



Findings as of July 2025

Mars

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	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.	Human Rights Policy	https://www.mars.com/sites/g/files/dfs_buz106/files/lh_files/id_623ff7833dff3401d7fb07a8bea3a62124d4b40c_mars_human%20rights%20policy_v04%20%20english.pdf
Human rights policy - ILO Core Labor Standards	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.	Human Rights Policy	https://www.mars.com/sites/g/files/dfs_buz106/files/lh_files/id_623ff7833dff3401d7fb07a8bea3a62124d4b40c_mars_human%20rights%20policy_v04%20%20english.pdf
Forced labor & prison labor	<p>Mars does not tolerate forced labor. All forms of forced labor are prohibited, including any form of trafficked, indentured, or bonded labor. We expect that:</p> <ul style="list-style-type: none"> -Workers enter employment freely and no identity or travel documents are retained. -Accurate and understandable information about the nature of work, compensation, work hours, and benefits is provided in writing in advance of employment. -Workers have freedom of movement and are not confined to the work premises, including transport vehicles and housing. -Pay is not withheld, and no conditions are present that constrain a worker's ability to freely choose or leave employment. -Workers are not charged or required to pay fees or deposits to obtain or maintain employment. -Employers are responsible for payment of all fees and expenses in connection with a worker obtaining employment or incurred in connection with the worker performing their duties. If workers have paid any fees and associated costs, these must be promptly reimbursed to the worker. -Workers are recruited through licensed, reputable recruitment agencies. All workers must be legally permitted to work in the host country. -Workers are free to terminate their employment after a reasonable notice period without penalty. -Prison labor is prohibited. In rare circumstances, certain work-release programs may be permitted if they are voluntary and the terms and conditions of work for individuals in prison are similar to those of other workers engaged in employment in the relevant economic sector. 	Supplier Code of Conduct	https://www.mars.com/about/policies-and-practices/human-rights

Human rights defenders & civic space	We view human rights defenders as enablers of sustainable business. From Indigenous People's communities and advocacy groups to climate and labor activists, human rights defenders have an important role. We support their work. Mars maintains an open-door policy for human rights defenders. We recognize that meaningful engagement with human rights defenders and other affected stakeholders is an important part of ongoing human rights due diligence. ...Mars believes in working with governments and other companies to develop and implement policies and practices that enable human rights defenders to carry out their work openly and freely, without fear of threats or reprisals. Where we believe it is appropriate, we may coordinate with others to support human rights defenders in exercising their rights. We're committed to working to ensure our activities do not lead to retaliation, violence, harassment or stigmatization of human rights defenders.	Website - Mars Statement on Human Rights Defenders	https://www.mars.com/about/policies-and-practices/human-rights-defenders
Gender equality and women's empowerment	The company has been a signatory of WEPs since 15 September 2020.	Webpage - WEPs Signatories	https://www.weeps.org/company/mars-incorporated
Indigenous Peoples	See human rights defenders & civic space and land rights		
<u>Natural resources</u>			
Land rights	Mars is committed to following the principles of Free, Prior and Informed Consent of Indigenous Peoples for property or land negotiations. Any Supplier involved in the use, leasing, and purchasing of land shall follow these requirements. -All forms of land and water grabbing are prohibited, and unlawful evictions are avoided. -Legal title to or a legal lease for land is obtained and there are no indications that the Supplier's right to own or lease land is contested.	Supplier Code of Conduct	https://www.mars.com/about/policies-and-practices/supplier-code-of-conduct
Free, Prior, and Informed Consent (FPIC)	See land rights		
<u>Living wage</u>			
Living wage, own operations	Remain committed to equal pay for male and female Associates across our global businesses. We continue to review our pay practices to ensure we pay our Associates fairly, as part of our commitment to ensuring an inclusive environment that attracts and retains the strongest talent.	Webpage: Full Potential Mars Platform on Gender	https://www.mars.com/sustainability-plan/thriving-people/unlocking-opportunities-for-women
Living wage in supply chain	Living income: At Mars, we believe everyone working within our extended supply chains should earn a sufficient income to maintain a decent standard of living. This is our goal. Although our relationship with smallholder farmers is rarely direct, we know they are critical for our business. Not only are we focused on helping smallholder farmers prosper today, we're also working to ensure that the next generation is motivated to stay connected to farming as a profession that allows them to thrive tomorrow.	Webpage: Supporting a Sustainable Future	https://www.mars.com/sustainability-plan/thriving-people/increasing-farmer-income

Human rights due diligence and supply chain

Process for assessing human rights risks and impacts	Mars expects Suppliers to adopt adequate and effective policies, procedures and training to enable them to conduct human rights and environmental due diligence so that their own suppliers and sub-contractors involved in producing or supplying Mars products or services meet the expectations of this Supplier Code.	Supplier Code of Conduct	https://www.mars.com/about/policies-and-practices/supplier-code-of-conduct
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Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs) No evidence

Affected stakeholder engagement

Our Sustainable Sourcing programs focus on advancing respect for human rights in our extended supply chains, in close collaboration with our Tier-One suppliers, their business partners, the industry, government, civil society organizations and communities.

Human Rights Disclosure 2024, pg 7

https://www.mars.com/sites/g/files/dfs_buz106/files/2025-05/Mars%20Global%20HR%20Disclosure%202024_Final%20Signed%20May%2021.pdf

Human rights requirements in supplier code/requirements

The Supplier Code is meant to establish clear requirements for business ethics, human rights, and environmental stewardship.

Supplier Code of Conduct

https://www.mars.com/sites/g/files/dfs_buz106/files/2024-09/MARS_SCOC_V4_13Sept.pdf

Access to remedy

Grievance mechanism for own employees

Our Associates know our business the best — we trust them to tell us if something isn't working. From there, we work together every step of the way to figure out the issue and solve it. We do everything we can to encourage the kind of open, two-way communication that lives up to The Five Principles. And we want our Associates to share their experiences and know we value their contribution to our mutual success. [...] The Mars Ombudsman Program provides a confidential, neutral and alternative channel of communication for Associates to report workplace issues or concerns.' [Webpage - Making More Responsible Decisions, Together]

Webpage - Making More Responsible Decisions, Together

<https://www.mars.com/sustainability-plan/working-with-others>

Our Ethics & Compliance program also offers a way for Associates to confidentially report concerns directly through the program's dedicated and published email, or through a hotline, accessible via phone or internet form [Human Rights Disclosure 2024]

Human Rights Disclosure 2024

https://www.mars.com/sites/g/files/dfs_buz106/files/2025-05/Mars%20Global%20HR%20Disclosure%202024_Final%20Signed%20May%2021.pdf

Grievance mechanism for workers - supply chain

We expect our labor and service providers at our sites to have their own grievance mechanisms, but they can also contact us through our Ethics & Compliance hotline. Our policy is to respond to every stakeholder submitting a complaint through our complaints procedure.

Human Rights Disclosure 2024

https://www.mars.com/sites/g/files/dfs_buz106/files/2025-05/Mars%20Global%20HR%20Disclosure%202024_Final%20Signed%20May%2021.pdf

Grievance mechanism for external individuals & communities

See above

Governance and staffing

Board and/or C-Suite-level oversight

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.

Human Rights Policy

https://www.mars.com/sites/g/files/dfs_buz106/files/lh_files/id_623ff7833dff3401d7fb07a8bea3a62124d4b40c_mars_human%20rights%20policy_v04%20%20english.pdf

Senior level responsibility for human rights

See above

Reporting and transparency

Human rights reporting (integrated or stand-alone)	Human Rights Disclosure annual report	Human Rights Disclosure 2024, published May 2025	https://www.mars.com/sites/g/files/dfs_buz106/files/2025-05/Mars%20Global%20HR%20Disclosure%202024_Final%20Signed%20May%202021.pdf
Memberships			
RBA	No (but member of RLI)	RBA RLI	https://www.responsiblebusiness.org/about/members/ https://www.responsiblelabor.org/about/members-and-collaborations/#:~:text=Labor%20Initiative%20include:-,A,EIZO%20Corporation
RSPO	Yes	RSPO	https://rspo.org/search-members/
WEPs (signatory)	Yes	WEPs	https://www.weeps.org/companies
Lobbying and ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	The Fostering Overseas Rule of Law and Environmentally Sound Trade (FOREST) Act represents an opportunity for the United States to address deforestation within agricultural supply chains. Sustainable Food Policy Alliance (SFPA) members agree that a legislative approach in the United States can provide a credible framework with reasonable incentives and penalties to prevent illegal deforestation and ensure harmonization and enforcement between international jurisdictions. [In addition to other statements]	Food Policy Alliance, 3/20/24 [In addition to other statements]	https://foodpolicyalliance.org/news/sfa-statement-on-the-forest-act/ https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/companies-investors-in-support-of-mhrdd/
Anti-bribery and anti-corruption policy	We do not offer bribes to government officials or tolerate commercial bribery. We expect all of our business partners, such as our distributors, customs brokers and other suppliers, to maintain the same standards as we do when acting on our behalf. These expectations are detailed in our Anti-corruption and Human Rights Expectations for Business Partners.	Webpage - Anticorruption	https://rus.mars.com/en/about/policies-and-practices/anti-corruption#:~:text=We%20do%20not%20offer%20bribes,when%20acting%20on%20our%20behalf.

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