



Australian Modern Slavery Statement 2025

For the Reporting Period:
1 January 2024 to 31 December 2024



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\$36.4 billion in 2024. The company's purpose is to empower people to snack right - 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 largest 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 (referred to as **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 2021, Mondelēz Australia Pty Ltd acquired Gourmet Food Holdings Pty Ltd (referred to as **Gourmet Food**), which is a Melbourne-based manufacturer of premium quality crackers and biscuits. Gourmet Food was integrated with the Mondelēz Australia policies and processes in 2023. While Gourmet Food is not a reporting entity under the *Modern Slavery Act 2018* (Cth) as it does not meet the reporting threshold for the 2024 reporting period, it is included as an entity owned or controlled by Mondelēz Australia. Descriptions of actions taken by Gourmet Food as an owned or controlled entity and which are not covered by the Group-wide actions are described throughout the statement where relevant.

In this statement, the collective expressions "we", "us", "our", "ourselves", "the Group", "MDLZ", "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. 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 based in Melbourne, Victoria. Mondelēz 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 manufacture, marketing and sale of food products for local consumers and markets in 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 85% of what is sold in Australia is made in Australia across our manufacturing sites. In 2024, Mondelēz took possession of its Truganina National Distribution Centre, which, at 47,000-square-metre, is Mondelēz's largest in-house automated warehouse in the world. For distribution and warehousing, Mondelēz

Australia primarily uses one owned, two leased and five multi-user sites in Melbourne, and one multi-user site 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 our operations. Mondelēz Australia has sales offices in Adelaide, Sydney, Perth, and Brisbane. In total across its operations, Mondelēz Australia directly employs approximately 2,090 people, 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, we have an extensive value chain with a large number of local, regional and global suppliers. Our 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 partners with 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 12% of Tasmania's total milk supply is purchased for Mondelēz Australia's manufacturing needs, while approximately 100% of the sugar in Mondelēz Australia's locally-made chocolate comes from sugarcane from Queensland and New South Wales farmers. In 2024, a spend review was conducted and it was determined that approximately 55% of Mondelēz Australia's annual spend for ingredients and materials for use 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, Ghana, Côte d'Ivoire, New Zealand, USA, India, the Philippines, China, Bulgaria, Pakistan, Vietnam, South Africa and Türkiye. The Mondelēz Australia 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 for services including a range of compliance audits including the Sedex Members Ethical Trade Audit (referred to as **SMETA** and explained in further detail under Section 4) as well as cleaning services.

3. Description of risks

At Mondelēz International, as described in our [Human Rights Policy](#), we are committed to respecting the human rights of people in our value chain, using the United Nations Guiding Principles on Business and Human Rights (referred to as the **UNGPs**) as a guide for preventing and mitigating human rights risks, including modern slavery risks. The UNGPs help us understand the ways in which we may be connected to potential human rights impacts (which include modern slavery practices).

As discussed below, our Corporate Responsibility Guidelines and Code of Conduct guide us as we strive to uphold the UNGPs and respect human rights within our own operations and our upstream supply chains.

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 Global Slavery Index (referred to as the **Global Slavery Index**) (all references made are to the 2023 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 exposed to the risk of causing or contributing to adverse human rights impacts (including modern slavery) through its own operations.

Mondelēz Australia uses labour hire in its Australian factories to meet the fluctuating seasonal demands of food production. Gourmet Food's largest supplier spend in 2024 was on labour hire services. 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
- dangerous or substandard working conditions, including conditions in which:
 - workers are not paid fairly or their entitlements are withheld
 - workers may be required to work excessive hours
 - workplace safety concerns

While the labour hire sector presents an increased risk of modern slavery, 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 Period².

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 recognises that there is the potential for it to contribute or be directly linked to adverse human rights impacts (including modern slavery) through its supply chain, and it takes steps to mitigate these risks in its sourcing activities, as set out in this statement.

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/reportjnt/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.

² Further information regarding human rights due diligence undertaken is set out in section 4 of this Statement.

Before moving to the inherent potential risks of modern slavery in Mondelēz Australia's supply chain, the Australian business also acknowledges the adverse effects that procurement practices could have on suppliers, which could have the potential to contribute to modern slavery issues. Mondelēz Australia is cognisant that sharing accurate forecasts with suppliers can help to mitigate the undue 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, to ensure it is maintaining workers' health and safety on the job. 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 (for example, to provide an understanding of the requirement to consider travel time against time slotting when booking loads to ensure sufficient time is allowed for travel).

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 from Australia, Ghana, Côte d'Ivoire, New Zealand, USA, Thailand, India, the Philippines, China, Bulgaria, Pakistan, Vietnam, South Africa 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:

- 15 of its top 20 suppliers source goods from or provide services exclusively in lower risk jurisdictions (Australia and New Zealand);³
- 2 of its top 20 suppliers source goods from moderate risk jurisdictions (China, Vietnam, USA and Thailand), among other jurisdictions;⁴ and
- 5 of its top 20 suppliers source from higher risk jurisdictions (Côte d'Ivoire, Türkiye, the Philippines, Bulgaria, Pakistan and India), among other jurisdictions.⁵

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 determine potential modern slavery risks. For example, Mondelēz Australia notes that 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.⁶ Child labour is also identified in the Global Slavery Index as a specific risk factor for these

³ 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.

⁴ 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.

⁵ 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.

⁶ See <https://www.globalslaveryindex.org/2018/findings/importing-risk/cocoa/> and the Global Slavery Index 2023 Report.

countries.⁷

Sector risks

Reflecting the broad range of products in its portfolio, Mondelēz Australia's supply chain includes a wide array of materials from these 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

- Dairy/Dairy Products;
- Cocoa/Cocoa Products;
- Packaging;
- Gelatine;
- Sugar/Glucose Products; and
- Nuts, Fruits and Seeds.

Indirect Inputs

- Transport Logistics/Warehousing;
- Marketing and Sales; and
- Media services.

Mondelēz Australia acknowledges that a large proportion of its spend is with suppliers in the cocoa, nuts, fruits, seeds, sugar (agriculture generally) and logistics and transport industries which have been linked to increased risks of modern slavery.⁸ Gourmet Food has a number of suppliers in the food industry being primarily traders of agricultural products. The agricultural industry has been identified as a high-risk sector for modern slavery, with key risk factors such as the prevalence of base-skilled and migrant workers, contract labour arrangements and 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 2024, 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 confirmed 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 (eg. 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 (mainly China) and India.

In combining information on source country and sector/product risks, Mondelēz Australia is

⁷ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.
⁸ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.

able to determine a level of inherent modern slavery risk within its supply chain and operations. Steps Mondelēz Australia have 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 (referred to as the **HRWG**) is a cross-functional team with members drawn from the Impact & Sustainability, People, Ethics & Compliance, Procurement, and Health & Safety functions. Together, the HRWG defines the company's human rights due diligence strategy and drives its implementation to embed it throughout the organisation's 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 (eg. 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 human rights due diligence strategy, in line with company values and commitment to respect human rights under the UNGPs.
- Oversee the implementation of the strategy and embedding of human rights due diligence throughout the organisation and our business relationships.
- Review and ensure appropriate action is taken to address potential human rights risks surfaced by due diligence systems.

The HRWG reports regularly to the Sustainability Huddle, made up of senior functional and business unit leaders including the Senior Vice President, Chief Impact & Sustainability Officer, Chief Procurement Officer, Vice President People Lead Supply Chain, and heads of several key business units. The Sustainability Huddle meets regularly to oversee and steer the four pillars of the company's sustainability strategy, including the 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 allows us to discuss each of the sustainability strategic pillars including climate and environment, packaging, sustainable ingredients and social sustainability, and includes updates provided by subject matter experts across the business. Throughout the year, key strategic decisions and updates related to human rights are escalated to the global executive leadership team. Annually, a comprehensive overview of progress is shared with the International Board of Directors.

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 bi-annually 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 ~90,000 colleagues⁹. The committee is made up of senior functional and business unit leaders. As part of our ongoing due diligence activities, we completed a comprehensive human rights risks assessment of our value chain in 2024. This annual exercise allows us to update our understanding of the potential human rights risk in our

⁹ 2024 reported information as of December 31, 2024.

own operations and supply chain and help us to prioritize our efforts in the right areas. The risk assessment was completed with expert support from sustainability consultants, twentyfifty, following best practice methodology.

In order to embed our human rights due diligence at all levels of the organisation and in all relevant functions, the Mondelēz Australia Lead Team, which is comprised of a cross-functional team of leaders from Corporate and Government Affairs, Legal, Finance, Supply Chain, Sales and Human Resources, implements the global approach into local practices, drives local initiatives and tracks progress against our global sustainability goals.

Our Health Safety and Environment (**HSE**) team holds responsibility for workplace health and safety matters, as well as for complaints and grievances received that are of an HSE nature. Our Human Resources team holds responsibility for 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, we endeavor to respect all internationally recognised human rights, as relevant to our operations and as set out in the Universal Declaration of Human Rights. We support the principles concerning fundamental rights set out in the International Labor Organization Core Conventions and the International Bill of Human Rights. Our commitment to this goal is demonstrated by our role as a signatory to the UN Women's Empowerment Principles and our adoption of the Consumer Goods Forum's (referred to as **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 everything we do to ensure that human rights are respected within our own operations and our upstream supply chains. 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. This is effected, in part, by detailing our Sedex requirements to potential suppliers at the request for information (**RFI**) stage to help us ensure the suppliers are sourcing more ethically and responsibly, and ensuring these obligations are clear in our contracts for the supply of raw materials, packaging materials, EMs and Co-packing suppliers with guides to our corporate sites which outline these commitments.

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 value chain. Human Rights Policy One Pagers are available in over 30 languages.

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 must comply with our Corporate Social Responsibility requirements, which are available through our [Supplier Information Centre](#).

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 ensure that selected suppliers act ethically and comply with all applicable laws. Further details are provided under our 'Due Diligence' section below.

Due diligence

Throughout 2024, we continued to embed and further strengthen human rights due diligence (HRDD) as an integral part of our operations. We strive to undertake practical, proactive, and ongoing human rights due diligence to identify, mitigate, and reduce the likelihood of potential and actual human rights impacts within our operations, and work with participants in our supply chain to help them achieve the same objectives. 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.

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 successful supplier contracts. We also screen potential suppliers against restricted party lists, based on human rights assessments of our own operations and supply chain, and take steps to ensure the purchased goods and services are sourced from suppliers who act ethically and comply 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 adequately 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;
- health and safety;
- freedom of association and collective bargaining; and
- women's rights.

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

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 the inclusion of audit rights in our supply contracts. This helps us to determine how our suppliers actually uphold the human rights and modern slavery standards we set (eg. in our [Corporate Responsibility Guidelines](#)).

We also prepare a monthly human rights due diligence dashboard to gather insights into the ethical and responsible practices of our direct and external manufacturer (EM) suppliers.

Case Study

During the reporting period, we engaged a commercial cleaning company to provide

services at several of our sites. Our contract with this supplier included modern slavery clauses. Consequently, during our Quarterly Business Reviews, our supplier provides updates on their employee welfare check results, health and safety, employee recognition and internal modern slavery training and assessment completion.

A Supply Chain Map has been developed for Mondelēz Australia ingredients and packaging materials as part of its Food Safety/Food Defence risk assessment to identify where these materials are sourced from and which ports, warehouses or other locations these ingredients transit through before delivery to Mondelēz Australia sites. This assists our ability to monitor the footprint of our supply chain against the Global Slavery Index. Furthermore, suppliers are required to complete their Self-Assessment Questionnaire (**SAQ**) in the SEDEX platform which covers various aspects of social responsibility, including human rights as part of our due diligence program. SEDEX uses the information of the SAQ together with the risk associated with the location where the supplier is located and the type of activity they perform to assign a risk rating. This risk rating is then used by MDLZ 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 2024. This included our own operations, our Tier 1 suppliers, and upstream ingredient supply chains including 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. This exercise uses a database of international human rights indicators to determine risk levels based on country and sector across a comprehensive list of potential issues and allows us to update our understanding of the potential human rights risk happening in our operations and supply chain and prioritise our efforts in the right areas for the following year.

The assessment confirmed that cocoa, palm oil, hazelnuts, and sugarcane are top priorities from a potential human rights risk perspective. We continued to address risks in the cocoa supply chain via our Cocoa Life program and by working with industry coalitions. We used supplier engagement and industry partnerships to do so in the case of palm oil and hazelnuts. We also began to explore engagement opportunities in the sugarcane supply chain. For instance, we became members of Coalition for Responsible Sugarcane India (**CRSI**).

The risk assessment was completed with external expert support, following best practice methodology:

1. Map value chain footprint and identify relevant rights-holders;
2. Identify and develop understanding of potential risks across value chains, using international human rights indicators to determine risk levels based on country and sector across a comprehensive list of potential issues;
3. Prioritise key risks based on severity to people, and opportunities to address risks; and
4. Inform programs and activities to mitigate and monitor impact.

The 2024 risk assessment confirms the continued need to focus on shared salient risks across the food industry such as child labour, forced labour, working hours, living wage/income, health and safety, freedom of association and collective bargaining, land rights, women's rights, access to water and the impact of climate change. By listing certain risks as salient for

particular segments of the value chain, we do not discount the importance of addressing other risks and aim to help address all potential human rights risks wherever they may arise along the value chain. We continue to work to identify further opportunities to work both internally and with our suppliers to address potential risks that are shared across the food industry such as child labour, health and safety, freedom of association and collective bargaining, land rights, water and sanitation, and women's rights.

The findings also helped to further prioritise our tier 1 supplier HRDD program, highlighting risks including working hours, discrimination, health and safety, child and forced labour.

As part of our Supplier Relationship Management program, our local Procurement team monitors and manages key performance indicators each month or quarter, while our Strategic Sourcing team reviews general procurement strategy and upstream sourcing considerations with our suppliers on a yearly basis. These regular and ongoing interactions help create a culture of communication regarding various quality and commercial issues, of which modern slavery and human rights more broadly may be raised. For example, approximately 47 family-owned dairy farms supply the fresh milk that goes into our Australian-made Cadbury chocolate. We have a dairy supplier executive committee which aims to meet at least annually where we engage a representative group of farmers to obtain their feedback, share ideas and identify opportunities to enhance our dairy supply chain.

Finally, as a board member of the Consumer Goods Forum (**CGF**) we are strong supporters of the Priority Industry Principles against Forced Labor. As an active member of the CGF's Human Rights Coalition of Action, we work collaboratively with consumer goods manufacturing peers and retailers towards a common goal to help eradicate forced labour from the consumer goods sector's value chain. With this ultimate vision in mind, we helped co-create the coalition's Maturity Journey Framework for Human Rights Due Diligence (**HRDD**) Systems focused on Forced Labor. In addition, we also engage in pre-competitive collaboration across these topics with other peer manufacturers as a member of AIM-Progress. We use this framework to guide our efforts towards our goal to implement robust human rights due diligence across our own operations and supply chain by 2025. Some of our aims are:

- ~100% of our manufacturing sites complete a SMETA audit within the past three years;¹⁰
- ~100% of our prioritised supplier sites complete a SMETA audit within the past three years;¹¹ and
- ~100% of Cocoa Life communities in West Africa to be covered by a Child Labor Monitoring & Remediation System (**CLMRS**)¹² by 2025 (see further information in our 'Community Initiatives and Stakeholder Engagement' section).

¹⁰ 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.

¹¹ Prioritized 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 have received a risk score other than High Risk, or have not yet made audit results available to Mondelez International. Registration and Mondelez International visibility to applicable supplier sites on Sedex is the responsibility of and provided by suppliers.

¹² Reported information for the period from January 1, 2024 to December 31, 2024 includes a Cocoa Life community in Ghana, Côte d'Ivoire, Nigeria or Cameroon (which differs from prior years) as covered by CLMRS if child labour sensitisation has occurred in the community and one or more household(s) in the community were interviewed and at least seven CLMRS interviews were conducted in the community in total to identify children, if any, in or at risk of child labour, over the last 2 years (January 1, 2023 through December 31, 2024), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected by and provided to Mondelez International by third parties. Reported information is verified by an independent third-party and available in our ESG Reporting & Disclosure Reporting Archive.

Remedy and grievance mechanisms

Through its Speaking Up and Investigations Policy, Mondelēz Australia encourages and expects its employees to report concerns or questions regarding its Code of Conduct, including any related to human rights and modern slavery. We are also committed to non-retaliation, and 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 appropriately address potential human rights impacts. Webline is available in 35 languages, while HelpLine is offered in more than 150 languages. The two mechanisms are accessible anonymously and via a QR code included on all posters. Allegations related to potential human rights issues are handled with utmost urgency by the Compliance team. Upon receiving notice of an allegation, the Compliance team notify the People Lead for Australia with a formal investigation then conducted and reported up to the management team. If the allegation is considered substantial, it will be reviewed to understand the root cause and to implement further training and / or additional management actions to mitigate risks in the future.

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.

We continue to improve access to, and awareness of, the Integrity HelpLine and WebLine throughout our supply chains and operations, and seek to increase the use of the Integrity HelpLine and WebLine functions outside of the Mondelēz International business to adequately understand and implement controls to reduce modern slavery risks. While no complaints were received during this reporting period, if an actual instance of modern slavery were to be identified within our operations and supply chain, for example in relation to issues of alleged underpayment, Mondelēz Australia would establish a Special Situation Management Team and work with the parties concerned to identify the facts and enable a formal investigation to be undertaken. With the support of expertise and resources from Mondelēz International where required, the Special Situation Management Team would devise an immediate action plan to address the situation, as well as implement steps to mitigate and prevent any future recurrences.

Ongoing Monitoring and Compliance

We audit our manufacturing facilities' adherence both to our policies and using the [SMETA](#) protocol. SMETA is a social auditing methodology developed by Sedex. It enables businesses to assess their sites and suppliers to 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 address issues found. As of 2024, a SMETA audit was conducted across all Mondelēz Australia's owned sites within the past three years. With SMETA audits undertaken every three years, no sites were due for SMETA audits during the 2024 reporting period. At a group level, as of end of 2024, ~96%¹³ of our manufacturing sites and ~98%¹⁴ of our prioritised supplier sites had completed a SMETA audit within the past three years. 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](#) and 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 teams remain focused on our three-year cycle social audit program as we continue to address the challenges caused by the COVID-19 pandemic.

In 2024, we continued our Mondelēz Europe cross-border road freight initiative to better understand the risks truck drivers are exposed to. This involved a review of our present practices and driver facilities in our own plants and warehouses, as well as partnering with third-party experts to conduct a pilot assessment within our cross-border road transportation carriers' base. This assessment has served as a basis for ongoing engagement with our suppliers on how to improve HRDD throughout the cross-border transport value chain. To help prevent potential human rights risks we aim to help equip our suppliers to implement HRDD best practices. In 2024, the resources developed to help prevent child labour and tackle root causes were made available publicly.

To help embed best practice, our Global People Team continued to conduct quarterly Sedex capability workshops to address potential audit findings promptly and help prevent recurrence. These sessions helped colleagues to evolve their understanding of the SMETA audit protocol. Further, the Asia Pacific, Middle East and Africa (AMEA) Supply Chain People Team meet approximately quarterly to discuss the topic of 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](#).

Leveraging the results of the risk assessment, we defined a risk-based prioritisation of our business units and formalised a Human Rights Check-in process for higher-risk countries.

In 2023, we developed a beyond audit process which we successfully piloted in our Middle East, North Africa and Pakistan (**MENAP**) business. In 2024, we rolled out our Human Rights Check-Ins across our India and South East Asia (**SEA**) business units. Aiming to conduct a root

¹³ 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.

¹⁴ Prioritized 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.

cause analysis, this program seeks to identify potential human rights issues, and further embed a preventative approach. The program also seeks to highlight best practice, reducing the need for Sedex follow-up audits and driving meaningful dialogue at a regional and global level. This approach complements our SMETA audit program by building capability and embedding HRDD in local business unit's business as usual.

In 2024, we continued to build the capability of our people, building awareness and understanding of our global employee population to recognise, prevent and address forced labour.

As part of our expanded HRDD systems to cover our own warehousing operations, in 2024 a dedicated training was delivered for managers based at logistics sites. Additionally, in 2024, we introduced a new Social Assessment program for our third party logistics (**3PL**) Distribution Centres in Australia which was conducted by independent auditor Bureau Veritas and covered key human rights topics including governance, child and forced labour, freedom of association and collective bargaining, working hours and wages, employees' wellbeing and benefit, gender equality, inclusion and diversity, and health and safety (**Social Audit**).

Training

We have continued to roll out and uplift 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 the role that we all play in making sure that everyone is treated with care and integrity, was made mandatory in 2022 for our office based employees. In 2024, we rolled out Human Rights at Mondelēz training to core employees not otherwise covered by the online training application. By the end of 2024, approximately 99% of our office based workers in Australia had completed the training. This module is available through Workday (online) and is now completed by all new starters as part of their induction. General induction training is provided for all new employees and labour hire staff in relation to their employment rights, among other things (eg. workplace health and safety and our whistleblower program). All employees, contractors and visitors to our sites are required to complete induction training which includes workplace health and safety. We also adapted the training for induction for factory-based colleagues, delivering this in person and in close to thirty languages, and rolled it out in our snack factories in 2024. We will continue to roll out this human rights training program as part of our mandatory onboarding training to all of our employees worldwide.

We have also developed a plan to roll out training in relation to workplace behaviour and broader aspects of our code of conduct. A more bespoke training session was also delivered to our Human Resources People Leads on the SMETA audit methodology to further strengthen their understanding of the process, take corrective action where needed, and continuously improve our systems and practices.

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 undertaken to confirm participant understanding of the training in relation to all training modules.

Labour Hire and Operations Management

As outlined in the Description of Potential Risks section above, Mondelēz Australia acknowledges that labour hire presents an increased inherent risk of modern slavery which cuts across 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 through 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);
- conducting a business review with hiring agencies every quarter as an opportunity to scrutinise workers' working rights, ensure workers are paid correctly at or above minimum wage in accordance with relevant awards or agreements, and ensure 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 is committed to protecting workers who voice concerns and will ensure that all disclosures are handled in compliance with Mondelēz Australia procedure, and are treated confidentially.

With respect to our Australian operations, we also conduct an analysis of payroll impacting terms (ie, 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 payroll team and includes assessing existing and new pay rules with our technical consultant.

Responsible Payment Practices

Throughout 2024, 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 risk associated with labor in the cocoa and palm oil supply chains through its programs Cocoa Life and the Palm Oil Action Plan.

In our raw materials supply chain, our efforts have primarily focused on cocoa, wheat and palm oil because this is where we believe that we can make the biggest difference from an environmental and social perspective. Beyond these, we are embedding sustainability into our sourcing practices for other raw materials. We are seeking more transparency, raising expectations of our suppliers and seeking to catalyse sector-wide change. An example of our implementation of these values is through our supplier due diligence assessments.

Through this work, we are helping address cross-cutting themes such as good agricultural practices, deforestation, human rights (including labour rights such as forced and child labour), land rights, gender and environmental footprint.

Mondelēz Australia seeks to evaluate its suppliers holistically, not only based on price or value propositions, but also incorporating 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

In the cocoa supply chain, Mondelēz International helps 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 supply of more sustainable cocoa and establish an integrated approach striving to help tackle the root causes of systemic issues in cocoa including farm productivity, farmer livelihoods, community development, and helping combat child labour and deforestation, together in one program. More than ten years on, the program has reached critical scale with over 208,000 farmers in the program¹⁵ reflecting a \$1 billion investment from 2012 to 2030. 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 2024, approximately 100%¹⁶ of our cocoa volume requirements for our Australian made chocolate blocks, bars and seasonal products continued to be sourced more sustainably through our Cocoa Life Program.

Our External Advisory Council continues to provide strategic advice on the program direction, challenges us, functions as a sounding board on progress made and helps identify opportunities for innovative partnerships. The council is chaired by an external advisor. The chair will rotate between the external advisors.

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 partner 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.

We have continued to scale up our program creating tangible results in cocoa-growing communities. For example, by the end of 2024, approximately 178,000 farmers were trained on Good Agricultural Practices to help improve farm productivity and approximately 379,000 community members (men & women) were involved in additional income generating activities to help promote income diversification.¹⁷

As part of our incentives, we pay loyalty premiums to farmers organisations who then pass it

¹⁵ Reported information for the period from January 1, 2024 to December 31, 2024 covers Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years). This data is provided by third parties. Reported information is verified by an independent third-party and available in our ESG Reporting & Disclosure Reporting Archive.

¹⁶ Reported information for cocoa volume sourced is based on a mass balance approach, which means that the equivalent volume of cocoa needed for the products sold under our chocolate brands is sourced from the Cocoa Life program. Reported information for the period from January 1, 2024 to December 31, 2024 includes volumes from cocoa producing countries Brazil, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years). Excludes markets where Mondelēz International does not sell chocolate brands. Excludes organic certified consumer offers for Green & Black's. Reported information is verified by an independent third-party and available in our ESG Reporting & Disclosure Reporting Archive.

¹⁷ Reported information for the period from January 1, 2024 to December 31, 2024 covers Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

on to their members (these amounts are independently verified by Flocert). To help cocoa farmers plan ahead and understand purchasing expectations, Cocoa Life registered farmer organisations know in advance of the year the cocoa volumes that can be expected and premiums they will receive (again, these volumes and premiums are independently verified by Flocert). With select suppliers, we continue to work towards longer-term planning against premiums and volumes.

We also support Village Savings and Loans Associations (**VSLAs**), which we believe are key drivers of financial empowerment. In addition to helping strengthen community members' savings culture, financial literacy and management skills, VSLAs 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 2024, Cocoa Life had helped to establish about 6,200 VSLAs which serve approximately 411,000 community members.¹⁸ By the end of 2024, approximately 69% of community members participating in VSLAs were women.¹⁹

To help prevent and support children at risk of child labour, 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 identifying 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.

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, Mondelez 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 are partners in the multi-stakeholder initiative Child Learning and Education Facility (**CLEF**). Our partnership goal is to provide every child in the cocoa-growing regions of Côte d'Ivoire with access to quality education.

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. By 2025, we aim to have all Cocoa Life

¹⁸ Reported information for the period from January 1, 2024 to December 31, 2024 covers Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

¹⁹ Reported information for the period from January 1, 2024 to December 31, 2024 covers Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

communities in West Africa²⁰ covered by CLMRS. As of the end of 2024, we reached ~89%²¹ CLMRS coverage in Cocoa Life communities in West Africa. This progress reflects our long-standing efforts towards our objective of helping reduce child labour in the cocoa supply chain and we continue our efforts to enhance the quality of implementation of our CLMRS.

In the process of scaling CLMRS within communities in Cameroon, Côte d'Ivoire, Ghana, and Nigeria, we have continued to support community-centered activities that may include community sensitisation including, for example, raising child labour awareness and building community support. We have also set up and supported Community Child Protection Committees (Ghana and Côte d'Ivoire) as well as household monitoring to help identify child labour and help with remediation.

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 2024, we collaborated with our implementing partners to integrate ICI's recommendations to further enhance our CLMRS, including by setting a monitoring cycle for the communities with the goal that each community is monitored at least every other year. This aims to help accelerate remediation timelines and to further enhance follow-up visits for potential children identified in child labour situations.

Mondelēz International is also partnering with CARE International through a new initiative, the Opportunities for Entrepreneurship Pathways initiative, to unlock new profitable and viable business opportunities for VSLAs. To help maximize the long term impact in Cocoa Life communities and beyond, CARE International, with the support of Mondelēz International, will seek to mobilise multistakeholder collaborations with peers, suppliers, public and donor organisations. We began developing this model in Cocoa Life communities in Côte d'Ivoire and Ghana in 2024 and aim to broaden its reach over time in other cocoa-growing communities and markets.

In October 2022, we announced the next phase of the Cocoa Life program, backed by an additional \$600 million through 2030 for a total of \$1 billion investment since the start of the program, with the ambition to increase cocoa volume at scale. With this investment, Mondelēz International aims to catalyse ground-breaking sector collaboration to help address systemic

²⁰ Reported information for the period from January 1, 2024 to December 31, 2024 includes a Cocoa Life community in Ghana, Côte d'Ivoire, Nigeria or Cameroon (which differs from prior years) as covered by CLMRS if child labour sensitisation has occurred in the community and one or more household(s) in the community were interviewed and at least seven CLMRS interviews were conducted in the community in total to identify children, if any, in or at risk of child labour, over the last 2 years (January 1, 2023 through December 31, 2024), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected by and provided to Mondelēz International by third parties. Reported information is verified by an independent third-party and available in our ESG Reporting & Disclosure Reporting Archive.

²¹ Reported information for the period from January 1, 2024 to December 31, 2024 includes a Cocoa Life community in Ghana, Côte d'Ivoire, Nigeria or Cameroon (which differs from prior years) as covered by CLMRS if child labour sensitisation has occurred in the community and one or more household(s) in the community were interviewed and at least seven CLMRS interviews were conducted in the community in total to identify children, if any, in or at risk of child labour, over the last 2 years (January 1, 2023 through December 31, 2024), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected by and provided to Mondelēz International by third parties. Reported information is verified by an independent third-party and available in our ESG Reporting & Disclosure Reporting Archive.

environmental and human rights challenges and help improve cocoa farmer livelihoods. More specifically, Cocoa Life aims to help increase the number of farming households reaching a living income, enhance child protection systems and access to quality education in Cocoa Life communities, and help prevent deforestation on Cocoa Life farms globally.

Further information on our Cocoa Life program is available in our [Global Human Rights Due Diligence & Modern Slavery 2024 Report](#) and our [Snacking Made Right 2024 Report](#).

Palm Oil Action Plan

Research, including a [Fair Labor Association report](#), and [independent assessment](#) from Embode commissioned by Mondelēz International, have confirmed that forced labour is an issue affecting the Malaysian palm oil sector. We purchase less than ~0.5% of worldwide palm oil production and source it predominantly from Malaysia and Indonesia, and to a lesser degree from other countries. In 2024, we continued to achieve our goal of sourcing approximately 100% Roundtable on Sustainable Palm Oil (**RSPO**) palm oil (maintained since 2013).²²

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. Mondelēz International is committed to sourcing palm oil more sustainably and helping to eradicate deforestation and human rights violations in the palm oil sector and is collaborating with its suppliers and the CGF Forest Positive Coalition of Action and [Human Rights Coalition of Action](#) to help prevent deforestation and human rights violations in the palm oil supply chain.

Given the small proportion of the global palm oil supply that we purchase, our direct impact on the supply chain is limited. Therefore, consistent with the UNGPs, we seek to use our leverage by engaging with stakeholders to support the transition to more sustainable practices across the palm oil sector, as detailed in our [Palm Oil Action Plan](#). The plan requires that our suppliers respect the labour rights of all workers, including migrant workers, within both their own operations and through their supply chains. It also requires that they embed the CGF [Priority Industry Principles against Forced Labor](#) within their practices in their own operations as well as in their engagements with third-party suppliers. As of 2024, Mondelēz International has achieved the traceability of approximately 99%²³ of our palm oil to the mill, approximately 89%²⁴ traceable to plantation, and approximately 97%²⁵ traceable to forest monitored in our supply chain. Furthermore approximately 100% of the palm oil we buy was sourced from suppliers with policies aligned to the Palm Oil Action Plan²⁶. To support the mainstreaming of

²² 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.

²³ 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 Mondelēz International finished goods.

²⁴ 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 Mondelēz International finished goods.

²⁵ 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 Mondelēz International finished goods.

²⁶ This data is based on supplier provided information and utilizes estimation. It excludes palm oil purchased in

robust due diligence practices in the palm oil sector, we have joined forces with peers and retailers in the CGF's [People Positive Palm Project](#). The project aims to foster collective action and advocacy on key issues faced by the sector – including a focus on understanding, addressing, and preventing recruitment fees – with the support of the Fair Labor Association (**FLA**) and the International Organization for Migration (**IOM**). In 2024 the P3 Project ran two training sessions for Malaysian suppliers, as well as training ~40 private recruitment agencies to help build capacity to prevent forced labour risks and equip suppliers and recruitment agencies with responsible recruitment best practices. In 2024, we attended an in-person event in Malaysia hosted by the CGF in partnership with other lead organizations, to engage with political stakeholders to discuss safe and efficient recruitment processes for migrant workers. Further information on our Palm Oil Action Plan is available in our Global Human Rights Due Diligence & Modern Slavery 2024 Report and our Snacking Made Right 2024 Report.

Hazelnut supply chain

Most of the world's hazelnut production occurs in Türkiye. To help address potential risks of forced and child labour in our hazelnut supply chain, we continued to collaborate with a key hazelnut supplier in a sustainable sourcing program aimed at helping tackle social issues in hazelnut agriculture in Türkiye. The program aims to create better living and working conditions for migrant workers, remove children from farms, empower women, map and register labor contractors, and improve recruitment practices. 2024 saw the establishment of a dedicated hazelnut platform within the Association of Chocolate, Biscuit and Confectionery Industries of Europe (**CAOBISCO**). The platform will aim to improve Turkish suppliers' Human Rights and Environmental Due Diligence (**HREDD**) management systems and to increase engagement with stakeholders on the responsible sourcing of hazelnuts. In 2024, the initiative also provided over ~1,200 children with educational services and other cultural activities, including English classes and lessons on children's rights.

Further information on our hazelnut supply chain is available in our Global Human Rights Due Diligence & Modern Slavery 2024 Report and our Snacking Made Right 2024 Report.

Sugarcane supply chain

We have identified sugarcane as one of the top priorities for Mondelēz International from a potential human rights risk perspective. In 2024, we initiated work to develop a more comprehensive HRDD approach for our sugarcane supply chain. This initiative complements our existing global due diligence efforts, with implementation expected to kick-off in 2025.

In December 2024, we joined the Coalition for Responsible Sugarcane India (**CSRI**), a new initiative aiming to bring together brands, civil society and relevant sugarcane stakeholders to embed sustainable practices and respect for human rights across the sugar value chain in India. CSRI's mission is to drive systemic change through dialogue and evidence-based actions.

Other initiatives

We recognise that rising inequalities and poverty are underlying drivers of other potential human rights risks. To play our part and help address these systemic issues, in addition to our continuing work (as outlined in previous statements), Mondelēz International's two key focuses through 2023 and onward are the ongoing goals of: (1) working with our suppliers with the

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.

ambition of having all our strategic suppliers engaged on a living wage roadmap by 2030; and (2) enhancing our human rights due diligence, in line with the increasing global recognition of this issue, where our ambition is to implement robust, risk-based human rights due diligence across our value chain.

In 2023, Mondelēz International became co-chair of the CGF as well as of the [Human Rights Coalition of Action](#) within the CGF. The coalition is dedicated to working to end forced labour in the consumer goods industry and will drive individual member company and collective action towards the implementation of the Priority Industry Principles into members' supply chains. As part of our continued membership of the Human Rights Coalition of Action within the CGF, in 2021 we joined the [Human Rights Due Diligence Project](#). This project is key in supporting our ambition towards implementing robust and future proofed human right due diligence systems across our own operations.

As Co-Chair of the CGF Human Rights Coalition, in 2024 we partnered with other food manufacturers and retailers through CGF and AIM Progress to help develop the Converged Human Rights tool and guidance, with support from experts at the Fair Labor Association and Proforest.

Building on our ongoing commitment to pay our employees a living wage in our recent Human Rights Policy, we continued our active involvement in the [Sustainable Trade Initiative \(IDH\) Living Wage roadmap](#) to help advance living wage and income in global supply chains, and we are also working with peers in the AIM-PROGRESS Living Wage working group where we supported the release of the Living Wage Playbook for the Fast-Moving Consumer Goods Sector. We will work with our suppliers with the goal of having all our strategic suppliers engaged on a living wage roadmap by 2030.

In 2024, as part of our efforts to mainstream living wage in the value chain, we became launch partners of WageMap, a new initiative to drive alignment across living wage methodologies and frameworks. Mondelēz International is supporting efforts to establish a transparent living wage reference standard across geographies.

Furthermore, we partnered with the Fair Wage Network to benefit from their global database of living wage benchmarks. We used a risk-based approach to complete a detailed benchmark analysis of pay and benefits of our direct employees around the world, using data from Fair Wage's typical family size methodology, in line with best practice and [IDH's criteria](#). We are embedding living wage into our ongoing compensation process and extending our approach to understand challenges with agency labour in our facilities.

We continue to encourage our sourcing and procurement colleagues to identify and include diverse suppliers and service providers in our procurement process, as part of our Economic Inclusion and Supplier Diversity (**EISD**) Commitment Program, which was introduced in 2020. The EISD Program helps diverse suppliers enhance their offerings, reach and capabilities through joint development and performance improvement programs.

We also recently released our global [Human Rights Due Diligence & Modern Slavery Report for 2024](#), 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 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 2024 ESG report, '[Snacking Made Right](#)', which covers broader environmental and governance

issues. Further information about our efforts to ensure sustainable sourcing is available in these reports.

5. Assessment of the effectiveness of actions

We assess the effectiveness of our actions through analysis of:

- compulsory training on our Code of Conduct;
- commenced Human Rights training module with 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 Sedex Members Ethical Trade Audit (SMETA) protocol;
- adherence to our Corporate Responsibility Expectations outlined 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 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
- introduction of the Social Audit.

We continually evaluate and review how best to strengthen our approach to addressing human rights, including modern slavery. We believe that working through external and industry initiatives, with governments and non-government organisations (for example, the [Ai Group](#) for Mondelēz Australia), suppliers, and other businesses, is often the best way to address shared and systemic challenges. As noted in our Human Rights Policy, we will track and publicly report on our progress in this area on an annual basis.

6. Consultation

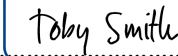
In the course of preparing this report, Mondelēz Australia has consulted with representatives of its local and regional Procurement, Human Resources, Legal and Corporate Affairs teams, Mondelēz International's Global Impact and Social Sustainability team, as well as owned and controlled entities and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

Mondelēz Australia's local Procurement Operations and Global Procurement teams have day-to-day accountability for responsible sourcing issues and human rights reporting and compliance requirements. The Mondelēz International Impact team regularly consults with cross-functional experts representing 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.

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 22 June 2025

DocuSigned by:

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Toby Smith

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

23 June 2025

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 OUR ESG GOALS

Information about our ESG goals, unless otherwise stated, (i) covers the annual reporting period from January 1 to December 31 of the stated year, (ii) includes manufacturing facilities under our direct and indirect control, (iii) excludes acquisitions since 2018 (other than the Gourmet Food acquisition in Australia), (iv) excludes Venezuela, and (v) excludes 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 revenue (excluding acquisitions since 2018 unless stated otherwise) except Venezuela, 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 (excluding acquisitions since 2018 unless stated otherwise); unless stated otherwise, data for external manufacturing includes estimates. Due to rounding, numbers presented in this report may not add up precisely to the totals provided and percentages may not reflect the absolute figures. Although the numbers presented in this report for this year's performance are rounded, some of the prior years' numbers were not rounded. Estimation is used in the reporting of some ESG data points, e.g., external manufacturing. As used in this Report, parentheses represent negative numbers. A negative number indicates a reduction when reported in connection with a reduction goal. The development of ESG 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 and uncertainties that we may not be able to predict or assess. In some cases, we may determine to adjust our commitments or goals or establish new ones to reflect changes in our business, operations or plans.

FORWARD-LOOKING STATEMENTS

This report 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," "potential," "commitment," "outlook," "continue," "strive," "ambition" or any other similar words. 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, many of which are beyond our control. 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 report, except as required by applicable law or regulation. The information included in, and any issues identified as material for purposes of, this report 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.

ESG REPORTING

We discuss our ESG goals and programs in detail in our annual Snacking Made Right reports available on our website. We provide an ESG data sheet 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.