

Mondelēz
International



COCOA LIFE STRATEGY TO HELP PROTECT CHILDREN

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EXECUTIVE SUMMARY

When we started Cocoa Life 10 years ago, we wanted to help combat child labor by investing and engaging with communities to help deliver positive impact where we source cocoa from suppliers. This enabled us to start working more holistically with others to help tackle interconnected challenges causing child labor. Our approach has been to test new ways to empower communities and to help take promising innovations to scale.

This has resulted in gathering learnings and child-centered insights that have helped influence where we will focus to evolve both at the program and industry levels as we seek to accelerate positive impact and help drive sector transformation.

A key 2030 goal for Cocoa Life is to enhance child protection systems and provide access to quality education in all Cocoa Life communities. And by

2025, we aim to have all Cocoa Life communities in West Africa covered by Child Labor Monitoring & Remediation Systems (CLMRS). As of the end of 2021, we reached 61% CLMRS coverage in Cocoa Life communities in West Africa, more than doubling coverage compared to 2020. This accelerated progress reflects our long-standing efforts as our ultimate vision is to collaborate with others for the entire cocoa sector to be free of child labor.

To accomplish our 2030 goals and help protect children, we focus on activities that are broken down into three primary areas of response: **1) Prevention Efforts;** **2) Monitoring and Remediation;** and **3) Helping Enable Systemic Solutions.** Our primary areas of response are mutually reinforcing and directly and indirectly help prevent child labor and support broader child protection.



Prevention Efforts: Our efforts to help prevent child labor include a focus on identifying and supporting children at risk of child labor. We are also proactively looking at, and helping to implement, responses that seek to address the underlying drivers of child labor risks. We do this by working closely with implementing partners, local and national governments and others involved in the sector to consider root causes. This is demonstrated by helping to strengthen fundamental community pillars such as through Community Action Plans (CAPs), helping to increase farming households' income, helping to empower women, enabling more children to have access to quality education and integrating awareness raising throughout our work in Cocoa Life communities and beyond.

Monitoring and Remediation: Beyond our efforts to help prevent child labor, we engage in monitoring to help identify cases of child labor and children at risk so they can receive support and remediation through community-based CLMRS. The experience of Cocoa Life communities is that CLMRS provides a positive impact as we continue our efforts to reach significant scale. For example, as of the end of 2021, 61% of Cocoa Life communities in West Africa are covered by CLMRS, with our aim for that number to increase annually towards our goal of 100% coverage across West Africa by 2025.

Helping Enable Systemic Solutions: Recognizing that eradicating child labor will require structural strengthening of systems that alleviate the underlying root causes of child labor, we seek to collaborate with others to help enable systemic solutions over time. Our teams actively advocate and leverage partnerships to help address factors that give rise to structural and systemic vulnerabilities to child labor. These include goals for universal access to basic quality education, infrastructure development (i.e., water, electricity, roads, school facilities), helping reduce the need for informal labor in the household, and helping provide social protection and related benefits to the most underserved. We help address this by partnering appropriately with government counterparts, as well as other sector-specific actors, to find areas of alignment and collaboration to help address underlying root causes.

The following strategy to help protect children provides a detailed overview of the key pillars of our approach to help prevent and address child labor and broader child protection issues in communities where we source cocoa from suppliers. Underpinning our entire strategy is the reality that addressing child labor is a shared goal and requires a collaborative process of partnership and coordination with governments, suppliers, communities, NGO partners, peer companies and multi-sector partners. We believe the private sector should collaborate and partner with government and community institutions to help strengthen child protection systems that help keep children safe from child labor and other issues.

In connection with the framework of the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct, we seek to engage with and support communities and supply chain actors where risks or actual adverse human rights impacts are identified. We also expect actors along the supply chain to help end child labor. In line with our [Supplier & Partner Code of Conduct](#), when an issue cannot be corrected or a supplier or partner is unwilling to engage, we reserve the right to end our relationship.

This strategy demonstrates how we take up this shared goal and the approach we follow to help prevent child labor.



1. INTRODUCTION

At Mondelez International, we are committed to making our snacks the right way, helping protect the planet and respect the human rights of people in our value chain, and using the UNGPs as a framework to help prevent and address associated risks. Our goal is to undertake practical business minded, proactive, ongoing human rights due diligence to help prevent, identify, mitigate and reduce potential and actual human rights impacts, such as child labor. As part of our Cocoa Life program, across the key countries where we source cocoa, we endeavor to take a contextually adaptive response to help prevent child labor.



1.1 The next phase of Cocoa Life: Through Cocoa Life, we will be investing ~US\$1 billion over the period from 2012 to 2030 to help address these issues. Our 2030 goal is to increase our cocoa volume scale and work with ~300,000 cocoa farmers through the program, including farmers from communities in Brazil, Côte d'Ivoire, Dominican Republic, Ghana, India and Indonesia. With Cocoa Life, we have a vision to make cocoa right by implementing our holistic program through sector-wide collaboration, sharing our perspective, and advocating for policy change.

1.2 Beyond the short-term measures: As a responsible company, we want to help prevent and address child labor, and broader child protection issues, including by implementing monitoring and remediation. In addition to short-term responses, we are also taking steps to support medium- to longer-term strategies to help address the underlying root causes of child labor such as poverty, lack of basic infrastructure, lack of access to quality education, structural gender inequality, lack of affordable adult labor and insufficient child protection systems. This document sets out our approach to help address child labor, and its underlying root causes.

1.3 Shared goals: We recognize that helping to prevent and address child labor should be a collaborative process that includes partnership and coordination with governments, suppliers, communities, NGO partners, peer companies and multi-sector partners. We see an important need for the private sector to join efforts and partner with government and community institutions in order to help strengthen child protection systems, within and beyond cocoa. Through a community-focused approach, we will help to support, and work with, community leaders, local authorities, child protection service providers and educational services in playing their roles. We seek to help protect children from risks, including child labor in cocoa farming, by working alongside other stakeholders, with each playing their part to help find more sustainable solutions.

2. WHAT IS CHILD LABOR?

Children's work can be seen as a broad spectrum of activities and conditions. Children helping their parents with light work and chores which are neither harmful, nor interfere with their enjoyment of other rights, such as their schooling, falls on one end of the spectrum. These activities are not considered problematic for children but are supportive of their development. According to the International Labor Organization (ILO), 'Child labor' refers to work which deprives children of their childhood, their potential and dignity and that is harmful for their physical and mental development. This can include children who are working below the minimum age of employment or are being deprived of their right to mandatory education. The most significant forms of child labor identified in cocoa is within this category. [As shown in the 2020 NORC report](#), most of the children who work on cocoa farms do so within their family structure. They may undertake tasks on cocoa farms, as well as other household chores, such as fetching water and caring for younger members of the family, as part of their household labor. They may work on cocoa farms before, after or instead of school at times, particularly during harvest seasons. At other times, parents take younger children to cocoa farms in order to avoid leaving them at home alone. There are socio-economic and cultural factors for why farmers encourage their children to work on cocoa farms, as a way of preserving generational income and taking future responsibility for the land. However, in some cases, children working on cocoa farms, and performing cocoa-related work, may be exposed to harm for their physical and mental development. Some children, for example, may miss or leave school in order to help on cocoa farms. This may happen for a myriad of socio-economics pressures within households.

2.1 Hazardous child labor: The Worst Forms of Child Labor (WFCL) are defined by ILO Convention No.182. Hazardous child labor, defined as a WFCL, is harmful due to its nature or circumstances and likely to impact the health, safety, and morals of children. Hazardous child labor generally includes working conditions that involve exposure to pesticides, sharp tools, carrying heavy loads or working before or after certain times of the day. Specific circumstances that are considered as hazardous child labor are enumerated by national legislation. National hazardous child labor regulations usually set out standards on working tasks such as the use of dangerous tools and automated machinery, and maximum weights to be carried, as well as limitations on where, how and when children and people under 18 years of age can work. These forms of hazardous child labor are called '*conditional worst forms of child labor*' as they are based on whether the tasks fall within or outside of the set national standards.

2.2 Unconditional WFCL: The 'unconditional worst forms of child labor', as articulated by ILO Convention No.182, includes forced child labor, trafficking, sexual exploitation, engagement in armed conflict or the production or trafficking of drugs. Such cases can occur across all sectors, and though rare, sometimes can happen on cocoa farms. For example, this can happen in circumstances where children migrate, either within a group or family or as unaccompanied children in order to seek work and earn income. Where the migration takes place in risky situations, children can fall into an exploitative, trafficking and/or forced child labor situation, including in cocoa farming.

3. OUR PROGRAMMATIC RESPONSE

We believe the entire cocoa sector should be free of child labor. To work toward that end, we support strengthening systemic responses to child labor, even beyond our supply chain, and beyond the cocoa sector. To accomplish this, our program is focused on helping to implement three primary areas of response; **1) Prevention Efforts;** **2) Monitoring and Remediation;** and **3) Helping Enable Systemic Solutions.** Our approach seeks to mirror [international child protection system strengthening standards](#).



STRATEGY TO HELP PROTECT CHILDREN THEORY OF CHANGE

HIGH-LEVEL OUTPUTS:

GOALS:

PREVENTION EFFORTS

- COMMUNITY AWARENESS RAISING ON CHILD LABOR RISKS
- IMPROVE ACCESS TO, AND QUALITY OF PRIMARY, MIDDLE AND SECONDARY EDUCATION
- SKILLS-BASED TRAINING
- WOMEN'S EMPOWERMENT AND ECONOMIC STRENGTHENING
- COMMUNITY ACTION PLANS (CAPS)

COMMUNITIES HAVE STRENGTHENED INFRASTRUCTURE AND CAPABILITY TO PROACTIVELY PROTECT CHILDREN FROM CHILD LABOR RISKS AND DEVELOP THEMSELVES TOWARD IMPROVED CHILD WELLBEING.

MONITOR & REMEDIATE

- IMPLEMENT COMMUNITY-BASED CHILD LABOR MONITORING & REMEDIATION SYSTEMS (CLMRS)
- REMEDATION FOR CHILDREN IDENTIFIED IN, OR AT HIGH RISK OF, CHILD LABOR
- STRENGTHEN AND SUPPORT COMMUNITY CHILD PROTECTION COMMITTEES (CCPCS)

CHILDREN, BOTH AT-RISK AND IN ANY FORM OF CHILD LABOR, ARE IDENTIFIED, SUPPORTED AND SUSTAINABLY REMOVED FROM SITUATIONS OF CHILD LABOR AND HAVE THE RESOURCES FOR INDIVIDUAL WELLBEING.

ENABLING SYSTEMIC SOLUTIONS

- COUNTRY-SPECIFIC CHILD PROTECTION PLANS
- SOCIO-ECONOMIC STRENGTHENING OF FARMING HOUSEHOLDS
- ADVOCACY TO AND WITH OTHER STRATEGIC STAKEHOLDERS
- SUPPORT GOVERNMENT FRAMEWORKS AND PLANS OF ACTION
- ENGAGE ALL LEVELS OF GOVERNMENT

COLLABORATION ACROSS SUPPLY CHAIN ACTORS AND INSTITUTIONS LEADS TO ALLOCATION OF RESOURCES AND INITIATIVES TO MEET CONTEXTUAL NEEDS THAT IMPROVE CHILDREN'S ACCESS TO EDUCATION AND REDUCE THE NUMBER OF CHILDREN IN CHILD LABOR.

VISION:

COLLABORATE WITH OTHERS FOR CHILD LABOR FREE COCOA SECTOR

2030 GOALS:

CHILDREN IN ALL COCOA LIFE COMMUNITIES HAVE ACCESS TO QUALITY EDUCATION

ALL COCOA LIFE COMMUNITIES ARE COVERED BY CHILD LABOR DUE DILIGENCE SYSTEMS

CONDITIONS:

SUCCESSFUL IMPLEMENTATION OF THESE RESPONSES IS CONDITIONAL ON STRONG PARTNERSHIP ACROSS SECTORS, GOVERNMENTAL LEVELS AND IMPLEMENTING PARTNERS. A CHILD LABOR FREE SECTOR NECESSITATES COLLABORATION ACROSS ALL ACTORS OF THE SUPPLY CHAIN AND GOVERNMENT TO HELP PROTECT AND PROMOTE THE RIGHTS OF CHILDREN.



3.1 PREVENTING EFFORTS

Helping to address child labor requires looking at the root causes that perpetuate risks of child labor. We have partnered with organizations and local and national governments to look at these root causes in a practical way. We have taken a rural community development approach through Community Action Plans (CAPs), taking actions to help improve farming households' income, implementing activities to help empower women, and helping to enable more children to have access to quality education.

3.1.1 CAPs: We conduct needs assessments in coordination with communities. The assessments cover human rights and child protection, including issues such as child labor and forced labor. Based on these assessments, and with support from government and NGO partners, community members develop a CAP. CAPs are gradually integrated with local development plans, with an aim toward aligning them with local and national development endeavors. CAPs are reviewed on an annual basis by community members, NGO partners, local government and Cocoa Life representatives. They gather to review the previous year's progress and to revise CAPs for the upcoming year. Upon adoption of a CAP, we help to support communities in realizing priorities in their CAPs through the Cocoa Life Opportunity Fund and by helping to build their capacity to advocate for their own development with relevant authorities.

Development of CAPs is undertaken for communities that are part of the Cocoa Life program. CAPs seek to identify rural and community development needs that can have a strategic impact on helping to strengthen child protection. This form of stakeholder engagement is an element of our human rights due diligence approach that helps us assess risk at the community level and define actions for mitigation and prevention.

Our approach recognizes that when a community is able to move beyond survival there can be greater emphasis on specific child protection efforts. When a community's basic needs such as water, electricity, sanitation, health, infrastructure, and school buildings have yet to be attained, endemic child protection issues are less likely to be given proper attention.



3.1.2 Helping to improve farmer income from cocoa farming and other sources: Poverty is an underlying driver of child labor. To help improve and support farmer livelihoods, we provide training on good agricultural practices, which can help increase productivity on existing land and support alternative income generating activities. Our efforts also help to enable services to provide seedlings, cocoa cultivation know-how and tools. Farmers also may receive additional support in the form of premiums on incomes for more sustainable cocoa and a Living Income Differential (in the West Africa context). We also work with NGO partners to help diversify income so that farmers may have alternative sources of income aside from cocoa, helping to reduce crop dependency and income risk.

3.1.3 Helping to improve access to education: In seeking to improve access to education, our goal is to facilitate assistance that is adapted to local contexts, and relevant and effective for children in their community environment. To this end, we have two levels of activities:

1. Multi-stakeholder engagement to help improve access to education: We consider various local and national factors that may affect children’s access and ability to attend school and engage various stakeholders to help address these factors. For example, in Côte d’Ivoire there is a significant population of children who do not have birth certificates, and as a result, are unable to pass the final primary school exam. To help address this challenge and others that impact children’s access to education in Côte d’Ivoire, we joined the Child Learning and Education Facility (CLEF) public-private partnership. Through these efforts, we are endeavoring to help provide better access to quality primary education. By 2027, CLEF aims to provide quality education for 5 million children and influence the behavior of 10 million parents. To achieve this goal, CLEF is working to bring improved teaching practices to up to 10,000 primary schools in cocoa-growing areas and beyond and to build 2,500 classrooms and other education infrastructure as needed (e.g., bridging classes, school canteens, and preschool classrooms).

We seek to support the development of a similar initiative in Ghana, where local barriers to quality education are different. For example, in Ghana partnerships that place older children in apprenticeship programs have had a positive impact. We aim to take country-specific factors into account when selecting and working with NGO partners who are well positioned to address the unique challenges children face in attending school.

2. Targeting communities’ unique needs: In Cocoa Life communities, we implement activities that help to promote and improve access to quality education across multiple dimensions. Depending on local needs, this may include early parenting training, construction of pre-school structures for early development, enabling access to birth certificates, set up of school canteens, teacher training, establishment of bridging classes for children returning to school, set up of school libraries, and establishing reading clubs for children to have a space to discuss issues they are facing and learn about their rights.

3.1.4 Helping to empower women: It is well known that when women are empowered child wellbeing is positively impacted. We partner with NGOs with technical expertise in gender-based issues to help implement women’s empowerment activities such as gender sensitization training for women and men, improve women’s access to farming, community and financial training, and promote access to income generating activities and Village Savings and Loans Associations (VSLAs) to help accelerate women entrepreneurship. We also aim to support and advocate at the national level for legislation and policies that help contribute to women’s empowerment.



3.2 MONITORING & REMEDIATION

Through our partners, we seek to monitor and remediate identified cases of child labor in our supply chain. Responses are primarily delivered through our community-based CLMRS. CLMRS were first rolled out in cocoa-growing areas by the ILO and have demonstrated their positive impact on child protection. Under the leadership of the International Cocoa Initiative (ICI) – a multi-stakeholder platform working to help end child labor in the West African cocoa sector, CLMRS are reaching significant scale. Our goal is to cover 100% of Cocoa Life communities in West Africa with CLMRS by 2025.

3.2.1 Community Child Protection Committees (CCPCs)

CCPCs form an integral part of our CLMRS. CCPCs are local bodies comprised of volunteer community members and representatives of local authorities tasked with child protection, identification, remediation, and monitoring. In some countries, CCPCs take primary responsibility for implementing CLMRS activities and in other countries they play a supportive and complementary role. Our goal is for CCPCs to become focal points within their communities and primary liaisons to school and local and district authorities, as well as supply chain partners.

Strong and effective CCPCs help to protect children from forms of abuse and violence.



3.2.2 Awareness: In partnership with local authorities and implementing partners, CCPCs help to raise awareness about issues related to child protection,

such as child labor and child trafficking. Awareness raising is a first step in equipping and supporting communities to help address issues of child labor. An aim of this approach is to take into consideration the cultural dimensions at the community and family level where views concerning relevant issues may vary. Awareness raising further helps to increase communities' and families' understanding of alternatives to child labor and to deliver clear information on remedial support aimed at improving access to education.

3.2.3 CLMRS: As part of Cocoa Life, CLMRS are aligned with our supply chain and covers farming families who grow the cocoa purchased by our suppliers. And in line with the program's holistic approach, it is centered on communities and their empowerment. To help the CLMRS to be more sustainable and run independently of Cocoa Life in the long-term, we focus on supporting the capacity of communities themselves, our supply chain partners, as well as that of public authorities to provide social protection services and help protect human rights.

CLMRS focus on the support needed for children identified as vulnerable through three key interventions: Identification, remediation, and monitoring.

a) Identification: Children at risk of child labor include those who are out of school or who are otherwise at risk of, or in a situation of, child labor, either in cocoa farming or other sectors. CLMRS seek to identify vulnerable children through household and child-focused interviews, supply chain monitoring, and passive monitoring through child protection committees. The goal is for CLMRS to also capture broader aspects of vulnerability and abuse, such as gender-based violence and child trafficking.

b) Provision of support and remediation: Remediating cases of identified child labor includes reducing vulnerability of children and families identified as at risk of child labor. Remediation can include the following interventions.

- i. Remediation of identified cases of child labor and other child protection issues:** Our CLMRS aim to provide child and family-focused remediation to children and families identified in child labor situations. This includes remedial support led by the relevant child protection authorities to children identified in unconditional worst forms of child labor, such as forced child labor, trafficking or sale of children, sexual exploitation or for illicit or criminal activities. Additionally, case responsive remediation includes children identified in hazardous and non-worst forms of child labor. Cocoa Life's specialized implementing partners work in partnership with local authorities to help provide needs-based remedial support, which includes a wide range of social services, including referral to specialized services such as medical care and family reunification as well as counseling. Other practical support, such as provision of school materials, scholarships for secondary education or vocational training and cash assistance, may be provided to children from Cocoa Life registered farming households, while NGO implementing partners provide support to other children.
- ii. Helping to prevent child labor among at-risk children:** Case remedial support is also available to children of cocoa farmers in our supply chain who, whilst not identified to be in child labor, are considered at risk. This may be due to children being out of school or living in communities without basic infrastructure, such as potable water or electricity. Remedial support is based on assessed needs, and the types of support are similar to the support provided to children identified to be in child labor. Support may include, for example, provision of school materials, scholarships for secondary education or vocational training, as well as referral to specialized services and cash assistance, when appropriate.

iii. Remediation at the community level: Collective remediation interventions focus on helping to reduce risk to children in communities where the risk of child labor has been identified as a whole. Collective remediation is aimed at benefiting children in the community through interventions to help increase household income, empower women, and improve access to quality education. Examples include supporting communities to acquire basic infrastructure, such as school infrastructure, or establishment of birth certificates for children without one. Additionally, raising community awareness of child labor and other child protection issues is a key step toward normalizing community discussion and culture around the topic and how to respond to it. These interventions have a dual purpose of addressing current risks while also assisting in efforts to help prevent child labor and other child protection issues in the future.

c) Monitoring and follow-up: CCPCs monitor and follow up on identified and remediated cases, along with implementing partners and local authorities. The monitoring and follow-up includes, for example, assessment of continued access to and attendance of school and other additional remedial and preventative support that may arise.



3.3 HELPING ENABLE SYSTEMIC SOLUTIONS

Our approach to monitoring & remediation includes looking beyond short- and medium-term interventions and toward collaborating with others to help enable systemic solutions. We endeavor to address factors that are known to reduce structural vulnerability to child labor such as universal access to basic quality education, infrastructure development (i.e., water, electricity, roads, school facilities), reducing need for informal labor in the household, and provision of social security and related benefits to the most underserved.

For this reason, we are engaged in helping to drive structural improvements to child wellbeing and child protection systems. Working to enable systemic solutions involves strategic partnerships with local and national governments. It also consists of working in collaboration with other industry partners to amplify funding and contributions to structural change, such as access to quality education. At the local level, our country teams and implementing partners collaborate with local authorities to support communities and their citizens. The following outlines some of the ways in which we endeavor to carry out long-term strategic interventions:

3.3.1 Supporting government policy and action:

Cognizant that cocoa producing countries, their economies, and communities are already on a trajectory of development, we work to support their priorities and plans. Progressing into the next phase of the Cocoa Life program, we continue to explore ways to align with and support existing government development strategies, action plans and protection frameworks, particularly those that have an impact on child labor, such as education, social protection, child trafficking and forced labor and other social welfare plans.

3.3.2 Advocacy: Mondelēz International aims to be a leader in a number of industry and multi-stakeholder partnership platforms and forums at international and national levels. We advocate for international, national and local initiatives to help improve child protection. We encourage and partner with other like-minded industry actors in this endeavor. Supporting the role of national governments in strengthening child wellbeing systems is key and, therefore, we advocate for governments to lead in building and improving national and local governance systems, i.e., child protection, social welfare, health and education.



3.3.3 Engaging all levels of government: We work to maintain strategic partnerships with relevant ministries and agencies at the national, regional, district and municipal levels through:

- **Partnership:** We engage government through Memoranda of Understanding that define goals of Mondelēz International and government institutions.
- **Capacity building:** We partner with regional and local child protection authorities to help build the institutional capacity of local systems – i.e., relying on government social workers to train CCPCs, raise awareness within communities, and provide support to vulnerable children.
- **System support:** We aim to align our efforts to support government policy and child protection systems. We use government-developed tools, refer cases to the authorities, support the use of national data systems, and share data to help inform governments' policy decisions.

3.3.4 Country-specific child protection plans: For countries where we source cocoa from our suppliers, we review and/or develop a community-based approach with an eye toward taking a broader view of child protection. This includes country-specific child protection plans that are aligned with national and local priorities, aiming to help address key gaps in systemic responses, developed in collaboration with government, supply chain, and NGO implementing partners.

4. WHAT OUR RESPONSE LOOKS LIKE ACROSS COUNTRY CONTEXTS

At-risk children, their families, and communities have unique stories underlying their situations. Our approach is intended to be fit-for-purpose in the localities where children are at risk and is designed to adapt to different contexts and cultures. In some countries, and in cocoa growing regions in particular, local infrastructure, child protection laws and systems, as well as institutional and professional capacity, are more effective than in other regions and countries. In accordance with the UNGPs, and a child-centered approach, we strive to focus our efforts and resources where the risk of child labor is the most salient, in terms of likelihood, severity and scale. The following provides a general overview of how we aim to help respond to child labor across each cocoa sourcing region.

4.1 West Africa - Côte d'Ivoire and Ghana: Consistent with ILO and UNICEF global statistics on child labor, sub-Saharan Africa sees the highest prevalence of incidents of child labor. It is also important to note that Côte d'Ivoire and Ghana have made significant progress in improving access to education over the past decade. In its [2020 study, NORC](#) reported 80% school attendance rate in Côte d'Ivoire and 96% in Ghana. Nevertheless, significant issues with access and quality of education persist.

Children and their families in rural areas of West Africa, including cocoa-growing regions, face a hard reality of poverty and slow development, which include lack of education infrastructure, food insecurity, lack of access to potable water and poor health services. For these reasons, Cocoa Life has developed community-based interventions with an aim to help address child labor in Côte d'Ivoire and Ghana. These interventions, delivered in partnership with our suppliers and NGO implementing partners, include the three-pronged responses as detailed above. Our efforts not only include development of CLMRS, access to education, interventions to help improve farming households' income, women's empowerment, and other community development initiatives, but also inform our advocacy and partnership with governments and other private sector partners. These responses are informed through assessments on child labor and child protection as well as community-specific needs assessments. We are also joining forces with peers, suppliers, and local child protection authorities to implement area-based landscape approaches, under the umbrella of the ICI.



4.2 Asia - Indonesia and India:

Cocoa source countries in Asia have seen significant developments and changes in child education and child protection systems over the last two decades. Mondelez International has conducted situational assessments covering child labor and child protection in both countries. Both Indonesia and India have mandatory universal education for children and established decentralized community governance mechanisms. Local governments are mandated and financed to provide social programs for the most underserved families, supporting children to attend school by providing school materials and subsidies, as well as midday school meals. Local government services, through district authorities, also provide basic-to-adequate access to health and medical care, including nutritional support to young mothers. The social security these systems provide have a significant impact on the capacity of families and communities to maintain child wellbeing, promoting basic welfare and alleviating deprivation and vulnerability of children and families. Nevertheless, Mondelez International remains concerned about child labor risks and works to help respond in ways that are both adaptive and proactive.

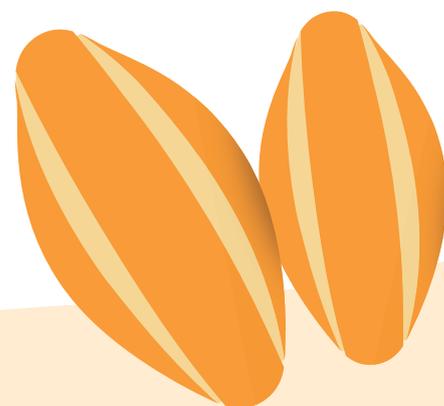
As Indonesia is among the world's largest cocoa producers, child labor remains a risk in its cocoa sector, particularly in situations where awareness of hazardous forms of child labor is low and where children drop out of school. Cocoa Life works with supplier and NGO implementing partners to help deliver a range of community-focused interventions. Primarily, Cocoa Life is working to strengthen community-based CLMRS through child protection committees (called PATBMs in Bahasa Indonesia) in partnership with local authorities and implementing partners. Government mandated CCPCs raise awareness and mobilize their communities around child protection. They monitor issues of child protection, including child labor, act as a focal point and perform visits to families and farms. They provide first assistance to vulnerable children, refer cases to child protection authorities and link families to relevant governmental social protection schemes related to education, healthcare, or social welfare. Further activities include interventions to help improve farming households' income, women's empowerment, VSLAs, and other community focused interventions.

In India, cocoa is partly cultivated by medium to large size holders, who present a lower risk for child labor. For smallholders, Cocoa Life has worked to help promote cocoa cultivation as a form of alternative livelihood for underserved and tribal communities as a form of poverty alleviation. In these areas, Cocoa Life has worked to help reduce child vulnerability by supporting access to school and positive, safe behaviors through NGO implementing partners.

4.3 The Americas - Brazil and Dominican Republic:

In Brazil, Cocoa Life works with suppliers who implement a risk-based CLMRS that is focused on parts of the supply chain where the risk is considered higher. Farmers joining Cocoa Life must make a formal commitment to zero child labor. Cocoa Life also works with local governments in key municipalities to improve access to quality education through a regional development perspective. Additionally, we support labor conditions through cross-sector engagement as part of Cocoa Action's Agenda 2030.

In the Dominican Republic, child labor is identified mostly in the service sector. In household situations, children may engage in family labor that can pose a hazard to their health. Cocoa Life works to help raise awareness and sensitize cocoa growing households to the risks of hazardous child labor. These efforts include training events and workshops at the community and supply-chain level.



5. OUR APPROACH TO PARTNERSHIP

Partnership is one of the primary ways to implement Cocoa Life and is vital to the success of our programs. We have three main types of partners: governments, suppliers and implementing NGO partners. Our supplier partnerships are key as we collectively work to help address child labor risks throughout our supply chain. As part of that shared endeavor, we expect all actors within the supply chain to do their part (see box below). The way we engage across the spectrum of our partners is a part of our global approach to Human Rights Due Diligence in alignment with the UNGPs.

Our NGO implementing partners enable a contextualized approach and provide technical expertise to the numerous activities we are undertaking. This is our perspective and how we engage partners:

5.1 Communities as partners: It is fundamental to have the buy-in of each Cocoa Life community. We endeavor to engage communities early on to maintain a learning and listening posture so that the programs and activities we implement are adaptive to communities' actual and perceived needs. This includes working with our implementing partners to help create a feedback loop where communities have access to shareable data in order to support collective decision-making in order to be better able to shape their future.

5.2 Farmers and farmer organizations: Cocoa farmers and farmer organizations play an integral role. Farmers are responsible for the way cocoa is cultivated and labor is organized. Their awareness, vigilance and explicit agreement not to use child labor is essential to prevention, as well as in identifying and monitoring of at-risk children. Cocoa Life, working through suppliers, endeavors to improve the understanding of farmers and farmer organizations of what is and is not hazardous child labor.

5.3 Government: National and local governments are key partners. At the national level, our country teams engage with national steering committees and working groups. For example, in Ghana we sit on the National Steering Committee on Child Labor. At the local level, we and our implementing partners work with local governments to implement the Cocoa Life program. This is evidenced in our approach to CCPCs, and the role local government officials are meant to play in responding to and monitoring cases of child labor.

The EU and HRDD: Mondelez International has been a vocal advocate in favor of mandatory human rights due diligence legislation. Recognizing the systemic nature of human rights issues in global supply chains and the need for multiple actors to work together to address them, we support legislative efforts aimed at enabling practical, proactive, ongoing human rights due diligence. We welcome the EU Commission's Corporate Sustainability Due Diligence directive (issued in February 2022), which requires companies to identify and address human rights and environmental risks in their value chain.

5.4 Suppliers: We work with our suppliers to help promote respect for human rights, including addressing child labor. We work with our suppliers to implement CLMRS and to identify other implementing partners to carry activities forward. In high-risk contexts, we expect suppliers to play an active role in identifying and supporting vulnerable children in their cocoa supply chain, including Cocoa Life registered farms. Suppliers also play a role in supporting farmers, farmer organizations and local community actors in identifying, monitoring and referring at risk situations. In the coming years, we expect our suppliers to play an increasingly leading role in running CLMRS within our supply chain and the Cocoa Life program.

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5.5 NGOs: Our NGO partners are technical experts at what they do, and they are selected for their areas of focus. We work with local NGOs due to their contextual expertise as well as to build local capacity. Our country teams engage and collaborate with implementing partners to help deploy targeted activities in areas such as assessments, remediation, support for children, education, economic strengthening, community facilitation and women’s empowerment.

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5.6 Area-based/jurisdictional landscape approach:

We are advocating for area-based landscape approaches where we can join forces with cocoa peers and suppliers, as well as other sectors, to support national, district and local child protection systems, schools and service providers. Partnering in this way allows greater efficiency, avoids the creation of parallel systems, and strengthens child protection responses to address all forms of child labor in the agreed region in and beyond the cocoa sector.

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5.7 Collective action platforms: We join forces with partners in a range of initiatives to support sustainable cocoa production including the World Cocoa Foundation, where we serve on the Board of Directors. We also serve on the Board of Directors of the International Cocoa Initiative (ICI), a multi-stakeholder platform whose mission is to help eliminate child labor and forced labor in the cocoa sector. Through these platforms, we also call for industry and governments to join forces to create comprehensive, systemic solutions that help address the root causes of child labor.

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5.8 Independent experts: We partner with human rights and child rights experts to inform and continuously enhance our approach to help address child labor. These external advisors include Aidan McQuade, an independent human rights expert and former head of Anti-Slavery International, as well as **Embode** and its Executive Director, Aarti Kapoor. Embode has performed **independent assessments** that helped guide Cocoa Life’s approach in countries including Ghana, Côte d’Ivoire and Indonesia. McQuade and Kapoor’s expert advice also helped shape this document.



6. HELPING TO PROTECT CHILDREN ALONG THE SUPPLY CHAIN

As a chocolate maker sourcing cocoa, we have a commercial interest in cocoa growing communities, as do other stakeholders in our supply chain. But our interest isn't simply commercial; instead, we have a strong human interest in advancing and protecting human rights, and that extends to supporting child labor due diligence throughout the cocoa supply chain.

Child labor anywhere in the supply chain is a shared problem, harming the child, his or her family, their community, and the whole cocoa and chocolate industry. Mondelez International, through its Cocoa Life program, is working collaboratively with others to help put an end to child labor. As outlined in this strategy, we aim to provide support to children identified in vulnerable situations, we support their families and help build the capacity of their communities to help protect and improve the well-being of children.

We strive to work with suppliers who have comparably high standards of ethical conduct as summarized in our [Supplier & Partner Code of Conduct](#).

Zero tolerance for modern slavery

Modern slavery is fundamentally unacceptable, and our rejection of modern slavery is a key element of our commitment to respect human rights. We have zero tolerance for the unconditional worst forms of child labor, such as child trafficking and forced child labor, and for the concealment of any slavery-like practices on the part of our partners and suppliers. Where unconditional worst forms of child labor are suspected, we will work through our partners to undertake an investigation, inform law enforcement, and provide support to vulnerable children. If wrongdoing is confirmed, Mondelez International will implement appropriate consequences for actors involved based on the circumstances of the case. In line with our [Supplier & Partner Code of Conduct](#), when an issue cannot be corrected or a supplier or partner is unwilling to engage, we reserve the right to end our relationship. Consequences may also include exclusion of farmers or communities from further participation in the Cocoa Life program.

While we remain committed to engage with and support communities and supply chain actors, we also expect all actors within the supply chain to do their part to end child labor and its worst forms.



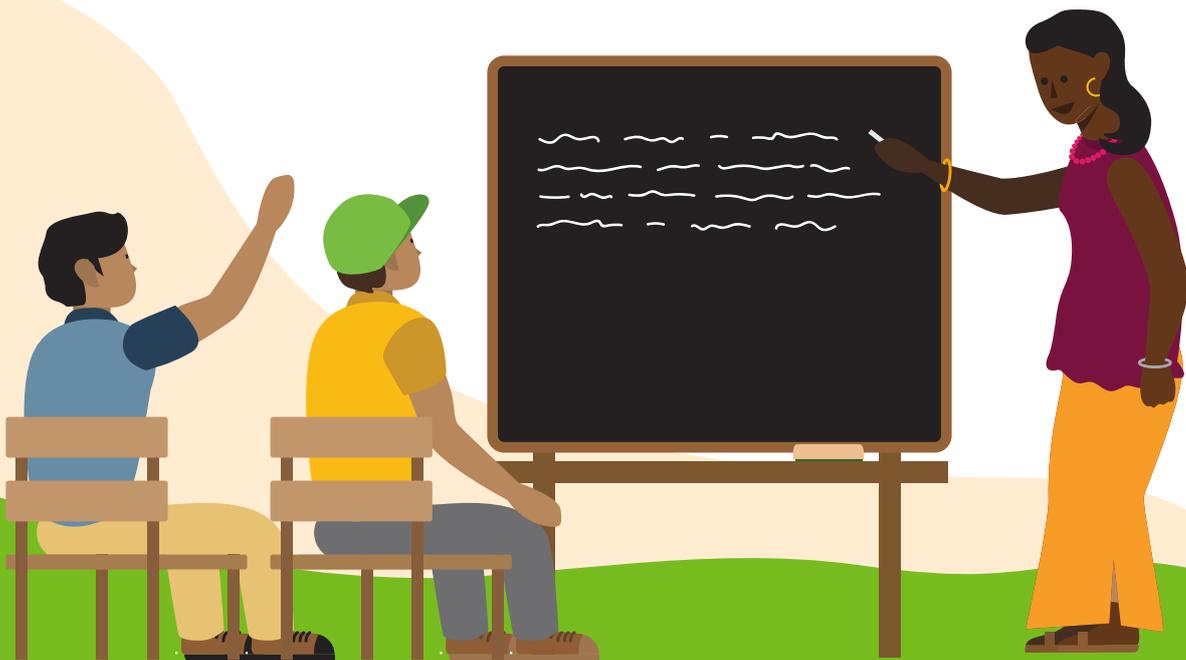
7. EVALUATING PROGRESS & IMPACT

Evaluating our progress will provide us, and our partners, with a realistic perspective on how effective our efforts are in helping children to stay safe. It will help provide us, our implementing partners, sector partners and national governments a realistic view into what aspects of our approach are working well and what areas need improvement and development.

To effectively evaluate the impact of our interventions, we need to concentrate on two main priorities:

7.1 Community-level understanding: Every community has its own characteristics, strengths and dynamics. We endeavor to ascertain a reliable and consistent understanding of what is happening in Cocoa Life communities. We seek to get comparable information from our child protection response across the countries where the program is active. This harmonized approach can help us to assess how the program is contributing, including with respect to helping child protection and access to quality education.

7.2 Evaluating impact: Our data collection efforts can help us to understand our activities and their impact. Impact is best measured by our implementing partners and will involve independent third-party experts. Regular cycles of impact measurement will help us to take an adaptive and iterative approach, and to continuously improve the program's interventions. Our hope is that our learnings also can contribute to the broader response to child labor in the cocoa sector and beyond. Additionally, as a member of the multi-stakeholder platform ICI, we voluntarily report key data on an annual basis about our efforts to help address child labor in West Africa. ICI aggregates similar data from actors in the cocoa industry to create an overview of the sector's efforts.



8. THE WAY FORWARD

In order to help drive long-lasting, positive change for children in cocoa-growing regions, all actors along the chocolate supply chain need to play their part and join forces in addressing the systemic issues underlying child labor.

We have taken tangible steps toward our ambition to move towards landscape approaches to address child labor. This is driven by our desire to avoid duplication of efforts and allow for greater sectoral and cross-sectoral efficiency to achieve better outcomes that help improve the lives of children in the countries and communities where we source cocoa. Working toward landscape approaches aligns with our belief and recognition that in order to combat child labor and its underlying root causes, there is a need for all actors to take action. This means recognizing that at the sectoral and government level as well as within communities many actors must play their part so that children are better able to develop and grow free from child labor and all forms of exploitation.

We strive to support and help strengthen national and local systems to help protect children and avoid creating parallel child protection systems. The goal of the collaborative approach we take is to put children and their best interests at the center of our interventions and for our stakeholder partners to help strengthen and inform our interventions moving forward toward a common goal of eradicating child labor.

PUBLIC PRIVATE PARTNERSHIP

We are a part of CLEF, a collaboration between the Jacobs Foundation, the UBS Optimus Foundation, the Ivorian government and the broader cocoa sector. The collaboration aims to reach 5 million children in cocoa-growing areas and beyond with a focus on access to quality primary education.

With a target investment of CHF110 million, through pooled funding from the Ivorian government, industry and donors, CLEF is a ground-breaking example of a jurisdictional approach. Lack of access to education is an underlying cause of child labor and this initiative, led by the Ivorian government, has potential to provide a blueprint for public private partnership that can be replicated in other countries to help address key root causes of child labor.

Given our size and experience, we have an opportunity to help further drive sector collaboration by using our voice to seek to influence industry peers and by partnering with communities, governments, donors, and other sectors toward systemic solutions. The path toward a child labor free sector is not expected to be without difficulty, but we are determined to play our part and be a solutions-oriented partner. We will continue to share our learnings, seek out exchange and partnership with all relevant stakeholders, help convene those exchanges where relevant, and advocate for solutions that help address the root causes of child labor and benefit the wellbeing of children over the long term.

