

Human Rights Disclosure 2024

May 2025

The world we want tomorrow starts with how we do business today

United Kingdom Modern Slavery Act

Australia Modern Slavery Act

Norway Transparency Act

**Canada Fighting Against Forced Labour
and Child Labour in Supply Chains Act**

**Art. 964j-Art. 964l of the Swiss Code
of Obligations (CO) and the Swiss
Ordinance on Due Diligence and
Transparency in Relation to Minerals and
Metals from Conflict-Affected Areas and
Child Labour (DDTrO)**

Table of Contents

1. Introduction to Our Business	1
2. Scope of Disclosure	2
3. Mars’ Approach to Human Rights Due Diligence	3
3.1 Policies and Governance	3
3.2 Risk Assessment and Salient Issues	4
3.3 Taking Action	5
3.4 Tracking Performance and Effectiveness	9
3.5 Communicating Performance	10
3.6 Grievance, Issue Reporting, Remedy	11
4. Conclusion	12
Annex 1. United Kingdom	12
Annex 2. Australia	12
Annex 3. Canada	13
Annex 4. Norway	14
Annex 5. Switzerland	16

1. Introduction to Our Business

For more than a century, Mars, Incorporated has been driven by the belief that the world we want tomorrow starts with how we do business today.

Mars, Incorporated is a privately held, family-owned company with a portfolio of confectionery, food and pet care products and services. For more than 100 years, we have sought to bring our Five Principles of Quality, Responsibility, Mutuality, Efficiency, and Freedom to life every day, seeking to create enduring opportunities and benefits for our stakeholders. We are proud to employ approximately 150,000 Associates in more than 70 countries and to support additional businesses and jobs throughout our value chain. Our global supply chains include agricultural commodities, services and labor, and for our Mars Vet Health Business, medicines. Read more about our global business structures [here](#).

2. Scope of Disclosure

This report describes our approach to human rights due diligence and to the specific issues of modern slavery and child labor.

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, supplier sites, and the extended supply chains of our business segments and divisions and are grounded in the UN Guiding Principles on Business and Human Rights framework.

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, for example, on the differences between consumer goods and veterinary health supply chains and their risk profiles. Certain acquired businesses are at different stages of implementation regarding the elements discussed below.

This disclosure is intended to cover the above laws. In some instances, laws in particular countries require more specific detail. That detail can be found in the country specific disclosures in the [Annexes](#).

This report responds to the following legislation:

Australia Modern Slavery Act

Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act

Art. 964j-Art. 964l of the Swiss Code of Obligations (CO) and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)

Norway Transparency Act

United Kingdom Modern Slavery Act

3. Mars' Approach to Human Rights Due Diligence

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), Mars conducts human rights due diligence to help identify, prevent, mitigate, and communicate how we address relevant human rights risks.



3.1 Policies and Governance

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

A dedicated global human rights team, working with our ethics & compliance team, establishes our human rights policy, strategies, and programs and provides guidance to colleagues around the world in our business segments.

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 on our human rights plans and performance, and the Boards of our businesses covered by human rights due diligence laws are

updated regarding our human rights approach and programming.

Our [human rights policy](#) articulates our commitment to respect human rights across our value chain. Our [Supplier Code of Conduct](#) describes the human rights standards we expect our Tier-One suppliers to uphold, including on child labor, forced labor and modern slavery. The Code prohibits the use of all forms of forced labor and states the expectation that the Code will apply where it establishes a higher standard than required by applicable law. Our Responsible Workplace Standard details our human rights standards and expectations for

our own workplaces, including prohibitions on forced and child labor.

These policies and others, and our approach to implementation, are aligned with frameworks laid

out in the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and the ILO-IOE Tool, and draw on the ILO's 1998 Declaration on Fundamental Principles and Rights at Work.



3.2 Risk Assessment and Salient Issues

Our human rights due diligence approach begins with understanding potential adverse impacts to people touched by our business.

Our risk assessment process covers risks to people in our own operations, our supply chain, and certain downstream business partners.

We use a variety of methods and data sources to assess risk. We work with partners, such as Verité to strengthen how we assess human rights risk at the country and regional levels, as well as by material or service. We also use a third-party risk screen that incorporates a variety of data, including indices generated by civil society, UN bodies, the World Bank, universities, and others, as well as data from thousands of social and environmental compliance audits.

Our assessment process includes identifying unique regional and sectoral risks, such as the significant migrant labor workforce in the Middle East and Southeast Asia, with a focus on our salient issues, including forced labor and child labor.

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

business on additional layers of risk assessment. Often implemented with independent human rights experts, this may include further desk research, validated self-assessment questionnaires, audits, and/or human rights risk assessments at specific sites and supply sheds. Our risk assessment process may include service providers, such as storage and handling, logistics, labor providers, and external manufacturing, in addition to our suppliers of goods and materials. This work helps us identify actual or potential risks that our business may cause, to which it may contribute, or to which it is directly linked through our supply chain or business partners.

Our most recent high-level review of human rights risks included more than 70 consultations internally and externally, and analyses of global trends and public data. We identified forced and child labor as two issues that may pose the most significant risk to people across our supply chain (the others included lack of living income and wages, gender discrimination, and mental and physical health and safety).



3.3 Taking Action

Our human rights strategy is focused on deploying programs in three areas: in our own operations through our Responsible Workplace program, with our suppliers through our Next Generation Supplier program, and in our extended supply chains through our Sustainable Sourcing programs.

3.3.1 Responsible Workplace Program: Our Own Operations

Our Responsible Workplace program aims to drive respect for the human rights of all Associates and other workers in our workplaces. Our Responsible Workplace Standard details our human rights standards and expectations for our own Associates, including forced and child labor prohibitions based on ILO Conventions 138 and 182.

We routinely evaluate our factories. To identify human rights risks and impacts at specific locations, we take a risk-based approach to prioritize our assessment schedules.

We engage independent auditors, expert in labor issues, to assess our workplace human rights performance against local laws and the Mars Responsible Workplace Standard. We will work with our sites to address any non-compliances that may be identified.

Responsible Workplace assessments include a focus on service providers and contingent labor at our sites, given this group of workers is often more vulnerable to risks. In certain key countries with known forced labor risks associated with labor sourcing, we are including 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.

3.3.2 Next Generation Supplier Program: Tier-One Suppliers

Our Next Generation Supplier program aims to ensure that our Tier-One suppliers respect human rights in their workplaces. It includes three components:



Align

Our Next Generation Supplier program is founded on our Supplier Code of Conduct. Our Supplier Code of Conduct is part of our standard contractual terms. It establishes an expectation that suppliers apply our Supplier Code of Conduct to sub-contractors and cascade its contents down the supply chain.

We recognize that suppliers may need additional direction on how to implement our **Supplier Code of Conduct** in their workplaces. Our Supplier Code of Conduct Guidebook provides guidance and capacity building for suppliers, including good practice examples for developing management systems to identify, remediate and prevent forced labor, child labor, and other human rights risks.



Assess

For suppliers operating in high-risk locations and sectors, we use tools to assess their risk, such as **EcoVadis**, an online validation platform. We then ask suppliers with low scores to improve their management systems based on the improvement areas identified and the corrective actions plans generated in their EcoVadis scorecards. In some instances, we carry out social compliance audits for select high-risk suppliers.



Advance

We support certain higher risk suppliers of raw materials, and other strategic suppliers such as selected external manufacturing sites and storage and handling providers, as they advance their performance through a longer-term model focused on driving systemic change and worker engagement. Through our Supplier Advance programs, third party experts assess these suppliers and build their capacity to prevent and address significant issues, such as responsible recruitment, health and safety, child labor, gender equality, and workplace discrimination. Supplier Advance programs include workers regularly on-site, including those from contingent labor and service providers. The model leverages the expertise of external advisors, including our global strategic human rights partner Verité.

3.3.3 Sustainable Sourcing: Extended Supply Chains

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.

Our Sustainable Sourcing programs focus on advancing respect for human rights in our extended supply chains, in close collaboration with our Tier-One suppliers, their business partners, the industry, government, civil society organizations and communities. We prioritize work on supply chains where severe human rights risks may be present, such as cocoa, fish, palm oil, mint and sugar.

We also continue efforts to better understand human rights risks across other supply chains we rely on as a business, to identify how we can best drive change.

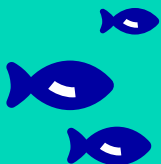
Our programs target human rights risks such as poverty, child labor, forced labor, and health and safety, as applicable. These initiatives are multi-year efforts, as expert third parties build the capacity of prioritized suppliers to understand and address issues in their supply sheds. We use our leverage to encourage those suppliers to act. In some instances, these initiatives encompass focused training for suppliers delivered by third party experts to help them address specific issues.

Selected Sustainable Sourcing Program examples include:



Cocoa

Our Protecting Children Action Plan lays out how we conduct risk assessment and support identifying, preventing, and mitigating human rights issues, including child labor, in our extended cocoa supply chain and make community-based investments to tackle the root causes of these complex issues. We have also developed a Responsible Cocoa specification to complement our Supplier Code, with an expectation that suppliers implement systems to monitor, identify, and remediate human rights issues.



Fish

Our fish human rights strategy focuses on risks in our Thai fish supply chain. Key elements of our fish human rights program include: 1) supporting third party experts to work with suppliers to address root cause issues and improve human rights management systems, including building capacity on responsible recruitment and 2) engaging key industry groups to level the playing field on responsible recruitment practices and catalyzing broader approaches to remediation and worker voice.



Mint

The Shubh Mint (Auspicious Mint) program seeks to improve mint farmer household incomes in India. It focuses on 1) increasing production, reducing cost, and mitigating environmental impact across the full farm—beyond mint; 2) strengthening and scaling Farmer Producer Companies that connect individual farmers to markets; and 3) empowering women to engage in off-farm income-generating activities.



Palm Oil

Our Palm Positive Plan includes 1) collaborating with suppliers to support their efforts to advance respect for human rights; 2) investing in programs designed to effect positive change at the landscape or jurisdictional level; and 3) engaging in broader industry forums.



Sugarcane

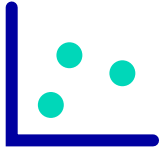
Our strategy for sugarcane focuses on health and safety, child labor, and forced labor risks. It includes 1) engaging suppliers and other stakeholders, including buyers, funders, and civil society organizations, in multi-year programs targeting prioritized suppliers or supply sheds; and 2) participating in industry-level action and advocacy to address the root causes of endemic issues.

3.3.4 Training

Our Mars Commercial Associates are expected to take training courses on our overall approach to building responsible and sustainable supply chains, our Supplier Code of Conduct, and our Next Generation Supplier program. These courses cover our human rights standards, our expectations of our suppliers and our overall approach to addressing human rights issues, including forced labor and child labor risks and remediation.

Our legal team also receives voluntary human rights training that includes child and forced labor topics.

We also provide a range of resources and tools to help our Associates develop human rights action plans for specific materials and engage suppliers in developing approaches to address key risk factors. Tailored training is provided to relevant teams internally.



3.4 Tracking Performance and Effectiveness

We aim to understand whether our interventions have the intended impact, and what we can learn through their deployment.

We track progress made on issues identified in our own workplaces. We also measure the impact of Supplier Advance programs through changes in worker voice surveys conducted by a third party, supplier-reported perspectives, and changes in EcoVadis scores. When supplier audits are conducted, we expect suppliers to conduct corrective actions within a specified time frame. Each corrective action is assigned an expected date of completion, at which time its effectiveness is typically verified through on-site audits and assessments. Our programs in extended supply chains incorporate worker voice surveys to better understand changes that workers experience due to the intervention.

Additionally, we review the adequacy and effectiveness of our complaint's mechanism.

We track issues through closure. We regularly survey our Associate population on their awareness of reporting channels and benchmark results. We are finalizing updated metrics, tracking, and evaluation systems to better measure effectiveness.



3.5 Communicating Performance

We communicate about our performance on human rights, including forced labor and child labor, in various ways.

In addition to this statement, our annual [Sustainable in a Generation](#) report provides public information about our progress across a range of sustainability issues. We also provide periodic updates on programs focused on particular commodities on our website. We also publish our Cocoa for Generations report, which includes a focus on child labor efforts and how we aim to address them, as well as other initiatives to address human rights in the cocoa supply chain.

We participate in other multi-stakeholder forums whose mandates include action on human rights, including forced labor and child labor, in global supply chains, such as the World Cocoa Foundation, the Sustainable Seafood Taskforce, and the Roundtable on Sustainable Palm Oil. We also work closely with the major global cross-commodity certification organizations Rainforest Alliance and FairTrade.

We work with a variety of partners to promote and engage in dialogue to inform action across the business and human rights community. These include:

- [The Consumer Goods Forum's Human Rights Coalition](#)
- [AIM-Progress](#)
- [Verité](#)
- [The UN Global Compact](#)
- [IHRB's Leadership Group on Responsible Recruitment](#)
- [The Farmer Income Lab](#)



3.6 Grievance, Issue Reporting, Remedy

We integrate grievance and issue reporting into our work.

In our own operations, 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 help resolve workplace issues. Our Ethics & Compliance program also offers a way for Associates to confidentially report concerns directly through the program's dedicated and published email, or through a hotline, accessible via phone or internet form. When using the hotline, Associates have an option to remain anonymous. The operators answering phone calls to the hotline speak over 150 languages. We expect our labor and service providers at our sites to have their own grievance mechanisms, but they can also contact us through our Ethics & Compliance hotline. Our policy is to respond to every stakeholder submitting a complaint through our complaints procedure.

Our Code establishes that suppliers are expected to notify Mars of any actual or suspected legal infractions, including legal actions against the supplier by authorities for human rights violations.

We seek to provide or support the provision of remedy consistent with the UNGPs when we cause or contribute to an adverse human

rights impact, often through the programs discussed in Section 3 above.

When indicators of forced labor are found among our suppliers, we use our leverage to influence our suppliers to remediate the issues and encourage our suppliers to engage third party experts who can assist in remediation and fixing root causes. Similarly, when allegations or indications of child labor arise among our suppliers, we use our leverage to influence suppliers to remediate them.

In 2024, along with other brands, we continued to work with AIM-Progress and Verité to improve online training for suppliers on identifying and addressing situations of child labor and forced labor. The training is now open to the public and covers the basic elements of an effective forced labor remediation protocol, and the management systems and due diligence necessary to provide holistic remedy.

In our extended supply chain, we use our leverage and, in some cases, programming to help suppliers learn to monitor for forced labor and child labor risk and address and remedy it when it arises.

4. Conclusion

This disclosure is a joint disclosure. It was prepared in consultation with the reporting entities, including by making those entities aware of its preparation and providing the opportunity to participate.

Annex 1. United Kingdom

In the United Kingdom:

Our covered entities in the UK include Mars Wrigley Confectionery UK Ltd., Mars Petcare UK, Mars Food UK Ltd., Crown Pet Foods Ltd., and Linnaeus Veterinary Ltd. Together, our covered entities employ more than 9,200 Associates in seven factories and in offices including a regional headquarters for Mars Wrigley in Paddington, the global headquarters for Mars Food & Nutrition (also in Paddington), and the Waltham Petcare Science Institute. Our growing veterinary business, Linnaeus, has over 180 sites across the UK and Ireland.

This statement constitutes the modern slavery and human trafficking statement for the financial year ending December 31, 2024, for the companies 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' holding companies, pursuant to section 54(2), in May 2025.

Annex 2. Australia

In Australia:

We employ nearly 2,000 Associates across six factories and two office sites, spanning Mars Pet Nutrition, Mars Wrigley, Mars Food & Nutrition and Royal Canin divisions. We source a range of raw materials for products produced in these divisions. The reporting entities in scope for the purposes of this disclosure include Mars Wrigley Australia Holdings Pty Ltd. and Royal Canin Australia Pty Ltd.

This statement constitutes the modern slavery statement for the financial year ending December 31, 2024, for the companies which fall within the Australian Commonwealth Modern Slavery Act of 2018, including Mars Wrigley Australia Holdings 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 May 2025.

Annex 3. Canada

In Canada:

In Canada, our covered entities include Mars Canada—which is comprised of Mars Wrigley, Pet Nutrition, and Food & Nutrition—Royal Canin Canada, and Champion Petfoods. All are indirect subsidiaries of Mars, Incorporated that are incorporated in Canada.

Together, our covered entities employ nearly 1,800 Associates in three offices (Bolton, Guelph, Edmonton) and five factories in Ontario (Bolton, Newmarket, and Guelph) and in Alberta (Edmonton). Our covered entities produce and sell products such as Maltesers®, MARS®, BEN’S ORIGINAL™, PEDIGREE®, WHISKAS®, IAMST™, ACANA®, and Royal Canin brand pet foods. Our supply chains include significant spend on a variety of fresh, raw, and semi-processed

agricultural products and finished goods, with the majority sourced from Canada and the US. We have not identified instances of forced or child labor in our employee workforce. Therefore, we have not taken steps to remediate loss of income in such circumstances. We are not aware of loss of income resulting from supplier remediation efforts and therefore have not taken steps or required our suppliers to take steps to remediate loss of income.

This statement constitutes the report for the financial year ending December 31, 2024, for Mars Canada Inc., Royal Canin Canada Company, and Champion Petfoods Holding Inc., which fall within the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. The report was approved pursuant to paragraph 4(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, by the boards of directors of each reporting entity in May 2025.

Attestation

This report was approved by the Boards of Directors of Mars Canada, Inc. Royal Canin Canada and Champion Petfoods Holding Inc. in accordance with section 11(4)(b)(i) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Mars, Canada, Inc.



Ellen Thompson

General Manager, Mars Wrigley Canada

May 16, 2025

Royal Canin Canada Company



Robert Lunn

General Manager, Royal Canin Canada

May 21, 2025

Champion Petfoods Holding Inc.



Stacey Osborn

Global President, Champion Petfoods

May 9, 2025

Annex 4. Norway

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 35 Associates with an office in Oslo, Norway. Mars Norway supports the business' three segments, Mars Wrigley, Mars Pet Nutrition and Mars Food & Nutrition. The business consists of import and distribution of the group's products in Norway across the Mars Wrigley, Mars Petcare, and Mars Food & Nutrition 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, employing around 22 Associates in the Mars Norge AS office in Oslo, with headquarters 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 AniCura veterinary care services business. AniCura is headquartered in Stockholm, Sweden. In Norway, the banner operates through the legal entity AniCura Holding AS (subsidiary of AniCura AB, Sweden) which is covered by the law, and its subsidiaries. AniCura Norway's office is in Oslo, Norway, and employs in aggregate over 550 Associates across the country. 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.

Our covered businesses operate in Norway. However, they are included in our global human rights due diligence systems that are discussed in the main body of the report.

To align our Norwegian businesses with our global approach, the Norwegian leadership teams of each business have been briefed on our global human rights due diligence systems and how they apply to their businesses after the Transparency Act came into place. The CEO and Board of each covered business unit sign 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 fall under the scope of our due diligence processes. Our covered veterinary health business, AniCura 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 Ethics & Compliance hotline or Ombudsman line ([Section 3.6](#)). 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 are aware of how to direct any questions from the public

Due Diligence Processes:

As described in [Section 3.2](#), 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 noted in Section 3.2.

Our Responsible Workplace program enables us to assess and remediate human rights risk in our own sites and includes our labor and

service providers (described in [Section 3.3.1](#)). 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 operating in high-risk locations and sectors, we use tools to assess risk. These include EcoVadis, an online validation platform ([Section 3.3.2](#)). We ask suppliers with low EcoVadis scores to improve their management systems based on the improvement areas identified and the corrective actions plans generated in their EcoVadis scorecards. Certain high risk, strategic suppliers participate in Supplier Advance, a program where third-party experts assess these suppliers and build their capacity to address challenging human rights issues. More information on Supplier Advance can be found in [Section 3.3.2](#).

Our Sustainable Sourcing programs target 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 ([Section 3.3.3](#)). These are multi-year efforts, as expert third parties build the capacity of prioritized suppliers to understand and address issues in their supply sheds. We have active programs in cocoa, mint, palm, sugarcane, fish, and other raw materials intended to positively impact the lives of vulnerable people.

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, described in [Section 3.2](#), although we also find a range of other labor-related challenges across our supply chain.

Remedy of Issues Identified:

We remedy issues through multiple mechanisms and approaches depending on issue type and location in our supply chain. Our Responsible Workplace program helps us address issues in our own workplaces, and we track the progress that our sites make. We provide training to our

Associates and certain suppliers ([Sections 3.3.4](#) and [3.6](#)). We ask suppliers with low EcoVadis scores to improve their management systems based on the improvement areas identified and the corrective actions plans generated in their EcoVadis scorecards. We use our leverage to influence suppliers to remediate issues, and our Supplier Advance and Sustainable Sourcing programs provide third party coaching to enable certain suppliers to address human rights challenges in factories and origin supply sheds.

[Section 3.5](#) outlines industry and multi-stakeholder collaborations that seek to address complex human rights issues.

AniCura Norway

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 Norway's website to ask questions about the company's human rights practices.

Due Diligence Processes:

We started by assessing risk through two exercises. First, we included AniCura in our global human rights saliency exercise ([Section 3.2](#)), with one issue identified as particularly relevant to AniCura Norway: mental and physical health and safety. Second, we carried out an initial assessment of the human rights impact of the business's procurement practices ("procurement assessment"). We believe it was the first of its kind for this sector. In 2024, we rolled out a supplier sustainability survey across our top Mars Veterinary Health suppliers, which included AniCura Europe suppliers.

AniCura's areas of procurement include medicine and medical equipment. We also piloted our Responsible Workplace program in our AniCura clinics in Norway and have been conducting follow up.

Results of Due Diligence Assessments:

Our global saliency exercise identified one of our top five human rights issues referred to in [Section 3.2](#) as being of particular relevance to AniCura Norway: mental and physical health and safety. Our Responsible Workplace assessments for AniCura in Norway helped identify where we need to strengthen our health and safety management systems.

Our procurement assessment indicates that manufacturing medicine and medical equipment in AniCura Norway's veterinary health supply chain could present potential human rights risks, as noted in the DFO's list of high-risk products (DFØ Høyrisikolisten), related to pollution entering the environment and labor rights. These risks can vary by country of origin and product, and we are accordingly continuing to develop our understanding of these potential issues, as noted above. Our Supplier Code of Conduct is part of AniCura's standard contractual terms.

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). Our Norway sites will continue to take steps to address issues identified in our Responsible Workplace assessments over the coming year.

This statement constitutes the report for the financial year ending December 31, 2024, for Mars Norge AS, Royal Canin Norge AS, and AniCura 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 May 2025.

Annex 5. Switzerland

In Switzerland:

Mars Schweiz AG is a wholly owned subsidiary of Mars, Incorporated. The business consists of import and distribution of products in Switzerland across the Mars Wrigley, Mars Petcare, and Mars Food & Nutrition portfolios.

Swiss disclosure obligations pursuant to the CO and the DDTro:

The products Mars Schweiz AG sells are part of Mars, Incorporated's human rights due diligence processes, which include an emphasis on child labor. Because Mars, Incorporated's policies and processes align with International Labor Organization (ILO) Convention 138, ILO Convention 182, the ILO-IOE Child Labour Guidance Tool for Business (ILO-IOE Tool), and the UN Guiding Principles on Business and Human Rights (UNGPs), per Art. 9 of the DDTro, we are exempt from the due diligence and reporting obligations of the DDTro. Given the importance of these issues, we report voluntarily—now for the third time—on our efforts to address human rights, including with respect to fighting against child labor, in line with Art. 964k–964l of the CO and the DDTro as well as through our Cocoa for Generations report and other public materials. Specifically, as regards the Swiss rules on conflict minerals and metals, we do not fall under the DDTro's conflict minerals and metals provisions because we do not import or process the relevant raw materials.

This statement constitutes the report for the financial year ending December 31, 2024, for Mars Schweiz AG, which falls within Art. 964j–Art. 964l of the Swiss Code of Obligations (CO) and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTro). This report was signed by the board of directors of Mars Schweiz AG in May 2025.



**To learn more about our Human Rights
approach and Sustainability programs visit:**

[mars.com.sustainability-plan](https://mars.com/sustainability-plan)