BHRC research on Human Rights Defender Policy Commitments – Mondelez International – September 2026

1. **Please provide one or two examples that demonstrate how your company has identified, assessed, and mitigated risks to Human Rights Defenders through its human rights and environmental due diligence processes since the adoption of your commitment.**

Development of a CGF Best Practice Note on Human Rights Defenders

In the palm oil sector, we continued work between the Consumer Goods Forum (CGF) Human Rights Coalition and CGF Forest Positive Coalition actively engaging and supporting the development of a new Best Practice Note for Business on Human Rights Defenders, outlining practical ways for consumer goods companies to support the rights of this vulnerable group. With insights from stakeholders, the note recommends the implementation of preventative measures and practical ways for companies to embed Defender protections into their existing human rights due diligence processes, such as grievance mechanisms and supplier engagement processes, to help identify risks early and address them effectively.

Project on Indigenous Peoples and Local Communities Rights in Indonesian Palm Oil

Indigenous peoples and local community members who speak out to defend their land rights are often among the most at-risk Human Rights Defenders in agricultural supply chains.

Since 2024, we have been part of a project "Respecting Indigenous Peoples and Local Communities Rights Affected by Agricultural Production in Indonesia" aimed at supporting collective action to help address some of the root causes of land rights issues in Indonesia. In the first phase of the project, national level interviews were conducted with key stakeholders, civil society organizations, government, and recommendations were developed for companies and other stakeholders to help improve respect for the land rights of indigenous peoples and local communities. In 2025, the project facilitated several multi-stakeholder dialogues in Aceh, helping to bring together community members, government, companies, and civil society organizations in order to develop a joint roadmap of action. These dialogues were preceded by preparatory awareness-raising sessions conducted for each stakeholder group. Concurrently, our implementation partner, the Conflict Resolution Unit, delivered training sessions on conflict resolution and mediation for local participants, including those from Indigenous Peoples and Local Communities (IPLC) groups.

2. **What steps does your company take to ensure that affected or potentially affected stakeholders - including local communities, Indigenous Peoples, workers, and civil society organizations - are aware of its commitments regarding Human Rights Defenders? Please provide an example of how these commitments have been communicated in practice.**

Our commitments to Human Rights Defenders are embedded in publicly available documents on our website, including our Human Rights Policy, Supplier Code of Conduct, and Palm Oil Action Plan. We report annually on our HRDD progress and implementation through our Human Rights Due Diligence and Modern Slavery Report and our wider ESG report, Snacking Made Right. These documents are accessible to all stakeholders and set clear expectations for both our own operations and our suppliers.

As a practical example of how these commitments have been communicated, we participated in public webinars and panel discussions presenting the new CGF Best Practice Note for Business on Human Rights Defenders. The development of the Note itself was a transparent process: it was shared with civil society organisations and subject-matter experts prior to publication, and their feedback is openly included at the end of the public document, demonstrating the CGF's commitment to meaningful stakeholder engagement. On 9 September 2025, the Consumer Goods Forum hosted an Expert Series webinar to explore how companies can integrate respect for Human Rights Defenders into their human rights policies and due diligence processes, featuring the MDLZ Senior Director Social Sustainability and Stakeholder Engagement as a speaker. In January 2026, MDLZ also joined a panel on Human Rights Defenders at the CGF Sustainable Retail Summit in Paris. These sessions were open to a broad audience of industry peers, civil society organisations, and other stakeholders, helping to raise awareness of both the Best Practice Note's recommendations and our own aim to support Defenders within our HRDD processes.

3. **What steps does your company take to ensure that business partners including suppliers, contractors, and other relevant business relationships - understand and respect its commitments regarding Human Rights Defenders? Please provide an example of how a business partner has engaged with or implemented these commitments.**

Our Supplier Code of Conduct includes an explicit reference to Human Rights Defenders, aligned with our Human Rights Policy. This sets a clear expectation that suppliers respect the rights of HRDs as part of their business relationship with us. In the palm oil supply chain specifically, suppliers agree to our Palm Oil Action Plan, which embeds respect for Human Rights Defenders as a core expectation.

Our grievance channel is open to all stakeholders, including third parties, local communities, and workers in our supply chain, to flag issues related to Human Rights Defenders or other human rights concerns. Reports are investigated in line with our grievance procedure.

4. **Please provide an example of how a Human Rights Defender or affected community member safely raised a concern related to your company's operations, projects, or business relationships, and describe the steps the company took to address the concern and prevent retaliation.**

We are not able to provide a specific example due to confidentiality obligations. Our Procedural Guidelines for Grievance Management state: “Anyone raising a case in good faith will be protected from adverse action in relation to having raised the grievance. If you feel you are being retaliated against for raising a concern or supporting an investigation, please contact Mondelēz

Compliance via the channels above. Allegations of retaliation will be properly investigated." In addition, our Human Rights Policy states, "We are committed not to interfere with the activities of human rights and environmental defenders, including those who campaign on issues that may be linked to our business operations, nor to tolerate or contribute to retaliation against them.".