More information on Supplier Advance is available in Section 6.2.

In our extended supply chain, our Sustainable Sourcing programs target severe human rights risks such as poverty, child labor, forced labor, and health and safety in certain supply sheds at the ends of our supply chains, as described in Section 6.4. These are multi-year initiatives building up the capacity of our suppliers to understand and address these issues in their supply sheds. We have active programs in cocoa, mint, palm, sugarcane, and other raw materials that have shown positive results and meaningful impact in the lives of vulnerable people, as outlined in section 6.4.

Results of Due Diligence Assessments:

We have identified actual negative consequences and risks of significant issues in our own operations, tier one supplier base, and extended supply chains. These include our salient issues, although we also find a range of other labor-related challenges across our supply chain. A number of the more severe issues we found are described in sections 6.2 and 6.4.

Remedy of Issues Identified:

We remedy issues through multiple mechanisms and approaches depending on the type of issue and where it is located in our supply chain. Our Responsible Workplace program enables us to address problems in our own workplaces, and we track progress that our sites make. We also provide training to our Associates and certain suppliers, as depicted in section 6.3. We track whether our suppliers who undertake third party risk questionnaires on their human rights management systems are improving their scores, and that system provides recommendations to suppliers regarding how to do so. Our Supplier Advance and Sustainable Sourcing programs provide third party coaching to enable suppliers to address significant and deep-rooted human rights challenges in their own factories and supply sheds.

Section 7 outlines the various industry and multi-stakeholder collaborations in which we engage to start moving the needle on the most challenging human rights issues.

AniCura (AniCura Jeløy Dyresykehus AS)

We believe we are among the first veterinary health businesses to undertake human rights due diligence, and therefore are still refining our approach. Our Mars Ombudsman and Ethics & Compliance hotlines have been rolled out in AniCura, to ensure that Associates can raise grievances. The Ethics & Compliance hotline, as noted above, is also available to the public on AniCura's website so they can ask questions about the company's human rights practices.

AniCura Jeløy Dyresykehus AS is covered and holds a veterinary hospital. Although only one of our AniCura business units in Norway is covered by the Norwegian Transparency Act, we roll out much of our human rights due diligence across the AniCura business in Europe, and therefore refer to "AniCura" below.

Due Diligence Processes:

We started by assessing risk through two exercises. First, AniCura was included in our global human rights saliency exercise, where one of the five saliency issues referred to in section 5.1 was identified as being of particular relevance: mental and physical health and safety. Second, we carried out an initial assessment of the human rights impact of the business' procurement practices ("procurement assessment"). We believe it was the first of its kind for this sector. AniCura's most significant areas of procurement includes medicine and medical equipment. To deepen our understanding of the sector, we will be conducting more analysis of AniCura business's supply chain human rights impacts this year. We will also be piloting our Responsible Workplace program in our AniCura clinics in Norway.

Results of Due Diligence Assessments:

Our global saliency exercise identified one of our top five human rights issues referred to in section 5.1 as being of particular relevance to AniCura: mental and physical health and safety. The veterinary health sector in Norway as a whole faces challenges related to the mental health of those working in it.

Our procurement assessment indicates that the manufacturing of medicine and medical equipment in AniCura veterinary health supply chain could present potential human rights risk related to pollution entering the environment. Labor rights could also potentially be a concern in the manufacturing of these products. These risks can vary by country and the particular product, and we are accordingly continuing to develop our understanding of these potential issues. We include AniCura's Supplier Code of Conduct in our contracts with our suppliers.

Remedy of Issues Identified:

Although AniCura continues to refine its approach as a newer Mars business, we have taken action based on available data and our understanding of human rights challenges facing the veterinary health sector in Norway as a whole. In addition to implementing health and safety measures in our clinics, we have also rolled out our Associate Assistance Program, a free, confidential counselling service on a range of personal and work-related issues, in order to support AniCura Associates' mental and physical health and safety. AniCura Associates also have access to our mental and physical health and safety program and series of resources (MVH4You), which, among other things, includes suicide prevention materials.

10. Conclusion

This statement constitutes the modern slavery and human trafficking statement for the financial year ending December 31, 2022, of Mars, Incorporated and all its applicable subsidiaries which fall within the scope of section 54(2) of the UK Modern Slavery Act 2015, including Mars Wrigley Confectionery UK Limited, Mars Petcare UK and Mars Food UK Limited, Crown Pet Foods Limited and Linnaeus Veterinary Limited. The statement was approved by the boards of directors of its relevant UK subsidiaries, pursuant to section 54(2), in June 2023 and signed by a director of each company.

This statement constitutes the modern slavery statement for the financial year ending December 31, 2022, of Mars, Incorporated and its applicable subsidiaries which fall within the Australian Commonwealth Modern Slavery Act of 2018, including Mars Wrigley Australia Holding Pty Ltd and Royal Canin Australia Pty Ltd. (the “reporting entities”). It was approved by the boards of directors of its relevant reporting entities in June 2023.

This statement constitutes the report for the financial year ending December 31, 2022, for Mars Norge AS, Royal Canin Norge AS, and AniCura Jeløy Dyresykehus AS, which fall within the Norwegian Transparency Act. The report was signed by the boards of directors and CEO of each Norwegian reporting entity in June 2023.

This Statement is a joint statement. The undersigned is a responsible member of the parent company. It was prepared in consultation with the reporting entities, including by making those entities aware of its preparation and providing the opportunity to participate.



Poul Weihrauch
Chief Executive Officer
Office of the President
Mars, Incorporated
June 2023

To learn more about our Human Rights approach and Sustainability programs visit:
mars.com.sustainability-plan

