



Australian Modern Slavery Statement 2024

For the Reporting Period:
1 January 2023 to 31 December 2023



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 billion in 2023. 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. Included in the acquisition was Gourmet Food's pre-packaged seafood business, MaxFoods Pty Ltd, including the Ocean Blue brand, however MaxFoods Pty Ltd was subsequently sold on 1 November 2021.

Gourmet Food was integrated with the Mondelēz Australia policies and processes in June 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 2023 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 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. Mondelez 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, HSE, Payroll, Customer Service, Logistics, Warehousing, Demand & Supply, Corporate & Government Affairs, Risk, Engineering, R&D, 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 seven manufacturing plants, one located in each of Suttontown in South Australia, Burnie and Claremont in Tasmania, and Ringwood, Scoresby, Dandenong and Croydon 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 seven manufacturing sites. For distribution and warehousing, Mondelēz Australia primarily uses one owned, two leased and four 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 2,400 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 700 Australian businesses, and many local Australian suppliers provide ingredients and materials for use in Mondelēz Australia's products, such as fresh milk, sugar, carton board, corrugated cardboard and various plastics. For example, approximately 11% of Tasmania's total milk supply is purchased for Mondelēz Australia's manufacturing needs, while approximately 100% of the sugar in Mondelēz Australia's locally-made chocolate comes from sugarcane from Queensland and New South Wales farmers. In 2023, a spend review was conducted and it was determined that approximately 60% of Mondelez 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, the Netherlands, Singapore, Türkiye, Malaysia, China, India, USA, the Philippines and Indonesia. 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 framework 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):

- **Cause** – the risk that the operations of a business may result directly in modern slavery practices.
- **Contribute** – the risk that the operations and/or actions of a business in its supply chain may contribute to modern slavery practices, for example facilitating or incentivising modern slavery through its purchasing practices or decisions.

- **Direct linkage** – the risk that the operations or products of a business may be connected to modern slavery practices through its business partners and other participants in its supply chain.

As discussed in more detail below, our Corporate Responsibility Guidelines and Code of Conduct guide us as we strive to uphold the UNGPs and ensure that human rights are respected 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 2023 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. We did not detect any modern slavery concerns within our labour hire workforce during the Reporting Period.

¹ See, for example, Commonwealth of Australia, 'Hidden in Plain Sight, Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia': https://parlinfo.aph.gov.au/parlInfo/download/committees/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.

Mondelēz Australia also acknowledges that 'hidden' instances of modern slavery can 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 our sourcing activities, as set out in 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 may have on suppliers, which may 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, Germany, New Zealand, USA, Thailand, India, the Philippines and Türkiye.

Gourmet Food's agricultural suppliers are primarily located in Australia, which is considered a low risk jurisdiction for modern slavery. However, we do recognise that there are potential modern slavery risks in the Australian agricultural sector, which is heavily reliant on contract labour and migrant and foreign workers.² Other international locations of Gourmet Food's agricultural suppliers include Germany, Spain, India, Türkiye, Bulgaria, Vietnam, USA, Morocco, South Africa, New Zealand, China, Thailand, Greece, France, the Netherlands, Albania, Austria, Hungary, and Poland. Of these locations, Türkiye, Bulgaria, Vietnam, China, India, Thailand, Greece, Albania, Hungary and Poland are identified in the Global Slavery Index as having a higher risk of modern slavery.³ High product risks exist for fruit and nuts from Türkiye and Vietnam. It has been reported that there are potential risks of child labour in the production of these products in those jurisdictions.⁴

² According to the recent Human Rights Law Centre report 'Paper Promises? Evaluating the early impact of Australia's Modern Slavery Act': see <https://www.hrlc.org.au/reports/2022/2/3/paper-promises-evaluating-the-early-impact-of-australias-modern-slavery-act>.

³ According to the Global Slavery Index.

⁴ USA Department of Labour report - [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#).

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:

- 2 of its top 20 suppliers source goods from moderate risk jurisdictions (USA and Thailand), among other jurisdictions;⁵
- 15 of its top 20 suppliers source goods from or provide services exclusively in lower risk jurisdictions (Australia, Germany and New Zealand);⁶ and
- 5 of its top 20 suppliers source from higher risk jurisdictions (Côte d'Ivoire, Türkiye, the Philippines and India), among other jurisdictions.⁷

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.⁸ Child labour is also identified in the Global Slavery Index as a specific risk factor for these countries.⁹

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

Indirect Inputs

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

⁵ 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.

⁶ 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.

⁷ 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.

⁸ See <https://www.globallslaveryindex.org/2018/findings/importing-risk/cocoa/> and the Global Slavery Index 2023 Report.

⁹ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.

Mondelēz Australia acknowledges that a large proportion of its spend is with suppliers in the cocoa, nuts, sugar (agriculture generally) and logistics and transport industries which have been linked to increased risks of modern slavery.¹⁰ 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 2023, 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 2023 assessment confirmed cocoa, palm oil, hazelnuts and sugarcane as 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, primarily from Europe.

In combining information on source country and sector/product risks, Mondelēz Australia is 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 from the Impact & Sustainability, Human Resources, 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 monthly 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

¹⁰ See, for example, Verite, 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains'.

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 bi-monthly to oversee and steer the four pillars of the company's sustainability strategy, including the social sustainability pillar. As part of this oversight role in 2023, the Sustainability Huddle covered topics including the implications of upcoming human rights due diligence legislation in the European Union, the evolving journey of our goal to implement robust human rights due diligence across our own operations and supply chain by 2025, and our progress against our 2021 commitment to incorporate living wage benchmarking as a key standard. 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.

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 issuing questionnaires which include our Sedex requirements to potential suppliers at the request for proposal (RFP) stage to help us ensure the suppliers are sourcing more ethically and responsibly, and ensuring these obligations are clear in our contracts with clear 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. In 2022, we developed Human Rights Policy One Pagers in over 30 languages to be posted for all our sites.

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

Given that the full integration of Gourmet Food did not occur until June 2023, the following policies applied to Gourmet Food for the first half of this reporting period. Our policies and commitments apply to Gourmet Food post June 2023.

Gourmet Food's Procurement Policy

This policy ties the corporate and social responsibility expectations of Gourmet Food Group to Mondelez International policies and standards. For example, suppliers may be required to submit a "Third Party Ethical Practices Audit" (Sedex Member Ethical Trade Audit – SMETA or similar) based on risk assessments conducted by Gourmet Food Group. Suppliers may also be required to disclose or provide updates in relation to modern slavery on an ongoing basis.

The Procurement Policy may also require Gourmet Food Group to complete a supplier due diligence process to evaluate suppliers and assess potential risk, including modern slavery risks.

Gourmet Food's Modern Slavery Policy

This policy outlines Gourmet Food's commitment to addressing potential modern slavery risks within its business and supplements its employment policies and standards. The policy outlines the ways in which Gourmet Food seeks to address modern slavery risks including, for example, conducting an annual assessment of its operations for modern slavery risks, undertaking supply chain due diligence to identify and address any modern slavery risks, and seeking to engage contractors and suppliers who uphold our commitments to address modern slavery risks.

Gourmet Food's Whistleblower Policy

This policy provides a grievance mechanism for third parties, including suppliers, their workers and labour hire contractors. The Whistleblower Policy outlines an example list of eligible disclosures including any criminal acts, which is broad enough to capture modern slavery related concerns. Potential indicators of modern slavery, whether past, current or future, may be reported in accordance with the policy, which also outlines how reports are handled, including investigation procedures and outcomes.

Due diligence

We undertake practical, proactive, 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 our business partners across our supply chain to achieve the same. 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](#)).

A Supply Chain Map has been developed for Mondelez 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 Mondelez Australia sites. This assists our ability to monitor the footprint of our supply chain against the Global Slavery Index.

Further, suppliers are required to complete a self-assessment questionnaire as part of the SMETA audit process which covers various aspects of social responsibility, including human rights. This questionnaire aims to evaluate suppliers' policies, procedures, and practices related to labour and human rights. Mondelez uses the information gathered from these assessments to identify potential risks and areas for improvement.

As part of our ongoing due diligence activities, we completed a comprehensive human rights risk assessment of our value chain in 2023. This included our own operations, our Tier 1 suppliers, and upstream ingredient supply chains including cocoa, dairy, hazelnuts, palm oil, soy, 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.

During 2023, based on the results of our 2022 assessment, our primary focus was cocoa, palm oil and hazelnuts, addressing risks in the cocoa supply chain via our Cocoa Life program and industry coalitions. We used supplier engagement and industry partnerships to do so in the case of palm oil and hazelnuts.

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 2023 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 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.

As part of our Supplier Relationship Management program, our local Procurement team monitor and manage key performance indicators each month or quarter, while our Strategic Sourcing team review 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 50 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 quarterly and 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. 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. Our goals for 2025 are:

- ~100% of our manufacturing sites complete a SMETA audit within the past three years;¹¹
- ~100% of our prioritised supplier sites complete a SMETA audit within the past three years;¹² and
- ~100% of Cocoa Life communities in West Africa to be covered by a Child Labor Monitoring & Remediation System (CLMRS)¹³ (see further information in our 'Community Initiatives and Stakeholder Engagement' section).

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. 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. Weblines 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.

¹¹ Excludes closed manufacturing sites. Reported information includes our manufacturing sites for developed market gum brands that were divested as of October 1, 2023.

¹² 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 Mondelēz International. Registration and Mondelēz International visibility to applicable supplier sites on Sedex is the responsibility of and provided by suppliers.

¹³ Reported information for the period from January 1, 2023 to December 31, 2023 includes a Cocoa Life community in Ghana, Côte d'Ivoire, or Nigeria as covered by CLMRS if one or more household(s) in the community were visited and interviewed to identify children, if any, in or at risk of child labour, at least once over the last 2 years (January 1, 2022 through December 31, 2023), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected and provided to Mondelēz International by third parties. An independent, third-party assurance process is underway, and any subsequent findings may result in changes to reported information if the underlying criteria, estimates, or available evidence change, as we continue to enhance our processes. Any updates, if needed, will be included in the ESG Datasheet.

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 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 Mondelez International business to adequately understand and implement controls to reduce modern slavery risks. In 2023, we explored additional ways of making grievance mechanisms available in ways that better align with local contexts. For example, we worked with Germany's Due Diligence Fund (DDF) to research the feasibility of a sector-wide grievance mechanism in the Ivorian cocoa supply chain. We also supported efforts led by the ICI to leverage grievance mechanisms to help address the risk of adult forced labour in the broader West African cocoa supply chain.

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, Mondelez 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 Mondelez 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. This process was also followed by our subsidiary Gourmet Food prior to its full integration with Mondelez Australia in June 2023.

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 (eg, forced labour, working hours and wages). Once an audit is complete the site or the supplier aim to define a Corrective Action Plan (CAPR) in collaboration with the auditor to address issues found. As of 2023, a SMETA audit was conducted across all Mondelez Australia's owned sites (including the Gourmet Food site) within the past three years. At a group level, as of end of 2023, ~91%¹⁴ of our manufacturing sites and ~90%¹⁵ 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

¹⁴ Excludes closed manufacturing sites. Reported information includes our manufacturing sites for developed market gum brands that were divested as of October 1, 2023.

¹⁵ 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.

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 a recently-launched initiative, we started to focus our efforts in Europe on cross-border road transportation, so that we could better understand the risks of modern slavery in our operations and prioritised suppliers, especially for truck drivers. 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. We will use what we learn to help further improve our systems and practices as we expand this work to other parts of the world.

To help embed best practice, our Global People Team conducted quarterly Sedex capability workshops to address potential audit findings promptly and help prevent recurrence. These sessions empowered 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.

Beyond our audit program, we continued to strengthen our human rights due diligence systems: building internal capability, embedding good practices within the relevant functions and local business units, and prioritising key risks. 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 and in 2023 the HRWG aligned on a list of countries to conduct Check-Ins Human Rights Working Group. This new due diligence step includes deeper engagement and capability building with senior cross-functional leaders (including the People, Procurement, and Manufacturing teams) to review potential risks flagged through SMETA audits as well as any other relevant emerging social risk in that given geography.

In 2023, we piloted Human Rights Business Unit Check-ins across our Middle East, North Africa and Pakistan (MENAP) business with the aim of conducting a root cause analysis to assess SMETA non-compliance, to hero best practices, reduce follow-up audits and drive meaningful dialogue at a regional and global level. This new approach compliments our audit program by building capacity and embedding human rights due diligence into the local Business Unit's business as usual. The pilot Check-in resulted in findings that both regional and global leadership can use to further enhance the rigor of our human rights due diligence systems. In 2024, we will leverage the learnings from the MENAP pilot to refine our human rights due diligence efforts.

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 and during 2023 approximately 100% of our office-based employees in Australia had completed it.

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. In 2023, we continued to build the capability of our people by incorporating human rights training into our mandatory onboarding training for new employees, who can access it online. We also adapted the training for induction for factory-based colleagues, delivering this in person and in close to thirty languages, and will start rolling 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;
- 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; and
- endeavouring to maintain communication with its labour hire providers to understand any current and emerging modern slavery risks. Mondelēz Australia regularly has an account

manager on site at its Croydon facility (which has a high level of labour hire staff), as well as occasional site visits at its other operating facilities.

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 2023, Mondelez continued to be a signatory to the Australian Supplier Code, committing to paying small businesses within 30 days.

Community Initiatives and Stakeholder Engagement

The following paragraphs outline the actions Mondelez International is undertaking under our 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 addressing 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, Mondelez International addresses human rights risks through its signature cocoa sustainability sourcing program - Cocoa Life. As the supply of cocoa was hindered in 2023 largely due to weather, with lower production causing a rise in the price of this important input, we have continued our focus on our cocoa sourcing program to support our goal of a thriving and equitable cocoa sector that collaborates to combat interrelated system issues. In 2023, we expanded the Cocoa Life team and dedicated more resources to the program as we work to scale. For example, in Cameroon and Ecuador, which joined Cocoa Life in 2023, we started by working with partners to conduct local needs assessments and define core activities to support cocoa communities while we are rolling out on-farm support to farmers.

Cocoa Life – about the initiative

Mondelēz International introduced Cocoa Life in 2012 to secure supply of more sustainable cocoa and establish an integrated approach striving to 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. Ten years on, the program has reached critical scale with over 243,000 farmers in the program¹⁶ and \$400 million invested by the end of 2022 with an additional \$600 million to be invested by 2030. Cocoa Life's integrated approach is designed to promote the human rights of smallholder farmers, as well as the social and economic resilience of cocoa farming communities. When a new community joins the program, our NGO partners conduct a thorough participatory needs assessment on focus areas including labour risks such as forced and child labour. Based on this assessment and with support from our partners, community members develop a Community Action Plan, which provides a detailed roadmap for community activation. Based on this plan, and as part of the program's holistic approach, our partners then implement a range of activities that address the issues identified.

Our Cocoa Life program's holistic approach addresses the root causes of child labour through interventions to increase income, empower communities to advocate for their development, and the empowerment of women at household and community level through the Women's Empowerment Action Plans. These action plans empower women to run more successful farms, take a more active role in community decision making, be able to give their children a quality education, make cocoa farming more attractive for young people, become more entrepreneurial, and protect their natural environment.

Cocoa Life – key updates and progress made

At the end of 2023, approximately 100%¹⁷ of our cocoa volume requirements for our Australian made chocolate blocks, bars and seasonal products was sourced more sustainably through our Cocoa Life Program.

In 2023, we also launched our new External Advisory Council which provides 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 will be completed with additional advisors joining during 2024. The chair of the Council will rotate between the external advisors.

Since 2016, Cocoa Life has partnered with Fairtrade to support farmers and farmer organisations in Ghana including through work to strengthen their organisations and income diversification initiatives. Fairtrade was further commissioned by Mondelēz International in 2023 to research farmer livelihoods.

We also partner with cocoa suppliers that have on-the-ground expertise, as well as government authorities, to 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, as at 2023, we have trained over 498,000¹⁸ farmers and community

¹⁶ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years). This data is provided by third parties. Reported information based on latest estimate; independent, third-party verification in progress. Any updates, if needed, will be included in the [ESG Datasheet](#).

¹⁷ 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. The sourced volumes are independently verified by FloCERT.

¹⁸ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte

members in good environmental practices, we have distributed over 8.59¹⁹ million shade trees throughout cocoa farming regions to provide additional sources of income and shade for cocoa growing, and mapped and monitored approximately 256,000²⁰ registered farms.

We also pay loyalty premiums to farmers organisations who then pass it 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 have also started to work towards longer-term planning against premiums and volumes.

Mondelēz International also signed a Memorandum of Understanding with Côte d'Ivoire's Ministry of Women, Family, and Children in August 2023 to strengthen joint efforts on child protection via the company's cocoa sustainability program Cocoa Life and work towards the common vision of a child labour free cocoa sector.

Cocoa Life – helping address child labour

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, to empower women, to enable more children to have access to quality education and 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, Mondelēz International's goal is 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

d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

¹⁹ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

²⁰ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years). Reported information based on latest estimate; independent, third-party verification in-progress. Any updates, if needed, will be included in the [ESG Datasheet](#).

communities in West Africa²¹ covered by CLMRS. In the course of 2023, as we continued to scale the program, we expanded the Cocoa Life program in West Africa by approximately 12 % (over 300 communities). The program is now running in nine cocoa-producing countries, up from seven in 2022: Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India and Nigeria. As of the end of 2023, we reached ~75%²² 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 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](#) targets our ultimate vision to collaborate with others to help work toward a cocoa sector that is free of child labour. Our strategy uses a systems approach and involves working holistically with communities to tackle the interconnected causes of child labour. It focuses on three primary areas of response, which mirror UNICEF's international child protection system strengthening standards, being: (1) Prevention Efforts; (2) Monitoring and Remediation; and (3) Enabling Systemic Solutions.

In 2023, we also partnered with the International Cocoa Initiative to perform an assessment of our CLMRS in Côte d'Ivoire and Ghana and identify opportunities to further enhance systems implementation and help develop standards for household monitoring and identification, in line with emerging sector practices. The process involved interviewing approximately 70 farmers and community members, and held approximately 18 focus groups in smallholder farming communities. The assessment highlighted the strengths of the Cocoa Life CLMRS, such as the child-rights centered approach and the development of Child Protection Committees anchored in farming communities (in Côte d'Ivoire and Ghana). Building on the sector's learnings, the assessment also helped identify ways that could further harmonise and enhance implementation. We are working with our implementing partners in West Africa to operationalise findings, including by setting a monitoring cycle for the communities with the goal that each community is monitored at least every other year.

²¹ Reported information for the period from January 1, 2023 to December 31, 2023 includes a Cocoa Life community in Ghana, Côte d'Ivoire, or Nigeria as covered by CLMRS if one or more household(s) in the community were visited and interviewed to identify children, if any, in or at risk of child labour, at least once over the last 2 years (January 1, 2022 through December 31, 2023), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected and provided to Mondelez International by third parties. An independent, third-party assurance process is underway, and any subsequent findings may result in changes to reported information if the underlying criteria, estimates, or available evidence change, as we continue to enhance our processes. Any updates, if needed, will be included in the [ESG Datasheet](#).

²² Reported information for the period from January 1, 2023 to December 31, 2023 includes a Cocoa Life community in Ghana, Côte d'Ivoire, or Nigeria as covered by CLMRS if one or more household(s) in the community were visited and interviewed to identify children, if any, in or at risk of child labour, at least once over the last 2 years (January 1, 2022 through December 31, 2023), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected and provided to Mondelez International by third parties. An independent, third-party assurance process is underway, and any subsequent findings may result in changes to reported information if the underlying criteria, estimates, or available evidence change, as we continue to enhance our processes. Any updates, if needed, will be included in the [ESG Datasheet](#).

Cocoa Life – key achievements

Our impact data, independently measured by Ipsos, a market research and consulting firm, demonstrates that the program delivered positive impact²³ to cocoa farmers and farming communities whose production represents approximately 85%²⁴ of our cocoa volume for chocolate brands globally. Key highlights from our impact data shows farmers and their communities' social and economic resilience has improved:

- In 2023, our partnership with Solidaridad helped enhance financial inclusion for women belonging to more than 800 Village Savings and Loan Associated and helped uplift the lives of about 15,000 cocoa farmers and their households.
- Communities are supported through, for example, initiatives that help farmers earn more from their cocoa trees and other crops with the aim to improve farming household livelihoods, investments in Cocoa Life communities, and landscape-wide initiatives to support forest conservation and restoration.
- As at the end of 2023, we have provided training on Good Agricultural Practices (**GAP**) to around 225,000 farmers with an aim to improve farm productivity. We have also provided training to approximately 360,000 community members in jobs outside of cocoa growing on business management and encouraging additional income generating activities.²⁵
- As at the end of 2023, Cocoa Life had helped to establish about 5,600 Village Savings & Loan Associations (**VSLAs**) which serve approximately 374,000 community members.²⁶

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 goal to increase cocoa volume at scale. With this investment, Mondelez International aims to catalyse ground-breaking sector collaboration to help address systemic environmental and human rights challenges and improve cocoa farmer livelihoods. More specifically, by 2030, Cocoa Life aims to increase the number of farming households reaching a living income, enhance child protection systems and access to quality education in Cocoa Life

²³ Reported information for the period from January 1, 2023 to December 31, 2023 includes a Cocoa Life community in Ghana, Côte d'Ivoire, or Nigeria as covered by CLMRS if one or more household(s) in the community were visited and interviewed to identify children, if any, in or at risk of child labour, at least once over the last 2 years (January 1, 2022 through December 31, 2023), even if any appropriate remediation and post-remediation follow-up has not yet occurred. CLMRS data is collected and provided to Mondelez International by third parties. An independent, third-party assurance process is underway, and any subsequent findings may result in changes to reported information if the underlying criteria, estimates, or available evidence change, as we continue to enhance our processes. Any updates, if needed, will be included in the [ESG Datasheet](#).

²⁴ Goal and 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, 2023 to December 31, 2023 includes volumes from cocoa producing countries Brazil, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years). Excludes markets where Mondelez International does not sell chocolate brands. Reported information based on latest estimate; independent, third-party verification in-progress. Any updates, if needed, will be included in the [ESG Datasheet](#).

²⁵ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

²⁶ Reported information for the period from January 1, 2023 to December 31, 2023 covers Brazil, Cameroon, Côte d'Ivoire, Dominican Republic, Ecuador, Ghana, Indonesia, India, and Nigeria unless otherwise stated (which differs from prior years).

communities, and help prevent deforestation on Cocoa Life farms globally.

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 2023, we continued to achieve our goal of sourcing approximately 100% Roundtable on Sustainable Palm Oil (RSPO) palm oil (maintained since 2013).²⁷

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 2023, Mondelez International has achieved the traceability of approximately 99% of our palm oil to the mill, approximately 90% traceable to plantation, and nearly 97% 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 ours. To ensure progress, we also actively participate in the Palm Oil Transparency Coalition's supplier and trader assessment to track progress against critical social sustainability topics. To support the mainstreaming of 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**), the International Organization for Migration (**IOM**), and the Remedy Project. The project offers two complementary tracks in which all palm oil suppliers with operations in Malaysia, including Mondelēz International's direct and indirect suppliers, are invited to participate in based on their individual needs, focusing on:

- Track 1: Learning, which offers a series of collaborative workshops to build and share knowledge on how to address key risks. In 2023, workshops focused on remediation and repayment of recruitment fees, as well as integrating worker voices in human rights assessments.
- Track 2: Engagement, which offers tailored advisory services for suppliers to strengthen their management systems for responsible recruitment.

The project brings together key actors of the Malaysian palm oil sector to deploy robust human

²⁷ Excludes palm oil procured by third-party external manufacturers & co-packers for use in manufacturing Mondelēz International finished goods.

rights due diligence along the supply chain and help combat forced labour. It is reinforced by joint advocacy towards key stakeholders including the Malaysian government.

Hazelnut supply chain

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. In 2023, the program made strong progress,²⁸ including over ~450 women taking place in health and nutrition training which covered topics such as seasonal agricultural worker's rights and children's rights.

In 2023, the initiative also provided over ~1,800 children with educational services and other cultural activities, including English classes and lessons on children's rights. Approximately 700 orchard owners were also provided with counselling on the elimination of child labour in seasonal agriculture.

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 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 goal 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 (for example, the recent developments on the EU Corporate Sustainability Due Diligence Directive), 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 progress towards our goal of having forced labour focused human rights due diligence systems in 100% of our own operations by 2025. The Human Rights Coalition of Action is dedicated to working to end forced labour in the consumer goods industry, and will drive individual member companies and collective action towards the implementation of the Priority Industry Principles in own operations and supply chains.

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

²⁸ Reported information covers the period from August 2022 through July 2023.

engaged on a living wage roadmap by 2030.

In 2023, our Total Rewards Team continued to make progress against our 2021 commitment to incorporate [living wage benchmarking](#) as a key standard in Mondelēz International's regular pay review process. Our last biennial assessment, conducted in 2022, found that all Mondelēz International direct employees were paid at or above the living wage for the countries in which they work.

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 2023](#), 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 2023 ESG report, '[Snacking Made Right](#)', which covers broader environmental and governance issues.

Mondelēz International also actively contributes to several initiatives specific to cocoa and other key ingredient sectors. For instance, we partner with industry peers as part of the World Cocoa Foundation (WCF), which we currently chair. We also serve on the board of directors of multi-stakeholder platform International Cocoa Initiative (ICI), alongside development NGOs, civil society experts and representatives of smallholder farmers. Through these platforms, we also call for industry and governments to collaborate and create comprehensive, systemic solutions that help address the root causes of child and forced labour.

Another example of our efforts to ensure sustainable sourcing is through our Harmony wheat sustainability program where we remain focused on sourcing wheat that is grown more sustainably with a focus on scaling up regenerative agricultural practices across our wheat sourcing. In 2023, we kickstarted Harmony Ambition 2030, setting our goal to grow 100% of the wheat volume needed for our European business biscuit products under our strengthened Harmony Regenerative charter.

In addition to our involvement in industry and multi-stakeholder initiatives, we continuously seek to engage in two-way dialogue with experts, civil society organisations, NGOs and other stakeholders to inform our approach. We also engage periodically with potentially affected rights-holders themselves.

4. 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; and
- 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](#)).

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.

5. Consultation

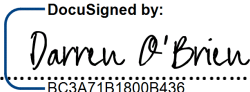
In the course of preparing this report, Mondelēz Australia has consulted with representatives of its local and regional Procurement, Human Resources, Legal and Corporate Affairs teams, Mondelēz International's Global Impact and Social Sustainability team, as well as owned and controlled entities and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

6. 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 18 June 2024.

DocuSigned by:

 BC3A71B1800B436...

Darren O'Brien

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

28 June 2024

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

Reported information against our quantitative 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, (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. 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. 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 may not be considered material for SEC 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 reporting purposes.

