Mondelēz International, Inc. paid a quarterly distribution on October 13, 2016 to its shareholders of record on September 30, 2016. Mondelēz International, Inc. has now determined that this distribution was a return of capital as Mondelēz International, Inc. did not have any U.S. earnings or profits (current or accumulated) on the date of payment.

Mondelēz International, Inc. paid a distribution of 19 cents a share on October 13, 2016. This amount is a non-taxable return of capital to the extent of a U.S. shareholder’s tax basis in each of its Mondelēz International, Inc. shares, with any remaining amount being taxed as capital gain to a U.S. shareholder.

Mondelēz International, Inc. has now determined that this distribution was a return of capital as Mondelēz International, Inc. did not have U.S. any earnings or profits (current or accumulated) on the date of payment. The amount (19 cents a share) that Mondelēz International, Inc. distributed on October 13, 2016 was determined by the Mondelēz International, Inc. Board of Directors. One hundred percent (100%) of this amount was a return of capital.
Part II  Organizational Action (continued)

17  List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based   ➤  Sections 301(c) and 316(a) of the Internal Revenue Code.

18  Can any resulting loss be recognized?   ➤  N/A

19  Provide any other information necessary to implement the adjustment, such as the reportable tax year   ➤  None

Signature  ➤  Philip D. Gregory
Date  ➤  1-12-17

Print your name  ➤  Philip D. Gregory
Title  ➤  Vice President of Tax

Paid Preparer Use Only
Print/Type preparer's name
Preparer's signature
Date
Check [ ] if self-employed
PTIN

Firm's name
Firm's address
Firm's EIN
Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054