US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of July

Mondelez

Indicator	Finding - July 2025	Source	Source Link	Yes/no change	Change
Policies and commitments					
General					
Human rights policy - UNGPs	At Mondelēz International, we are committed to making our snacks the right way, protecting the planet and respecting the human rights of people in our value chain, using the United Nations Guiding Principles on Business and Human Rights (UNGPs) as a framework for preventing and mitigating human rights risks.	Human Rights Policy	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf	Updated language	In connection with these efforts, Mondelez International is mindful of the United Nations Guiding Principles on Business and Human Rights (UNGPs), which, along with other external instruments, provide illustrative examples of approaches for helping to prevent and mitigate human rights risks.
Human rights policy - ILO Core Labor Standards	We support the principles concerning fundamental rights set out in the International Labor Organization Core Conventions	Human Rights Policy	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf	Updated language	This approach is guided by certain international conventions and protocols, which serve as illustrative examples of potential approaches for helping to prevent and mitigate human rights risks.1 Footnote: Including the Universal Declaration of Human Rights, the International Labor Organization (ILO) Fundamental Conventions and the International Bill of Human Rights.
Forced labor & prison labor	Child Labor and Forced Labor: We explicitly prohibit child labor and forced labor in our operations	Human Rights Policy	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf	No change	
Human rights defenders & civic space	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.	Human Rights Policy	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf	Additional source	Supplier & Partner Code of Conduct. https://www.mondelezinternational.com/assets/PDFs/Supplier-and-Partner-Code-of-Conduct-MDLZ.pdf Do not interfere with human rights or environmental defenders, nor tolerate or contribute to any retaliation against them.
Gender equality and women's empowerment	Our commitment to this goal is demonstrated by our role as a signatory to the UN's Women's Empowerment Principles. [Human Rights Policy] Mondelēz International today announced new action plans to accelerate women's empowerment across four cocoa origin countries as part of Cocoa Life, the company's cocoa sustainability program. The company launched specific women's empowerment action plans in Ghana and Côte d'Ivoire in 2014 and is now expanding to include two additional origin countries, Indonesia and Dominican Republic. These new action plans will empower more than 100,000 women in over 1,000 communities in these four countries. [Webpage] As part of the Cocoa Life program, we believe that when women rise, cocoa thrives. In cocoa-growing communities, women farmers typically have lower incomes and less access to financing, inputs and land ownership than men. To help address gender inequality, Cocoa Life partners with NGOs that have technical expertise in gender-based issues to help implement women's empowerment initiatives including gender sensitization training, VSLAs and	Human Rights Policy Webpage - Mondelez International Expands Women's Empowerment Plans in Cocoa Communities 4/4/2018 2024 HRDD Report, pg 18	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf https://ir.mondelezinternational.com/news-releases/news-release-details/mondelez-international-expands-womens-empowerment-plans-cocoa https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2024.pdf	Updated	Annual human rights due diligence and modern slavery report - 2025. https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2025.pdf Several references Supplier & Partner Code of Conduct. https://www.mondelezinternational.com/assets/PDFs/Supplier-and-Partner-Code-of-Conduct-MDLZ.pdf 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.
Indigenous Peoples	We are committed to meaningful engagement with all potential and actually impacted rights holders, particularly those who are traditionally excluded or marginalized, including women, children, migrant workers and indigenous peoples.	Webpage - Human Rights	https://www.mondelezinternational.com/snacking-made-right/esg-topics/human-rights/	Updated link	https://www.mondelezinternational.com/snacking-made-right/our-positions/human-rights/
Natural resources					
Land rights	Deforestation is a risk because of its contribution to global climate change as well as its impact on indigenous people and local communities and ecosystem services in affected areas. Therefore, it is important to take action to help reduce deforestation and promote more sustainable land use practices which respect human rights, including land rights, in line with our Human Rights policy.	Webpage - Deforestation	https://www.mondelezinternational.com/snacking-made-right/esg-topics/deforestation/	Updated link	https://www.mondelezinternational.com/snacking-made-right/our-positions/deforestation/

Free, Prior, and Informed Consent (FPIC)	Commit to respect and effectively implement Free Prior and Informed Consent. The implementation of FPIC should be documented and supplier should be willing to share relevant information with MDLZ in case of a grievance	Palm Oil Action Plan - 2025 Update	https://www.mondelezinternational.com/assets/Snacking-Made-Right/ESG-Topics/Palm-Oil/PO_Action_Progress_Update_2025.pdf	Additional source	Mondelēz International Scales Up Human Rights Due Diligence Across Own Operations and Supply Chain (June 11, 2026) https://ir.mondelezinternational.com/node/30761/pdf Palm Oil: Mondelēz International requires suppliers to respect human rights, including land rights, Free Prior and Informed Consent (FPIC) and the rights of human rights defenders, as laid out in their strengthened 2025 Palm Oil Action Plan (POAP). To help address some of the systemic issues in the palm supply chains, the Company supports collective action through the Consumer Goods Forum
Living wage					
Living wage, own operations	Our goal is to pay our employees a living wage and provide equal opportunity for advancement to all our employees [Human Rights Policy] CHICAGO, Dec. 13, 2021 (GLOBE NEWSWIRE) -- Mondelēz International, Inc. (Nasdaq: MDLZ) today joins IDH (The Sustainable Trade Initiative) Living Wage Roadmap to help advance living wages in global supply chains and confirms a continued commitment to pay its employees a living wage.	Human Rights Policy Mondelēz International Strengthens Commitments to Human Rights and Endorses Call to Action to Advance Living Wages - 12/13/2021	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf https://ir.mondelezinternational.com/node/26221/pdf	Updated	We aim to pay our employees a living wage and provide equal opportunity for advancement to all our employees
Living wage in supply chain	See above			No change	
Human rights due diligence and supply chain					
Process for assessing human rights risks and impacts	As part of our ongoing due diligence activities, we completed our annual human rights risks assessment of our value chain. This assessment considered external developments affecting our business, such as changes in operational contexts or conflicts that could potentially heighten the risk of human rights abuses. We also incorporated lessons learned from our previous due diligence activities. This annual exercise allows us to update our understanding of the potential human rights risk in our own operations and supply chain and prioritize our efforts in the right areas. The risk assessment was completed with expert support from sustainability consultants, twentyfifty, following best practice methodology: • Map value chain footprint and identify relevant rights-holders • Apply a lens focused on conflict-affected and high-risk areas to identify relevant regions and specific risks • Identify and develop understanding of potential risks across the value chain, using international human rights indicators to determine risk levels based on country and sector across a comprehensive list of potential issues	Human Rights Due Diligence & Modern Slavery 2024 Report	https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2024.pdf	Updated	Annual human rights due diligence and modern slavery report - 2025. https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2025.pdf Also see International Human Rights Policy. https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf We undertake practical, proactive, and ongoing human rights due diligence to help identify, mitigate and prevent human rights impacts within our own operations, and work with our business partners in our supply chain to achieve the same. We strive to embed these due diligence practices at a central level, as well as at a local level in collaboration with our business units.
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	No evidence			No change	

Affected stakeholder engagement	We are committed to meaningful engagement with all potential and actually impacted rights holders, particularly those who are traditionally excluded or marginalized, including women, children, migrant workers and indigenous peoples. Through our Compliance & Integrity program, we are committed to ensuring the availability of accessible grievance mechanisms (e.g., Integrity HelpLine and WebLine) for our own employees, contractors, and subcontractors, as well as anyone to use for raising any concerns and to better enable Mondelēz International to appropriately redress human rights impacts which we have either caused or contributed to. We are also committed to ensuring we don't unreasonably inhibit access to other forms of remedy for potentially and actually impacted rights holders.' [Webpage - Human Right] It is important we hear from workers and farmers in our supply chains about any relevant issues that affect them. As part of our efforts to engage in two-way dialogue, we engage periodically with civil society organizations who represent them, and where possible, we also engage with potentially affected rights-holders themselves. [2024 HRDD Report]	Webpage - Human Rights 2024 HRDD Report, pg 11	https://www.mondelezinternational.com/snacking-made-right/esg-topics/human-rights/#reports https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2024.pdf	Updated source 2	Annual human rights due diligence and modern slavery report - 2025. https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2025.pdf. It is important we hear from workers and farmers in our supply chains about any relevant issues that affect them. . Smallholder farmers and their communities are at the heart of our Cocoa Life program. We aim to involve farmers and their communities in the design of the program's interventions, and seek their input and feedback as we continue to enhance our approach.
Human rights requirements in supplier code/requirements	Our Supplier & Partner Code of Conduct, created in June 2021, and as may be amended from time to time, outlines Mondelēz International's (MDLZ) 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.	Supplier &Partner Code of Conduct	https://www.mondelezinternational.com/assets/PDFs/MDLZ-Supplier-and-Partner-Code-of-Conduct.pdf	Updated	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).
Access to remedy					
Grievance mechanism for own employees	Anyone – including our own employees and those in our value chain – has the right to report tips or cases regarding potential human rights or environmental risks and alleged violations. Concerns relating to human rights and environmental risks can be reported using the channels below by external parties including non-employee workers in our value chain (e.g. temporary workers and employees of external service providers), business partners, farmers, local communities, and other third parties. [Procedural Guidelines] MDLZ uses this grievance procedure to process, manage and respond to the grievance cases raised to us worldwide. The procedure's objectives are to be fair, objective, confidential, and action-driven. The concepts set forth herein apply to own operations and our value chain (i.e. involving suppliers as set forth). [Human Rights & Environmental Grievance Management]	Procedural Guidelines for Grievance Management in respect of Human Rights and Environmental Impacts in the Supply Chain (Lieferkettensorgfaltspflichtengesetz - LkSG) Human Rights & Environmental Grievance Management	https://www.mondelezinternational.com/assets/Grievance-Procedure.pdf https://www.mondelezinternational.com/assets/Grievance-Procedure.pdf	Additional source	Also see: Human Rights Policy. https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf We believe it is fundamental to ensure the availability of accessible grievance mechanisms for all employees and people outside Mondelēz International who want to raise a concern. Our Integrity HelpLine and WebLine are made available to our employees and third parties to raise concerns or questions, which enable appropriate follow-up.
Grievane mechanism for workers - supply chain	See above			See above	
Grievance mechanism for external individuals & communities	See above			See above	
Governance and staffing					
Board and/or C-Suite-level oversight	Governance Structure for Human Rights The Mondelēz International Human Rights Working Group ("HRWG") is the cross-functional team that defines Mondelēz International's human rights due diligence strategy and drives its implementation throughout our own operations and supply chains. The HRWG reports regularly to senior leaders in the Human Rights Council and a report on Mondelēz International's human rights due diligence is provided at least annually to the Board of Directors' Governance, Membership & Public Affairs Committee (GMPAC).	Human Rights Policy	https://www.mondelezinternational.com/assets/PDFs/Mondelez-International-Human-Rights-Policy.pdf	Updated	The Mondelēz International Human Rights Working Group ("HRWG") is the cross-functional team that defines Mondelēz International's human rights due diligence strategy and drives its implementation throughout our own operations and supply chains. The HRWG reports regularly to senior leaders in the Sustainability Huddle and a report on Mondelēz International's human rights due diligence is provided at least annually to the Board of Directors' Governance, Membership and Sustainability Committee.
Senior level responsibility for human rights	See above			See above	
Reporting and transparency					

Human rights reporting (integrated or stand-alone)	Annual human rights due diligence and modern slavery report	Webpage - Human Rights	https://www.mondelezinternational.com/snacking-made-right/esg-topics/human-rights/#reports	Updated	Mondelez International Scales Up Human Rights Due Diligence Across Own Operations and Supply Chains. June 11 2026. https://ir.mondelezinternational.com/node/30761/pdf Annual human rights due diligence and modern slavery report - 2025. https://www.mondelezinternational.com/assets/About-Us/Human-Rights/MDLZ-HRDD-and-Modern-Slavery-Report-2025.pdf
Memberships					
RBA	No	RBA	https://www.responsiblebusiness.org/about/members/	No change	
RSPO	Yes	RSPO	https://rspo.org/search-members/	No change	
WEPs (signatory)	Yes	WEPs	https://www.weps.org/companies	No change	
Lobbying and ethics					
Public statement or endorsement in support of mandatory human rights and environmental due diligence	We, the undersigned, as leading businesses, investors, business associations and initiatives operating in the UK, encourage the government to play a positive role in building a more resilient and sustainable post-pandemic economy that works for all. To realise this ambition, we call on the government to introduce a new legal requirement for companies and investors to carry out human rights and environmental due diligence. [In addition to other statements]	Signatory to: CALLING FOR A NEW UK LAW MANDATING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE FOR COMPANIES AND INVESTORS [In addition to other statements]	UK_BUSINESS_STATEMENT_MHREDD_OCT21_FINAL.pdf https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/companies-investors-in-support-of-mhrdd/	No change	
Anti-bribery and anti-corruption policy	At Mondelēz International, we deal honestly with the government, our business partners, our competitors and the public. We do not pay bribes for any reason. We comply with the law whenever and wherever we do business. [C-17 Policy Against Corruption and Bribery] The general rules here are obvious and simple. We won't bribe. We won't lie. We won't deceive. We won't hide information from government inspectors or falsify documents. We will not offer anything of value to a government official to obtain an improper business advantage. We will also maintain the highest level of integrity when advocating on behalf of the company via lobbying or otherwise engaging with governmental entities. The same is expected from our agents or service providers who interact with government officials on our behalf. [Code of Conduct]	C-17 Policy Against Corruption and Bribery Mondelez International Code of Conduct	https://www.mondelezinternational.com/assets/PDFs/LCD-EN-C17.pdf https://www.mondelezinternational.com/assets/PDFs/employeecodeofconduct.pdf	No change	

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