

NOT FOR REPRODUCTION

# IN GOOD COMPANY

Hershey's Commitment to Our Employees,  
Consumers & Business Partners



**HERSHEY** 

Code of Conduct

## KNOW YOUR RESPONSIBILITIES

**Our good name is in your hands.**

No matter what job you do or where you do it, you are Hershey. Think about that as you watch over every business relationship, every transaction and every product, and make sure your actions always reflect our values. Follow our Code and policies as well as the laws and regulations of the country (or countries) where you work, and protect what we've built. And, complete your assigned training—it's the best way to stay up-to-date on what's expected of you.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead—but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment with Hershey.

If you manage people, you have an even greater responsibility. Lead by example, making sure your team members know the Code is a resource for them and that there is no difference between what you do and what you expect from others. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues. Never retaliate against employees for sharing concerns in good faith, and prevent retaliation by others.

## SPEAK UP WITHOUT FEAR

**We don't tolerate retaliation.**

As a company we know it takes courage to come forward and share your concerns. We won't retaliate or permit retaliation against anyone who raises questions or concerns about corporate activities. We won't retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or legal violations to us or a government authority or assists in an investigation of misconduct or legal violation.

Regardless of who you contact, you can be confident that you're doing the right thing and that your concern will be handled promptly and appropriately. We investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the issue.



***I suspect—but am not certain—that someone is violating our Code. Should I keep my concerns to myself?***

No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.

***Culturally, it's not common to report a concern about someone that is in a leadership position. What should I do?***

It's important to say something about your concerns. Hershey respects its diverse workforce, considers various cultural norms when looking into concerns and takes all appropriate actions to protect the identity of the person who is sharing the information, as well as the information that's being shared.

# YOU ARE HERSHEY.

## UPHOLD HUMAN RIGHTS

**We are committed to fair employment practices everywhere we operate.**

As a company, we respect the rights of every individual and abide by the employment laws in the markets where we operate. We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking.

We expect our suppliers to share our commitment to the same high standards. As part of our commitment to eliminating illegal labor from our supply chains, we continue to build and accelerate programs aimed at changing the underlying circumstances that contribute to labor rights violations. To learn more about the steps we are taking, see our [Corporate Social Responsibility report](#). Our [Supplier Code of Conduct](#) further reinforces our commitment.

What can you do? Follow the employment laws where you work, be alert to abuses and speak up if you see or suspect possible labor law or human rights violations.

### *Goodness Works*



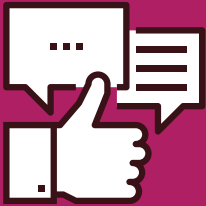
- Treat others with respect and dignity.
- Do not engage in human rights abuse or conduct business with those who do.

### *A Shared* COMMITMENT



Our business is built on a long, interdependent supply chain, and we want every link to be solid and strong. We have zero tolerance for the worst forms of child labor as defined by International Labor Organization Conventions 138 and 182 and expect suppliers to support and participate in industry efforts aimed at eliminating these kinds of practices wherever they exist. We respect the rights of every individual and believe that anyone employed by Hershey or Hershey suppliers should be treated with dignity and respect, paid a fair wage based on applicable law and assured of safe working conditions.

## Goodness Works



- Insist on product quality and safety. Follow our rigorous quality-control procedures.
- If you become aware of a customer complaint or a quality, safety or reliability issue, report it immediately to your manager or other company resource.
- **FIND OUT MORE:**
  - Allergen Policy
  - Intranet site for QRC

## What if?



*One of the tests that we perform on a product is repeated further down the production line. Why not skip the first test—wouldn't that help us speed up delivery?*

Skipping a required test is never okay. If you have ideas for improving efficiency, it's great to share them. But unless the process is evaluated and modified, it's critical to complete every step, as required, to make sure we're delivering a safe, high-quality product every time.