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HUMAN RIGHTS POLICY

INTRODUCTION

The business philosophy of Mars, Incorporated is deeply rooted in our Five Principles of Quality, Responsibility, Mutuality, Efficiency and Freedom. The Principles are the foundation of our Human Rights Policy. In accordance with the UN Guiding Principles on Business and Human Rights, this Policy is informed by the International Bill of Human Rights and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, as described below.

OUR COMMITMENT

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

In accordance with the UN Guiding Principles, we will implement a due diligence process to identify, mitigate and prevent adverse impacts on human rights and appropriate mechanisms for 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 operate in accordance with our standards. If there is a lack of clarity on the competing claims of rights bearers, we will work with stakeholders to seek resolutions that are consistent with this Policy.

IMPLEMENTATION OF THIS POLICY

To ensure that we target salient impacts, where we can make the most valuable contribution, this Policy will initially focus on two areas: our operations, where we have the most control; and



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sourcing, where we can have the greatest impact. Our areas of focus will be regularly reviewed with external stakeholders.

We will make every effort to:

- Equip our Associates with training and raise their awareness of human rights.
- Identify and validate the effectiveness of our initiatives through our risk and impact assessments.
- Remediate any adverse human rights impacts and mitigate risks.

This Policy complements other Mars policies, programs and practices, including:

- **The Five Principles**, which commit us to provide our Associates with a high-quality and safe workplace that respects and promotes human rights and business ethics and is free from harassment, discrimination and all other unlawful employment practices.
- **Our Associate Concept**, which captures one of the fundamental beliefs in Mars. It describes the unique relationship the company and its Associates hold, different from most other corporations. We want the specific relationship between Associates, their Line Managers and the company to reflect those beliefs and to be based on The Five Principles.
- **Our Position on Freedom of Association and Collective Bargaining**, which respects our Associates' right to join, form or not to join, a labor union without fear of reprisal, intimidation or harassment. Where Associates are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Mars is committed to bargaining in good faith with such representatives.

- **Our Supplier Code of Conduct**, which includes 10 workplace standards that meet or exceed International Labour Organization guidelines. The content in the Code is aligned with the U.K. Bribery Act, the U.S. Foreign Corrupt Practices Act and the California Supply Chain Transparency Act. It sets our global expectations prohibiting the use of child labour in accordance with ILO Minimum Age Convention No. 138 and in the areas of health and safety, the environment and ethical business practices.
- **Our Responsible Sourcing Program** which implements our Supplier Code of Conduct with all our direct and indirect suppliers alongside a system of risk assessments, audits and remediation.
- **Our Deforestation Policy** applies to our beef, palm oil, pulp and paper, and soy supply chains. It requires our producers and suppliers to produce or purchase all raw materials from legal sources and to comply with our Supplier Code of Conduct. Producers and suppliers must respect the rights of all affected communities to give or withhold their free, prior and informed consent for plantation developments on land they own legally, communally or by custom. They must resolve land rights disputes through a balanced and transparent dispute resolution process and support farmers and plantation owners to comply with our Deforestation Policy.

GOVERNANCE & REVIEW OF THIS POLICY

This Policy was developed with input from Associates in key functional areas and from external stakeholders. It was approved by the company's Global Public Policy Group, which ensures that Mars has globally consistent policies across the company. Executive oversight and responsibility for the implementation of this Policy rests with our Global Leadership Team.

At an operational level, this policy is implemented by Mars' Human Rights Director, who reports to our Chief Sustainability Officer and advises the Global Leadership Team on human rights issues.



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This Policy applies to all Mars Associates worldwide. We expect our direct and indirect suppliers and distributors to comply with this Policy. Non-compliance is subject to escalation, investigation and remediation in accordance with internal corporate policies.

NEXT STEPS

We will work with stakeholders to continue to evolve our human rights approach, and will update this Policy as lessons are learned. We will also continue to report on our human rights progress and performance in our annual Principles in Action Summary.