

RESOLVED: Shareholders request that Mondelez International, Inc. (“Mondelez”), at reasonable cost and omitting proprietary information, report to shareholders on the processes and policies, above and beyond legal compliance, to assess and manage risks and/or hazards to human health, the company’s reputation and its financial position associated with chemicals and additives in its food and beverage products.

SUPPORTING STATEMENT:

Weak federal regulations concerning Generally Recognized as Safe (GRAS) substances enable the food industry to self-regulate and determine whether an ingredient is GRAS without notifying the Food and Drug Administration (FDA) of the company’s determination or the research underlying its determination that the substance is safe.¹ According to a 2022 analysis, nearly 99 percent of all food chemicals introduced since 2000 were approved by the food and chemical industry, not the FDA.²

Approximately 29 percent of Mondelez products contain synthetic dyes.³ These petroleum-based compounds offer no nutritional value, are used in low-nutritional products, and are added purely for visual appeal.⁴ Evidence demonstrates the dyes are associated with neurobehavioral issues in children, including hyperactivity⁵ and adverse behavioral outcomes.⁶

In 2015, Mondelez made a commitment to phase out synthetic dyes from a majority of its products by 2020.⁷ Now in 2025, after federal government pressure for companies to voluntarily phase out these dyes,⁸ Mondelez says it is working to make the transition to natural dyes. However, Mondelez has not made a timebound commitment⁹ and has not made any voluntary pledge to the FDA, according to the government’s industry pledge

¹ <https://ajph.aphapublications.org/doi/full/10.2105/AJPH.2024.307755?role=tab>

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<https://www.ewg.org/news-insights/news/2022/04/ewg-analysis-almost-all-new-food-chemicals-greenlight-ed-industry-not-fda>

³ <https://www.cspi.org/page/synthetic-dyes-corporate-commitment-tracker>

⁴ <https://www.cspi.org/chemical-cuisine/artificial-colorings-synthetic-food-dyes>

⁵ <https://www.sciencedirect.com/science/article/pii/S2772529424001255>

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<https://oehha.ca.gov/risk-assessment/press-release/report-links-synthetic-food-dyes-hyperactivity-and-other-neurobehavioral-effects-children>

⁷ <https://www.foodbusinessnews.net/articles/5178-mondelez-to-remove-artificial-colors-flavors-by-2020>

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<https://www.fda.gov/food/color-additives-information-consumers/tracking-food-industry-pledges-remove-petroleum-based-food-dyes>

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<https://www.reuters.com/business/healthcare-pharmaceuticals/swedish-fish-maker-mondelez-will-switch-food-dyes-to-natural-not-synthetic-2025-09-25/>

tracker.¹⁰ Notably, Kraft Heinz and Kellanova have pledged to remove synthetic dyes from all products by the end of 2027; Nestle will remove all synthetic dyes by mid-2026.¹¹

Competitors in the food industry continue to make commitments to removing harmful ingredients. Walmart announced in October that it would remove more than 30 harmful ingredients from its US private brands.¹²

Increasingly, companies are facing legal risks associated with chemicals and additives in their products as consumers become wary of ultra-processed foods, often defined as including artificial flavors and colors.¹³ Mondelez was accused in a 2024 lawsuit of creating and marketing ultra-processed foods that are addictive to children and harmful to health.¹⁴ Although the case was recently dismissed, it highlighted causation as an area for lawyers to focus on in drafting future complaints.¹⁵

States are seeking to address the GRAS regulatory loophole by banning food chemicals that pose potential harm to human health. As of 2025, 20 states have introduced and/or passed legislation targeting food chemicals.¹⁶ The federal government is also advocating for the reduction of health-harming ingredients in food products.¹⁷

The lack of transparency regarding Mondelez's risk assessment and management approach, combined with growing regulatory pressures and consumer demand for ingredient information, creates risks for shareholders and our Company.

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<https://www.fda.gov/food/color-additives-information-consumers/tracking-food-industry-pledges-remove-petroleum-based-food-dyes>

¹¹ <https://infogram.com/synthetic-dyes-corporate-commitment-tracker-1h0n25owglew/4p>

¹²

<https://corporate.walmart.com/news/2025/10/01/walmart-u-s-moves-to-eliminate-synthetic-dyes-across-all-private-brand-food-products>

¹³ <https://pmc.ncbi.nlm.nih.gov/articles/PMC10260459/>

¹⁴ <https://www.cnn.com/2024/12/11/food/addictive-processed-food-kids-lawsuit>

¹⁵

<https://www.reuters.com/sustainability/boards-policy-regulation/kraft-other-companies-defeat-test-lawsuit-over-ultra-processed-foods-2025-08-25/>

¹⁶

<https://www.ewg.org/news-insights/news/2025/10/interactive-map-tracking-state-food-chemical-regulation-US>

¹⁷ <https://www.whitehouse.gov/wp-content/uploads/2025/05/MAHA-Report-The-White-House.pdf>