

This document sets out the policy and approach of Mondelez International, Inc. and its UK subsidiaries (“Group”, “We”), in respect of its UK tax matters.

The Group is committed to conduct its UK tax matters consistent with the following objectives:

1. Compliance with all relevant laws, rules, regulations, and reporting and disclosure requirements wherever we operate. The Group has a dedicated and experienced tax team who work with the Group’s businesses to provide advice and guidance as necessary to ensure accuracy and compliance with the law.
2. Ensuring the UK tax strategy is at all times consistent with the Group’s overall strategy, its approach to risk, and the Group’s values. Key business decisions should be made cognisant of the tax consequences. The tax team partners with the business to ensure there is consistency. We structure our business and transactions on sound commercial principles that adhere to both the spirit and letter of the law.
3. Application of professional diligence and care in the management of all risks associated with tax matters and ensuring governance and assurance procedures are appropriate. In limited circumstances, relating to the application or interpretation of tax law; appropriate written advice, evidencing the facts, risks and conclusions may be taken from specialist advisers to support our decisions. The tax department employ various risk management processes to provide assurance as to the accuracy and integrity of information.
4. Fostering a constructive and professional relationship with HMRC, based on the concepts of integrity and mutual trust. On 1 October 2019, HMRC launched its new Business Risk Review (“BRR+”) approach, applicable to large businesses. The Group complies with the requirements of the risk-based approach laid out in the guidance and actively seek to reduce tax risk, promoting best practice in governance over its UK tax affairs.
5. We use incentives and reliefs where appropriate and in line with substantive business activities, but do not use them for purposes which are knowingly contradictory to the intent of UK tax legislation.

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