

WHEN DOES A CONFLICT OF INTEREST ARISE?

...WHEN OUR PERSONAL INTERESTS (SOCIAL, PROFESSIONAL, OR FINANCIAL) COULD COMPROMISE OUR ABILITY TO ACT IN THE BEST INTERESTS OF MDLZ. THESE SITUATIONS MAY AFFECT MDLZ BUSINESS AND REPUTATION AND THEREFORE REQUIRES DISCLOSURE FOR PROPER REVIEW.



SECOND JOB OR BOARD PARTICIPATION

You should not have an outside employment, unless it is a charitable or community organization, you do not represent MDLZ or use MDLZ resources and information, and the work schedule does not conflict with your activities within the company. Likewise, you must not work for, or serve as a director, with a MDLZ competitor, customer, or supplier.



INVESTMENTS

You (or a family member) should not have a substantial investment with a company that does business with – or competes with – MDLZ.



PERSONAL RELATIONSHIP

You must disclose a close relationship you have with someone at a MDLZ competitor, supplier or customer, or with another MDLZ employee (or job candidate). Same if this close contact is a public official and might be directly connected with business dealings of MDLZ.



FREQUENTLY ASKED QUESTIONS



DO I HAVE TO DISCLOSE ALL MY AFFILIATIONS OUTSIDE MDLZ?

No. Only if it's somehow related to (or potentially impactful on) MDLZ business.

Here are some examples of situations where you don't need approval:

- A youth sports club invites you to join its board.
- You decide to run for election to your local school board.
- You are a member of the neighborhood's home-owners association.
- You want to serve on the board of a religious, educational, or cultural organization.



WHEN MIGHT MY OUTSIDE INVESTMENT CREATE A CONFLICT?

Ask yourself these questions:

- Would I be investing in a MDLZ customer or vendor that I select, assess or manage the account myself, or supervise someone who has such responsibility?
- Could the **investment potentially affect any decisions I will make for MDLZ?**
- How would the investment look to others inside MDLZ, such as my co-workers – would they think it might affect how I do my job for the company?
- How would it look to someone outside MDLZ, such as a customer, supplier, stockholder or even the media?



WHAT ARE THE AFFILIATIONS OF MY CLOSE PERSONAL CONTACTS THAT MUST BE DISCLOSED?

You only need to disclose this relationship **if you will potentially have business dealings with your close personal contact, both outside or inside MDLZ.**

For example, if you are a MDLZ sales representative and you have a close personal contact who is a sales representative for a competitor or a buyer for a supermarket chain, you must disclose this fact.

However, if your close contact works in a competitor's HR department and you work for MDLZ Procurement function, you do not need to disclose this situation, unless you believe it could affect your business judgment or benefit your close personal contact.

Same rationale applies when you have a family member or a romantic relationship with someone working for MDLZ – or a candidate.

You should never be in a position that could directly influence the life-cycle employment of a close contact and vice-versa, or influence in the hiring decision of this person.

AFTER REVIEWING THE EXAMPLES ABOVE, IF YOU UNDERSTAND YOUR SITUATION MAY POSE AN ACTUAL OR PERCEIVED CONFLICT OF INTEREST TO MDLZ, YOU MUST DISCUSS THE CASE WITH YOUR MANAGER AND COMPLETE A CONFLICT OF INTEREST DISCLOSURE FORM.

IF STILL UNSURE, REVIEW THE CONFLICTS OF INTEREST POLICY OR REACH OUT TO ETHICS & COMPLIANCE.

