

# Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Mondelez International  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 25.6 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
12.0	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
2.5	20	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations
2.3	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company has a statement supporting human rights on their website that states "Mondelez International is committed to do business the right way and to its responsibility to respect human rights. We comply with all applicable laws in the jurisdictions where we operate." [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2: On the Company website, it states that the company 'subscribe in principle to the United Nations Guiding Principles on Business and Human Rights (UNGPs). The company states that "In line with the UNGP framework of 'Protect, Respect and Remedy', we have the appropriate policies in place, and we acknowledge our responsibility to respect human rights by avoiding the infringement of the rights of others, addressing negative impacts with which we may be involved, and providing access to effective remedy if violations have occurred." [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: On the Company website, it states that the company 'subscribe in principle to the United Nations Guiding Principles on Business and Human Rights (UNGPs). The company states that "In line with the UNGP framework of 'Protect, Respect and Remedy', we have the appropriate policies in place, and we acknowledge our responsibility to respect human rights by avoiding the infringement of the rights of others, addressing negative impacts with which we may be involved, and providing access to effective remedy if violations have occurred." [Compliance and Integrity: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: The Company states on its company website that they prohibit the unlawful employment of exploitation of children in the workplace, in accordance to the ILO conventions. However, the Company does not commit to the core conventions, nor are these commitments in a public policy document. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: All four ILO for AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: All four ILO Core</li> <li>• Not met: Respect H&amp;S of workers: The Company Website 'corporate responsibility guidelines' covers safety and health of workers. However, this is not a formal policy. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: H&amp;S applies to AG suppliers: to suppliers and covers safety and health of workers. However, this is not a formal policy. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's rights: The Company signed the UN Women's Empowerment Principles in April 2013. This is considered a proxy for women's rights.</li> <li>• Not met: Children's rights: The Company Code of Conduct states that 'child labour....and the like erode trust these and other forms of unfair treatment are exactly the opposite of what Mondelez International stands for'. The Company refers to children's rights as part of the Cocoa Life Program. However, this is not considered a company wide commitment to children's rights. [Our Way of Doing Business, 01/10/2012: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: Migrant worker's rights: The Company states that they 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 people.' However, this does not cover migrant workers rights and is not included in a policy commitment.</li> <li>• Not met: Expects suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The Company has signed the Women's Empowerment Principles. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states in their impact for growth policy report that there 'committed to listening to and talking with a wide variety of stakeholders. From farmers and community leaders, to academia and global officials....'. The Company states that they 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 people.' [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Met: Regular stakeholder engagement: The Company is members of various organisations that cover a range of material issues for the business. This includes the Consumer Goods Forum, The Grocery Manufacturers Association, The International Cocoa Initiative and more. The Company publishes a 'Progress Report' yearly (from 2013 to 2016) that reports on social impact progress against the companies goals. Engagement through the Cocoa Life program includes engagement with local communities and potentially affected stakeholder. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The Company states that they participate in collaborative efforts with NGOs and community based groups. The Company states that many of these groups serve as advisers to key programs, such as the 'Cocoa Life external advisory panel'. However, this information is not in a public policy. [Mondelez Reporting our Progress, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Met: Regular stakeholder design engagement: The Cocoa Cola Life Advisory Members include external experts who find solutions to human rights issues. Also Cocoa Life has partnered with Embode an independent human rights consultancy, who analysed the environment and national child protection infrastructure in key cocoa producing countries and published these assessments for Cote D'Ivoire and Ghana.</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company states that they acknowledge their responsibility to respect human rights by avoiding the infringement of the rights of others, addressing negative impacts for which they are involved 'and providing access to effective remedy if violations have occurred'. However, this information is not in a public policy. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company states that they are committed to ensuring that they don't 'unreasonably inhibit access to other forms of remedy for potentially and actually impacted rights holders.' However this information is not in a public policy. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states that they do not tolerate anyone who raises a concern in code faith through their grievance mechanism. However, there is no information regarding zero tolerance on attacks of human rights defenders. [Our Way of Doing Business, 01/10/2012: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: CEO or Board approves policy: The Company Code of Conduct has been signed by the CEO, however, the Code of Conduct does not cover human rights. Therefore, this has resulted in a downgrade, as the policy signed must cover human rights. [Our Way of Doing Business, 01/10/2012: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Speeches/letters by Board members or CEO: The President of Mondelez EU spoke on child labour/ forced labour at Consumer Goods Forum's Sustainable Retail Summit in Oct 2016, however the President of Mondelez EU is not a board member.</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Board/Committee review of salient HRs: This has resulted in a downgrade, as implementing the Company's compliance and integrity program is not considered to be a review of salient human rights risks.</li> <li>Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Incentives for at least one board member</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Senior responsibility fo HR (inc ILO): The Company dedicated business integrity staff and four regional business integrity officers around the world who implement the compliance and integrity program which includes human rights responsibility (Inc. UNGPS which includes core ILO ). The business and integrity team work with senior management to implement the compliance and integrity program. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Day-to-day responsibility: The business integrity staff ensure employees know what is expected of them with regards to compliance and integrity. They also bear responsibility for the grievance mechanism and for reporting to senior management and the board of directors any 'potentially significant matters.' . [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Not met: Day-to-day responsibility in supply chain: The Company highlights programs that address human rights issues in the supply chain. However, these are product specific - for example - the cocoa business has the Cocoa Life program. The Company has clarified through engagement that the Human Rights Working Group has day-to-day responsibility of human rights in the supply chain. However, Mondelez does not provide further public information regarding the Human Rights Working group. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a> &amp; CHRB Engagement Score Sheet, 24/06/2018]</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Senior manager incentives for human rights</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR part of enterprise risk system: The Company states 'We undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts within our own operations, and work with our business partners through our supply chain to achieve the same.' The Company also states they identify potential human rights impacts through AIM-Progress. However, it is not clear how human rights is integrated in the companies broader enterprise risk management system. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: The Company has a set of employment policies that cover ethical and legal practices - which are communicated to nearly every employee and translated into 32 languages around the world. However, it is not clear whether these cover general human rights. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Steps to communicate policy commitments to BRs</li> <li>• Not met: Including to AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: The Company states that their purchasing contracts require direct suppliers to comply with all laws and support Mondelez International's policies on child and forced labour. However, this does not cover broader human rights. The Company audits audit manufacturing facilities under the Program for Responsible Sourcing (PROGRESS). Failing to meet company standards on child and forced labour is a breach of corporate policy. As such, violators are subject to disciplinary action, up to and including termination of employment. The PROGRESS framework suggests four pillars of responsible sourcing - one pillar relates to Human Rights and labour standards. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>• Not met: Including on AG suppliers</p>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments: The Company states that 'we promote honesty and integrity in our business conduct by raising ethical awareness among our employees and providing direction and education on ethical issues'. It further states that 'Mondelez International provides specialized training for procurement employees.' However, it is unclear whether the company's ethical training covers collective bargaining.</li> <li>• Not met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Monitoring implementation of HR policy commitments: The Company's Compliance and Integrity Program monitors compliance with the company's human rights statement. However, the Company's human rights commitments does not cover the core ILO. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Not met: Monitoring AG suppliers: The Company's Compliance and Integrity Program monitors compliance with the company's human rights statement, and the company uses a third party audit system to monitor suppliers. However, the Company's human rights commitments does not cover the core ILO. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects selection of suppliers: It is not clear whether the supplier selection process covers human rights related issues.</li> </ul> <p>The company is part of the industry forum AIM-PROGRESS. This initiative supports a common set of CSR standards, which include human rights. However, it is unclear whether this initiative influences the selection of suppliers. [Mondelez Program for Responsible Sourcing, 11/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: HR affects on-going supplier relationships: The Company states that 'strive to ensure that human rights are respected within our own operations and our upstream supply chains. We also seek to do business with partners who share the same commitment.' The Company uses the Sedex Member Ethical Trade Audit (SMETA) protocol to evaluate suppliers. With regards to child and forced labour, the company states ' If the supplier does not resolve the issues of concern in a timely and satisfactory manner, Mondelez International reserves the right to take more drastic action, such as termination of the business arrangement. ' [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with suppliers to improve performance</li> </ul> </li></ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: The Company states that they undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts. However, it is unclear how they identify, and engage with potentially affected stakeholders more generally. Through the cocoa life program, the companies commit to listening to farmers and their communities to design interventions that lift people out of poverty. The program is also committed to partnerships with NGOs, farmer organisations, governments and supply chain partners. [Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Met: Workers in SC engaged: The Cocoa Life program is also committed to partnerships with NGOs, farmer organisations, governments and supply chain partners. [Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> <li>• Met: Communities in the SC engaged: Through the cocoa life program, the companies commit to listening to farmers and their communities to design interventions that lift people out of poverty. [Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company discloses 'We undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts within our own operations'. For the Company's own operations and direct suppliers, potential human rights issues are identified and monitored for compliance with the company's policies through AIM-PROGRESS. AIM-PROGRESS is a forum of consumer goods manufacturers and suppliers which has a focus on responsible sourcing practices and knowledge sharing. The Company is a founding member of AIM-PROGRESS. The Company also utilises the SMETA Protocol to evaluate internal manufacturing sites against a common set of CSR standards developed for the consumer industry. These two processes then 'supports the identification of potential risks and helps guide our approach for impact mitigation and monitoring.' [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a> &amp; Mondelez International Modern Slavery Statement, 2017: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Identifying risks in AG suppliers: Mondelez partnered with WWF in 2016 to assess the long-term sustainability risks of the agricultural and commodities chain. The Company has clarified that this assessment covered human rights in their Modern Slavery Statement. The prioritized risk assessment run by WWF examined agricultural commodities by source country based on publicly available, secondary data, covering the Company's largest raw materials volume and spend. The assessment confirmed cocoa and palm oil as top priorities from a human rights risk perspective. [Mondelez International Modern Slavery Statement, 2017: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders: The Company states '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.' However, it is not clear whether the company conducts this engagement to identify human rights risks. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Met: In consultation with HR experts: The Company has an updated palm oil action plan, which includes engagement and advocacy with the CGF's Palm Oil Working Group, the RSPO and UNDP. The Company states in their palm oil action plan that they are concerned about the long-term environmental and social impacts of palm oil production, including deforestation and human rights. However, it is not clear whether the company has engaged in consultation with human rights experts for this plan. Cocoa Life has partnered with Embody, an independent human rights consultancy, who analysed the environment and national child protection infrastructure in key cocoa producing countries (Cote d'Ivoire and Ghana).</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company states 'We undertake practical, business minded, proactive, ongoing human rights due diligence to identify and mitigate potential and actual human rights impacts within our own operations, and work with our business partners through our supply chain to achieve the same.'</li> </ul> <p>The Company states that they provide specialised training for procurement employees, which helps them identify and mitigate labour related sourcing risks. The Company also states that the SMETA process supports the identification of potential risks and 'helps guide our approach for impact mitigation and monitoring.' [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company states that 'many factors, from the relative poverty of farmers to the lack of national infrastructure, schools and healthcare, make children vulnerable to risks and contribute to the problem of child labour.' The Company works with NGO partners including CARE International and Solidaridad to raise awareness of child labour in Cocoa Life communities with training for both children and parents. It also implements broad-ranging community development programs, recognizing that every child needs a safe and conducive environment to grow and thrive. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Met: Example of Actions decided: In the 2016 Progress Report the company disclosed information on their Cocoa Life program, and how they have partnered with Embode, an independent human rights consultancy, who analysed the environment and national child protection infrastructure in Ghana and Cote D'Ivoire. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>• Met: Including in AG supply chain: Through the work in the Cocoa Life Program the Company has taken action to prevent and mitigate salient human rights risks through their Cocoa supply chain. [Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met: The Company stated that based on Embode's recommendations for the Cocoa Life program they are working together with government authorities to implement community based child labour monitoring and remediation systems, improve children's access to education and linking into and helping to strengthen local child protection systems. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: System to check if Actions are effective: The Cocoa Life Program partners regularly with third party organisations. The Company has also partnered with an independent human rights consultancy through the Cocoa Life program to provide independent assessments of child protection in the Cocoa Sector in Cote D'Ivoire and Ghana. The Company also asked CARE International to assess their progress with regards to women empowerment in Cote D'Ivoire and Ghana. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Met: Lessons learnt from checking effectiveness: The Company stated that from CARE International's review they learnt that increased cocoa yields from giving women better access to farmer training, increased household income from access to finance through the Village Savings and Loan Associations (VSLAs) and improved role of women in decision-making. Based on CARE's recommendations the company also evolved their approach to women's empowerment. [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirement under score 1 met [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Comms plan re identifying risks: The Company has communicated its system to identify human rights risks and impacts including own operations and supply chain (see B.2.1). [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a> &amp; Mondelez International Modern Slavery Statement, 2017: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Not met: Comms plan re assessing risks</li> <li>Met: Comms plan re action plans for risks: The Company has communicated that it has a system to take action to prevent, mitigate or remediate its salient human rights issues and has provided an example (see B.2.3). [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a> &amp; Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> <li>Met: Comms plan re reviewing action plans: The Company has communicated that it has a system to track actions taken in response to human rights risks and impacts, and evaluating whether the actions have been effective. In this disclosure, it communicates examples of lessons learned (see B.2.4). [Impact for Growth Progress Report, 2016 : <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> <li>Met: Including AG suppliers: See above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>



## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company has a grievance mechanism toll-free call line and a collect/call/reverse charge telephone Helpline (dependent on the country). The Company also has an online grievance mechanism 'Web line' which is independently operated by Ethics Point. There is a clause on the Ethics Point Weblines that states that if you're in certain countries of the EU you can only report financial, accounting or auditing practices of the company, fraud or bribery allegations - therefore excluding human rights issues. However, the Company website states that they 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 Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company states that they received more than 1,900 contacts in 2017 through the 'speaking up channels'. However, it is not clear whether any of these grievances related to human rights grievances.</li> <li>• Met: Channel is available in all appropriate languages: The grievance channel 'Integrity Weblines' is available in 46 different languages, including some indigenous languages - such as Suomi.</li> <li>• Not met: Expect AG supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AG supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company states that external reports of wrong doing can be reported by mail (and provides an address in the USA) or via email through <a href="mailto:compliance@mdlz.com">compliance@mdlz.com</a>. The Company also states that the Integrity Helpline can be accessible through language interpreters to the community. The Company human rights webpage states that the company grievance mechanisms (e.g. Integrity helpline and Weblines) can be used by their own employees, contractors and subcontractors 'as well as anyone to use for raising any concerns and to better enable Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' [EthicsPoint Mondelez, 43234: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Integrity HelpLine is accessible 24 hours a day, every day, and language interpreters are available. There are 46 languages listed on the Integrity Weblines.</li> <li>• Met: AG supplier communities use global system: The Company human rights webpage states that the company grievance mechanisms (e.g. Integrity helpline and Web line) can be used by their own employees, contractors and subcontractors 'as well as anyone to use for raising any concerns and to better enable Mondelez International to appropriately redress human rights impacts which we have either caused or contributed to.' This is assumed to extent to the agricultural supplier communities. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales: A third party provider, EthicsPoint, handles the Integrity WebLine which operates in 46 languages. These are then routed to the appropriate persons within Mondelez International 'who will ensure that each report is handled in a professional and confidential manner.'</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>For the Integrity WebLine, the Company has a Follow Up System. However, it is not clear what the timescales are for addressing complaints. [EthicsPoint Mondelez, 43234: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: How complainants will be informed: For the Integrity WebLine, the Company has a Follow Up System where users are provided a report key and a password to follow-up on the report, provide additional information and upload any relevant documents. [EthicsPoint Mondelez, 43234: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: There is no information regarding how complaints can be escalated to senior or independent officials.</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation: The Company states in the Employee Code of Conduct, with regards to reporting grievances against the code 'maybe you're worried about retaliation. Mondelez International won't tolerate that. Anyone who retaliates against someone for raising a concern in good faith will face discipline, which may include termination...' However, the Code of Conduct does not cover human rights. Therefore this has resulted in a downgrade. [Our Way of Doing Business, 01/10/2012: <a href="https://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Practical measures to prevent retaliation</li> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Won't impede state based mechanisms: The Company states that they are 'committed to ensuring we don't unreasonably inhibit access to other forms of remedy for potentially and actually impacted stakeholders.' [Mondelez Human Rights, 09/05/2018: <a href="https://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Complainants not asked to waive rights</li> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company has information regarding keeping honest books and records in their employee code of conduct. However, this does not extend to living wage requirements.</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to manufacturing sites (factories or fields): In the CHRB Disclosure Program the company stated that they map tier 1 suppliers. The Company is also involved in the SEDEX Member Ethical Trade Audit (SMETA) which evaluates internal manufacturing sites and suppliers based on the ETI base code. However, the company has not indicated that its mapping includes all manufacturing sites.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why</li> </ul>
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: The Company Employee code of conduct states that 'child labour' is 'exactly the opposite of what Mondelez International stands for'. The Company website states that the purchasing contracts require direct suppliers to comply with all laws and support Mondelez International's policies on child and forced labour.</li> </ul> <p>The Company is a member of the Sedex Members Ethical Trade Audit (SMETA). Under SMETA audit reports an auditor must record how age is checked both at and prior to recruitment and how the records of age are maintained and monitored. However, it is not clear whether age verification is detailed in the Company codes or contracts. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a> &amp; Our Way of Doing Business, 01/10/2012: <a href="http://mondelezinternational.com">mondelezinternational.com</a> ]</p> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on child labour: Through the Cocoa Life program, the company works to eliminate child labour in the cocoa supply chain (through the Cocoa Life Child Labour Interventions). The Company also has third party audits to assess direct supplier's compliance with Mondelez's Corporate Responsibility Expectations (including child and forced labour) through Progress. The company is also working with civil society, government and industry to tackle child labour at the farm level. The Company does this through supporting the International Cocoa Initiative and through the Cocoa Life program.</li> </ul> <p>The Company is a member of the Sedex Members Ethical Trade Audit (SMETA). Under SMETA audit reports an auditor must record how age is checked both at and prior to recruitment and how the records of age are maintained and monitored. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a> ]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Met: Analysis of trends in progress made: The Company discusses the developments of the Cocoa-Life program and the trends amongst suppliers. [Cocoa Life Program, 43231: <a href="http://cocoalife.org">cocoalife.org</a>]</li> </ul>
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts: The Company has indicated that a check on fees is performed as part of the SMETA audit. However, this is not sufficient information to be awarded this indicator.</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company website states that part of the corporate responsibility expectations for supplier contract provisions states that a (supplier shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.' [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a> ]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on free movement: The Company states that they have begun to assess direct suppliers' compliance with their corporate responsibility expectations (including child and forced labour) through PROGRESS - the Program for Responsible Sourcing. Two of the key objectives of PROGRESS are 'building supply chain capability so that member organisations and their suppliers are competent in executing robust responsible sourcing programs' and 'driving continuous improvement in member supply chains.' Failing to meet company standards on child and forced labour is a breach of corporate policy, and violators are subject to disciplinary action, up to and including termination of employment. [AIM Progress Website, 43231: <a href="http://aim-progress.com">aim-progress.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company meets freedom of association requirements. The Company states that they 'respect the interests of its employees to join (or not join) a union' in their corporate responsibility guidelines. However, collective bargaining is not addressed. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> ] <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on FoA and CB: The Company meets freedom of association requirements in their corporate responsibility guidelines which are included in the supplier contract provisions. However, collective bargaining is not addressed. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> ]           Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company sets out their health and safety requirements. The Company has a Work Play Live Safe program and a goal of ZERO incidents. The programs put in place at Mondelez plants meet the Occupational Health and Safety Assessment Series (OHSAS) 18001 Series.</li> <li>• Not met: Injury Rate disclosures: The Company reports their injury frequency rate in the 2015 reporting suit, however, there are no public figures for 2016 or 2017.</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S: The Company Corporate Responsibility Expectations (supplier contract provisions) states that a supplier will 'i) endeavour to provide safe working conditions (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities.' However, the company does not explicitly state how they are actively working with suppliers to improve health and safety. [Mondelez Human Rights, 09/05/2018: <a href="http://mondelezinternational.com">mondelezinternational.com</a>]</li> </ul> ] <ul style="list-style-type: none"> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts</li> <li>• Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in the progress made</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts</li> <li>• Not met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts</li> <li>• Not met: How working with suppliers on women's rights: The Company has signed the Women's Empowerment Principles, however it is not clear how they work with suppliers on women's rights beyond the Cocoa Life program.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Health and Safety</li> <li>• Headline: Fire leads to death of 35 workers at Mondelez packaging supplier in Bangladesh, triggering renewed concerns over working conditions</li> <li>• Sources: <a href="http://reuters.com">reuters.com</a> <a href="http://financialexpress.com">financialexpress.com</a> Forty-one industrial sectors exposed to fire hazards - The Financial Express - 16/09/2016; Bangladesh: Government sued as death toll rises - Deutsche Welle - 12/09/2016; Bangladesh: Government and brands share factory deaths blame - ITUC - 17/09/2016; Death toll rises in Bangladesh fire at factory supplying packaging to consumer multinationals - IUF - 19/09/2016; Company website - corporate expectations for direct suppliers - <a href="http://mondelezinternational.com">mondelezinternational.com</a></li> <li>• Allegation: On September 10, 2016, 35 workers were killed and more than 50 others injured when a factory in the Tongji industrial zone in Bangladesh belonging to Tampaco Foils Limited collapsed following an explosion. Tampaco Foils Limited is a packaging supplier of Nabisco Biscuit &amp; Bread, a unit of Mondelez International.</li> </ul> <p>Officials suspect a gas leak and a boiler eruption caused the fire. Fire crews were reportedly unable enter the building as there were chemical containers and oil drums on various floors. The factory owner, a former member of parliament, claimed it was "fully compliant" with safety standards. However, police later said the factory owner and seven other top managers went into hiding as the death toll rose, Reuters reported. The factory's clients also include British American Tobacco and Nestlé.</p> <p>The global union confederation ITUC reported the Bangladesh government as saying global brands doing business with the factory shared responsibility for the deaths. Reuters quoted a government secretary with the ministry of labour and employment as saying that after checking the factory's design, it seemed that it was a one floor building to which floors were added later, similar to Rana Plaza. The father of one of the victims reportedly filed a lawsuit against the building's owner.</p>
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public response available</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised</li> <li>• Met: Policies apply to the type of business relationships involved</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company's expectations towards direct suppliers regarding health and safety are: 'In addition to complying with all laws and regulations, Supplier must comply with the following in connection with the goods and services provided to Mondelez International: (...) Supplier will (i) endeavor to provide safe working conditions, (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities'.</li> </ul>
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Freedom of association and collective bargaining</li> <li>• Headline: A Union reported in June 2015 that its affiliated BCTGM in North America, representing some 4,000 Nabisco (Mondelez subsidiary) workers, reports attacks on trade union rights at Mondelez facilities</li> <li>• Sources: Union rights violations at Mondelez North America IUF 10/06/2015 - <a href="http://iuf.org">iuf.org</a> <a href="http://iuf.org">iuf.org</a> Company website</li> <li>• Allegation: In June 2015 the trade unions representing some 4,000 Nabisco (Mondelez subsidiary) workers reported attacks on trade union rights at Mondelez facilities. The reports came via the Geneva-based International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Association (IUF) from its affiliated Bakery, Confectionery, Tobacco Workers and Grain Millers' International Union (BCTGM) in North America.</li> </ul> <p>The Union stated that Mondelez had attempted to deny elected union officials access to their members' plants, in violation of the rights set out in collective agreements and in US federal labour law. It also accused the management of insisting the union inform management which officers were seeking access, with whom and what they planned to discuss, and imposing management escorts as a condition for access. Further, IUF accused Mondelez of attempting to bypass the role of union officials in grievance procedures, instead proposing video conferencing grievance procedures (allegedly to reduce travel costs). The union has made clear its firm opposition to any form of video conferencing of such meetings as a violation of due process and basic rights.</p>
E(2).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public response available</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Company policies address the general issues raised: The Mondelez International Corporate Responsibility guidelines state (on the Company website) state: 'We aim to have constructive relationships with our employees and their unions. Mondelez International respects the interests of its employees to join (or not join) a union. In those situations where our employees have third-party representation, we will work with employee representatives in a direct and straightforward manner.'</li> </ul> <p>However, it does not have a policy referring specifically to collective bargaining.</p> <ul style="list-style-type: none"> <li>• Not met: Policies apply to the type of business relationships involved</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.81 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Mondelez International made data public that met one or more elements of the methodology in 19 cases, leading to a disclosure score of 1.81 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>



Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0.5 out of 4	<p>Mondelez International met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.