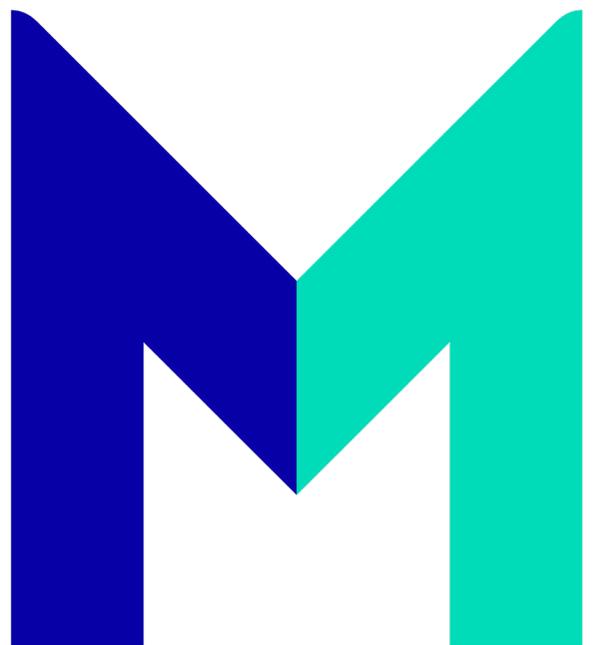


# MARS

## Human Rights Policy



## Human Rights Policy

The business philosophy of Mars, Incorporated is deeply rooted in our Five Principles of Quality, Responsibility, Mutuality, Efficiency and Freedom. These Principles are the foundation of our Human Rights Policy.

This Policy is informed by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

It is the duty of governments to protect and fulfill human rights. As a private company, we are committed to respecting human rights in our value chain, starting with areas where we have the most control and influence, and where we can have the greatest impact.

In accordance with the UN Guiding Principles, we will advance respect for human rights in our value chain by implementing a due diligence process to identify relevant adverse impacts on human rights and to establish or support appropriate and effective mechanisms for prevention and remediation.

No matter where we operate, Mars strives to comply with the spirit and the letter of the law. Where local laws are less stringent than our Policy, we will seek to operate in accordance with this Policy and our Five Principles.

Our aim is to prioritize action on the most severe human rights impacts and where we believe we can make the most valuable contribution. We will concentrate our initial efforts in two areas of our value chain: our operations, where we have the most control; and sourcing, where we can have the greatest impact, with a particular emphasis on potentially vulnerable groups. We will equip relevant Associates with training and raise their awareness of our human rights expectations.

### Policy Governance

This Policy was developed with input from Mars Associates in key functional areas and from a range of external stakeholders. To govern the application and implementation of this policy, our Human Rights Steering Committee meets regularly to review our progress and opportunities. Executive oversight ensures governance and continued assessment of plans and performance. Our Board of Directors are informed annually of our human right plans and performance.

Our dedicated global human rights team establishes our human rights policies, strategies and programs and provides expertise and guidance to the teams across our business engaged in implementation.

This Policy applies to Mars, Incorporated and the entities in which we hold a majority interest. Our Supplier Code of Conduct establishes our expectations of our suppliers with regard to human rights and also encourages our suppliers to take appropriate steps to understand and address human rights issues in their supply chains.

### Engagement and Transparency

We will work with and actively engage our stakeholders, including potentially impacted people, as we implement this policy. We will update this Policy as needed as lessons are learned. We will also report regularly on our human rights plans and performance externally.