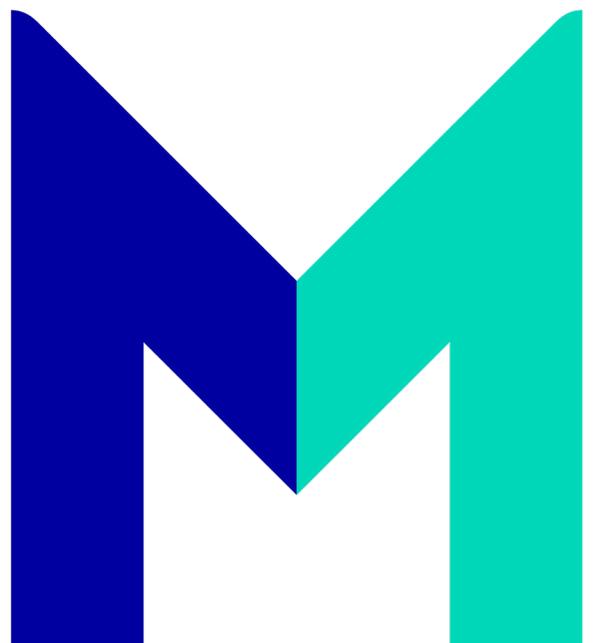


MARS

Supplier Code of Conduct



Our business philosophy, which is deeply rooted in the Mars Five Principles, leads us to work with suppliers who are willing to meet our standards and specifications and are committed to values that are compatible with our own.

Our Supplier Code of Conduct is informed by the International Bill of Human Rights, the principles set forth in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

This document, and related guidance, establishes expectations of Mars's suppliers with regard to business practices, including their approach to human rights, the environment, and ethical practices aligned with legal requirements, the Mars, Incorporated Human Rights Policy, other relevant Mars policies, and international good practice.

All Mars suppliers, defined as third parties with whom Mars has active commercial relationships for the supply of goods or services, are expected to apply this Supplier Code of Conduct as follows:

Child Labor

- All forms of unlawful employment or exploitation of children are prohibited.
- No individuals are hired under age 16 or under the legal age of work or compulsory schooling, whichever is higher. This guidance is subject to exceptions recognized by the International Labour Organization.
- Individuals under 18 years of age are not hired for positions that include hazardous work or that interfere with normal educational activities.
- Where applicable, child protection measures are in place to ensure that children suffer no harm, exploitation, or abuse as a result of the activities of workers in the workplace or in employer-provided housing or transport.

Compensation & Benefits

- All legally mandated wages and benefits are provided.
- Payment is made on time and on at least a monthly basis.
- Deductions are not taken from pay as punishment.
- Itemized records are maintained, consistent with this standard, and transparent pay information is provided in a timely manner.

- Pregnancy, maternity and lactation benefits, including relevant protections, leave, and accommodations, are provided in accordance with the law.

Discrimination

- Discrimination or harassment in hiring, pay, promotion, or in the workplace on the basis of race, color, sex, national or social origin, religion, age, disability, sexual orientation, marital status, pregnancy status, gender identity or any other status protected by applicable law is prohibited.
- All forms of abuse or harassment in the workplace is prohibited.

Environment

- Compliance with applicable environmental laws, particularly with regard to waste, air and water.
- All required environmental permits for use and disposal of water and waste are obtained.
- Legal title to or a legal lease for its land is obtained, and there are no indications that the supplier's right to own or lease that land is contested.

Ethics

- The supplier complies with all applicable laws, including those pertaining to bribery, corruption, or any type of fraudulent business practice.

Forced Labor

- All forms of forced labor are prohibited, including any form of prison, trafficked, indentured or bonded labor.
- Original personal identification and travel documents are not retained, and freedom of movement is not restricted.
- Workers are not charged or required to pay fees or deposits to obtain or maintain employment. Pay is not withheld, and no conditions are present that constrain a worker's ability to freely choose employment.
- Accurate and understandable information regarding the nature of work, compensation, work hours, and benefits is provided in writing in advance of employment.

Freedom of Association

- The right to join, not join, or form a labor union in accordance with the law is respected without fear of reprisal, intimidation, or harassment.
- Where workers are represented by a legally recognized union, the supplier is committed to establishing a constructive dialogue with the union's freely chosen representatives and bargaining in good faith with such representatives.

Health & Safety

- A safe and hygienic workplace is provided in compliance with the law, and systems are in place to detect and manage potential risks to workers.
- Workers undertake health and safety training, hazardous materials and chemicals are properly stored, and workers are provided with the appropriate personal protective equipment.
- Health and hygiene of workers is provided for as relevant at the site, including toilet facilities, access to drinking water and food safety.
- Unreasonable restrictions are not be placed on workers' toilet, rest or lactation breaks.

- Employer-provided housing, transportation and food must be sanitary and safe.

Issue Reporting

- Workers will be aware of, and have access to, a supplier-provided complaints mechanism that is transparent, responsive, anonymous, unbiased, and confidential through which they can raise questions about or report violations of supplier policies, expectations contained in this Supplier Code of Conduct, other workplace grievances, or legal or ethical violations.
- Retaliation against workers reporting violations or cooperating in investigations is prohibited.

Work Hours

- Regular and overtime working hours are in compliance with the law and take into account worker safety, and overtime is voluntary.
- 24 consecutive hours of rest are provided in every 7 day work period. If allowed by law, 48 consecutive hours of rest in every 14 day work period are permitted.

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All suppliers to Mars are expected, at a minimum, to comply with applicable laws and regulations. If the Supplier Code of Conduct establishes a higher standard than is required by applicable law, Mars expects its suppliers to apply the Supplier Code of Conduct. Where alignment with the Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the supplier will notify Mars of the situation and explain how it intends to operate in a responsible manner.

Suppliers will have in place appropriate policies, management systems, procedures, and staffing to meet the expectations in the Supplier Code of Conduct. Suppliers will communicate to workers the standards to which the supplier is committed, as well as relevant laws, regulations and protections. Suppliers will notify Mars of any actual or suspected legal infractions, including any legal actions against the supplier by the authorities for violations of human rights, environmental laws, or anti-corruption or bribery laws. Mars reserves the right to request and receive additional information from the supplier with regard to its management of relevant issues.

If Mars suppliers are distributors, brokers, and agents, they are expected to assure that their first-tier suppliers supplying goods for Mars also apply these standards, and to provide this assurance to Mars upon request. Suppliers to Mars are expected to provide these partners with assistance in complying with these expectations as needed.

Suppliers are not permitted to sub-contract the production of goods and services for Mars without first informing Mars in writing and receiving written agreement that this is acceptable to Mars. If Mars has approved sub-contracting, the sub-contracted workplaces are expected to meet the Supplier Code of Conduct expectations.

Suppliers are expected to assure that all vendors providing them with services in their workplace, including the provision of workers, also apply these standards, and to provide this assurance to Mars upon request. Suppliers are expected to provide their vendors with assistance in complying with these expectations as needed.

To identify whether a supplier is in compliance with the Supplier Code of Conduct, Mars reserves the right to request suppliers to complete self-assessments, disclose relevant policies or procedures, or to be subject to announced and unannounced on-site direct and/or third-party audits or evaluations of the supplier's facilities, including housing provided by the supplier or labor providers, and workplaces to which the supplier has sub-contracted production of Mars-procured products. Mars reserves the right to audit the operations, records, policies, and procedures of the aforementioned entities and to conduct confidential worker interviews in connection with such audits or evaluations as appropriate and as agreed. Upon request, distributors, brokers and agents supplying to Mars will also provide Mars with access to the workplaces, records, policies, procedures, and workers of their first-tier suppliers. If Mars identifies areas of non-compliance, Mars reserves the right to request suppliers to make the necessary investments in systems and conditions improvements to ensure compliance.

Mars encourages its suppliers to understand, and take appropriate steps to address, human rights, environmental and ethics issues in their supply chains. Upon request, Mars expects its suppliers to share with Mars information regarding their relevant supply chain policies and practices, conditions or risks in their supply chains, and how such conditions or risks are being prevented or addressed. If requested by Mars, suppliers will disclose to Mars information related to their supply chain, including countries of origin of materials used in products supplied to Mars – Mars reserves the right to disclose this information publically.

Mars, in its sole discretion, reserves the right to not initiate, to suspend or to terminate its relationship with a supplier if the supplier refuses to consent to the Supplier Code of Conduct or to take the appropriate steps to come into compliance with the Supplier Code of Conduct.