[Policies & Practices](https://www.mars.com/about/policies-and-practices)

**Human Rights Position Statement**

In today’s world, we often hear of people who live at the poverty level, people who do not have any food or water. People get exploited on a daily basis due to their poverty or vulnerabilities. ViberTEX, Inc. belives that the global economy — and our global businesses need do something about this! We feel that we need to be able to empower people who do not have anything! It is important for them to succeed but they do not have the means or the ability. ViberTEX, Inc. believes in the global possibilities of helping those in need in our domestic and our international communities.

Why do we feel this way? We feel that when people have the ability to do well, they are able to achieve their daily needs for survival and ensuring they are able to thrive, and they are able to meet their own needs and perhaps the needs of their families and communities.

We believe we can, and should, play a role in increasing opportunity for people to thrive in the workplaces and communities we touch.

ViberTEX, Inc. is committed to respecting human rights. Human rights are one of the five sustainability areas we prioritize, alongside income, climate action, land management and water stewardship. In the 78 countries where we do business and across our value chain, we’re making progress in respecting human rights.

Significant, complex and systemic human rights issues persist in the global economy and affect people in a number of extended supply chains that we ultimately rely on as a business.1 These challenges are often linked with poverty, weak rule of law or the vulnerability of migrant workers. For example, the International Labor Organization (ILO) estimates that more than 85 million children are working under hazardous conditions, most in the agriculture sector, and that more than 21 million people are victims of forced labor around the world.2ViberTEX, Inc. does not control and has very limited influence over operations in our extended supply chains. Nevertheless, we believe these practices are unacceptable and that we must renew our individual and collective efforts to take action, boldly test new approaches and form new collaborations to drive sustained progress.

Approach Our global Human Rights Policy describes our commitment to respecting rights across our valued supply chain line.

We use the UN Guiding Principles on Business and Human Rights (UNGPs) at ViberTEX, Inc. for ourselves and for our search in supplies, manufacturers, third party vendors, and distributors.

The Policy is also informed by the ILO’s Declaration on Fundamental Principles and Rights at Work.

Our [Supplier Code of Conduct](https://www.mars.com/policies/supplier-code-conduct) is grounded in international human rights guidance and best practice and identifies the human rights standards we expect our first-tier suppliers to uphold.

Our approach to human rights reaches our workplaces, first-tier supplier workplaces and the extended supply chain. To bring our commitments to life across our value chain, we use a unique ‘CARE Framework’ that we developed based on the UNGPs. It is a step-by-step tool to guide our human rights decisions and actions. We are also building strong human rights partnerships, as we recognize that breakthrough solutions to these issues will require concerted collaboration across private and public sectors. In consultation with human rights experts and through thorough review of publicly-available data we have identified forced labor and child labor as the human rights issues that may pose the most severe risk to people in our extended supply chains.

Our Approach in Action

Our global human rights strategy includes action in our own workplaces, first-tier supplier workplaces and the extended supply chain.

* Responsible Workplace focuses on ensuring respect for rights in our own workplaces. Through our Responsible Workplace program, independent auditors assess our human rights performance – if issues are identified, we work to address them.
* [Our Supplier Program](https://www.mars.com/about/policies-and-practices/next-generation-supplier-program) ensures that we utilize suppliers, distributors, manufacturers that are able to address the human rights act domestically and internationally. We expect all of our suppliers, distributors, manufacturers and 3rd part software creators to join us in our efforts to stop the labor issues, human trafficking issues – make them aware, allow them to read up, ensure that they are following our same guided principles.
* We continue to align all of our suppliers with our social, environmental and ethical expectations through our Supplier Code of Conduct.
* We assess the sustainability performance and existing social compliance audit results of prioritized suppliers using the EcoVadis online platform, leveraging recognized third –party tools while also unlocking increased visibility and broader insights. We support strategic suppliers, as they advance performance through a new, longer-term collaboration model focused on driving systemic change and engagement of workers.
* Human Rights and Sustainable Sourcing focuses on advancing respect for human rights in our extended supply chains. We seek to understand the nature and extent of human rights issues and to support our suppliers and business partners as they take steps to identify, prevent and address them.

We focus on collaboration across sectors to drive long-term change, with a particular focus on root causes. Our “CARE Framework” is a step-by-step approach that supports our teams around the world as they prepare to take action on human rights, highlighting four key action areas – Commit, Assess, Respond, Engage:

* Commit: Forming a cross-functional team across all relevant functions with clear accountabilities and governance processes. Identifying or creating relevant policies, standards and practices. Allocating appropriate resources to support successful activation of the agreed plan.
* Assess:
  + Conducting human rights due diligence to identify and understand relevant human rights impacts including, where possible, input from impacted and vulnerable people and local communities.
* Respond:
  + Seeking to prevent, address and remediate human rights impacts, either directly or in collaboration with industry, government and civil society. Actions may include monitoring and verification systems, awareness raising and training or grievance mechanisms, remediation of individual cases, and addressing the enabling environment and root causes.
* Engage:
  + Engaging externally to learn from and collaborate with others and to share our own progress and challenges transparently. Seeking to mobilize or join key coalitions and to drive collective action across sectors to meet shared goals.

1 ViberTEX, Inc. supply chain includes suppliers which supply products and/or services directly to ViberTEX, Inc. as well as businesses which supply goods and/or services to others.

2 The International Labor Organization defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” Hazardous child labor, which includes the worst forms of child labor is defined by the ILO as “work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.”

**Human Rights Policy**

The business philosophy of ViberTEX, Inc. is deeply rooted in our Five Principles of Quality, Responsibility, Mutuality, Efficiency and Freedom. These Principles are the foundation of our Human Rights Policy.

This Policy is informed by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work. It is the duty of governments to protect and fulfill human rights. 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. No matter where we operate, ViberTEX, Inc. strives to comply with the spirit and the letter of the law. Where local laws are less stringent than our Policy, we will seek to operate in accordance with this Policy and our Five Principles.

Our aim is to prioritize action on the most severe human rights impacts and where we believe we can make the most valuable contribution.

We will concentrate our initial efforts in two areas of our value chain: our operations, where we have the most control; and sourcing, where we can have the greatest impact, with a particular emphasis on potentially vulnerable groups.

We will equip relevant Associates with training and raise their awareness of our human rights expectations.

**Policy Governance**

This Policy was developed with input from ViberTEX, Inc. Associates in key functional areas and from a range of external stakeholders.

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.

Our dedicated global human rights team establishes our human rights policies, strategies and programs and provides expertise and guidance to the teams across our business engaged in implementation.

This Policy applies to ViberTEX, Inc. Incorporated and the entities in which we hold a majority interest.

Our Supplier Code of Conduct establishes our expectations of our suppliers with regard to human rights and also encourages our suppliers to take appropriate steps to understand and address human rights issues in their supply chains.

Engagement and Transparency We will work with and actively engage our stakeholders, including potentially impacted people, as we implement this policy.

We will update this Policy as needed as lessons are learned.

We will also report regularly on our human rights plans and performance externally.

Contact Us if you want to discuss Human Rights, Transparency on Human Rights about our suppliers, distributors, 3rd party vendors and manufacturers.