

Mondelez CHRB 2016 Additional Data to support engagement with the CHRB process
December 2016

Q. ref	Area	Additional data
	Gov. and Policies	
A.1.1	Commitment to respect human rights	<p>“We have several corporate compliance policies that either directly or indirectly provide guidance to employees regarding risk management, including, for example, Code of Conduct, speaking up, discrimination & harassment data protection & privacy, competition law, environmental, worker safety, food safety, interacting with government officials, anti-corruption, and security.”</p> <p>As per our publicly stated Human Rights Policy, our core belief is that people should be treated fairly and with dignity, which we demonstrate in the following ways:</p> <p>Our Own Operations</p> <ul style="list-style-type: none"> • Our corporate Code of Conduct sets out 10 rules that guide everything we do. The third rule states that employees will “Treat People Fairly.” We implement the code through detailed policies that provide guidelines for our employees in certain areas. The Code of Conduct applies to our employees, contractors, subsidiaries, and joint ventures. <p>Our Direct Suppliers</p> <ul style="list-style-type: none"> • We want to work with suppliers whose own standards of conduct align with ours. In our contracts, we require suppliers to comply with various human rights provisions, including those relating to forced labor, child labor, diversity and inclusion, harassment and abuse, and others. <p>See http://www.mondelezinternational.com/about-us/compliance-and-integrity#directSuppliers. The Broader Community</p>

		<p>Beyond careful oversight of our own operations and our influence over direct suppliers, we are working to address systemic issues. For example, we have longstanding relationships with certification schemes like Fairtrade for agricultural products like cocoa. We also work and invest with many valued partners like, the International Cocoa Initiative, the World Cocoa Foundation, and our partners within our signature sustainability programs, such as Cocoa Life and Harmony, on projects to help improve the lives of farmers and their families at the base of our supply chain. For Cocoa Life, we emphasize gender equity (See page 24 onwards http://www.cocoalife.org/~media/cocoalife/Files/pdf/Library/Cocoa%20Life%20Progress%20Report) and aim to eliminate child labor in the cocoa supply chain. On the child labor issue, we extensively work with other organizations and within Cocoa Life. This includes a group of external advisers such as Aidan McQuade, Director of Anti-slavery International; David W. McLaughlin, Managing Director and VP for Agriculture at WWF; and Andrew Bovarnick, Lead Natural Resource Economist and Global Head of UNDPs Green Commodities Facility (see http://www.cocoalife.org/about%20us).</p> <p>In May 2016, we published national situation assessments for Ghana and Cote d’Ivoire by an specialist human rights consultancy, Embode. We are working to implement the reports’ recommendations for us to strengthen our work in this area. Also, for palm oil production, we are working to support human and labor rights via our palm oil action plan and ongoing supplier engagement. In addition, we have supported the United Nations Development Programme (UNDP) in setting up the Indonesia Palm Oil Platform a multi-stakeholder initiative that is developing a national action plan for the Indonesian palm oil sector, addressing issues such as smallholder capacity building and support to protect legal land tenure</p>
A.2.1	Commitment from the top	<p>“Our Board formally has responsibilities for important business functions and these responsibilities are clearly allocated within the board. Responsibilities for important functions are held by independent directors.</p> <p>We have 11 independent directors and one director, Irene B. Rosenfeld, who is Chairman/CEO. Ms. Rosenfeld is not a member of any of the Board committees. Therefore, all Board Committees have only independent directors.</p> <p>Each committee’s charter is publicly available. See bottom of the following for links to each: http://www.mondelezinternational.com/investors/corporate-governance.</p>

		<p>Our directors are active on the Board committees. We have five growth strategies of which the Board had oversight in the development. Each function within the company and each business unit developed its goals and strategic plans to address each of the five growth strategies.</p> <p>One of the growth strategies is to Protect the Well-Being of Our Planet. In 2013 we launched our Call to Well-Being. This holistic program involved intense Board oversight in its development and now in its implementation. We take a comprehensive approach to well-being, integrating it throughout our business processes. Our CEO is engaged in the review of our Well-Being strategy in conjunction with our Board of Directors' Governance, Membership and Public Affairs Committee.</p> <p>We believe well-being is holistic. The health of individuals, communities and the planet are inextricably linked. We believe in creating a more holistic and connected approach to well-being for a greater global good. The Call for Well-Being is focused on four powerful pillars: Mindful snacking: We are improving the nutrition of our products. Our goal is to reduce sodium and saturated fat by 10 percent and increase whole grains by 25 percent by 2020. We're also transforming our portfolio through new product innovation. We aim to grow our Better Choice products to 25 percent of our revenue by 2020 and increase our offerings of 200 calories or less by 25 percent. In addition, we will help consumers make informed choices by providing calorie counts on the front of packaging globally by 2016.</p> <p>Sustainability: We focus on sustainable agriculture and reduced environmental footprint. We're helping farmers create thriving communities with a 10-year, \$400 million investment in our Cocoa Life program. We're also promoting biodiversity and good environmental practices through Harmony, our European wheat-sourcing program, and embedding sustainability into our sourcing practices across our key commodities. In 2015, we released new 2020 goals to drive further progress in our operations and packaging.</p> <p>Safety - Keeping consumers and our employees safe. All of our manufacturing facilities aim to achieve third-party food safety certification.</p> <p>Communities: Over the next several years, we're investing \$50 million in community partnerships to promote healthy lifestyle programs, focused on nutrition education and promoting active lifestyles.</p> <p>To guide our strategy, we established a Well-being Leadership Team (WLT) managed by our Vice President, Global</p>
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A.2.3	Incentives and performance management	“Environmental metrics are published in our 2015 Call For Well-Being Progress Report. They include reductions in water, waste, energy, CO2 emissions, packaging and transportation, as well as our sustainable agriculture goals”.
	Embedding	
B.1.1	Responsibility and resources	<p>Senior management responsible for relevant human rights within the Company Include EVP Integrated Supply Chain EVP HR officer and the EVP General Counsel</p> <p>Our policy and actions on human rights are managed by senior executives within global corporate affairs who report to the general counsel and who then coordinate our activities across the company through colleagues in supply chain and human resources</p>

<p>B.1.3</p>	<p>Integration with enterprise risk mgt.</p>	<p>“Mondelēz International has a robust enterprise risk management (ERM) process for identifying, measuring, monitoring, and managing risks, with oversight by the Mondelēz International Risk and Compliance Committee (MRCC). The executive sponsors of the MRCC are the EVP and Chief Financial Officer, and the EVP and General Counsel. The purpose of the MRCC is to manage our process to identify and assess the most significant inherent risks to us so we may adequately mitigate them and/or monitor them across the company. All identified risks are vetted by the MRCC and remain under the MRCC’s governance. Ownership of specific risks is assigned at the Mondelēz International Leadership Team (MLT) level (MLT members report directly to the CEO). As owners of each specific risk, MLT members are responsible for verifying that appropriate mitigation controls and monitoring systems are in place. Our ERM methodology includes:</p> <ul style="list-style-type: none"> • Annual reviews of current risks and mitigating control expectations across all business regions, updating our risk register to include new and emerging risks, and holding discussions with each Region President and staff, which includes reviewing: <ul style="list-style-type: none"> • Key risks <ul style="list-style-type: none"> – Additional region risks including new or emerging issues – Assessing the likelihood and impact of each risk using defined metrics – Assessing region controls against pre-defined control expectations – Developing action plans for risk mitigation improvement opportunities and/or for inclusion in Mondelēz International’s strategic plan – Region President’s letter to the MRCC on the status of identified risks in the region, specifically the likelihood, impact and an action plan to manage the risk • Annual interviews with the CEO and direct reports to discuss key risks for the enterprise, including their likelihood and impact, as well as the status of the company’s current control expectation • Presentation of consolidated results of interviews by MRCC to the CEO and direct reports to obtain alignment of top risks for the enterprise • Presentation of the results of the annual ERM risk assessment by the MRCC to the Audit Committee • Periodic reports on individual risks to the Audit Committee or the Board, as appropriate, by the MRCC • Region Risk and Compliance Committees meet at least quarterly to discuss risk areas relevant to their region. Region Presidents present their risk profiles annually to the MRCC and submit quarterly updates of action plan status to the MRCC, as well as any new or emerging risks.
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B.1.4.a	Comm / dissemination of policy commitments (own organization)	<p>“Employees are required to complete trainings annually on pertinent topics. Compliance with training is monitored by HR, the functional owners of the policies, and the Business Integrity group.”</p> <p>“We require each employee to undergo training on our Code and relevant compliance policies, such as information security, records management, and anti-bribery. We track this training to confirm it is up to date. Our compliance and integrity training is integrated with the company’s overall training platform, Mondelēz International University (MIU), which establishes expectations for all employees across the globe. This includes a section that reinforces the importance of the Code and the role it plays in helping ensure we achieve our goals the right way. In the Code, each compliance policy, and training, we communicate to employees that failure to follow the Code or our compliance policies may result in discipline up to and including termination. Discipline is issued on a regular and consistent basis against employees for such failures.”</p>
B.2.1	Identifying	<ul style="list-style-type: none"> • Through ERM (detail above) • Mondelez working with WWF in 2016 to identify significant social risk within supply chains. Results will be internally distilled in 2017 • Through compliance function

• **Updated Palm Oil Action plan** (also uploaded to the Disclosure Platform)

We address the potential for human rights issues in our operations, with our direct suppliers, and further upstream in our supply chain for key commodities.

For our own operations, we have a clear 'Speaking up policy', which is supported by an independently run reporting mechanism (helpline etc). We strongly encourage all our employees to 'speak up' and report activities that they believe are an infringement of our company policies, and the law (see 'speaking up and being heard' <http://www.mondelezinternational.com/about-us/compliance-and-integrity>). This includes human rights infringements.

For our direct suppliers, consultants and business partners, we take steps to align what they do for us with our own values and goals. We have laid out our expectations to all our direct suppliers in our published supplier contract provisions and supply chain transparency statements. Our corporate responsibility guidelines outline key human rights issues that we expect our operations and our suppliers, et al., to follow. These issues include child labor, harassment, diversity, third-party representation, and more (See "human rights" and "mondelēz international corporate responsibility guidelines" at <http://www.mondelezinternational.com/about-us/compliance-and-integrity>).

We do not just rely on these statements, we enforce and verify them through multiple mechanisms.

For our own operations and direct suppliers, we identify potential human rights issues and vulnerable groups, as well as address mitigation and monitoring. We do this through AIM-PROGRESS, of which we are a founding member. We also adhere to the Sedex Member Ethical Trade Audit protocol, which is part of AIM-PROGRESS. This audit evaluates our internal manufacturing sites and suppliers against a common set of corporate social responsibility standards to drive efficiency on performance improvement for the consumer goods industry. In 2015, 286 of our key suppliers – 99 percent of our 2015 target group of highest priority suppliers – completed the audit, in addition to the 388 suppliers audited in 2014. See Call for Wellbeing Progress Report 2015. In 2016 we completed an additional 189 audits.

		<p>In addition to our own Code of Conduct and our contract requirements with suppliers, we have developed an extensive approach to identifying potential human rights impacts further upstream in our supply chain through our signature Cocoa Life program and our Palm Oil Action Plan. Our Cocoa Life program involves the external assessment of our approach in this area from third party experts in this area, including Anti-Slavery International, WWF and Care International. While we had already identified cocoa and palm oil as areas of potential human rights issues, including child labor for cocoa and smallholder land rights for palm oil, we worked with the external experts to mitigate and monitor. For Cocoa Life, we studied gender inequity and have put into place programs with KPIs to address that systemic issue. See Cocoa Life - Mainstreaming Gender Equality in Cocoa. We did the same for child labor. See Cocoa Life Child Labor Interventions. For palm oil, we work with third parties to identify specific vulnerable groups and what human rights issues they face, including land rights potential abuses for smallholder farmers. We also work with third parties, including our suppliers, to mitigate and monitor these potential issues.</p> <p>See our Palm Oil Action Plan and Palm Oil Action Plan Update (October 2016) (Uploaded to the Disclosure Platform).</p>
<p>B.2.2</p>	<p>Assessing</p>	<p>Amongst issues identified as material “socio-economic challenges persist in agricultural supply chains, including poverty, gender inequality, and land and labor rights issues”</p> <p>“We have an enterprise risk management process that identified sustainable sourcing as a business priority and then we determined it was a material risk</p> <p>We specifically address cocoa and wheat through our signature programs as part of the holistic Call for Well- Being, including investing into Cocoa Life over \$400MM to address various risks, including supply and reputation.</p> <p>We embed sustainability into our sourcing practices across our commodities. We also work with direct suppliers (the focus in this answer) to answer our Call For Well-Being.</p> <p>Our direct suppliers have yearly initial risk screenings to determine whether to do a more detailed risk assessment. During a deeper assessment (if needed), we determine whether a supplier needs a business continuity plan (BCP) and/or to be assessed using PROGRESS/SEDEX (see below). The deeper risk assessment is done on approximately 3,500 suppliers We identified 288 suppliers to undergo CSR audits in 2015.</p>

		<p>The screening and assessment processes are standardized. The processes help better focus our risk management measures and detect suppliers' potential environmental and safety (ES) issues earlier. We also review for potential financial stressors, corruption risk, conflicts of interest and sanctioned parties.</p> <p>As needed based on the deeper risk screening, we develop business continuity plans (BCPs) after analyzing SEDEX assessment results, supplier financial stability, supply sector risks, single and sole suppliers, market sensitivities, and more. This process allows us to identify tier 1 suppliers that appear to pose the highest ES and economic risks and then manage their risks. The buyer/relationship manager who works with a particular supplier would be aware of all these identified risks (ES and econ).</p> <p>We use SEDEX to identify ES risks in our facilities and direct material suppliers. SAQs and audits measure occupational health & safety, labor, business integrity, and environmental risks. Manufacturing suppliers and internal sites complete an SAQ and are audited via a common protocol as directed. Through this process, we will reach some of both critical and non-critical suppliers. BCPs address any audit findings.</p> <p>"Mondelēz International has a robust Enterprise Risk Management (ERM) process for identifying, measuring, monitoring, and managing risks with oversight by the Mondelēz International Risk and Compliance Committee (MRCC). The purpose of the MRCC is to manage our risk identification and assessment process to identify the most significant inherent risks to us so we may adequately mitigate them and/or monitor them across the company. The risk universe considered during this process is wide and varied.</p> <p>For the corporation to assess the most important risks at a senior management level, we use a risk mapping process to help identify the impact and likelihood of the risk based upon a uniform framework. To verify this process is being used and completed, the Internal Audit department audits the control expectations set up by the MRCC at the beginning of each year.</p> <p>Our ERM methodology is governed by the MRCC and includes annual reviews with all business regions. The ERM process results in the identification of a variety of risks. The results of climate change risk and water-related risks</p>
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(including those caused or worsened by climate change) are captured in commodities, reputation and brand image, unanticipated business disruptions, and changes in laws and regulations.

Mondelēz International does business continuity planning for a variety of business matters. We have a well thought-out business plan to react to disruptions caused by a given crisis, including potential facility interruptions, key sourcing interruptions and system interruptions.

We use other risk analysis tools for financial and business risks. Other examples come from operations, information systems, global environmental and safety standards and agricultural commodities. For global environmental and safety (E&S) standards, we operate a Global E&S Standards and Management System. The system includes several global E&S standards that involve crisis preparedness / risk management. Facilities worldwide are required to assess E&S risks and implement these standards and address those risks.

For agricultural commodities: given the nature of challenges linked to sourcing agricultural commodities, we have developed specific ways of looking at challenges and risks that may go beyond the timeframe for likelihood of impacts (i.e., within about a year). Notably, we have assessed with the World Wildlife Fund the long-term sustainability risks for many of our main commodities, including cocoa, palm oil, wheat and sugar.

Also, we completed a first-of-its-kind project that mapped our company's total environmental footprint: carbon (air), land and water. This work is updated every year and has provided us with a better understanding of the impacts across our supply chain and enables us to focus activities where it matters: CO2, water and land use.

We also conduct rigorous assessments of human rights issues and impacts through our signature sustainability programs.

As part of our Cocoa Life (CL) program, when we enter a new community, our partners conduct a thorough participatory needs assessment. See Cote d'Ivoire Needs Assessment. The needs assessment covers focus areas and informs the program design with partners. As a next step, community members develop a Community Action Plan, facilitated by the CL partners, which provides a detailed roadmap for community activation. Many of the topics on roadmaps address human rights.

		<p>CL addresses child labor directly, as well as root causes. NGO partners, like CARE International and Solidaridad, raise awareness of child labor in Cocoa Life communities with training for both children and parents. As part of this commitment, CL has partnered with Embode, an independent human rights consultancy, to analyze the context and national child protection infrastructure in Côte d'Ivoire, Ghana and Indonesia. See attached Embode Reports. Embode was selected under the guidance of two of CL external advisors: Aidan McQuade of Anti- Slavery International and Mil Niepold of The Consensus Building Institute.</p> <p>We also address gender empowerment issues in CL. See CL gender assessments and the Women's Empowerment plans.</p> <p>Our Palm Oil Action Plan Update requires suppliers to assure protection of the rights of all workers, including migrant workers in their own operations and engage third-party suppliers to do the same, by providing annual assurance, verified by a recognized third-party labor rights expert, of continuous improvement in labor rights performance in own operations; and developing a roadmap with milestones to engage third-party suppliers to provide assurance of their labor rights performance in the same manner. In addition it requires suppliers to continue to engage smallholders in palm oil sustainability, by knowing the proportion of smallholders in own supply base and the proportion of smallholders engaged in sustainability programs and the progress, outcomes of these programs; and encouraging third-party suppliers to know and report in the same manner.</p> <p>We also address human rights issues indirectly by addressing climate change. Our 2020 goals are aimed towards reducing the impacts of climate change.</p>
B.2.3	Integrating and acting	<p>Managing supply chain risks in tier 1 suppliers</p> <p>New and existing suppliers: <i>Part of SEDEX assessments and reflected in our contract language. Any deviation can result in immediate termination. We explain to suppliers they will undergo the SEDEX process.</i></p> <p>Our sustainability goals related to supply chain are fully integrated into our supply chain management, as well as into our key growth platform of protecting the well-being of our planet.</p>

		<p>We require the selected suppliers to cooperate with SEDEX. If a supplier is found through an audit to have an issue, our goal is to work with them to resolve the issue. If, however there are ongoing issues, our intent is to look for other suppliers. During our supplier validation process, we address anti-bribery and anti-corruption.</p> <p>Procurement management is trained about supply risk management. Training has been conducted for management team members and purchasers, primarily direct material buyers.</p> <p>Cocoa Life: \$400MM USD 10 year commitment to empower over 200,000 farmers and over 1MM people in our 6 key cocoa growing origins by 2022. Results by 2015: reached 76,700 farmers in over 795 communities, 21% of our cocoa sustainably sourced. Initial impact evaluation in Ghana in early 2014 showed Cocoa Life farmers' incomes increased by 49% and yield increased 37% more than similar control communities. At COP21 we committed to lead private sector action in Côte d'Ivoire's national program to combat deforestation in cocoa, and we similarly partner with UNDP to combat deforestation in Ghana, both via Cocoa Life.</p> <p>Our Palm Oil Action Plan, established in 2014, focuses on direct supplier engagement and sector-wide change. We achieved 100% RSPO coverage in 2013 (two years early vs. goal). We have set supplier targets to have holistic policies in place and 100% traceability for all their inbound palm oil, not just what they supply us, by 2015, and to achieve policy implementation and traceability to plantation as soon as possible after 2015. To influence sector-wide change we serve on the RSPO Board of Governors, co-chair the Consumer Goods Forum working group on palm oil, and support the UNDP's Indonesia Sustainable Palm Oil Initiative (SPO), which aims to help smallholder farmers. At the end of 2015, 90% was traceable to the mill and 91% was from suppliers with published policies, including all our strategic global suppliers. In 2016 we updated the plan to require suppliers to improve their performance against key sustainability criteria, including labor rights, and to engage their third party suppliers (who supply much of the oil they trade).</p> <p>We are members of Consumer Goods Forum, RSPO, and Bonsucro, and we use Fairtrade cocoa and sugar in some of our chocolate products.</p>
B.2.4	Tracking	See Embode Children at the Heart reports (already submitted)

Press release 'Mondelēz International Strengthens Efforts to Address Child Labor in Cocoa Production' (<http://ir.mondelēzinternational.com/releasedetail.cfm?releaseid=972380>)

Cocoa Life will work with partners to reinforce community child protection structures following publication of independent assessments

DEERFIELD, Ill., May 23, 2016 (GLOBE NEWSWIRE) -- Today, Embode, a human rights consultancy, published the results of two independent assessments of child protection in the cocoa sector in Côte d'Ivoire and Ghana. Mondelēz International (Nasdaq:MDLZ) commissioned these assessments as part of the company's continuing efforts to empower cocoa-farming communities through its Cocoa Life program. Embode assessed conditions in Côte d'Ivoire and Ghana in 2015 and analyzed the environment and national child protection infrastructure. The reports commend Cocoa Life's holistic approach and direct work with cocoa communities in its supply chain. Embode recognizes Cocoa Life's potential to drive meaningful change at scale by tackling the root causes of child labor, and recommends that Mondelēz International build on its existing approach to strengthen cocoa communities' capacity to foster the well-being of children.

"We value Embode's insights and plan to implement the recommendations for our Cocoa Life program," said Cathy Pieters, Director of Cocoa Life. "We'll consult with our program partners and government authorities to strengthen existing child protection structures, improve access to education and continue to address root causes like poverty in Cocoa Life communities in Ghana and Côte d'Ivoire."

Aidan McQuade, Director of Anti-Slavery International, said: "Embode's reports are a significant step forward for transparency and offer new thinking on ways to address the root causes of child labor in cocoa farming. Further engaging with other businesses through existing non-competitive platforms within the cocoa sector to address these issues will be crucial to help deliver wider impact."

For both countries, Embode's recommendations to Cocoa Life include:

- Developing and implementing a child protection policy and code, which would explicitly require the reporting and referral of child protection cases, including child labor and child slavery

		<ul style="list-style-type: none"> • Taking more initiatives aimed at improving children's access to education • Reviewing targets and indicators to measure progress on children's well-being • Working alongside communities with a "system-strengthening" approach to ensure sustainability of outcomes over the long term • Working in closer partnership with local and national authorities to align and contribute to governments' strategies for cocoa sustainability and child well-being <p>Engaging proactively with the cocoa sector to share Cocoa Life's distinct approach to cocoa sustainability</p>
B.2.5	Communicating;	<p>“We report on our analysis of key issues in our Call For Well-Being Progress Report 2015 at page 61 and in the Materiality and Call For Well-Being section of the Our Progress Page on our corporate website.</p> <p>We report on progress towards our targets and metrics for our key issues in our Call For Well-Being Progress Report 2015 at pages 5-7. We also provide an overview of how these goals, as part of the Call for Well-Being, fit within our overall corporate strategy in our 2015 10K Annual Report at 2-3.”</p> <p>We publish our approach and commitments to Human Rights on the Compliance & Integrity section of our website at http://www.mondelezinternational.com/about-us/compliance-and-integrity#humanRights.</p> <p>Cocoa Life has also partnered with Embode, an independent human rights consultancy, to analyse the environment and national child protection infrastructure in key cocoa-producing countries. In 2015, Embode conducted this research in Côte d’Ivoire and Ghana and will be publishing recommendations for us to strengthen our approach to child protection through Cocoa Life in the course of 2016</p> <p>We work with thousands of suppliers, consultants and business partners around the world. We are taking steps to align what they do for us with our own values and goals.</p> <p>We have laid out our expectations to all our direct suppliers in our published supplier contract provisions and supply chain transparency statements</p>

		As a founding member of AIM-PROGRESS, we also adhere to the Sedex Member Ethical Trade Audit protocol. This audit evaluates our internal manufacturing sites and suppliers against a common set of corporate social responsibility standards to drive efficiency on performance improvement for the consumer goods industry. In 2015, 286 of our key suppliers – 99 percent of our 2015 target group of highest priority suppliers – completed the audit, in addition to the 388 suppliers audited in 2014
	Remedy	
C.1 (and C4)	Grievance channels – internal	<p>“Mondelēz has numerous postings in all facilities with information, as well as intranet information, regarding the Integrity HelpLine and WebLine to enable and encourage employees to report potential and actual risks to the organization. Our policies also provide this information on how to report and let employees know they will not be retaliated against for reporting potential policy violations or other issues”.</p> <p>Via the HelpLine and the WebLine matters can be reported anonymously. When someone calls the HelpLine an operator will answer the call. The reporter – if they decided to stay anonymous – will then be given a case ID number and asked to call back within weeks to inquire about the status and to check whether there are any follow-up questions for him/her. The operator would then create a new case in our global case management system EthicsPoint (provided by NavexGlobal) and submit the information received. The matter is then automatically assigned to a regional business integrity officer who then has to assess the matter and take appropriate steps in line with our investigation guidelines (i.e. the matter is assessed by the regional business integrity officer and assigned to an investigator who develops an individual investigation plan, investigates the matter and concludes the investigation; conclusions are documented in a written investigation report). If an investigator has follow-up questions to the anonymous reporter (or I would inform the HelpLine operator about my follow-up inquiries and these would then be communicated to the reporter the next time he/she calls back (using the case ID number). This way we can ensure that a reporter does not have to disclose his/her name if he/she wishes to do so.</p> <p>Investigations are conducted and assigned to specific investigators based on type of allegations and investigation tier (1 – 4).</p> <p>Matters can also be reported directly to a business integrity officer (via e-mail, phone, meeting etc.) or via the Webline which functions very similar to the HelpLine and is also operated by an independent provider (NavexGlobal) and linked to the case management system. Matters can also be reported to any manager, Legal</p>

		Department, HR, Internal Control, Internal Audit and are then also forwarded to Business Integrity for further handling
C2	Grievance channels – external	See above and 2016 updated Palm Oil Action Plan
C5	Non retaliation	<p>“Speaking Up and Investigations Policy, LCD-EN-C02A-20160505-094314.pdf (Pages: All) This relates to Whistleblowing and our expectation that employees speak up if they see an issue. This is repeated (in summary) in other policies as: "CAN I BE RETALIATED AGAINST FOR REPORTING A VIOLATION? No. When you speak up and raise concerns or report wrongdoing in good faith, you are doing the right thing and Mondelēz International will not tolerate any retaliation against you. If you think someone has retaliated against you or any other employee for raising a concern, tell your Regional Compliance Officer or Compliance & Integrity, or contact the Integrity Helpline or Integrity WebLine, as soon as possible."</p> <p>“When you speak up and raise concerns or report wrongdoing in good faith, you are doing the right thing and Mondelēz International will not tolerate any retaliation against you. If you think someone has retaliated against you or any other employee for raising a concern, tell your Regional Business Integrity Officer or Business Integrity , or contact the Integrity Helpline or WebLine as soon as possible. Anyone who retaliates against another employee for raising a concern in good faith will face discipline, which may include termination. On the other hand, concerns or allegations raised in bad faith (e.g., knowing they are not true) will not be tolerated and employees who make them are subject to discipline, including termination of employment.”</p>
C7	Remedying adverse impacts	Corrective actions are developed through the SEDEX process are the responsibility of the plant manager. Once corrected, the plants or suppliers re-schedule an audit or otherwise verify completion and a re-audit summary is posted on the SEDEX site, updating with the corrections made.
	Practices	
D.1.3	Mapping and disclosure supply chain	<p>The Call for Well Being 2015 Progress report (also uploaded to the Disclosure Platform)</p> <p>Mondelez maps tier 1 suppliers as well as the origins of the majority its raw materials volume/spend</p>

D.1.7.b	Health and Safety	<p>“Our safety data and food safety data are externally assured. For safety data: In 2015, we reported a 13% reduction in lost time injury frequency rate (LTIFR), compared to 2014. Safety is part of our Call for Well-being, which is one of our strategic growth goals. The safety of our people is a top priority. Our goal is to achieve world-class safety performance. We implemented an extensive program to achieve this: Work, Play, Live, Safe. All of the programs at our plants meet the Occupational Health and Safety Assessment Series (OHSAS) 18001, one of the only internationally recognized safety management systems. See Call For Well-being 2015 Progress Report at page 55.”</p>
D.1.8	Land acquisition	<p>Updated Palm Oil Action plan (also uploaded to the Disclosure Platform)</p>
D.1.9.b	Water and sanitation	<p>“We also conduct sensitivity and stress testing analysis on changes in water availability or quality. In 2009, we hired an external consultant, Quantis (http://www.quantis-intl.com/), who completed an assessment in 2010 that we have recently updated to help us understand the impact of Mondelez International direct and indirect water consumption to allow for strategy development. We map water use and water stress using the WBCSD tool annually and will be developing programs to focus activity on those plants with the highest consumption in the most heavily stressed areas (both present and predicted). In 2013 we started to use the new WRI Aqueduct Water Risk Mapping tool, a complimentary tool to WBSCD, to map our sites in terms of overall water risk, water quality and legislative/ media risk. WRI includes an analysis of regulatory and reputational risks. We have already taken the results of the Aqueduct tool to help prioritize sites for focused water reduction assessments, as part of our new global partnership with Ecolab.</p> <p>Our sustainability platform within our Call for Well-Being, one of our five growth strategies, exhorts us to find ways to use less water and other resources. Our manufacturing sites implement our internal global environmental standards. The water supply management standard ensures that the water supplied to plants meets environmental and health standards and that we have a framework to promote water conservation. The standard for wastewater discharge management reduces the environmental impact of facility water discharges, allowing for compliance with relevant legislation and managing discharges to avoid adverse impacts on human health, the environment, and our company. Plants establish annual water reduction goals for continual improvement and work to achieve them. Incoming water is analyzed to meet food safety and quality requirements.</p>

Our Environmental Policy is publically available (<http://www.mondelezinternational.com/well-being/sustainable-resources-and-agriculture/environmental-footprint>). We are committed to reducing the environmental impact of our activities, preventing pollution, and promoting the sustainability of the natural resources upon which we depend, while providing quality products that meet the needs of our consumers. We also are committed to the continuous improvement of our environmental performance and to meeting or exceeding the requirements of all applicable environmental laws and regulations.

Since 2009, we've been working with an external consultant, Quantis, to systematically assess freshwater consumption and scarcity and also degraded water (grey water) at the local level throughout the whole company lifecycle under the project "Company footprint: air, water and land." The amount of freshwater use is estimated at the country level for each purchased raw material (e.g. dairy, wheat, cocoa and coffee) and at the site level for each manufacturing plant. Since then, we have engaged Quantis to refine the quality of the data and analysis on an annual basis.

This allows us to develop a water management strategy and identify key issues for improvement.

Water quantity and quality risks are predominantly managed on a local level in close cooperation with local municipal water entities.

While we map water use and water stress using the WBCSD Global Water Tool, we started in 2013 to also use the new WRI Aqueduct Water Risk Mapping tool, a complimentary tool to WBSCD, to map our sites in terms of overall water risk, water quality and legislative/media risk. We have already taken the results of the Aqueduct tool to help prioritize sites for focused water reduction assessments as part of a global water management partnership we have with Ecolab.

See also CPD Water Submission – uploaded as separate document

<http://www.mondelezinternational.com/~//media/mondelezcorporate/uploads/downloads/cdpwater2016.pdf?la=en>

<p>D.1.10. b</p>	<p>Women's rights</p>	<p>With the ongoing objective of building a diverse, open, and inclusive corporate culture, we incorporate diversity achievements in our annual cash incentive plan</p> <p>The Diversity Program establishes diversity objectives and sets metrics aligned with increasing the representation, advancement, and retention of women worldwide and, in the U.S., people of color. The metrics are established every year at a regional level and are tracked quarterly through year-end. This assessment is further enhanced by employee resource groups that are focused on the retention of various diverse groups (women, Latinos, African Americans, GLBT, and Asians). For example, the Supply Chain Women's Council in the U.S. continues to focus on providing support to women in a historically male dominated field by promoting deep networking bonds and focusing on the advancement and development of its members. See Supply Chain Women's Council 2014 Brochure.</p> <p>Our focus on gender issues extends beyond our own employees. We require it in our contracts, we implement changes within our supply chain (particularly for cocoa), and our Foundation funding impacts gender issues. For example, 70-75% of NGO community partners are led by women CEOs, and much of the "on the ground" programming is run by women. This applies to Brazil (2), China, Ghana (2), Indonesia, Italy, Spain, Russia, UK. With our focus on healthy lifestyles it is important to work with women on the ground as nutritional gatekeepers for families.</p> <p>We extend our diversity commitment into our supply chain. We contractually require direct suppliers to employ based on performance and ability and to not discriminate. See http://www.mondelezinternational.com/About-Us/Compliance-and-Integrity.aspx#supplierContract. We also explain to them the importance of diversity for our suppliers via our Supplier Portal (http://mondelezinternationalsupplierdiversity.com/overview/mission/).</p> <p>We go further into our supply chain, beyond our direct suppliers, too. Our commitment to gender issues is also demonstrated with our holistic Cocoa Life program. See Call For Well-Being 2015 Progress Report at 17 and Cocoa Life library (search for Women's Empowerment under focus area (http://www.cocoalife.org/library)). Cocoa Life was launched in 2012 and implemented starting early 2013. It is based on a prior program that tackled gender issues since 2008. In 2013, we announced a new initiative to extend our reporting on gender rights in cocoa farming, having a consistent approach to gender programs in key cocoa origin markets. In April 2013, our CEO signed the UN's Women's Empowerment Principles, supporting actions to increase women's empowerment</p>
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		<p>within our business and our supply chain. See http://ir.mondelezinternational.com/releasedetail.cfm?releaseid=845154. As explained elsewhere, Cocoa Life is part of our Well-being growth strategy, which is one of five growth strategies highlighted in our Annual Report (at page 2); see also http://www.mondelezinternational.com/well-being/sustainable-resources-and-agriculture/agricultural-supply-chain/cocoa). In early 2014, we published third-party assessments by Harvard University and CARE International, which revealed striking gaps in income and opportunities for female cocoa farmers. Based on those insights, we strengthened our Action Plan on women’s empowerment</p> <p>in cocoa communities. See Cocoa Life Gender Action Plan in 2014 Documents Library. The plan includes measuring key KPIs by gender in each country (for example for Ghana, KPIs include: cocoa productivity, net cocoa income, and net income from other than cocoa, each broken down by gender). The action plan is based on assessments by Harvard and CARE. We have taken action in Ghana and Côte d’Ivoire to systemically address the root causes driving gender inequality. In October 2014, an independent consultant from Oxfam found that our published gender action plans for Ghana and Cote d’Ivoire “stood out as being reasonably comprehensive and significantly stronger” than other action plans assessed. Following that, we published a further update to our plans in early 2015.</p>
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