

# Human Rights Disclosure 2023

May 2024

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

**United Kingdom Modern Slavery Act**

**Australia Modern Slavery Act**

**Norway Transparency Act**

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

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

# Table of Contents

<b>1. Introduction to Our Business</b>	<b>1</b>
<b>2. Scope of Disclosure</b>	<b>3</b>
<b>3. Policies and Governance</b>	<b>4</b>
<b>4. Risk Assessment and Salient Issues</b>	<b>5</b>
<b>5. Taking Action</b>	<b>6</b>
5.1 Responsible Workplace Program: Our Own Operations	6
5.2 Next Generation Supplier Program: Tier-One Suppliers	7
5.3 Sustainable Sourcing: Extended Supply Chains	8
5.4 Training	9
<b>6. Tracking Performance and Effectiveness</b>	<b>10</b>
<b>7. Communicating Performance</b>	<b>11</b>
<b>8. Grievance, Issue Reporting, Remedy</b>	<b>12</b>
<b>9. Norwegian Transparency Act Disclosure</b>	<b>13</b>
<b>10. Conclusion</b>	<b>16</b>

# 1. Introduction to Our Business

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

Mars, Incorporated is a privately-held, family-owned company with a portfolio of confectionery, food and pet care products and services. For more than 100 years, we have sought to bring our Five Principles of Quality, Responsibility, Mutuality, Efficiency, and Freedom to life every day, seeking to create enduring opportunities and benefits for our stakeholders. We are proud to employ 150,000 Associates in more than 75 countries and to support additional businesses and jobs throughout our value chain. Some components of our global supply chains include agricultural commodities, services and labor, and for our Mars Vet Health Business, medicines. Read more about our global business structures [here](#).

## **In the United Kingdom:**

Our covered entities in the UK include Mars Wrigley Confectionery UK Ltd., Mars Petcare UK, Mars Food UK Ltd., Crown Pet Foods Ltd., and Linnaeus Veterinary Ltd. Together, our covered entities employ more than 9,200 Associates in seven factories and in offices including a regional headquarters for Mars Wrigley in

Paddington, the global headquarters for Mars Food & Nutrition (also in Paddington), and the Waltham Petcare Science Institute. Our growing veterinary business, Linnaeus, has over 180 sites across the UK and Ireland.

## **In Australia:**

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

## **In Canada:**

In Canada, our covered entities include Mars Canada—which is comprised of Mars Wrigley, Pet Nutrition, and Food & Nutrition—and Royal Canin Canada. Both are indirect subsidiaries of Mars, Incorporated that are incorporated in Canada. Together, our covered entities employ nearly 1,500 Associates in three offices and four factories in Ontario: in Bolton, Newmarket, and Guelph. Our covered entities produce and sell products such as Maltesers®, MARS®, BEN'S ORIGINAL™, PEDIGREE®, WHISKAS®, IAMSTM, and Royal Canin brand pet foods. Our supply chains include significant spend on a variety of semi-processed agricultural products and finished goods, with the majority sourced from Canada and the US.

## **In Norway:**

Our covered businesses in Norway have offices in Oslo and employ more than 800 Associates across the country. Mars Norge AS imports and distributes the group's products in Norway across the Mars Wrigley, Mars Petcare, and Mars Food & Nutrition portfolios. Royal Canin Norge AS imports and sells our Royal Canin portfolio through pet stores, veterinarians, and directly to breeders. We also take care of Norway's pets through our AniCura veterinary care services business, which provides veterinary care services to companion animals through approximately 40 clinics across the country.

## **In Switzerland:**

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

# 2. Scope of Disclosure

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

**This report responds to the following legislation:**

**Australia Modern Slavery Act**

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

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

**Norway Transparency Act**

**United Kingdom Modern Slavery Act**

Our approach to understanding and addressing human rights risks, as outlined throughout this disclosure, is based on our global policies and frameworks for owned operations, supplier sites, and the extended supply chains of our business segments and divisions.

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

different stages of program rollout regarding the elements discussed below.

This disclosure represents our eighth Modern Slavery statement in compliance with the UK Modern Slavery Act of 2015, and our fourth disclosure in compliance with Australia's Modern Slavery Act of 2018. This disclosure constitutes our second disclosure to comply with the Norwegian Transparency Act of 2022 and our first to comply with the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act, which took effect in 2023.

## **Swiss disclosure obligations pursuant to the CO and the DDTrO:**

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

# 3. Policies and Governance

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

A dedicated global human rights team, working with our ethics & compliance team, establishes our [human rights policy](#), strategies, and programs and provides guidance to colleagues around the world.

To govern the global application and implementation of our policies, our Human Rights Steering Committee meets regularly to review our progress, challenges, and opportunities. Our Board of Directors is periodically updated on our human rights plans and performance, and the Boards of our businesses covered by human rights due diligence laws are updated regarding our human rights approach and programming.

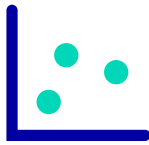
Our [Human Rights Policy](#) articulates our commitment to respect human rights across our value chain. Our [Supplier Code of Conduct](#) describes the human rights standards we expect our Tier-One suppliers to uphold, including on child labor, forced labor and modern slavery. The Code prohibits the use of all forms of forced

labor, including any form of prison, trafficked, indentured, or bonded labor, and states the expectation that it will apply where it establishes a higher standard than required by applicable law. Our Responsible Workplace Standard details our human rights standards and expectations for our own workplaces, including prohibitions on forced and child labor.

These policies and others, and our approach to implementation, are aligned with frameworks laid out in the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and the ILO-IOE Tool, and draw on the ILO's 1998 Declaration on Fundamental Principles and Rights at Work.

# 4. Risk Assessment and Salient Issues

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



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

We work with partners, such as Verité and Verisk Maplecroft, to assess human rights risk at the country and regional levels, as well as by material.

We also use publicly available data from sources such as the US Department of Labor, United Nations Development Programme, ILO, public media and civil society reports. Our assessment process includes identifying unique regional and sectoral risks, such as the significant migrant labor workforce in the Middle East and Southeast Asia, with a focus on our salient issues, including forced labor and child labor.

Based on specific risks identified, our global human rights team advises and supports colleagues across the business on additional layers of risk assessment. Often implemented

with independent human rights experts, this may include further desk research, validated self-assessment questionnaires, audits, and human rights risk assessments at specific sites and supply sheds.

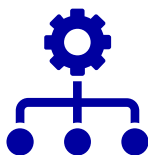
Our risk assessment process may include service providers, such as storage and handling, logistics, labor providers, and external manufacturing, in addition to our suppliers of goods and materials. This work helps us identify actual or potential risks that our business may cause, to which it may contribute, or to which it is directly linked through our supply chain or business partners.

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



# 5. Taking Action

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



## 5.1 Responsible Workplace Program: Our Own Operations

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

We routinely evaluate our factories. To identify human rights risks and impacts at specific locations, we take a risk-based approach to prioritize our assessment schedules. We engage independent auditors, expert in labor issues, to assess our workplace human rights performance against local laws and

the Mars Responsible Workplace Standard. We work with our sites to address non-compliances that are identified.

Responsible Workplace assessments include a focus on service providers and contingent labor at our sites, given this group of workers is often more vulnerable to risks. In certain key countries with known forced labor risks associated with labor sourcing, we are including contractual terms with labor providers to include specific guidance on recruitment fees, access to personal documents and other foundational elements of our Supplier Code of Conduct.



## 5.2 Next Generation Supplier Program: Tier-One Suppliers

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



### Align

Our Next Generation Supplier program is founded on our Supplier Code of Conduct, described in Section 3. Our Supplier Code of Conduct is part of our standard contractual terms. It establishes an expectation that suppliers apply our Supplier Code of Conduct to sub-contractors and cascade its contents down the supply chain.

We recognize that suppliers may need additional direction on how to implement our **Supplier Code of Conduct** in their workplaces. Our Supplier Code of Conduct Guidebook provides guidance for suppliers, including good practice examples for developing management systems to identify, remediate and prevent forced labor, child labor, and other human rights risks. For instance, it includes a section on child labor due diligence that references the ILO-IOE Child Labour Guidance Tool for Business.



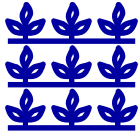
### Assess

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



### Advance

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



## 5.3 Sustainable Sourcing: Extended Supply Chains

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

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

other supply chains we rely on as a business, to identify how we can best drive change.

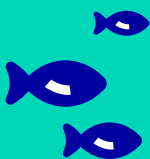
Our programs target human rights risks such as poverty, child labor, forced labor, and health and safety, as applicable. These initiatives are multi-year efforts, as expert third parties build the capacity of prioritized suppliers to understand and address issues in their supply sheds. We use our leverage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

### Selected Sustainable Sourcing Program examples include:



#### Cocoa

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



#### Fish

Our fish human rights program focuses on risks of forced labor and health and safety in factories and on vessels in our Thai fish supply chain. Key elements of our fish human rights program, focused on our Thai fish supply chain, include: 1) supporting third party experts to work with suppliers to address root cause issues and improve human rights management systems, including building capacity on responsible recruitment; 2) partnering with civil society organizations to test different approaches to remediation and worker voice; and 3) engaging with key industry groups to level the playing field on responsible recruitment practices.



## Mint

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



## Palm Oil

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



## Sugarcane

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



## 5.4 Training

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

legal team also received voluntary human rights training that included child and forced labor topics this year.

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

# 6. Tracking Performance and Effectiveness

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

We track progress made on issues identified in our own workplaces. We also measure the impact of Supplier Advance programs through changes in worker voice surveys conducted by a third party, supplier-reported perspectives, and changes in EcoVadis scores. Our programs in extended supply chains also incorporate worker voice surveys. We are finalizing updated metrics, tracking, and evaluation systems to better measure effectiveness.

# 7. Communicating Performance

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

In addition to this statement, we annually publish our Cocoa for Generations report, which includes a substantial focus on child labor risks and how we aim to address them. Our annual Sustainable in a Generation report provides public information about our progress across a range of sustainability issues. We also provide periodic updates on programs focused on particular commodities on our website.

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

These include:

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

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

# 8. Grievance, Issue Reporting, Remedy

## We integrate grievance and issue reporting into our work.

In our own operations, we seek to ensure that all Associates in Mars workplaces are aware of and have access to our accredited [Ombudsman program](#) (including a toll-free hotline and online portal) to report any workplace issue. Our Ethics & Compliance hotline also offers a way for Associates to anonymously and confidentially report concerns. We expect our labor and service providers at our sites to have their own grievance mechanisms, but they can also contact us through our Ethics & Compliance hotline.

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

We seek to provide or support the provision of remedy consistent with the UNGPs when we cause or contribute to an adverse human rights impact, often through the programs discussed in Section 5 above. We have not identified instances of forced or child labor in our employee workforce. Therefore, we have not taken steps to remediate loss of income in such circumstances.

When indicators of forced labor are found among our suppliers, we use our leverage to influence our suppliers to remediate the issues, and also encourage our suppliers to engage third party experts who can assist in remediation and fixing root causes. Similarly, when allegations or indications of child labor arise among our suppliers, we use our leverage to influence suppliers to remediate them. We are not aware of loss of income resulting from supplier remediation efforts, and therefore have not taken steps or required our suppliers to take steps to remediate loss of income.

This year, along with other brands, we worked with AIM-Progress and Verité to develop online training for suppliers on identifying and addressing situations of child labor and forced labor. The training covers the basic elements of an effective forced labor remediation protocol, and the management systems and due diligence necessary to provide holistic remedy. Some relevant Mars Associates also took the training.

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

# 9. Norwegian Transparency Act Disclosure

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

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

Royal Canin Norge AS is part of the Royal Canin Nordics Cluster, employing around 20 Associates, and is located in the Mars Norge AS office in Oslo, with headquarters in Copenhagen, Denmark. Royal Canin Norge imports and sells our Royal Canin portfolio through pet stores, veterinarians and directly to breeders.

We also take care of Norway's pets through our AniCura veterinary care services business. AniCura is headquartered in Stockholm, Sweden. In Norway, the banner operates through the legal entity AniCura Holding AS (subsidiary of AniCura AB, Sweden) which is covered by the law, and its subsidiaries. AniCura Norway has its office in Oslo, Norway, and employs in aggregate over 750 Associates

across Norway. The business provides veterinary care services to companion animals in Norway through approximately 40 clinics distributed from the southernmost city of Mandal all the way to Tromsø in the North. The major referral clinics also provide specialist care and educational activities for veterinarians and veterinary nurses.

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

To align our Norwegian businesses with our global approach, the Norwegian leadership teams of each business have been briefed on our global human rights due diligence systems and how they apply to their businesses after the Transparency Act came into place. The CEO and Board of each covered business unit sign the report.

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



## **Notification and Grievances:**

We have several mechanisms to become aware of any concerns related to our Norwegian businesses. To report any issues, our Norwegian business can use our Ethics & Compliance hotline or Ombudsman line (Section 8). We included our Ethics & Compliance hotline on our Norwegian business websites so that the public can access it and submit any questions they may have about our human rights impacts, consistent with the Right to Information in the Norwegian Transparency Act, and also have alerted our consumer affairs lead for Norway so that they are aware of how to direct any questions from the public.

## **Due Diligence Processes:**

As described in Section 4, we carry out a saliency exercise to define the most severe human rights risks to people in our global businesses, and then use additional risk screens focused on country and material to target our assessment tools and remediation efforts. Our risk analysis includes both our suppliers of goods and materials and service providers, such as storage and handling, logistics, labor providers, and external manufacturing, as noted in Section 4. Our Responsible Workplace program enables us to assess and remediate human rights risk in our own sites and includes our labor and service providers (described in Section 5.1). We are deepening our engagement with labor and service providers, where we see the most challenges to respect for labor rights in our operations.

For Tier-One suppliers operating in high-risk locations and sectors, we use EcoVadis, an online validation platform (Section 5.2). We then ask suppliers with low scores to improve their management systems based on the improvement areas identified and the corrective actions plans generated in their EcoVadis scorecards. Certain high risk, strategic suppliers participate in Supplier Advance, a program where third party experts assess these suppliers and build their capacity to address challenging human rights issues. More information on Supplier Advance can be found in Section 5.2.

Our Sustainable Sourcing programs target human rights risks, such as poverty, child labor, forced labor, and health and safety, in certain supply sheds at the ends of our supply chains (Section 5.3). These are multi-year efforts, as expert third parties build the capacity of prioritized suppliers to understand and address issues in their supply sheds. We have active programs in cocoa, mint, palm, sugarcane, fish, and other raw materials intended to positively impact the lives of vulnerable people.

## **Results of Due Diligence Assessments:**

We have identified actual negative consequences and risks of significant issues in our own operations, Tier-One supplier base, and extended supply chains. These include our salient issues, described in Sections 4 and 5.3, although we also find a range of other labor-related challenges across our supply chain.

## **Remedy of Issues Identified:**

We remedy issues through multiple mechanisms and approaches depending on issue type and location in our supply chain. Our Responsible Workplace program helps us address issues in our own workplaces, and we track the progress that our sites make. We provide training to our Associates and certain suppliers (Sections 5.2 and 5.4). We ask suppliers with low EcoVadis scores to improve their management systems based on the improvement areas identified and the corrective actions plans generated in their EcoVadis scorecards. We use our leverage to influence suppliers to remediate issues, and our Supplier Advance and Sustainable Sourcing programs provide third party coaching to enable certain suppliers to address human rights challenges in factories and origin supply sheds.

Section 8 outlines industry and multi-stakeholder collaborations that seek to address complex human rights issues.

## **AniCura Norway**

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

### **Due Diligence Processes:**

We started by assessing risk through two exercises. First, we included AniCura in our global human rights saliency exercise (Section 4), with one issue identified as particularly relevant to AniCura Norway: mental and physical health and safety. Second, we carried out an initial assessment of the human rights impact of the business's procurement practices ("procurement assessment"). We believe it was the first of its kind for this sector. In 2023, we developed additional human rights risk assessment tools for our AniCura business's suppliers that we are starting to roll out.

AniCura's areas of procurement include medicine and medical equipment. To deepen our understanding of the sector, in 2023, we devised a questionnaire for some of our top suppliers to better grasp their impacts. We also piloted our Responsible Workplace program in our AniCura clinics in Norway.

## **Results of Due Diligence**

### **Assessments:**

Our global saliency exercise identified one of our top five human rights issues referred to in Section 4 as being of particular relevance to AniCura Norway: mental and physical health and safety. Our Responsible Workplace assessments for AniCura in Norway helped identify where we need to strengthen our health and safety management systems. In addition, we will monitor the working conditions of service providers who are staffed in clinics in Norway.

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

### **Remedy of Issues Identified:**

Although AniCura continues to refine its approach as a newer Mars business, we have taken action based on available data and our understanding of human rights challenges facing the veterinary health sector in Norway as a whole. In addition to implementing health and safety measures in our clinics, we have also rolled out our Associate Assistance Program, a free, confidential counselling service on a range of personal and work-related issues, in order to support AniCura Associates' mental and physical health and safety. AniCura Associates also have access to our mental and physical health and safety program and series of resources (MVH4You). Our Norway sites will take steps to address issues identified in our Responsible Workplace assessments over the coming year.

# 10. Conclusion

This statement constitutes the modern slavery and human trafficking statement for the financial year ending December 31, 2023, of Mars, Incorporated and all its applicable subsidiaries which fall within the scope of section 54(2) of the UK Modern Slavery Act 2015, including Mars Wrigley Confectionery UK Limited, Mars Petcare UK and Mars Food UK Limited, Crown Pet Foods Limited and Linnaeus Veterinary Limited. The statement was approved by the boards of directors of its relevant UK subsidiaries, pursuant to section 54(2), in May 2024.

This statement constitutes the modern slavery statement for the financial year ending December 31, 2023, of Mars, Incorporated and its applicable subsidiaries which fall within the Australian Commonwealth Modern Slavery Act of 2018, including Mars Wrigley Australia Holdings Pty Ltd and Royal Canin Australia Pty Ltd (the “reporting entities”). It was approved by the boards of directors of its relevant reporting entities in May 2024.

This statement constitutes the report for the financial year ending December 31, 2023, for Mars Norge AS, Royal Canin Norge AS, and AniCura AS, which fall within the Norwegian Transparency Act. The report was signed by the boards of directors and CEO of each Norwegian reporting entity in May 2024.

This statement constitutes the report for the financial year ending December 31, 2023, for Mars Schweiz AG, which falls within Art. 964j-Art. 964l of the Swiss Code of Obligations (CO) and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labor (DDTrO). This report was signed by the board of directors of Mars Schweiz AG in May 2024.

This statement constitutes the report for the financial year ending December 31, 2023, for Mars Canada Inc. and Royal Canin Canada Company, which fall within the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. The report was approved pursuant to paragraph 4(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, by the boards of directors of each reporting entity in May 2024.

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



**Poul Weihrauch**  
Chief Executive Officer  
Office of the President  
Mars, Incorporated  
May 2024

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

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

# Canada Attestation

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

Mars, Canada, Inc.



**Ellen Thompson**

General Manager, Mars Wrigley Canada

May 16, 2024

Mars Canada, Inc.



**Robert Lunin**

General Manager, Royal Canin Canada

May 17, 2024

