Mondelēz International

SUPPLIER & PARTNER CODE OF CONDUCT

Our Way of Doing Business





Mondelēz International

SNACKING MADE RIGHT

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Why do we have a Supplier & Partner Code of Conduct?

Mondelēz International (Mondelēz) is known for "Snacking Made Right." We're the largest snacking company in the world – and not just because of our iconic brands and products. We've built trust with our consumers and stakeholders. This trust is maintained by the integrity of our everyday actions, doing things the right way.

Our Suppliers & Partners are an integral part of our ecosystem and success and help us build and maintain our reputation. Therefore, it is essential for us that all the Suppliers & Partners involved with Mondelēz commit to and uphold the highest standards of ethics and integrity, values, and operating principles.

Our Supplier & Partner Code of Conduct outlines Mondelēz expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain.



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Expectations

We require all Suppliers & Partners acting on Mondelēz' behalf and/or providing goods or services to Mondelēz for compensation to comply with this Supplier & Partner Code of Conduct. This includes, but is not limited to, our direct and indirect Suppliers, External Manufacturing Partners and co-packers, labor providers, logistic providers, subsidiary or affiliate entities. Suppliers' sub-contractors are also expected to adhere to the Supplier & Partner Code of Conduct.

We expect our Suppliers & Partners to comply with and communicate these expectations throughout their supply chain – including their own Suppliers & Partners. This includes adopting efficient management systems, polices, procedures and training to uphold the standards and expectations set forth in this Code within their own business operations. We require our Suppliers & Partners to abide by all applicable national, state and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier & Partner Code of Conduct, we expect our Suppliers to comply with the most stringent standards and principles.

In the spirit of continuous improvement, Mondelēz is committed to working with and supporting our Suppliers & Partners to meet, and when possible, exceed, the requirements in this Code. By its acceptance of any purchase order from Mondelēz, the Supplier or Partner acknowledges its acceptance of the Supplier & Partner Code of Conduct and intention to comply with its requirements.

COMPLY WITH APPLICABLE LAWS, REGULATIONS, PLEDGES AND MONDELĒZ POLICIES

Our Suppliers & Partners are expected to:

- *Know and follow global and local laws that apply to them and their business.*
- *Comply with or outperform all applicable regulations relative to their business:*
  - *Environmental*
  - *Social Sustainability*
  - *Health & Safety and Security*
  - *Quality & Food Safety*
  - *Business Integrity*
- *Treat legal requirements as a minimum standard.*
- *Alert Mondelēz to any material issue with the goods and services they supply.*
- *Fulfill all Mondelēz contractual commitments.*
- *Avoid any situations that may adversely affect Mondelēz business interests or reputation.*



Our Guiding Principles

Our Supplier & Partner Code of Conduct contains 10 overarching principles that are based on Mondelēz's very own Code of Conduct. We expect our Suppliers & Partners to use all of these important principles to guide their decisions as they do business. Our principles enable us to achieve mutual success in the right way.

1 Treat People Fairly

We expect our Suppliers & Partners to:

- Treat employees, workers, partners and others fairly (as laws and cultures may differ around the world). The concept of fairness is universal, regardless of race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any other legally protected personal characteristic or status.
- Provide safe and healthy working conditions at all operating locations.
- Foster an inclusive and ethical work environment that is free of harassment, discrimination, bullying or intimidation, provides equal chances of success to all their employees, and respect human rights.
- Meet or exceed all legal requirements for compensation and working conditions.

2 Make Food that Is Safe to Eat

We expect our Suppliers & Partners to:

- Follow the highest standard of food manufacturing, storage, packaging and transportation to guarantee our products and consumers' safety.
- Meet or exceed the agreed specifications to guarantee committed quality, food safety, and regulatory requirements to our customers.
- Report to Mondelēz in a complete, accurate and timely manner any concern about their product safety or quality.

3 Market Responsibly

We expect our Suppliers & Partners to:

- Not engage in misleading marketing.
- Set clear guardrails to ensure claims are substantiated.
- Comply with our Marketing to Children Policy.

4 Embrace Social and Environmental Responsibility

We expect our Suppliers & Partners to:

- Commit to social and environmental sustainability principles within their own operations and value chain, from employees in our plants to smallholder farmers and their communities in our agricultural supply chains.
- Never engage in or tolerate any breach of human rights, including child labor, forced labor or human trafficking, as defined by the International Labor Organization (ILO).
- Provide a confidential, anonymous channel for workers to raise concerns, ensuring issues are addressed effectively and without retaliation.
- Respect employees' rights to organize and bargain collectively.
- Do not interfere with human rights or environmental defenders, nor tolerate or contribute to any retaliation against them.
- Follow the Mondelēz Human Rights Policy.
- Prevent pollution, minimize waste, and reduce use of natural resources.
- Be aware of and comply with all applicable laws on animal welfare when responsible for sourcing ingredients from farm animals. Adhere to the guidelines of the World Organization for Animal Health (WOAH) where regulation does not exist.
- Work with Mondelēz to implement sustainable processes and corrective actions to drive continuous improvement and social value.

5 Protect and Respect Private and Proprietary Information

We expect our Suppliers & Partners to:

- Protect Mondelēz's confidential, sensitive, private or other non-public information to which they have access, including its suppliers, employees or consumers' information, intellectual property, trade secrets, patents, or financial information.
- Safeguard any property belonging to Mondelēz while under their control.
- Be cybersecurity savvy, keep your passwords secure, stay vigilant on any phishing attempts, follow Mondelēz information security policies and handle any incident appropriately.
- We encourage the use of new digital technologies, including AI, provided that such technologies are used in accordance with responsible frameworks, laws and regulations, such as ensuring it is safe for Mondelēz and our people, and protecting our data. All use of AI should be in accordance with the Mondelēz Responsible AI Policy.

6 Compete Fairly and Follow International Trade Laws

We expect our Suppliers & Partners to:

- Compete fairly and ethically for Mondelēz's business.
- Refrain from engaging in practices that reduce or limit competition, such as arrangements that unlawfully restrain competition, the improper exchange of information, spying, price fixing, etc.
- Comply with applicable regulations when conducting global business, including sanctions, import/export controls, and customs laws.

7 Deal Honestly with the Government

We expect our Suppliers & Partners to:

- Prohibit all types of bribery, corruption, and money laundering.
- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Mondelēz's business.
- Forbid gifts or anything of value offered to private or public officials, directly or indirectly, in order to obtain any improper benefit or influence business decisions in connection with Mondelēz.
- Comply with all anti-corruption laws and regulations that govern operations in the countries in which they do business.

8 Never Trade on Inside Information

We expect our Suppliers & Partners to:

- Keep strictly confidential any non-public ("inside") information about Mondelēz or another company that they become aware as part of our relationship that could influence investment decisions (such as buying, selling, or holding stock/securities).
- Comply with insider trading laws and take steps to prevent their employees from trading our securities while in possession of material Mondelēz non-public information, or disclosing it to others for their benefit.

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9 Keep Accurate Books and Business Records

We expect our Suppliers & Partners to:

- Maintain books and records that reflect all transactions in an accurate, honest, complete and timely way.
- Avoid engaging in fraud, theft, or misuse of assets, obscuring any record, or circumventing any policy or process for personal gain.
- Employ appropriate quality audit and compliance processes.
- Disclose the location of facilities and known origins of materials to enable traceability upon request.

QUALITY AUDIT AND COMPLIANCE

Suppliers & Partners are expected to manage all records and information securely – everywhere Mondelēz does business. Appropriate processes for quality audits and compliance include:

- *Product and food safety*
- *Worker health and safety*
- *Financial statements*
- *Labor and employment*

10 Avoid Conflicts of Interest

We expect our Suppliers & Partners to:

- Avoid situations creating actual or perceived conflicts of interest with Mondelēz. Business decisions must be objective and impartial, to the extent possible.
- Avoid any conflict of interest relating to financial interests, outside employment, or close relationships with Mondelēz employees, that may be considered inappropriate.
- Never employ or compensate Mondelēz employees during business transactions. Personal relationships between employees should never influence business judgment.
- Disclose any potential or perceived conflict of interest through the Mondelēz International Compliance Line.

CONFLICTS OF INTEREST SITUATIONS

- No Personal Gain: Suppliers & Partners must not influence Mondelēz employees in ways that create conflicts of interest, personal benefit, or unfair advantages for partners, relatives, or friends.
- No Gifts: Suppliers & Partners must not offer any gifts to our employees, as this could compromise their objectivity.
- No Bribes: Suppliers & Partners are strictly prohibited from offering bribes, kickbacks, or any illegal or unethical inducements in dealings with Mondelēz or our employees.

Partnership Built on Trust

At Mondelēz, we aim to build trust-based relationships with ethical Suppliers & Partners who follow this Code of Conduct. We expect our Suppliers & Partners to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to work with the Supplier or Partner. We may be able to help identify possible improvements. However, when an issue cannot be corrected, or a Supplier or Partner is unwilling to engage, we reserve the right to end our relationship.

By working closely with our Suppliers & Partners, we believe we can achieve mutual success while helping our consumers, communities, and employees thrive.

If you see or suspect any conduct or business practices that you think could violate this Supplier & Partner Code of Conduct, please contact your designated Mondelēz contact or contact the Mondelēz Ethics & Compliance Office directly. You may raise a concern or get help by contacting the secure **Mondelēz International Compliance Line:**

- By phone: **1.877.781.2421**
- Online: **mdlzethics.com**
- Email: **compliance@mdlz.com**

Useful Resources

Additional resources, including copies of documents and policies referenced in this Code, are available in the **Supplier Information Center**.