

OUR WAY OF DOING BUSINESS

Mondelēz International
Code of Conduct

Mondelēz
International
SNACKING MADE RIGHT



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A Message from our Chair and Chief Executive Officer

Dear Colleague:

Empower people to snack right.
It's our purpose, and it drives us every day.

Our three values work hand in hand to shape our culture and guide our actions and decisions. Love Our Consumers and Brands. Grow Every Day. Do What's Right.

To sustain the legacy of trust in our company and our brands, we must remain steadfast in our commitment to do business in a lawful and responsible manner.

Each of us has a responsibility to do what's right by following legal requirements and respecting our consumers, our customers, our business partners and our fellow employees. It may seem like second nature, but it takes a conscious effort and a strong commitment by each of us to always do what's right.

The principles embodied in our Code of Conduct guide us to do what's right anywhere we do business and set out our integrity commitment to our stakeholders.

Our Code of Conduct continues to focus on relevant areas of importance for our business and provides examples related to the expectations of all of us as employees of Mondelēz International.

Please take these 10 Guiding Principles to heart and live them every day. Speak up if you have concerns or see something that seems wrong. Ask for guidance if you are not certain or have questions.

Sincerely,

Dirk Van de Put

Chair and Chief Executive Officer





The Reason We Have a Code

What makes Mondelēz International the biggest snacking company in the world is not only our iconic brands and products, but also the trust we have built with our stakeholders. This trust is maintained by the integrity of our everyday actions, doing things the right way.

Our Code of Conduct contains 10 overarching principles to guide us to live our values in the right way. We must use all these important principles to guide our decisions as we do business. They provide us with the guardrails for our strategies, give us the support system for our company values, and enable us to achieve success in the right way.

Our Values



We love our consumers and brands – we will not intentionally mislead consumers in labeling or advertising, and we will make food that is safe to eat. We grow every day – we will compete fairly. We do what’s right – we treat people fairly, we practice social and environmental responsibility, and we deal honestly with the government. When gaining a business advantage means ignoring our values or violating our guiding principles, we won’t do it!

We will adhere to these guiding principles, which are cornerstones of our business. People leaders are responsible for leading by example and reinforcing the principles of our Code at every level of our workforce. Failure to comply with this Code and related policies can result in penalties, fines, reputational harm and other significant consequences for Mondelēz and for the individuals involved.

By following this Code, we will sustain our culture of integrity in Mondelēz, which should make us each proud to work here.



The Reason We Have a Code

This Code guides us to... 

- Understand what Mondelez expects from us.
- Comply with the policies and legal requirements that apply to our work.
- Obtain guidance if we have questions.

We all do our part:

- **Live the Code:** be familiar with our Code and policies applicable to you.
- **Promote a culture of integrity:** be an example of integrity by making ethical decisions. No business result should be more important than our values and reputation.
- **Learning is key:** complete required training on time and ensure your team does the same.
- **Ask questions:** seek help to resolve and escalate issues to the Ethics & Compliance Office as they arise.
- **As a manager, foster an open environment:** your team members should feel comfortable to ask you questions or voice their concerns and opinions without a fear of retaliation.



A top-down photograph of a small blue bowl filled with multi-colored gummy bears (red, orange, yellow, green, blue). The bowl sits on a light green and white striped cloth. Several gummy bears are scattered on the dark, textured surface around the bowl. To the left, a portion of a light blue clipboard with a silver clip is visible.

To Whom Does the Code of Conduct Apply?

Our Code of Conduct applies to all our employees worldwide, regardless of location, role or level of seniority. We expect temporary and contract employees, consultants, agents and any other third party who acts on behalf of Mondelez to follow the principles of the Code.

Every subsidiary and joint venture the company controls must adopt and comply with the Code. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Code.

The members of the Board of Directors must follow the Code of Business Ethics and Conduct for Non-Employee Directors, which has similar principles to those in this Code of Conduct, but tailored specifically for corporate governance purposes.

We also expect our third-party business partners and suppliers to adhere to the business principles set forth in our [Supplier & Partner Code of Conduct](#), which encompass the principles of the Code.



Making Right Decisions

Not Sure What Way to Follow?

If the right thing to do is not clear, ask yourself:

- 

Is it consistent with our Code, policies and laws?
- 

Am I acting in the best interests of the company?
- 

Would I be comfortable if my actions were made public?
- 

Will it protect Mondelēz's reputation as an ethical company?

If you answered “no” or even “maybe” to any of these questions, you should stop and get advice or ask questions, via any of these resources:

- 

Your manager or your manager's manager
- 

Human Resources
- 

Ethics & Compliance Office
- 

Legal
- 

Compliance Line

Where to Get Help

Your Manager (or your manager's manager) is generally your go-to person when you're not sure which way to follow. But if you prefer not to speak with your manager or are uncomfortable speaking with your manager, or if you have already shared a concern and feel it's not being addressed appropriately, you may contact the [Ethics & Compliance Office](#) directly or use our [Compliance Line](#) to submit an inquiry or report a concern.

You may also reach out to a supporting Mondelēz function, such as your point of contact with Human Resources or Legal. External stakeholders should contact our Compliance Line with questions related to this Code.



Raising a Concern

No set of principles could address every issue we may face at work. So, if you ever feel that the Code of Conduct doesn't clearly address a particular situation, you should simply remember our mission of "Snacks ... made the right way."

If still not clear, we encourage our employees to ask questions or speak up.

If you notice something about to go wrong at Mondelēz, you may address the issue directly and try to stop it. But when something has already gone wrong, and you think someone may have violated the law, this Code or a Compliance Policy, you must let the Ethics & Compliance Office know immediately, so the company can act quickly. Our Speaking Up Policy requires it.

In case you prefer, you can also report a concern anonymously. Just call our toll-free Compliance Line or visit our webpage at mdlzethics.com. A third-party representative will receive your concerns and inform the right people in our Ethics & Compliance Office.

Violations of the Code and/or a Compliance Policy will result in disciplinary action, up to and including termination. Mondelēz takes all allegations of misconduct or other wrongdoing seriously and will investigate them. We will protect and support anyone who reports misconduct or unethical behavior in good faith, including employees and other stakeholders. We adhere to whistleblower protection laws to ensure a safe reporting environment.

When we follow our guiding principles, ask questions if we're not sure and report concerns, we are helping our company succeed. We are living our values and building trust. That's "Snacking Made Right." And it's our way of doing business the right way – with integrity.



Click here for additional reporting information and resources:

[Speaking Up & Investigations Policy](#)

[Compliance Line](#)

[Ethics & Compliance Office](#)



What happens when I call the Mondelēz Compliance Line?



1. **You can reach out to our Compliance Line 24/7 to report a concern, disclose a potential conflict of interest or raise an inquiry.**
Any report you make will be kept confidential to the fullest extent possible consistent with law and good business practices.



2. **Your concern is received by an independent party.**
At the end of the call, you receive a report ID number that you can use to check on the status of your matter or provide additional relevant information.



3. **The Mondelēz Ethics and Compliance team is notified** and your case is assigned to an appropriate resource, who ensures that the incident is thoroughly investigated, in a timely and efficient manner.



4. **Appropriate action is taken to remediate the matter.**
If the company confirms that misconduct has occurred, we address the situation appropriately, including the issuance of corrective or disciplinary action as appropriate.



5. **How long does it take?** It depends on the complexity of the case. While investigations are normally initiated promptly, in some cases, timing depends on how much additional information needs to be gathered.

NO RETALIATION

Mondelēz has zero tolerance to retaliation. Anyone who retaliates against someone for raising a concern in good faith will face discipline, which may include termination.

If you report a concern, Mondelēz will fully support you, and conduct an independent and appropriate investigation.



Click here for additional reporting information and resources:

[Speaking Up & Investigations Policy](#)



Our Guiding Principles

We all have to abide by applicable laws, rules and regulations of the countries in which we operate – that’s the starting point. Also, we must follow our company policies. And if there is a difference between a legal requirement and our Code of Conduct or policies, we will always apply the higher standard. To help provide clarity, this Code sets out the 10 most important principles to doing business with integrity that apply company-wide. Each principle has a cross-reference to the relevant Compliance Policy in our Corporate Global Policy Center that contains more details on expectations.



Treat People Fairly

We value the authentic selves of the individuals who work hard every day to empower people to snack right. We see diversity and inclusion as tied to our success. We are committed to providing a respectful and safe working environment, and we believe that everyone deserves an equal chance to succeed based on their hard work, talent and commitment to the values of Mondelēz.

HEALTH AND SAFETY

At Mondelēz, the safety and well-being of our colleagues is a priority – a core value deeply ingrained in every aspect of our operations. We do not tolerate any acts or threats of violence. Each of us plays a role in securing our work environment, protecting our assets and responding to risks.



Click here to read more about expectations for living up to this principle:

Anti-Discrimination & Anti-Harassment Policy

Health & Safety Policy

Security of People, Product, Premises & Other Assets Policy

Laws and cultures may differ around the world, but the concept of treating others as you want to be treated 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. Likewise, we do not tolerate discrimination, harassment, bullying, intimidation, or any disrespect to human rights, including child and forced labor.

SMART BITES

Treating people fairly means, for example, that:



- > *We practice civility in our workplace; we treat our colleagues and partners with dignity and respect.*
- > *We have fun while we work and grow, but not in a way that makes others feel excluded or offended.*
- > *Managers lead by example, giving employees confidence that Mondelēz is a fair and safe place to work.*



Make Food that Is Safe to Eat

We are a snack company, and “Snacking Made Right” reflects our relentless focus on food safety.

Therefore, we ensure that the food we make achieves our highest standards. We must be aware of and follow our company policies and procedures to protect this commitment. Whenever we face challenges, we resolve them with urgency and transparency.



Click here to read more about expectations for living up to this principle:

Food Safety, Food Defense & Regulatory Policy

Security of People, Product, Premises & Other Assets Policy



3 Market Responsibly

We take great care to market responsibly – to help consumers snack mindfully. Misleading marketing erodes consumers' trust in us and can ultimately hurt all our brands. We have clear guardrails to ensure our product claims are substantiated and that we comply with our Marketing to Children Policy.



USE SOCIAL MEDIA RESPONSIBLY

Each of us can be a positive ambassador for our company, but with that opportunity comes responsibility and accountability. If you choose to engage on social media, as an employee, you are required to speak “about” the company, not “on behalf of” the company. Only our Communications & Government Affairs representatives are permitted to serve as official company spokespeople. If you choose to discuss our company online, clearly state that you are an employee and that your views are personal and not representative of the company.

Employees may never post information concerning the company or its personnel that the poster knows to be false, that is made with reckless disregard to the truth or falsity of the information, that is likely to injure the subject’s reputation in a manner not protected by law, or that is confidential information.



Click here to read more about expectations for living up to this principle:

Advertising & Marketing Policy

Marketing to Children Policy

Social Media Policy

4 Embrace Social and Environmental Responsibility

We care about the lives we touch and our goal is to treat everyone with respect, from employees in our plants to smallholder farmers and their communities in our agricultural supply chains.

Through our actions and policies, we strive to respect human rights within our own operations and our value chain. We also seek to do business with partners who share the same principles.

We care about our planet, so we work hard to prevent pollution, minimize waste and reduce our use of natural resources.

Be vigilant. Human rights risks can arise in any location or situation. If you identify a potential human rights violation, report it immediately to your manager, Human Resources, Legal, or the Ethics & Compliance Office.



RESPECT FOR HUMAN RIGHTS

Apply the same human rights principles to suppliers, customers, communities and others as you would with your colleagues at Mondelez. When making decisions about work activities, particularly regarding new business processes, acquisitions, or partnerships, ensure they are in line with our Human Rights Policy. Require that all partners we collaborate with adhere to the standards of our [Supplier & Partner Code of Conduct](#).



Click here to read more about expectations for living up to this principle:

[Human Rights Policy](#)

[Environmental Policy](#)



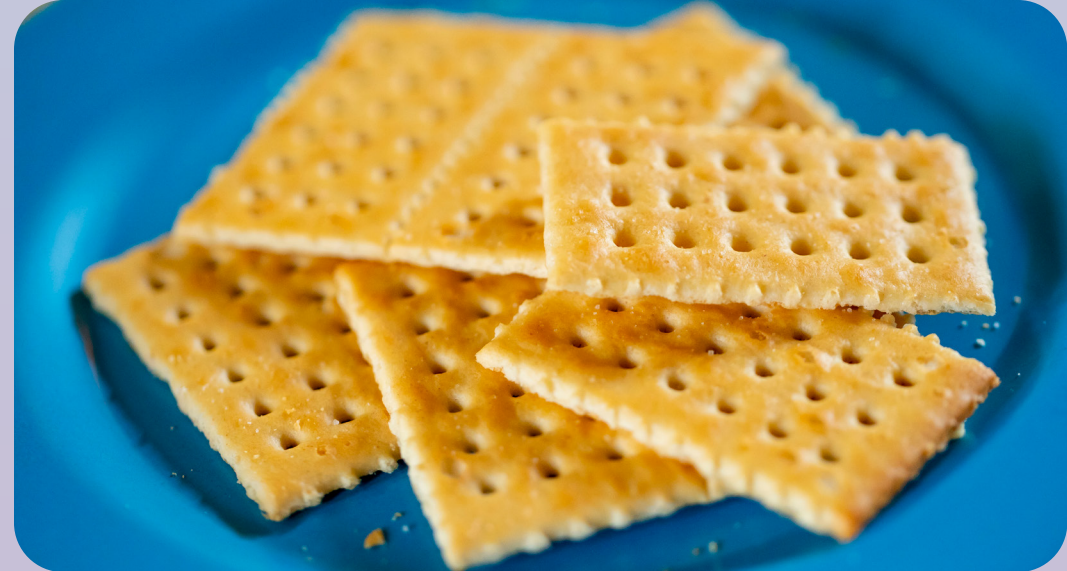
5 Protect and Respect Private and Proprietary Information

Many of us have access to confidential, sensitive, private or other nonpublic information through our work and it is our obligation to safeguard it. At Mondelez we protect our employees', consumers', customers' and business partners' confidential information we may have access to as part of our business relationship.

DATA PRIVACY IS A NON-NEGOTIABLE COMMITMENT

Protecting personal information is vital to our people, our business and our reputation. We take steps to abide by laws that require us to secure personal information that can identify or relate to an individual. Thus, we will collect, use, access, process and share personal information for legitimate business purposes and as described in our Data Privacy Policy, and we will take steps to safeguard it against potential loss, misuse, or unauthorized disclosure.

We also protect our own confidential information. Mondelez's confidential information is among our most valuable assets. This information represents the outcome of significant company investment and years of hard work by our team. Unauthorized disclosure may result in a competitive disadvantage. That means we will not share this information with our family, friends, colleagues, or anyone who is not authorized to receive such information for business purposes – and this obligation continues even after we leave the company.



5 Protect and Respect Private and Proprietary Information

At Mondelēz, we also understand and respect the importance of proprietary intellectual property rights (including trademarks, patents and trade secrets) both for our company and for others. We protect the intellectual property rights of the company, and we do not knowingly violate the valid intellectual property rights of others.

We are all responsible for the information security of the company and keeping Mondelēz information systems, data, technology and equipment safe, whether working on-site or remotely. Be cybersecurity savvy, keep your passwords secure, stay vigilant on any phishing attempts, follow all information security policies and handle any incident appropriately.

SMART BITES

- > **Check:** Always check with your supervisor or another designated resource before taking action or giving out information if you have questions or are uneasy about the validity of a message or request you receive.
- > **Alert:** Immediately report and preserve any suspicious messages you receive. Prompt reporting allows Mondelēz to alert others and take the necessary steps to contain the phishing attempt.



OUR STANCE ON ARTIFICIAL INTELLIGENCE (AI)

We encourage the use of new digital technologies, including AI, provided that such technologies are used in accordance with responsible frameworks, such as ensuring it is safe for the company and our people, and protecting our data. All use of AI should be in accordance with the Responsible AI Policy.



Click here to read more about expectations for living up to this principle:

Data Privacy Policy
Intellectual Property Policy
Information Security Policy
Responsible AI Policy



6 Compete Fairly and Follow International Trade Laws

We compete hard – but also fairly and equitably within the law. This means that we won't spy on our competitors or use their confidential information, and we expect our competitors to treat us the same. We won't engage in business practices or exchange information with our customers or competitors that reduces or limits competition. We implement fair and equitable pricing and promotional programs for our customers, and we follow the law when competing for our customers' business. We won't interfere with free markets, but instead we allow competition to take its course for the benefit of our consumers.

Mondelēz is committed to compliance with applicable laws in conducting our global business including sanctions, export controls, and customs and import laws.

MONEY LAUNDERING

Mondelēz is dedicated to preventing money laundering and ensuring that our operations remain free from illicit financial activities. Stay vigilant for any suspicious financial transactions by knowing your customers and partners and understanding how they use our products.

SMART BITES



- > *Be aware of sanctions, which are imposed on certain countries, territories, entities and individuals, and which can impact our business.*
- > *Be aware of export controls and other trade laws, which can impact our ability to move goods, software and technology around the world.*
- > *Do not make your own assumptions regarding the applicability (or lack thereof) of sanctions, export controls, or other trade laws without guidance from Legal and Ethics & Compliance.*
- > *Conduct appropriate due diligence on our suppliers, customers and other counterparties, and never take any action that seeks to circumvent or evade economic or financial sanctions – whether due to business pressure or a lack of knowledge.*



Click here to read more about expectations for living up to this principle:

Fair Competition Policy

Sanctions Compliance Policy

Customs & Trade Laws Policy

Anti-Money Laundering Policy

7 Deal Honestly with the Government

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.

8 Never Trade on Inside Information

Employees shall not trade Mondelēz stock ("MDLZ") or options based on "inside" information. That means we, our family members, or anyone living in our household must not buy or sell company stock or exercise options based on material things we know about the company that the public doesn't know. Not only is it basic fairness, insider trading is a crime. Our investors should be able to trust that everyone trading in the market has the same information.

SMART BITES



- > *We do not make any payments, directly or indirectly, to improperly obtain a business advantage or expedite a permit or license – no matter what. Mondelēz does not permit facilitation payments of any kind.*
- > *If a government official requests a bag full of products to avoid imposing a fine on us, we say no.*
- > *There is no "cultural aspect" more important than our ethical standards. Stop and speak up if you hear "that's the way we do business in this country."*
- > *We ensure the third parties we hire are aware that we will deal honestly with the government – and expect the same of them.*



Click here to read more about expectations for living up to these principles:

Anti-Bribery & Anti-Corruption Policy

Insider Trading Policy

9 Keep Accurate Books and Business Records

Our financial statements must be complete, timely, accurate and fair and comply with applicable accounting principles. We won't hide liabilities, overstate earnings, keep things off our balance sheets that belong there, or disguise our transactions. We will provide investors with accurate data they need to make informed investment decisions, since omissions and distortions would severely harm their trust.

We will not engage in fraud, theft or misuse of our assets. We will not obscure any record or circumvent a policy or process for personal gain.

We will manage all records and information securely and in full compliance with all applicable laws and regulations and business needs – everywhere we do business.



Click here to read more about expectations for living up to this principle:

[Records Management Policy](#)

RECORDS MANAGEMENT

Create and circulate records responsibly. Understand which business records you have to keep per our company's policies and for how long.



10 Avoid Conflicts of Interest

Doing what's right goes both ways. The company works hard to earn our trust, and in turn, expects our loyalty. That means we won't have personal interests that conflict with those of Mondelēz or use our position with the company for any advantage or gain to ourselves or our close friends and relatives. For the same reason we generally may not accept gifts from business partners, since it could affect our objectivity in pursuing Mondelēz's best interests, and, of course, we never accept a bribe or kickback.

If an employee has a potential or actual conflict of interest, he or she must report this per our Conflicts of Interest Policy.

SMART BITES

Some examples of potential conflicts of interest:

- > *Hiring a firm owned by a close relative to do consulting work for Mondelēz.*
- > *Having a financial interest in one of our suppliers, customers, or competitors.*
- > *Serving on the board of directors of a competitor.*
- > *Having an outside job that could interfere with our work for Mondelēz.*



GIFTS AND HOSPITALITY

Offering gifts or hospitality to third parties can be suitable in some circumstances, but it needs to be managed with caution. Refrain from such gestures if they risk compromising professional judgment, creating conflicts of interest, causing feelings of obligation or breaching local laws. Gifts or courtesies of significant value, either individually or combined, could potentially improperly influence judgment and therefore are not allowed.



Click here to read more about expectations for living up to this principle:

[Conflicts of Interest Policy](#)

[Conflict of Interest Disclosure](#)





We Lead the Future of Snacking

Our Mission is to lead the future of snacking by offering the right snack, for the right moment, made the right way.

We call this **Snacking Made Right**. But our iconic global and local brands can't do it on their own. To achieve this, we must adhere to both the letter and the spirit of our Code, upholding our commitment to integrity and honesty, and supporting one another in our shared values.

We will keep building a culture of ethics and compliance at Mondelēz, and we will do this together.

Let's do our part!



Helpful Resources

GENERAL

[Compliance Line](#)

Corporate Global Policy Center

[Ethics & Compliance Office](#)

Legal Contacts

Human Resources

Global Employee Center

Conflict of Interest Disclosure

[Supplier & Partner Code of Conduct](#)



POLICIES

Advertising & Marketing Policy

Anti-Bribery & Anti-Corruption Policy

Anti-Discrimination &
Anti-Harassment Policy

Anti-Money Laundering Policy

Conflicts of Interest Policy

Customs & Trade Laws Policy

Data Privacy Policy

Environmental Policy

Fair Competition Policy

Food Safety, Food Defense &
Regulatory Policy

Health & Safety Policy

Human Rights Policy

Information Security Policy

Insider Trading Policy

Intellectual Property Policy

Marketing to Children Policy

Records Management Policy

Responsible AI Policy

Sanctions Compliance Policy

Security of People, Product,
Premises & Other Assets Policy

Social Media Policy

Speaking Up & Investigations Policy





If you have any questions about our Code or our policies, please contact the **Ethics & Compliance Office** or our **Compliance Line**. Mondelēz International reserves the right to make unilateral changes to our Code or company policies at any time. Mondelēz International's Code of Conduct contains many of the valuable trademarks owned and/or used by Mondelēz International and its subsidiaries and affiliates. The photos and/or images included in our Code of Conduct may or may not represent current logos, marks, or staff and should not be reproduced in any other media or publication.