



Australian Modern Slavery Statement 2026
For the Reporting Period:
1 January 2025 to 31 December 2025



1. Identification of the reporting entities

Mondelēz International, Inc. (NASDAQ: MDLZ), headquartered in Chicago, USA, is a publicly listed global food company involved in the manufacture and marketing of food products with net revenues of approximately US\$38.5 billion in 2025. The company's purpose is to empower people to snack right, and our mission is to lead the future of snacking around the world by offering the right snack, for the right moment, made the right way. In Australia, Mondelēz International is one of the longest-standing food manufacturers with more than 100 years of history and a portfolio of iconic brands such as Cadbury, The Natural Confectionery Co., Pascall, Philadelphia and OREO.

Mondelēz Australia Holdings Pty Ltd (ACN 004 880 817) is the indirect holding company of Mondelēz Australia (Foods) Limited (ACN 004 125 071) and Mondelēz Australia Pty Ltd (ACN 004 551 473). These are the three reporting entities under this joint statement

(Statement)(collectively, **Mondelēz Australia** or the **Reporting Entities**). All three entities operate under the management of a single leadership team, share values and use the same policies and processes. Mondelēz Australia is part of the Mondelēz International, Inc. group of companies.

In this Statement, the collective expressions “we”, “us”, “our”, “ourselves”, “the Group”, “Mondelēz International” and “Mondelēz Group” are used when we refer to Mondelēz International, Inc. and any entities which it owns or over which it has control, including Mondelēz Australia. This also includes any entities owned or controlled by Mondelēz Australia. This is because we operate using Group-wide policies and procedures to assess and manage modern slavery risks. It is not intended to convey how we are structured, managed or controlled.

2. Description of Mondelēz Australia's business – structure, operations, production, supply chain

Mondelēz Australia's head office is located in Melbourne, Victoria. Mondelēz Australia operates an end-to-end manufacturing business and engages in a wide range of functions such as Sales, Marketing, Finance, Legal, Human Resources, Procurement, Manufacturing & Operations, Quality, Health Safety and Environment, Payroll, Customer Service, Logistics, Warehousing, Demand & Supply, Corporate & Government Affairs, Risk, Engineering, Research and Development, and Business Development. Its key activities are the manufacturing, marketing and sale of food products for local consumers and markets in New Zealand and Asia. Mondelēz Australia's product portfolio is split into two distinct business lines: Meals and Snacking.

Mondelēz Australia's manufacturing network includes six manufacturing plants, one located in each of Suttontown in South Australia, Burnie and Claremont in Tasmania, and Ringwood, Scoresby and Dandenong in Victoria. It also has relationships with co-manufacturers for some products who are primarily located in Australia. Approximately 86% of what is sold in Australia is made in Australia across our manufacturing sites. For distribution and warehousing, Mondelēz Australia primarily uses one owned, two leased, and one multi-user site in Melbourne, and one multi-user site (supported by overflow capacity) in each of Queensland, Western Australia, Tasmania and South Australia as well as some small warehousing and cross docking arrangements elsewhere in Australia which support operations. Mondelēz Australia has sales offices in Adelaide, Sydney, Perth, and Brisbane. In total across its operations, Mondelēz Australia directly employs approximately 2,200 people (as at 30 December 2025), with most employees employed on a full-time basis.

Mondelēz International operates a global integrated supply chain model, and Mondelēz Australia sources its inputs from both related group companies, as well as third party suppliers. Across the globe, it has an extensive value chain with a large number of local, regional and global suppliers. The business depends on a steady and high-quality supply of agricultural crops including wheat, cocoa, vegetable oils (including palm oil), hazelnuts, sugar, milk and eggs.

Mondelēz Australia's direct and indirect supply chains include more than 1,000 Australian businesses, and many local Australian suppliers provide ingredients and materials for use in Mondelēz Australia's products, such as fresh milk, sugar, carton board, corrugated cardboard and various plastics. For example, approximately 11% of Tasmania's total milk supply is purchased for Mondelēz Australia's manufacturing needs, while almost all of the sugar in Mondelēz Australia's locally-made chocolate comes from sugarcane from Queensland and New South Wales farmers. In 2025, a spend review determined that approximately 59% of Mondelēz Australia's annual spend for ingredients and materials used in its products was sourced locally in Australia.

Mondelēz Australia relies on goods and services procured from across the globe. During the reporting period, Mondelēz Australia's manufacturing operations used raw materials from a range of countries including (but not limited to) Australia, Malaysia, Indonesia, Ghana, Côte d'Ivoire, New Zealand, USA, India, the Philippines, Thailand, Belgium, and Türkiye. Mondelēz Australia's business is largely focused on the manufacturing of chocolate and confectionery products in local factories with labour engaged on enterprise work and labour hire agreements.

Third parties are also engaged to provide services including a range of compliance audits such as the Sedex Members Ethical Trade Audit (referred to as **SMETA** and explained in further detail under Section 4).

3. Description of risks

As described in our [Human Rights Policy](#), at Mondelēz International, we are committed to respecting the human rights of people in our value chain, and we undertake efforts on the following human rights areas, among others:

- **Child Labour and Forced Labour:** We explicitly prohibit child labour and forced labour in our operations;
- **Diversity and Inclusion:** We value diversity and inclusion and aim to promote cultural and individual differences;
- **Harassment and Discrimination:** We will not tolerate any form of harassment in employment or employee treatment;
- **Safety and Health:** We use internal and external expertise to provide a safe work environment;
- **Compensation and Development:** We aim to pay our employees a living wage and provide equal opportunity for advancement to all our employees;
- **Freedom of Association and Collective Bargaining:** We believe in a workplace where employees have the right to join (or not join) a union and we are committed to bargaining with employee representatives in good faith; and
- **Natural Resources, Environment and Sustainability:** In our operations, we respect the

ownership and use of land and natural resources.

In connection with these efforts, Mondelēz International is mindful of the United Nations Guiding Principles on Business and Human Rights (**UNGPs**), which, along with other external instruments, provide illustrative examples of approaches for helping to prevent and mitigate human rights risks.

As discussed below, our Corporate Responsibility Guidelines and Code of Conduct guide us and, as set out in our Human Rights Policy, Mondelēz International strives to respect internationally recognised human rights, as relevant to our operations.

Operations

Mondelēz Australia's business operations cover a range of areas from sales and marketing to administration and manufacturing. All of its operations are located in Australia, which is an inherently low risk jurisdiction according to the Minderoo Foundation/Walk Free 2023 Global Slavery Index (**Global Slavery Index**). While the sales, marketing and administration activities in its operations are inherently low risk, according to international trends it was identified that manufacturing can potentially be an inherently higher risk activity and Mondelēz Australia, as a manufacturer, could potentially be connected to human rights risks (including modern slavery risks) through its own operations.

Mondelēz Australia uses labour hire in its Australian factories to meet the fluctuating seasonal demands of food production. It has been reported that there are increased modern slavery risks associated with the labour hire industry, irrespective of the country risk profile,¹ due to a combination of factors such as:

- the prevalence of outsourcing;
- reliance on a migrant workforce with limited local language competency and temporary visa arrangements, particularly in the agricultural sector;
- multiple sub-contracting arrangements with informal agreements;
- low barriers for entry for labour hire providers; and
- dangerous or substandard working conditions, including conditions in which workers:
 - may not be paid fairly or their entitlements are withheld;
 - may be required to work excessive hours; and
 - may face workplace safety concerns.

While the labour hire sector presents increased modern slavery risks, the inherent risk potentially associated with labour hire is reduced because it occurs in Australia, which is a jurisdiction with comparatively strong labour laws and protections, including government inspectors and union activity. Mondelēz Australia did not detect any modern slavery concerns within its labour hire workforce during the reporting period.

¹ See, for example, Commonwealth of Australia, 'Hidden in Plain Sight, Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia':

https://parlinfo.aph.gov.au/parlInfo/download/committees/reportint/024102/toc_pdf/HiddeninPlainSight.pdf;fileType=application%2Fpdf. Website references throughout this document are provided for convenience only. We assume no liability for any third-party content contained on the referenced websites.

Mondelēz Australia also acknowledges that 'hidden' instances of modern slavery could be a potential risk in services that support its primary operations, such as cleaning, security and facilities management.

Supply Chain

Mondelēz Australia's supply chain covers a range of jurisdictions and categories of suppliers. According to the UNGPs' continuum of involvement, Mondelēz Australia faces potential human rights risks (including modern slavery risks) through its supply chain, and Mondelēz Australia takes steps to mitigate these risks in its sourcing activities, as set out in this Statement.

Before moving to the potential modern slavery risks in Mondelēz Australia's supply chain, the Australian business also acknowledges the adverse effects that procurement practices could have on suppliers, which could potentially increase modern slavery risks. Mondelēz Australia is cognisant that sharing accurate forecasts with suppliers can help to mitigate pressure caused by potential demand spikes. An example of action which Mondelēz Australia takes to reduce this risk is maintaining regular and open communication with its transport and logistics suppliers. More specifically, Mondelēz Australia is also subject to Chain of Responsibility obligations relating to driver and road user safety. Mondelēz Australia incorporates references to those obligations into its contracts with transport and logistics providers, as well as into specific internal training for teams which book logistics services.

Country risks

Countries which provide goods and services to Mondelēz Australia vary in their level of modern slavery risks (based on the Global Slavery Index). In particular, Mondelēz Australia's top 20 suppliers for the reporting period procure goods and services from Australia, Ghana, Côte d'Ivoire, New Zealand, USA, Thailand, India, the Philippines, Belgium, Nigeria, Malaysia, Indonesia and Türkiye.

When reviewing supplier spend, Mondelēz Australia's procurement team considers primary spend up the supply chain in order to map source countries. When assessing its top 20 suppliers against the Global Slavery Index, Mondelēz Australia has found that:

- 12 of its top 20 suppliers source goods from or provide services exclusively in lower risk jurisdictions (Australia and New Zealand);²
- 4 of its top 20 suppliers source goods from moderate risk jurisdictions (USA, Malaysia, Indonesia and Thailand), among other jurisdictions;³ and
- 6 of its top 20 suppliers source from higher risk jurisdictions (such as Côte d'Ivoire, Türkiye, the Philippines, Nigeria and India), among other jurisdictions.⁴

Mondelēz Australia acknowledges that these risk ratings may not accurately reflect the complete risk profile of these jurisdictions, and it endeavours to consult with a variety of sources to assess potential modern slavery risks. For example, Mondelēz Australia notes that

² Low risk being those jurisdictions that are assessed to have less than 3 victims of modern slavery per 1,000 people, according to the Global Slavery Index.

³ Moderate risk being those jurisdictions that are assessed to have greater than 3 but less than 7 victims of modern slavery per 1,000 people, according to the Global Slavery Index.

⁴ Higher risk being those jurisdictions that are assessed to have more than 7 victims of modern slavery per 1,000 people, according to the Global Slavery Index.

Ghana, which is classified as a lower risk jurisdiction, was specifically highlighted in the Global Slavery Index report as a higher risk jurisdiction through the lens of its cocoa production, which is Mondelēz Australia's primary procurement product from that country.⁵ Child labour is also identified in the Global Slavery Index as a specific risk factor for some of these countries.⁶

Sector risks

Reflecting the broad range of products in its portfolio, Mondelēz Australia's supply chain includes a wide array of materials from different jurisdictions, which in turn vary in terms of their associated risks.

Mondelēz Australia’s top 20 suppliers operate in a broad range of sectors, including provision of direct inputs and indirect supporting services to Mondelēz Australia, including:

Direct Inputs	Indirect Inputs
• Dairy products; • Cocoa products; • Packaging; • Sugar/glucose products; and • Nuts, grains and seeds.	• Transport services; • Real estate services; • Media services; and • Temporary labour.

Mondelēz Australia acknowledges that a large proportion of its spend is with suppliers in the agricultural sector (i.e., cocoa, nuts, grains, seeds, sugar) and logistics and transport sectors which have been linked to increased risks of modern slavery.⁷ The agricultural sector has been identified as presenting heightened modern slavery risks, driven by factors such as the prevalence of low-skilled and migrant workers, reliance on contract labour arrangements, and the presence of high-risk product categories. As acknowledged above, Mondelēz Australia is also cognisant of the modern slavery risks labour hire can present throughout its supply chain and operations.

In 2025, we completed an assessment of the human rights risks of our value chain, including our largest raw materials supply chains by volume and spend (see further information in our 'Due diligence' section). The assessment indicated that cocoa, palm oil, hazelnuts, and sugarcane are top priorities from a potential human rights risk perspective.

Mondelēz Australia sources uniforms and personal protective equipment from Australian suppliers. However, it acknowledges that a proportion of these products are manufactured offshore including within Malaysia and China, and that there is a higher risk of labour exploitation of vulnerable workers (e.g., women and children) in both the manufacturing of the textile products as well as supply of materials in those regions, as identified in the Global Slavery Index. Machinery is sourced offshore, including from Australia, Europe, USA, Asia

⁵ See <https://www.globalslaveryindex.org/2018/findings/importing-risk/cocoa/> and the Global Slavery Index 2023 Report.

⁶ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.

⁷ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.

(mainly China) and India.

By combining information on source country and sector/product risks, Mondelēz Australia seeks to assess the level of inherent modern slavery risk within its supply chain and operations. Steps Mondelēz Australia has taken to address those risks are outlined below.

4. Description of the actions Mondelēz Australia takes to assess and address the potential risks of modern slavery in its operations and supply chains

Governance structure for human rights (including modern slavery)

The Mondelēz International Human Rights Working Group (**HRWG**) is a cross-functional team with members drawn from the global Impact & Sustainability, People, Ethics & Compliance, Procurement, and Health & Safety functions. Together, the HRWG defines the company's human rights due diligence (**HRDD**) strategy and drives its implementation to embed it throughout the organisation's own operations and supply chains. Through each of these teams, the work of the HRWG flows down into each of our operating jurisdictions, including Australia. This work is embedded through capability building (e.g., training sessions) with our Human Resources and Health and Safety teams in the Asia, Middle East and Africa regions.

The HRWG met regularly during the reporting period, and continues to do so, to:

- Maintain the company's HRDD strategy, in line with the company's values and its commitment to respect human rights, as set out in our Human Rights Policy.
- Oversee the implementation of the strategy and embedding of HRDD throughout the organisation and promotion of HRDD in our business relationships.
- Review and take appropriate action to address potential human rights risks surfaced by due diligence systems.

The HRWG reports to the Sustainability Huddle, made up of senior functional and business unit leaders, including the Chief Impact & Sustainability Officer, the Chief Procurement Officer, VP People Lead Supply Chain, and heads of several key business units. The Sustainability Huddle meets regularly to oversee and steer the company's sustainability strategy, including its social sustainability pillar. Our monthly global Sustainability Business Unit Connect initiative brings together sustainability leads in each business unit across the globe, including the ANZ Sustainability lead, which also feeds into the Sustainability Huddle. The Business Unit Connect initiative provides a forum to discuss each of the sustainability strategic pillars, including climate and environment, packaging, sustainable ingredients and social sustainability, with updates provided by subject matter experts across the business. Throughout the year, key updates and progress related to human rights are shared with the global executive leadership team. At least annually, a comprehensive overview of progress is provided to the global Board of Directors, who also review and approve our annual [Global Human Rights Due Diligence & Modern Slavery Report](#).

We are working to increase the communication of potential relevant human rights and modern slavery risks from the business up to the HRWG. The Human Rights & Environmental Grievance Escalation Committee meets quarterly, and on an ad hoc basis as required, to review potential severe and critical human rights and environmental issues across our value chain, including

potential issues affecting our ~91,000 colleagues and local communities.⁸ The committee is made up of senior functional and business unit leaders. The Human Rights & Environmental Grievance Escalation Committee oversees corrective action to help address potential modern slavery (and other human rights) issues identified in our audits, as well as grievances received through our grievance mechanisms.

As part of our ongoing due diligence activities, we completed a comprehensive human rights risks assessment of our value chain in 2025. This annual exercise allows us to update our understanding of the potential human rights risk in our own operations and supply chain and helps us prioritise our efforts in the right areas. The risk assessment was completed with expert support from sustainability consultants at TwentyFifty and applied recognized HRDD methodology.

In order to embed our HRDD in the organisation and relevant functions, the Mondelēz Australia Lead Team, which is comprised of a cross-functional team of leaders including corporate and government affairs, legal, finance, supply chain, sales and human resources personnel, implements the global approach in local practices, driving local initiatives and tracking progress against our global sustainability goals.

Our Health Safety and Environment (**HSE**) team is responsible for workplace health and safety matters, as well as for complaints and grievances received that are of an HSE nature. Our Human Resources team is responsible for reporting relating to potential human rights and modern slavery matters, as well as for complaints and grievances received that are of a human resource nature.

Policies and commitment

In addition to abiding by applicable laws and regulations, Mondelēz International strives to respect internationally recognised human rights, as relevant to our operations. This approach is guided by certain international conventions and protocols, which serve as illustrative examples of potential approaches for helping to prevent and mitigate human rights risks (including the Universal Declaration of Human Rights, the International Labor Organization (**ILO**) Fundamental Conventions and the International Bill of Human Rights). Our commitment to this goal is demonstrated, for example, by our adoption of the Consumer Goods Forum's (**CGF**) Forced Labor Priority Industry Principles that every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work.

Our [Corporate Responsibility Guidelines](#) and [Code of Conduct](#) guide us in striving for human rights to be respected within our own operations and our value chain. These set out our position against child and forced labour, as well as against discrimination, harassment, bullying and intimidation. We also seek to do business with partners who share the same commitment. We support this, in part, by detailing our Sedex requirements to potential suppliers at the request for information (**RFI**) stage and embedding these obligations in contracts for the supply of raw materials, packaging materials, external manufacturers (**EMs**) and co-packing suppliers. Suppliers are also directed to corporate site guides which outline these expectations.

Our dedicated [Human Rights Policy](#), together with our [Code of Conduct](#), demonstrate our long-standing commitment to respect the human rights of people within our own operations and

⁸ Consistent with past years' reporting, we reported information in 2025 as of December 31, 2025 and included all acquisitions and divestitures as of December 31, 2025.

value chain. Human Rights Policy documents are available in over 30 languages, and in 2025 we continued to raise awareness of our Human Rights Policy with posters in 30+ local languages displayed in our manufacturing sites.

Our [Supply Chain Expectations](#) and our [Supplier & Partner Code of Conduct](#) apply to the suppliers we work with, and include expectations around assessing and managing risks relating to forced labour, child labour, slavery, human trafficking, labour standards and environment and sustainability, as well as the requirement for our suppliers to comply with all applicable laws and regulations including those relating to human rights and forced labour. Per our contractual agreements, suppliers are required to comply with the Supplier & Partner Code of Conduct.

Our Global Buying Policy requires that all goods or services greater than \$250K USD are requested through the RFP process and that, following this process, supplier due diligence is to be completed to assess whether selected suppliers act ethically and comply with all applicable laws. Further details are provided under our 'Due Diligence' section below.

Our Forced Labor Internal Policy explicitly defines forced labour using the ILO's definition, and prohibits all forms of forced labour in Mondelēz's own operations. The Forced Labor Internal Policy requires proactive and ongoing HRDD and mandates that any sites where forced labour is identified must undertake strict reviews of personnel records and hiring practices with third-party expert support.

Finally, our Pre-Employment Background Screening Policy requires risk-based employee screening, which helps prevent the recruitment of victims of trafficking or individuals subject to coercion. Contracting companies are required to attest that their employees have been appropriately screened prior to employment, reducing the risk of forced labour at third-party labour providers.

Due diligence

Throughout 2025, we continued to strive to embed and further strengthen HRDD as an integral part of our operations. We strive to undertake practical, proactive, and ongoing HRDD to help identify, mitigate, and prevent potential human rights impacts within our operations, and work with participants in our supply chain to help them achieve the same objectives.

In 2025, Mondelēz Australia rolled out a HRDD roadmap which adopts a phased approach to scaling its HRDD program. The roadmap encompasses Sedex registration, completion of self-assessment questionnaires, completion of audits at increasing frequency, and enhanced visibility of audit findings. It places emphasis on increasing the number of suppliers and the number of Mondelēz Australia's own sites that meet HRDD standards, and it includes expansion of HRDD expectations to external partners. The global HRDD team also engages with the Australian business on a monthly to bimonthly basis to review progress against the roadmap, identify Australia-specific requirements, and support Mondelēz Australia in meeting its obligations under the broader HRDD framework.

Before engaging in new business relationships (and during the course of business with our current suppliers) we conduct appropriate and risk-based due diligence which includes screening potential suppliers against restricted party lists from authorities worldwide, which may include human rights-related information. Such systems support the identification of potential risks, help guide our approach for impact mitigation and monitoring, and inform our procurement practices.

Prior to onboarding, suppliers are also provided with a contract which includes human rights clauses and obligations, including requirements relating to modern slavery. Mondelēz Australia may not proceed with engaging suppliers that are not willing to agree to contractual terms relating to modern slavery. Following this process, a vendor code is then created for the supplier, during which time additional due diligence checks are conducted.

This involves a request for proposal process which includes requiring compliance with anti-slavery laws, as well as the integration of anti-slavery and audit rights clauses into our supplier contracts. We screen potential suppliers against restricted party lists, based on human rights assessments of our own operations and supply chain, and take steps to seek to verify that purchased goods and services are sourced from suppliers who are committed to acting ethically and complying with all applicable laws. Prior to establishing a relationship with a supplier, employees purchasing the goods and services conduct necessary risk assessments to identify and address risks, including informing the supplier of our requirement to abide by our Supplier & Partner Code of Conduct (which includes a requirement to respect human rights and to not use forced labour).

For modern slavery, we seek to identify the following salient human rights risks/factors:

- child labour;
- forced labour;
- working hours;
- living wage/income;
- health and safety;
- discrimination;
- freedom of association and collective bargaining;
- land rights;
- women's rights;
- access to water; and
- the impact of climate change.

We also measure these risks against information from authorities on human rights and modern slavery (e.g., the Global Slavery Index).

Following the onboarding process, Mondelēz Australia engages with suppliers on an ongoing basis. This includes providing human rights training to suppliers as required and conducting audits of suppliers. Where modern slavery risks are identified post-onboarding, Mondelēz Australia activates a Business Continuity Plan (**BCP**) process, including consideration of alternative suppliers where appropriate.

In respect of our current supplier relationships, we also seek to understand our indirect supplier spend and secondary suppliers "upstream" of our direct contractors. We action this through various methods, including by including audit rights in our supply contracts. This helps us determine how our suppliers actually uphold the human rights and modern slavery standards we set (e.g., in our [Corporate Responsibility Guidelines](#)).

We also prepare a monthly HRDD dashboard based on audit results to gather insights into the ethical and responsible practices of our direct and EM suppliers.

Because subcontracting may carry increased modern slavery risks, suppliers are generally only permitted to subcontract the services for which we engage them with our consent. Where unauthorised subcontracting is identified, we engage with the supplier to address this issue.

Supply Chain Map and human rights risk assessment

A Supply Chain Map has been developed for Mondelēz Australia ingredients and packaging materials as part of its Food Safety/Food Defence risk assessment, identifying where these materials are sourced from and which ports, warehouses or other locations these ingredients travel through before delivery to Mondelēz Australia sites. This assists our ability to monitor the footprint of our supply chain against the Global Slavery Index. Suppliers are required to register on the Sedex platform and complete a Self-Assessment Questionnaire (SAQ) which covers various aspects of social responsibility, including human rights, as part of our due diligence program. The SAQ addresses questions on policy existence and requires the provision of relevant policies, which may be reviewed during audits and employee interviews on site. Sedex uses the information from the SAQ, together with the risk associated with the supplier's location and type of activity, to assign a risk rating. This risk rating is then used by Mondelēz International to prioritise suppliers for our audit program.

As part of our ongoing due diligence activities, we completed a comprehensive human rights risk assessment of our value chain in 2025, with support from external experts. This included our own operations, our Tier 1 suppliers, and upstream ingredient supply chains including our highest volume ingredients: cocoa, dairy, hazelnuts, palm oil, soybean, sugar beet, sugarcane and wheat. Key rights-holders identified in our value chain included manufacturing workers, contract workers, migrant workers, sales staff, merchandisers, drivers, shipping workers, farmers, children, women and Indigenous communities. The assessment uses international indicators to identify risk levels based on country and sector across a comprehensive list of potential human rights issues such as child labour, forced labour, working hours, living wage, health and safety, discrimination, and land rights and allows us to update our understanding of potential human rights risks in our operations and supply chain and prioritise our efforts for the following year.

In 2025, cocoa, palm oil, hazelnuts, and sugarcane were confirmed as priority commodities. We aim to address risks in these prioritized supply chains through targeted programs, supplier engagement, and industry collaboration. Because poverty and inequality drive human rights risks, we also help promote living wage initiatives and work with partners to help support systemic change.

We also continued to help address risks in the cocoa supply chain via our Cocoa Life program and by working with industry coalitions.

With support from sustainability consultants, following recognized methodology, we mapped our value chain, identified key rights-holders, assessed risks using international indicators, and prioritized issues based on severity and our ability to help address them. The results guide our efforts to help mitigate and monitor human rights risks in our operations and supply chain.

The 2025 risk assessment indicates that shared salient risks across the food industry, including child labour, forced labour, working hours, living wage/income, health and safety, discrimination, freedom of association and collective bargaining, land rights, women's rights, access to water and the impact of climate change, remain a priority focus area. While we prioritise salient risks, we remain attentive to other risks that may arise across the value chain.

We continue to work to identify further opportunities to work both internally and with our suppliers to help address potential risks that are shared across the food industry, including child labour. The findings also support prioritisation of our tier 1 supplier HRDD program, highlighting potential risks including child labour, discrimination, forced labour, freedom of association, health and safety, income and wages, and working hours.

Our ongoing interactions with suppliers help foster a culture of communication regarding various quality and commercial issues, through which modern slavery and human rights concerns may also be raised. For example, approximately 50 family-owned dairy farms supply the fresh milk that goes into our Australian-made Cadbury chocolate. We have established a dairy supplier executive committee that aims to meet at least annually, engaging a representative group of farmers to obtain feedback, share ideas and identify opportunities to enhance our dairy supply chain.

Finally, Mondelēz International has been a strong supporter of the Priority Industry Principles against Forced Labor, and as a recently re-elected co-chair of the CGF's Human Rights Coalition, we work collaboratively with consumer goods manufacturing peers and retailers towards a common goal to help combat forced labour, as well as promote decent working conditions and sustainable supply chains across the industry. With this ultimate vision in mind, we helped co-create the coalition's Maturity Journey Framework for Human Rights Due Diligence Systems focused on Forced Labor. We use this framework to guide our efforts towards our ambition to implement robust HRDD across our own operations and supply chain.

Throughout 2025, we continued to embed and further strengthen HRDD as an integral part of our operations. Our teams around the world remain focused on our three-year cycle social audit program.

Remedy and grievance mechanisms

Mondelēz seeks to help provide access to effective remedy where adverse human rights impacts are identified. We aim to maintain accessible grievance mechanisms for employees and external stakeholders who want to raise a concern. Through our Speaking Up and Investigations Policy and Code of Conduct, Mondelēz encourages and expects employees to report concerns about potential violations of law, the Code of Conduct or a Compliance Policy, including those related to human rights and modern slavery. We reinforce our "speaking up" and "non-retaliation" expectations through regular compliance training.

To provide access to potentially affected rights-holders, we use our [Human Rights & Environmental Grievance Management procedure](#), which is supported by our Integrity HelpLine and WebLine. Our [Integrity HelpLine and WebLine](#) are made available to our employees, contractors, subcontractors, and other third parties to raise concerns and to better enable Mondelēz International to help address potential human rights impacts, including issues relating to modern slavery. WebLine is available in 35 languages, while HelpLine is offered in more than 150 languages. These mechanisms are accessible anonymously and via a QR code included on relevant posters. Concerns may also be raised by employees with our internal managers (such as People Leads or HSE Leads), and suppliers may raise concerns with our procurement team directly, and via our Corporate Affairs email address.

Upon receiving notice of an allegation, the Compliance team notifies the People Lead for Australia. A formal investigation is then conducted and reported up to the management team, as appropriate. If misconduct is found to have occurred, we seek to address the situation

appropriately, including through the issuance of corrective or disciplinary action. The global Human Rights & Environmental Grievance Escalation Committee also oversees our response to grievances and may escalate a grievance if necessary. Mondelēz Australia also maintains a Whistleblower Policy and processes for protecting whistleblowers (where applicable) which operate in conjunction with our Human Rights Policy and our other grievance mechanisms, including in relation to concerns about modern slavery. For grievances that relate to suppliers, rather than our own operations, the grievance would be directed to the Global Impact Team which leads the investigation and response in line with our [Grievance Procedure](#).

On site, Mondelēz Australia has implemented training in its operations on workplace behaviour, escalation of issues and awareness of the Integrity HelpLine and WebLine. Internally, people leaders and human resources receive training on how to conduct investigations and respond to whistleblowing generally, including the provision of a detailed investigations "toolkit". Staff that conduct investigations receive coaching and guidance from internal subject matter experts, to successfully navigate the investigation and whistleblowing process. In 2025, our Claremont plant held additional training to promote our Integrity HelpLine and WebLine, which was delivered to employees and contract labour workers on site.

We continue to improve access to, and awareness of, the Integrity HelpLine and WebLine throughout our supply chains and operations, and we seek to increase the use of the Integrity HelpLine and WebLine functions outside of the Mondelēz International business to help reduce modern slavery risks. While no complaints relating to modern slavery were received during this reporting period, if an actual instance of modern slavery were to be identified within our operations and supply chain, we have a plan in place to establish a Special Situation Team and activate an action plan to help address the situation, along with mitigation steps to help prevent any recurrences.

Additionally, worker interviews conducted as part of SMETA audits at Mondelēz Australia's manufacturing sites and prioritised supplier sites provide an additional structured opportunity for worker feedback to be surfaced.

Ongoing Monitoring and Compliance

We audit our manufacturing facilities' adherence both to our policies and to the [SMETA](#) (Sedex Members Ethical Trade Audit) protocol, which is a social auditing methodology developed by Sedex. It enables businesses to assess their sites and suppliers to help understand working conditions across various issues (e.g., forced labour, working hours and wages). Once an audit is complete, the site or the supplier aim to define a Corrective Action Plan in collaboration with the auditor to help address issues found. At a group level, as at the end of 2025, ~100%⁹ of our manufacturing sites and ~99%¹⁰ of our prioritised supplier sites had completed a SMETA audit within the past three years. SMETA audits were conducted across all of Mondelēz Australia's

⁹ Excludes closed manufacturing sites. Due to ongoing conflict in Russia and Ukraine, alternative social sustainability audits / on-site compliance mechanisms have been applied in those countries.

¹⁰ Prioritised supplier sites are defined as Tier-1 Direct material supplier sites, and excludes suppliers that are not registered on Sedex, have not yet received a risk score or received a risk score other than High Risk, or have not yet made audit results available to Mondelēz International. Registration and Mondelēz International visibility to applicable supplier sites on Sedex is the responsibility of and provided by suppliers.

owned sites within the past three years. SMETA audits are undertaken every 2-3 years. SMETA audits were conducted at the following sites during the 2025 reporting period:

- Ringwood;
- Scoresby;
- Claremont;
- Burnie; and
- Dandenong.

We use Sedex's SMETA audit protocol to evaluate our internal manufacturing sites and prioritised supplier sites against a common set of corporate social responsibility standards developed for the consumer goods industry. In our own plants, SMETA audits are performed by APSCA certified independent social compliance auditors from [Bureau Veritas](#). The audit requirements are based on the [Ethical Trade Initiative \(ETI\) Base Code](#), cover risks that are relevant to the manufacturing sector, including child and forced labour, and recognise the vulnerability of migrant and temporary workers to such risks.

Our People Team at our manufacturing sites around the world conducted capability sessions to help build awareness of Sedex's SMETA 7 methodology, which is designed to provide a more focused audit and to enhance identification of harder to detect issues. These sessions were designed to help colleagues evolve their understanding of the SMETA audit protocol. In addition, to prepare our recently acquired and now fully integrated manufacturing sites, we deployed an onboarding training across both the Sedex platform and SMETA Audit process for all our People Leads across sites that are due for their initial SMETA audit in 2026.

Further, approximately quarterly, the Asia Pacific, Middle East and Africa (**AMEA**) Supply Chain People Team meet to discuss enhancing employee capabilities in relation to SMETA audits.

Our supplier contracts include provisions on anti-slavery in line with our Corporate Responsibility Guidelines and our [Supply Chain Expectations](#). We treat non-compliance as a serious breach that may result in contract termination.

In 2025, we continued to build the capability of our people via structured online training modules through Workday (our Human Resources Information System (**HRIS**)) that are designed to build awareness and understanding to help recognise, prevent and address human rights issues including child and forced labour.

We engage third parties to conduct a range of compliance audits (including SMETA audits) for our third party logistics (**3PL**) Warehouses and Distribution Centres.

Training

We have continued to roll out and enhance our Human Rights at Mondelēz Training and the Preventing Forced Labor module. Our Human Rights at Mondelēz training program, which supports our Human Rights Policy and aims to raise awareness of key potential risks and individual responsibilities in treating others with care and integrity, was made mandatory in

2022 for our office-based employees. In 2024, we rolled out our Human Rights at Mondelēz training to core employees not otherwise covered by the online training application for our office-based workers in Australia that had completed the Human Rights at Mondelēz training. This module is available through Workday (online), is available in over 30 languages and is now completed by all new hires as part of their induction. We have adapted mandatory human rights training for our manufacturing and logistics sites-based colleagues and contractors, to be delivered in person and in local languages. Additionally, a more advanced, mandatory module on forced labour prevention is required for colleagues in key stewardship roles such as procurement, human resources, and site leadership. We continued to build the capability of our people by delivering dedicated human rights training to key functions to support our management of potential human rights risks across our supplier base. Specialised sessions were hosted for our procurement teams across the world which were designed to equip them to better support our supply chain HRDD program. These sessions covered our policies, our Supplier Code of Conduct, our commodity-specific supplier requirements and our SMETA audit program, among others.

General induction training is provided for all new employees and labour hire staff focusing on their employment rights, among other things (e.g., workplace health and safety and our whistleblower program). All employees and contractors at our sites are required to complete induction training which includes workplace health and safety. For colleagues working in factories, the training has been adapted for in-person delivery in local languages, with plans to continue the roll out across our snack factories through 2026. We will continue to roll out this human rights training program as part of our mandatory onboarding training to our employees worldwide.

We also provide mandatory training on anti-bribery and corruption, our way of doing business contained in our code of conduct, and sanctions compliance. Completion rates and testing is recorded to assess participant understanding of the training.

Labour Hire and Operations Management

As outlined in the Description of Risks section above, Mondelēz Australia has identified labour hire as an area of increased modern slavery risk relevant to both its operations and supply chain. Actions Mondelēz Australia takes to reduce this risk include:

- including anti-slavery provisions in labour hire agreements;
- undertaking compliance checks for labour hire agencies, as well as general oversight of the labour hire recruitment process, from advertisement of work to reference and identification checks (we only engage with recruitment agencies that have passed our strict tender requirements and operate in accordance with our policies and applicable laws, and it is our understanding that no recruitment agencies are charging candidates a recruitment fee);
- conducting a business review with hiring agencies approximately every quarter as an opportunity to scrutinise workers' working rights, verify that workers are paid correctly at or above minimum wage in accordance with relevant awards or agreements, and confirm workers are treated in a fair and equal manner with dignity and respect; and
- providing its people with access to dedicated channels through which they may voice concerns, either directly through Mondelēz Australia's Human Resources department or to the hiring agencies themselves. Mondelēz Australia has processes in place to protect workers who

voice concerns and to handle disclosures confidentially in compliance with Mondelēz Australia procedures.

With respect to our Australian operations, we also conduct an analysis of payroll impacting terms (i.e., terms that may impact an employee's pay such as updates to hourly rates or allowances) after a replacement enterprise agreement is approved by the Fair Work Commission. This process is undertaken with the Employee Relations Manager and payroll team and includes assessing existing and new pay rules. In addition, in 2025 Mondelēz Australia moved to a new time and attendance (**T&A**) system (Infor) for its modern award and enterprise agreement covering employees in the manufacturing sites. This resulted in a bottom-up build of each rule in the new T&A system which was led by subject matter experts in our People Team. The outcome was successful, with all nine enterprise agreements and two awards across the seven sites having gone live and all fully operational under the new T&A system. Payroll is also audited monthly to ensure accuracy, completeness and compliance of payments. During 2025, we also reviewed leave accrual, and a further review was undertaken to determine that all pay codes were correctly set up for superannuation purposes.

Responsible Payment Practices

Throughout 2025, Mondelēz continued to be a signatory to the Australian Supplier Code, committing to paying small businesses within 30 days.

Community Initiatives and Stakeholder Engagement

Mondelēz International continues to seek to help address human rights risks associated with labour in the cocoa and palm oil supply chains through its Cocoa Life program and the Palm Oil Action Plan. Further information on these initiatives is available in our [Snacking Made Right 2025 Report](#) and our [Global Human Rights Due Diligence & Modern Slavery 2025 Report](#).

In 2025, we joined a new initiative by the Global Child Forum called 'Beyond Compliance: Children's Rights and the Future of Supply Chain Responsibility'. As part of this initiative, alongside other fast moving consumable goods companies, we contributed to the co-development of the Children's Rights & Business Atlas as a practical due diligence tool to help identify risks to children in business supply chains. This will be made available in 2026 and will support the business sector in understanding how children's rights are impacted across the world.

Mondelēz Australia seeks to evaluate its suppliers holistically, not only based on price or value propositions, but also based on assessments of sustainability, working conditions and potential modern slavery risks. For example, Mondelēz Australia's business is shifting its focus from international procurement to promoting Australian sourcing where possible.

Cocoa Life

Mondelēz International aims to help address human rights risks associated with labour in the cocoa supply chain through its signature cocoa sustainability sourcing program – Cocoa Life. Mondelēz International introduced Cocoa Life in 2012 to help secure a supply of more sustainable cocoa and establish an integrated approach aimed to help tackle the root causes of systemic issues in cocoa sourcing, including farm productivity, farmer livelihoods, community

development, child labour and deforestation. Cocoa Life's integrated approach is designed to help promote the human rights of smallholder farmers, as well as the social and economic resilience of cocoa farming communities. During 2025, approximately 100%¹¹ of our cocoa volume requirements for our locally made chocolate brands, including Australian made chocolate blocks, bars and seasonal products, continued to be sourced more sustainably through our Cocoa Life program.

It is important we hear from workers and farmers in our supply chains about any relevant issues that affect them. As part of our efforts to engage in two-way dialogue, we engage periodically with civil society organisations who represent them, and where possible, we also engage with potentially affected rights-holders themselves. We collaborate with cocoa suppliers that have on-the-ground expertise, as well as government authorities, to help promote more sustainable practices and assess where we can align with national strategies.

By the end of 2025, approximately 202,000 farmers were trained on Good Agricultural Practices to help improve farm productivity and approximately 395,000 community members (men & women) were involved in additional income generating activities to help promote income diversification.

As part of our incentives, we pay loyalty premiums to farmers organisations who then pass it on to their members (these amounts are verified by FLOCERT, one of the world's leading social auditing and verification bodies). To help cocoa farmers plan ahead and understand purchasing expectations, we ask suppliers to inform Cocoa Life registered farmer organisations in advance of the year about the cocoa volumes that can be expected and premiums they will receive. These volumes and premiums are also verified by FLOCERT. With select suppliers, we have started to work towards longer-term planning against premiums and volumes.

We also help support Village Savings and Loans Associations (**VSLAs**), which have been indicated as key drivers of financial empowerment in rural development literature. As part of a VSLA, people can save money together and take small loans from those savings. In addition to helping strengthen community members' savings culture, financial literacy and management skills, VSLAs have been shown to help empower women economically. Many VSLA participants are women who choose to invest in their own farms and additional businesses, as well as their children's education. As at the end of 2025, Cocoa Life had helped to establish about 7,800 VSLAs which serve approximately 461,000 community members.¹²

¹¹ All chocolate brands are under the scope of reporting (with exclusions noted below). For chocolate brands that began sourcing through Cocoa Life during the last six months of the reporting year, only the chocolate volume for the second half of the year was covered (these brands represent less than 3% of total sourcing volume). From the time these brands started sourcing through Cocoa Life until the end of the reporting year, their sourcing needs were met with cocoa volume sourced through Cocoa Life. The reported information includes all external manufacturing except for Hershey's co-manufactured volume and all acquisitions and divestitures as of December 31, 2025, except for Ricolino (subject to 2026 integration). Exclusions include:

- Brands with a production volume less than 5 metric tonnes in the reporting year
- Products containing cocoa that are not classified in the chocolate category in our internal system (such as Biscuits & Baked Snacks)
- Brands that are part of a different sustainability program
- Volume of cocoa lost during production
- Organic certified consumer offers for Green & Black's
- Russia volumes.

¹² Reported information for the period from January 1, 2025 to December 31, 2025 covers Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

To help prevent child labour and support children at risk of it, our approach seeks to help combat the underlying causes of child labour, with a particular focus on helping to empower communities. Community Action Plans (**CAPs**), for example, are based on needs assessments that identify community needs and development actions. Through CAPs, we are helping to increase farming households' net income, aiming to empower women and to enable more children to have access to quality education, as well as helping to integrate awareness throughout our work in Cocoa Life communities and beyond.

Cocoa Life also launched a new pilot project to provide certain incentives to help encourage farming families to consider professional labour support that could potentially improve good agricultural practices. Essentially, the participating family would receive funds to help cover professional labour support, with a portion remaining for investment in other household or farm needs. Participating households can also receive an incentive to help send children to school.

According to the International Labor Organization (**ILO**), "child labour" refers to work which deprives children of their childhood, their potential and dignity and that is harmful for their physical and mental development. This can include children who are working below the minimum age of employment or are being deprived of their right to mandatory education. In seeking to improve access to education in cocoa communities, Mondelēz International strives to facilitate assistance that is adapted to local contexts, and relevant and effective for children in their community environment. In Côte d'Ivoire, we participate in the multi-stakeholder initiative Child Learning and Education Facility (**CLEF**). Its goal is to help transform education in cocoa-growing regions, aiming to provide quality education for over 4 million children. In 2025, we joined the SCALE public-private partnership to help improve the quality of education in Ghana. The initiative aims to enhance teaching capacity, accountability, leadership systems, access to high-quality resources, and operational management. This represents an important step within our broader initiatives intended to help support industry engagement regarding the cocoa sector, help improve access to quality education in cocoa communities and help enable systemic solutions in Ghana and other cocoa growing regions.

Beyond our efforts to help prevent child labour, we engage in monitoring to help identify cases of child labour and children at risk with a goal for them to be able to receive support and remediation through community-based Child Labor Monitoring & Remediation Systems (**CLMRS**). We are continuing our efforts to scale CLMRS. In 2025, we further scaled the CLMRS to cover approximately 100% of Cocoa Life communities in West Africa by the end of the year¹³ achieving our goal to cover all West African Cocoa Life communities with a CLMRS by the end of 2025. Through this expanded coverage approximately 337,000 interviews were conducted by our CLMRS to help prevent child labour.¹⁴ In parallel, we continued our efforts to enhance the quality of implementation of our CLMRS.

¹³ The scope includes Cocoa Life communities in Ghana (from 2017), Côte d'Ivoire (from 2020), Nigeria (from 2022), and Cameroon (from 2024). CLMRS interviews considered for this goal scope were performed during the last 2 years (from January 1, 2024 through December 31, 2025).

¹⁴ Reported information includes the total number of interviews in Cameroon, Côte d'Ivoire, Ghana, or Nigeria that were conducted to identify children, if any, in or at risk of child labour, at least once over the last 2 years (January 1, 2024 through December 31, 2025), even if any appropriate remediation and post remediation follow-up has not yet occurred. CLMRS data is collected and provided to Mondelēz International by third parties. Reported information is verified by an independent third-party and available in our Sustainability Reporting & Disclosure Reporting Archive.

Our [Strategy to Help Protect Children](#) sets out our systems approach to help enhance child protection systems and help improve access to quality education in Cocoa Life communities.

In a long-term partnership with the International Cocoa Initiative (**ICI**), we continue to look for opportunities to further enhance CLMRS implementation and help develop standards for household monitoring and identification. In 2025, we supported the development of ICI's new CLMRS Core Criteria and Manual. The Core Criteria for CLMRS defines the minimum standards for system design and implementation, including required activities, essential definitions and key metrics. The CLMRS Manual serves as a practical guide for CLMRS implementers, drawing on over a decade of ICI's experience and the latest evidence from the field. These new resources were designed to help guide implementing partners and further enhance the impact of CLMRS across the sector.

Mondelēz International, in partnership with CARE International, also launched the Opportunities for Entrepreneurship Pathways (**OP-EN**) initiative to create new business opportunities for VSLAs in cocoa communities. Leveraging CARE's expertise, the program aims to develop and implement best-in-class entrepreneurship models, mobilise multi-stakeholder collaborations, and expand its reach beyond initial pilots in Côte d'Ivoire and Ghana to other cocoa-growing regions. In 2025, CARE introduced advanced business and finance training for VSLA members across 50 micro-businesses, covering topics such as profitability, business management, and digital literacy. Additionally, a partnership with Advans and Lendwithcare in Côte d'Ivoire provided affordable micro-loans to participating VSLAs, with further funding support from Beyond Chocolate and other private sector partners, helping to scale and sustain the initiative.

Further information on our Cocoa Life program is available in our [Global Human Rights Due Diligence & Modern Slavery 2025 Report](#) and our [Snacking Made Right 2025 Report](#).

Palm Oil Action Plan

In line with our sourcing principles, our Palm Oil Action Plan (**POAP**) requires our suppliers to respect the human rights of all workers, including migrant workers within their operations and supply chains. It also requires them to follow the CGF's Priority Industry Principles against Forced Labor.

In 2025, we continued to source approximately 100% of our palm oil as Roundtable on Sustainable Palm Oil (**RSPO**) certified.¹⁵ Smallholder farmers play an important role in the palm oil supply chain and are estimated to represent approximately 40% of palm oil production across Indonesia and Malaysia. To help support their livelihoods while preserving local ecosystems, Mondelēz International supports landscape initiatives in Indonesia including the Coalition for Sustainable Livelihoods (**CSL**), of which we are a founding member.

While we purchase a relatively small proportion of global palm oil supply, we seek to use our sourcing practices and stakeholder engagement to support more sustainable practices across the sector, as detailed in our [POAP](#). As of 2025, Mondelēz International has achieved the

¹⁵ This data is based on supplier provided information and utilises estimation. It excludes palm oil purchased in the form of a component of other material and palm oil procured by third-party external manufacturers and co-packers for use in manufacturing Mondelēz International finished goods.

traceability of approximately 98%¹⁶ of our palm oil to the mill, approximately 91%¹⁷ traceable to plantation, and approximately 85%¹⁸ traceable to forest monitored in our supply chain. Approximately 100% of the palm oil we purchased in 2025 was sourced from suppliers with policies aligned to the Palm Oil Action Plan.¹⁹

In 2025, we continued to support robust due diligence practices through the CGF's [People Positive Palm Project](#) (P3 Project), fostering collective action on issues like preventing recruitment fees, with support from key organisations. This included ethical recruitment training for Indonesian Private Placement Agencies, leading to commitments to reduce worker costs. Multi-stakeholder consultations in Malaysia reviewed the Post-Arrival Orientation (PAO) Guiding Document, providing critical feedback now shaping revisions for accuracy and stronger government buy-in. Engagement with Indonesian palm oil suppliers, started in 2024, has progressed. Four capacity-building sessions trained over 100 participants on Human Rights Due Diligence and Responsible Recruitment. Suppliers completed the Converged HREDD Assessment Tool and developed action plans to address identified gaps.

As co-chair of the CGF Human Rights Coalition, in 2025 we engaged and supported the development of a new Best Practice Note for Business on Human Rights Defenders, outlining practical ways for consumer goods companies to support the rights of those involved in the palm oil supply chain.

Further information on our Palm Oil Action Plan is available in our [Global Human Rights Due Diligence & Modern Slavery 2025 Report](#) and our [Snacking Made Right 2025 Report](#).

Hazelnut supply chain

We source most of our hazelnuts from Türkiye. To address potential human rights risks in that supply chain we have joined forces with other companies in the food industry, via a multi-stakeholder program coordinated by the Association of Chocolate, Biscuit and Confectionery Industries of Europe in partnership with the International Labour Organization (ILO). In 2025, we continued our co-chair role to support this public-private partnership with the ILO to help tackle potential child labour risks in hazelnut harvesting in Türkiye. The project entered a new three year phase in 2024, which runs until 2026, marking a strategic shift towards institutional sustainability, resilience, and the integration of its achievements into local and national frameworks.

Direct interventions remained a key aspect of the program, and in 2025, over 1,000 children were referred to social support centers to prevent child labour in hazelnut fields. These children also received nutritional support, educational and stationery kits, hygiene support, and participated in social and cultural activities.

¹⁶ This data is based on supplier provided information. It excludes palm oil purchased in the form of a component of other material and palm oil procured by third-party external manufacturers & co-packers for use in manufacturing Mondelez International finished goods.

¹⁷ This data is based on supplier provided information. It excludes palm oil purchased in the form of a component of other material and palm oil procured by third-party external manufacturers & co-packers for use in manufacturing Mondelez International finished goods.

¹⁸ This data is based on supplier provided information. It excludes palm oil purchased in the form of a component of other material and palm oil procured by third-party external manufacturers & co-packers for use in manufacturing Mondelez International finished goods.

¹⁹ This data is based on supplier provided information and utilises estimation. It excludes palm oil purchased in the form of a component of other material and palm oil procured by third-party external manufacturers and co-packers for use in manufacturing Mondelez International finished goods.

In November 2025, we also collaborated with peers under the AIM-Progress umbrella to organise a multi-stakeholder roundtable in Ankara to explore collaborative approaches aimed toward promoting fundamental rights at work in Türkiye's agricultural supply chains, including hazelnuts.

Further information on our hazelnut supply chain is available in our [Global Human Rights Due Diligence & Modern Slavery 2025 Report](#) and our [Snacking Made Right 2025 Report](#).

Sugarcane supply chain

We continue to identify sugarcane as one of the top priorities for Mondelēz International from a potential human rights risk perspective. In 2025, we became a member of Bonsucro, the leading global sustainability platform and standard for sugarcane.

Since 2024, we have been a member of the Coalition for Responsible Sugarcane India (**CRSI**), a multi-stakeholder initiative promoting responsible and sustainable practices across India's sugarcane value chain. While Mondelēz Australia sources the majority of its sugar locally, we are cognisant of the risks associated with the sugarcane industry.

Other initiatives

We recognise that rising inequalities and poverty may be underlying drivers of other potential human rights risks. To help address these systemic issues, Mondelēz International has identified two key areas of focus: (1) working with suppliers, with the ambition of having prioritised strategic suppliers engaged on a living wage roadmap by 2030; and (2) enhancing our HRDD, with the aim of implementing risk-based HRDD across our value chain.

In 2023, Mondelēz International became co-chair of the CGF and the Human Rights Coalition of Action within the CGF. The coalition works to help address forced labour in the consumer goods industry and aims to drive individual member company and collective action towards implementing the Priority Industry Principles across members' supply chains.

As Co-Chair of the CGF Human Rights Coalition, in 2025 we partnered with other food manufacturers and retailers through CGF and AIM-Progress to help develop the Converged Human Rights & Environment Due Diligence (**HREDD**) tool and guidance, with support from experts at the Fair Labor Association and Proforest. The harmonised tool aims to enable a consistent approach to supplier engagement on HREDD and allows businesses to pro-actively identify, prevent and address both human rights and environmental risks and impacts. The wide adoption of this aligned methodology aims to help drive efficiency for the sector and maximise positive outcomes along the value chain. Since 2024, we have been supporting the global WageMap initiative, contributing to its mission to support the achievement of living wages for workers globally. Our involvement aims to bring more consistency to methodologies and advance positive change across diverse stakeholder perspectives on living wages. In November 2025 and following several rounds of public consultations involving a wide range of stakeholders, the launch of the WageMap Living Wage Reference Standard marked a major milestone in the global movement for living wages.

We also recently released our Global [Human Rights Due Diligence & Modern Slavery 2025 Report](#), which is a Mondelēz Group-wide human rights statement published in line with the United Kingdom's *Modern Slavery Act*. This report also provides a helpful summary of the actions we take to measure and help address modern slavery risks within our operations and supply chains, as well as how we measure the impact of our actions. It also complements our

2025 sustainability report, ['Snacking Made Right'](#), which covers broader environmental and governance issues. Further information about our efforts to promote more sustainable sourcing practices is available in these reports.

5. Assessment of the effectiveness of actions

We assess the effectiveness of our actions by tracking how we are performing against the goals we set for ourselves at a global level, and through analysis of data relating to:

- compulsory training on our Code of Conduct;
- human rights training completed by our employees;
- audit results (measured against a common set of corporate social responsibility standards developed for the consumer goods industry) at our internal manufacturing facilities and prioritised supplier facilities using the SMETA protocol;
- adherence to our Corporate Responsibility Expectations provided to our suppliers;
- results of our comprehensive overview of progress related to human rights, which occurs at least annually and is shared with the Board of Directors;
- the number and nature of contacts to our grievance mechanisms, including our Integrity HelpLine and WebLine;
- supplier compliance with standards set out in our Cocoa Life program and Palm Oil Action Plan, and measurement of impact of our Cocoa Life program performed by IPSOS (see methodology [here](#) and results [here](#)); and
- the results of our annual Engagement Survey and our annual Pulse employee surveys.

We review opportunities to strengthen our approach to promoting respect for human rights. We believe that collaborating with external stakeholders including industry participants, and with governments and non-government organisations, suppliers, and other businesses is often an effective way to address shared concerns and systemic challenges. We regularly track and publicly report on our progress on an annual basis.

6. Consultation

In the course of preparing this report, Mondelēz Australia has consulted with representatives of its local and regional Procurement, Human Resources, Legal and Corporate Affairs teams, Mondelēz International's Global Impact and Social Sustainability team, personnel of owned and controlled entities and external subject matter experts.

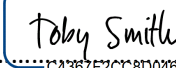
Mondelēz Australia's local procurement operations and global procurement teams have day-to-day responsibility for managing responsible sourcing, human rights reporting, and compliance requirements, with support from the Global Impact and Social Sustainability team (**Impact team**). The Impact team regularly consults with cross-functional experts specialising in human rights, ethical sourcing, corporate affairs, environment and safety, human resources and legal affairs.

As noted in section 1 above, all three Reporting Entities operate under the management of a single leadership team, which has been consulted in the preparation and approval of this

Statement. Therefore, the entity giving this Statement (Mondelēz Australia Holdings Pty Ltd) has, in effect, consulted with the other Reporting Entities in addition to its and their owned and/or controlled entities.

7. Approval

This joint Statement was approved by the Board of Directors of Mondelēz Australia Holdings Pty Ltd (ACN 004 880 817), on behalf of each of the Reporting Entities, on 26 June 2026.

DocuSigned by:

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Toby Smith

Director, Mondelēz Australia Holdings Pty Ltd (ACN 004 880 817)

29 June 2026

Website references throughout this document are provided for convenience only. We assume no liability for any third-party content contained on the referenced websites

ABOUT THIS STATEMENT

Unless otherwise stated, the disclosures in this document, (i) cover the reporting period from January 1 to December 31 of the stated year, (ii) reflect data from four regions including North America, Latin America, Europe, and Asia Middle East & Africa (AMEA), including Australia where stated, and (iii) include manufacturing facilities under our direct and indirect control. Unless otherwise specified, general exclusions include: (i) stand-alone entities not included in financial or non-financial reporting data (e.g., Venezuela), (ii) external manufacturing sites, co-packers, and vendors with no direct purchases from Mondelez International, (iii) joint ventures or stand-alone companies owned by Mondelez International but operating independently unless Mondelez International owns more than 50% of the outstanding shares, (iv) acquisitions made since 2018, until fully integrated into the Mondelez International reporting structure, and (v), developed-market gum brands, which were divested as of October 1, 2023, in the United States, Canada and Europe. Where quantitative goals are linked to revenue, information is for Mondelez International, Inc., except our Venezuelan subsidiaries that were deconsolidated in 2015, for which results are excluded from our consolidated financial statements. Where quantitative goals are linked to operations, information is for operations under the control of our integrated supply chain function. Due to rounding, numbers presented in this Statement may not add precisely to the total provided and percentages may not reflect the absolute figures. Estimation is used in the reporting of some sustainability data points. As used in this Statement, parentheses represent negative numbers. The development of sustainability reporting requires the use of estimates, judgments, and assumptions that may affect the reported figures at the date of publication during the reporting period. Historical, current, and forward-looking sustainability related information and statements may be based on standards for measuring progress that are still developing, internal controls, and processes that continue to evolve, and assumptions that are subject to change in the future. The company's goals are aspirational in nature and are not intended to create legal obligations or rights. We caution you that this information is approximate, that these statements and information are not guarantees of future performance, nor promises that our goals will be met, and are subject to numerous and evolving risks, external factors and uncertainties that we may not be able to predict or assess. In some cases, we may adjust our commitments or goals or establish new ones to reflect changes in our business, operations or plans.

FORWARD-LOOKING STATEMENTS

This Statement contains forward-looking statements. All statements other than statements of historical fact are "forward-looking statements" for purposes of federal and state securities laws, including any statements of the plans, strategies and objectives of management; any statements regarding our environmental, social and governance and sustainability strategies, goals, policies, initiatives and programs; any statements concerning proposed new products, services or developments; any statements regarding future economic conditions or performance; any statements of belief or expectation; and any statements of assumptions underlying any of the foregoing or other future events. Forward-looking statements may include, among others, the words, and variations of words, "will," "may," "expect," "would," "could," "might," "intend," "plan," "believe," "likely," "estimate," "anticipate," "objective," "predict," "project," "drive," "seek," "aim," "target," "remain," "potential," "commitment," "outlook," "continue," "strive," "ambition" or any other similar words or expressions. Although we believe that the expectations reflected in any of our forward-looking statements are reasonable, actual results or outcomes could differ materially from those projected or assumed in any of our forward-looking statements. Our future financial condition and results of operations, as well as any forward-looking statements, are subject to change and to inherent risks and uncertainties such as changes in consumer demand and product pricing, changing weather patterns, and evolving laws and regulations, many of which are beyond our control and are amplified by ongoing macroeconomic volatility and uncertainty. Please also see our risk factors, as they may be amended from time to time, set forth in our filings with the U.S. Securities and Exchange Commission (SEC), including our most recently filed Annual Report on Form 10-K and subsequent Quarterly Reports on Form 10-Q. There may be other factors not presently known to us or which we currently consider to be immaterial that could cause our actual results to differ materially from those projected in any forward-looking statements we make. We disclaim and do not undertake any obligation to update or revise any forward-looking statement in this Statement, except as required by applicable law or regulation. The information included in, and any issues identified as material for purposes of, this Statement is not an indication such matters are material to the Company, our operations, business, strategy, or financial performance, or to our stakeholders, for purposes of our SEC or other mandatory reporting purposes. In the context of this disclosure, the term "material" is distinct from, and should not be confused with, such term as defined for SEC or other mandatory reporting purposes.

SUSTAINABILITY REPORTING

We discuss our sustainability goals and programs in detail in our annual Snacking Made Right reports available on our website. We provide a Non-Financial Datasheet and consider the Sustainability Accounting Standards Board (SASB) and Task Force on Climate-Related Financial Disclosures (TCFD) reporting frameworks as guidelines that are applied where relevant. We also provide our annual CDP disclosure.