# 2022 Global Reporting Initiative (GRI) Content Index

The data in this report represents January to December 2022, unless otherwise stated. For a detailed explanation of the indicators, visit the Global Reporting Initiative (GRI) website: [globalreporting.org](https://globalreporting.org). This content report accompanies our 2022 ESG Report, has been prepared in accordance with the GRI Universal Standards and follows the reporting principles from GRI: Foundation 2021.

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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</thead>
<tbody>
<tr>
<td><strong>GENERAL DISCLOSURES</strong></td>
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<tr>
<td>The organization and its reporting practices</td>
<td>2-1</td>
<td>Organizational details</td>
<td>Legal name: The Hershey Company</td>
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<tr>
<td></td>
<td></td>
<td>Nature of ownership and legal form: 2022 Form 10-K, pages 2-3</td>
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<td></td>
<td></td>
<td>Location of the headquarters: 19 East Chocolate Avenue, Hershey, PA 17033</td>
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<td>Countries of operation: 2022 Form 10-K, pages 2-7, Exhibit 211</td>
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<td></td>
<td>2-2</td>
<td>Entities included in the organization’s sustainability reporting</td>
<td>2022 Form 10-K, pages 2-5</td>
</tr>
<tr>
<td></td>
<td>2-3</td>
<td>Reporting period, frequency and contact point</td>
<td>Hershey 2022 ESG Report: About this Report, page 126</td>
</tr>
<tr>
<td></td>
<td>2-4</td>
<td>Restatements of information</td>
<td>During 2022, there have been no corrections or restatements of information given in any of our previous financial reports. Throughout the 2022 ESG Report, restatements due to scope and/or methodology changes have been noted with footnotes where applicable. These changes are driven by Hershey’s merger and acquisition activities with the addition of Lily’s Sweets, LLC, Dot’s Pretzels, LLC and Pretzels, Inc. Additionally, some data has been restated from past years as we expand our data-collection abilities to be more inclusive of the global scope of the company.</td>
</tr>
<tr>
<td></td>
<td>2-5</td>
<td>External assurance</td>
<td>Select environmental data within Hershey’s 2022 ESG Report has been verified by Quantis, an independent verifier. Additional environmental data has received limited assurance by Ernst &amp; Young (EY). Hershey 2022 ESG Report: About This Report: EY Limited Assurance Statement pages 127-129, About This Report: Quantis Verification Letter, pages 130-131</td>
</tr>
<tr>
<td><strong>Activities and workers</strong></td>
<td>2-6</td>
<td>Activities, value chain and other business relationships</td>
<td>We are not aware of any of our products being banned in any markets where we operate and distribute.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Hershey 2022 ESG Report: Making Good for Our Future, pages 4-10, Our Company, pages 11-23, Responsible Sourcing and Human Rights, pages 42-63</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>See also: 2022 Form 10-K, pages 2-5, 10, Statement Against Slavery &amp; Human Trafficking</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2-7</td>
<td>Employees</td>
<td>We do not have a significant portion of activities performed by workers who are not employees. The increase in global employee totals from 2021 to 2022 may be attributed to general employee population growth and mergers and acquisitions. Our HR analytics team manages employment data and calculates these metrics.</td>
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<td>Hershey 2022 ESG Report: Our People: Our Progress (data), pages 102-109</td>
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<td></td>
<td></td>
<td>See also: 2022 Form 10-K, pages 6-7</td>
<td></td>
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<tr>
<td></td>
<td>2-8</td>
<td>Workers who are not employees</td>
<td>Requirement omitted: Entire disclosure Reason for Omission: Topic not material for Hershey</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Explanation of Omission: We do not have a significant portion of activities performed by workers who are not employees.</td>
<td></td>
</tr>
</tbody>
</table>
### Governance

#### Governance structure and composition

- **Hershey 2022 ESG Report:** Our Company: Our ESG Governance, pages 12-14

See also:
- 2023 Proxy Statement: Corporate Governance, pages 17-27
- 2023 Proxy Statement: Our Director Nominees, page 26
- Board of Directors
- Committees & Charters
- Corporate Governance

#### Nomination and selection of the highest governance body

- 2023 Proxy Statement: Corporate Governance—Board Composition and Criteria for Board Membership, pages 17-19
- Corporate Governance Guidelines
- Governance Committee Charter

#### Chair of the highest governance body

Michele Buck is the Chairman of the Board, President and Chief Executive Officer for The Hershey Company.

See also:
- Our Leadership

#### Role of the highest governance body in overseeing the management of impacts

- Our Company: Our ESG Governance, pages 12-14

See also:
- 2022 TCFD Report
- 2023 Proxy Statement: Corporate Governance—Communications with Directors, page 28
- 2023 Proxy Statement: The Hershey Company Purpose and Values, page 12
- 2023 Proxy Statement: Corporate Governance—Enterprise Risk Management, page 24
- Corporate Governance Guidelines
- Hershey’s Commitment to Human Rights
- Statement Against Slavery & Human Trafficking

#### Delegation of responsibility for managing impacts

- Hershey 2022 ESG Report: Our Company: Our ESG Governance, pages 12-14

See also:
- 2023 Proxy Statement: The Hershey Company Purpose and Values—Our Shared Goodness Promise—Board Oversight of ESG, pages 12-13
- Corporate Governance

#### Role of the highest governance body in sustainability reporting

Michele Buck and Hershey's Board of Directors review Hershey's ESG Report and the material topics covered therein.

- Hershey 2022 ESG Report: Our Company: Our ESG Governance, pages 12-14

See also:
- 2023 Proxy Statement: The Hershey Company Purpose and Values, page 12

#### Conflicts of interest

- Code of Conduct
- Corporate Governance Guidelines
- Related Person Transaction Policy
### General Disclosures

#### Governance

<table>
<thead>
<tr>
<th>Standard</th>
<th>Reference</th>
<th>Disclosure</th>
</tr>
</thead>
</table>
| 2-16     | Communication of critical concerns | In 2022, Hershey recorded three cases that were deemed “critical.” Any “critical” concerns are reported to the Ethical Business Practices Committee (EBPC) and the Audit Committee pursuant to our policies and procedures. Compliance concerns are reported through various channels, including but not limited to: Hershey’s Concern Line, business partners, Human Resources (HR), Ethics & Compliance. All concerns are managed and followed closely by the Ethics & Compliance department. Hershey applies severity codes to cases depending on certain parameters such as violation, potential fines and/or involvement of senior leaders. Critical concerns (red) and significant concerns (orange) are reported to the EBPC and Audit Committee for visibility. Issues reported to the Concern Line cover a wide array of topics, including conflicts of interest, general labor practices, employment-related concerns, potential fraud, security and requests for general advice. | Hershey 2022 ESG Report:  
• Our Company: Our ESG Governance, pages 12-14  
• Our People: Engaging with Unions, page 94  
See also:  
• 2023 Proxy Statement: Corporate Governance—Communications with Directors, page 28  
• Ethics & Compliance: Hershey’s Concern Line |
| 2-17     | Collective knowledge of the highest governance body | Hershey 2022 ESG Report:  
• Our Company: Our ESG Governance, pages 12-14  
See also:  
• Corporate Governance Guidelines |
| 2-18     | Evaluation of the performance of the highest governance body | Hershey 2022 ESG Report:  
• Our Company: Our ESG Governance, pages 12-14  
See also:  
• Corporate Governance Guidelines |
| 2-19     | Remuneration policies |  
• 2022 Form 10-K, page 97  
• 2023 Proxy Statement: Compensation Discussion and Analysis, pages 47-61  
• Corporate Governance Guidelines |
| 2-20     | Process to determine remuneration |  
• 2023 Proxy Statement: Compensation Discussion and Analysis—Setting Compensation, page 54 |
| 2-21     | Annual total compensation ratio |  
• 2023 Proxy Statement: CEO Pay Ratio Disclosure, page 79  
• 2023 Proxy Statement: Compensation Discussion and Analysis, pages 47-61  
Requirement omitted b:  
Reason for Omission: Information unavailable  
Explanation of Omission: the percentage increase in annual total compensation for the organization’s highest-paid individual to the median percentage increase in annual total compensation for all employees is not currently tracked. |

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**GRI Standard**

**Reference**

**GRI Disclosure**

**2022 Hershey Response**
Hershey 2022 ESG Report:
- Making Good for Our Future: A Message From Our CEO, page 5
- Making Good for Our Future: A Message From Our CSO, page 6
- Making Good for Our Future: Our ESG Approach and Priorities, page 8

See also:
- Environmental Policy Statement
- Supplier Code of Conduct

Hershey 2022 ESG Report:
- Our Company, pages 11-23

See also:
- 2023 Proxy Statement: Corporate Governance - Enterprise Risk Management, page 24
- 2023 Proxy Statement: The Hershey Company Purpose and Values, page 12
- Code of Conduct
- Hershey policies
- Supplier Code of Conduct

Hershey 2022 ESG Report:
- Our Company: Our ESG Governance, pages 12-14
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Responsible Recruitment and Employment, pages 48-49
- Responsible Sourcing and Human Rights: Responsible Recruitment Program (data), page 59
- Responsible Sourcing and Human Rights: Responsible Sourcing Supplier Program (Supplier Program) (data), page 60

See also:
- Hershey policies

Hershey 2022 ESG Report:
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

Hershey engages with many different initiatives/organizations where we are also members.

Hershey 2022 ESG Report:
- Cocoa: Cocoa Partners, page 29
- Environment: Environmental Partnerships, page 79

See also:
- Statement Against Slavery & Human Trafficking
### Stakeholder engagement

**Approach to stakeholder engagement**

Our key stakeholder groups include:
- Communities where we operate
- Consumers
- Employees
- Farmers
- Government and policymakers
- Investors
- Non-governmental organizations
- Retailers
- Suppliers and other business partners

Hershey 2022 ESG Report:
- Cocoa: Cocoa Partners, page 29
- Environment: Environmental Partnerships, page 79
- Making Good for Our Future: Double Materiality, page 7
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51
- Responsible Sourcing and Human Rights: Responsible Recruitment Program (data), page 59
- Responsible Sourcing and Human Rights: Responsible Recruitment and Employment, pages 48-49

See also:
- 2023 Proxy Statement
- Statement Against Slavery & Human Trafficking

### Collective bargaining agreements

**Process to determine material topics**

Hershey 2022 ESG Report:
- Our People: Engaging with Unions, page 94

See also:
- 2022 Form 10-K, page 6
## ECONOMIC PERFORMANCE

### GRI 201: Economic Performance 2016

**201-1 Direct economic value generated and distributed**

Hershey 2022 ESG Report:
- Our Company: Financial Performance (data), page 22

See also:
- 2022 Form 10-K, pages 23-33

**201-2 Financial implications and other risks and opportunities due to climate change**

Hershey 2022 ESG Report:
- Environment, pages 64-89
- Making Good for Our Future, pages 4-10

See also:
- 2022 TCFD Report
- Environmental Policy

**201-3 Defined benefit plan obligations and other retirement plans**

a) Estimated value of U.S. qualified plan liabilities as of December 31, 2022: $749 million.
b) The Hershey Company has a Master Retirement Plan Trust that holds the investment funds for our Pension Plan.
   - As of December 31, 2022, the U.S. qualified plans had a 107% funded status.
   - This is based on actuarial valuation reports used to support Hershey’s 2022 Form 10-K filing for fiscal year ending December 31, 2022.c) Hershey’s pension plan is funded entirely via employer contributions. Employee contributions are not required.d) Hershey’s pension plan is closed to new hires, but eligible participants continue to accrue benefits.

See also:
- 2022 Form 10-K, pages 38-40
- Hershey Careers: Benefits

**201-4 Financial assistance received from government**

In 2022, the company received $661,241 in grants and incentives. The Hershey Company is a publicly traded company on the NYSE, and as such, may have governmental entities (e.g. pension funds, state-owned banks) as investors/shareholders in the ordinary course of business.

See also:
- 2022 Form 10-K, page 76

## MARKET PRESENCE

### Disclosures on Material Topics 2021

**3-3 Management of Material Topics**

Hershey 2022 ESG Report:
- Making Good for Our Future, pages 4-10
- Our Company: Our ESG Governance, pages 12-14

See also:
- 2022 Form 10-K, pages 2-7, 18-102
- Corporate Governance Guidelines
- Statement Against Slavery & Human Trafficking

### GRI 204: Procurement Practices 2016

**202-1 Ratios of standard entry level wage by gender compared to local minimum wage**

Requirement omitted: Entire disclosure
- Reason for Omission: Information unavailable
- Explanation of Omission: Hershey does not currently monitor or report on employee wages relative to local minimum wage, and there is no established timeline to do so.

**202-2 Proportion of senior management hired from the local community**

Hershey 2022 ESG Report:
- Our People: U.S. Senior Leader (data), page 105
<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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<tbody>
<tr>
<td>INDIRECT ECONOMIC IMPACTS</td>
<td>3-3</td>
<td>Management of Material Topics</td>
<td>Hershey 2022 ESG Report:</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Cocoa, pages 24-41</td>
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<td>• Community, pages 117-124</td>
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<td>• Environment, pages 64-89</td>
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<td>• Making Good for Our Future, pages 4-10</td>
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<td>• Our Company: Our ESG Governance, pages 12-14</td>
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<td></td>
<td>• Responsible Sourcing and Human Rights, pages 42-63</td>
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<tr>
<td>GRI 203: Indirect Economic Impacts 2016</td>
<td>203-1</td>
<td>Infrastructure investments and services supported</td>
<td>Hershey 2022 ESG Report:</td>
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<td></td>
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<td>• Cocoa: Cocoa For Good, pages 25-26</td>
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<td>• Community, pages 117-124</td>
</tr>
<tr>
<td>GRI Standard</td>
<td>Reference</td>
<td>GRI Disclosure</td>
<td>2022 Hershey Response</td>
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<td>PROCUREMENT PRACTICES</td>
<td>3-3</td>
<td>Management of Material Topics</td>
<td>Hershey 2022 ESG Report:</td>
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<td>MATERIAL TOPIC: RESPONSIBLE SOURCING</td>
<td></td>
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<td>• Cocoa: Cocoa For Good, pages 25-26</td>
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<td>• Responsible Sourcing and Human Rights, pages 42-63</td>
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<td>• Cocoa</td>
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<td>• Human Rights Policy</td>
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<td>• Living Wage &amp; Income Position Statement</td>
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<td>• Our Shared Goodness Promise</td>
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<td>• Priority Ingredients and Raw Materials</td>
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<td>• Responsible Recruiting &amp; Employment Policy</td>
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<td>• Supplier Code of Conduct</td>
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<td>• Cocoa: Cocoa For Good, pages 25-26</td>
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<td>• Community, pages 117-124</td>
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<td>• Youth, pages 110-116</td>
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<td>• Responsible Sourcing and Human Rights, pages 42-63</td>
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<td>GRI Standard</td>
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</tbody>
</table>
| G4-PP1      | 204-1     | Proportion of spending on local suppliers | Hershey 2022 ESG Report:  
• Our People: Supplier Diversity (data), page 107 |
|             |           | Percentage of purchased volume from suppliers compliant with company’s sourcing policy | Of our purchased volume, 100% comes from suppliers who are required to adhere to the provisions of our sourcing policies and Supplier Code of Conduct. |
|             |           | Of our purchased volume, 100% comes from suppliers who are required to adhere to the provisions of our sourcing policies and Supplier Code of Conduct. | Hershey 2022 ESG Report:  
• Responsible Sourcing and Human Rights: Responsible Sourcing Supplier Program (Supplier Program) (data), page 60  
• Responsible Sourcing and Human Rights: Responsible Sourcing Ingredient Commitments & Progress (data), page 63 |
|             |           | Percentage of purchased volume, which is verified as being in accordance with credible, internationally recognized responsible production standards, broken down by standard | In 2022, 41% of food ingredients purchased (by cost) from Tier 1 suppliers were certified to a third-party environmental and/or social standard. These standards include Fair Trade USA, Rainforest Alliance, RSPO and Bonsucro. |
|             |           | Requirement omitted: Purchase volume by standard. Reason for Omission: Confidentiality constraints. | Explanation of Omission: Information regarding breakdown of purchases that are verified by responsible production standards is not reported due to commercial sensitivity. |

| G4-PP2      | 204-2     | Management of Material Topics | Hershey 2022 ESG Report:  
• Making Good for Our Future, pages 4-10  
• Our Company: Our ESG Governance, pages 12-14 |
|-------------|-----------|-----------------------------|---------------------|

<table>
<thead>
<tr>
<th>G4-PP2</th>
<th>204-3</th>
<th>Communication and training about anti-corruption policies and procedures</th>
<th>All corporate employees are required to take our Discrimination and Harassment and Code of Conduct training annually, which includes anti-corruption provisions.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>G4-PP2</th>
<th>204-4</th>
<th>Confirmed incidents of corruption and actions taken</th>
<th>There were no confirmed incidents of corruption in 2022.</th>
</tr>
</thead>
</table>
## ANTI-COMPETITIVE BEHAVIOR

### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
<th>GRI Standard</th>
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<th>GRI Disclosure</th>
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</tr>
</thead>
<tbody>
<tr>
<td>GRI 206: Anti-Competitive Behavior</td>
<td>206-1</td>
<td>Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</td>
<td>No instances of material noncompliance with regulations concerning antitrust occurred in 2022.</td>
</tr>
</tbody>
</table>

### GRI Standard

- **GRI 206: Anti-Competitive Behavior**
  - 206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

### Hershey 2022 ESG Report:

- **Making Good for Our Future**, pages 4-10
- **Our Company: Our ESG Governance**, pages 12-14

### See also:

- **Code of Conduct**
- **Procedures For Submission And Handling Of Complaints Regarding Compliance Matters**
- **Supplier Code of Conduct**

## MATERIALS

### MATERIAL TOPIC: PACKAGING AND END-OF-LIFE

### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>GRI 301: Materials 2016</td>
<td>301-1</td>
<td>Materials used by weight or volume</td>
<td>Hershey 2022 ESG Report: Environmental Performance (data), page 86</td>
</tr>
<tr>
<td>301-2</td>
<td>Recycled input materials used</td>
<td>Hershey 2022 ESG Report: Environmental Performance (data), page 86</td>
<td></td>
</tr>
<tr>
<td>301-3</td>
<td>Reclaimed products and their packaging material</td>
<td>Hershey does not currently reclaim products or packaging</td>
<td></td>
</tr>
</tbody>
</table>

### GRI Standard

- **GRI 301: Materials 2016**
  - 301-1: Materials used by weight or volume
  - 301-2: Recycled input materials used
  - 301-3: Reclaimed products and their packaging material

### Requirement omitted: Entire disclosure outside of North America.

### Reason for Omission: Information unavailable

### Explanation of Omission: Recycled input materials are not currently tracked outside of North America. There are no specific plans to report these data.

## ENERGY

### MATERIAL TOPIC: ENERGY MANAGEMENT

### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
<th>GRI Standard</th>
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### GRI Standard

- **GRI 301: Materials 2016**
  - 301-1: Materials used by weight or volume
  - 301-2: Recycled input materials used
  - 301-3: Reclaimed products and their packaging material

### Hershey 2022 ESG Report:

- **Environment: Acting on Climate Change**, pages 65-66
- **Environment: Making Progress on Packaging**, page 71
- **Our Company: Our ESG Governance**, pages 12-14
- **Making Good for Our Future**, pages 4-10

### See also:

- **2022 TCFD Report**
- **Code of Conduct**
- **Environmental Policy**
- **Statement Against Slavery & Human Trafficking**
GRI 302: Energy 2016

302-1 Energy consumption within the organization
   Hershey 2022 ESG Report:
   - Environment: Electricity Mix (data), page 85
   - Environment: Energy Consumption (data), page 84
   - Environment: Reducing GHG Emissions in Our Operations, page 67

302-2 Energy consumption outside of the organization
   While energy conservation is part of Hershey's climate action strategy, greenhouse gas (GHG) emissions are the most meaningful indicator for Hershey, and are the metric used.
   The CO2 equivalent of energy consumption outside of the organization is calculated and accounted for in our GHG footprint as part of our Scope 3 (value chain) emissions data.
   Hershey 2022 ESG Report:
   - Environment: GHG Emissions: Scope 3 (data), page 83

302-3 Energy intensity
   Hershey 2022 ESG Report:
   - Environment: Energy Consumption (data), page 84

302-4 Reduction of energy consumption
   Hershey 2022 ESG Report:
   - Environment: Electricity Mix (data), page 85
   - Environment: Energy Consumption (data), page 84
   - Environment: Reducing GHG Emissions in Our Operations, page 67

302-5 Reductions in energy requirements of products and services
   Requirement omitted: entire disclosure.
   Reason for Omission: disclosure non applicable
   Explanation of Omission: This disclosure is not applicable to Hershey as we do not sell any products or services involving energy requirements.

GRI Standard Reference GRI Disclosure 2022 Hershey Response

WATER AND EFFLUENTS MATERIAL TOPIC: WATER USE

Disclosures on Material Topics 2021

3-3 Management of Material Topics
   Hershey 2022 ESG Report:
   - Environment: Water Impact (data), page 86
   - Environment: Water Stewardship in Our Supply Chain, pages 74-75
   - Making Good for Our Future, pages 4-10
   - Our Company: Our ESG Governance, pages 12-14
   See also:
   - Environmental Policy

GRI 303: Water and Effluents 2018

303-1 Interactions with water as a shared resource
   Hershey 2022 ESG Report:
   - Environment: Water Impact (data), page 86
   - Environment: Water Stewardship in Our Supply Chain, pages 74-75

303-2 Management of water discharge-related impacts
   We comply with the water quality standards for the quality of effluent discharge established by law for each location in which Hershey operates. The profile of the receiving water body is considered to the extent required by local laws.

303-3 Water withdrawal
   Hershey 2022 ESG Report:
   - Environment: Water Impact (data), page 86
   - Environment: Water Stewardship in Our Supply Chain, pages 74-75

303-4 Water discharge
   Hershey 2022 ESG Report:
   - Environment: Water Impact (data), page 86
   - Environment: Water Stewardship in Our Supply Chain, pages 74-75

303-5 Water consumption
   Hershey 2022 ESG Report:
   - Environment: Water Impact (data), page 86
   - Environment: Water Stewardship in Our Supply Chain, pages 74-75
### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
</tr>
</thead>
</table>
| 3-3          | Management of Material Topics | Hershey 2022 ESG Report:  
  - Cocoa: Cocoa For Good, pages 25-26  
  - Cocoa: Protecting the Environment, pages 35-37  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  - Making Good for Our Future, pages 4-10  
  - Our Company: Our ESG Governance, pages 12-14  
  - Responsible Sourcing and Human Rights, pages 42-63  
  - Responsible Sourcing and Human Rights: Sourcing Our Priority Ingredients and Materials, Palm Oil, page 57  
  See also:  
  - Cocoa & Forests Initiative  
  - Environmental Policy  
  - No Deforestation Policy  
  - Responsible Palm Oil Sourcing Policy  
  - Responsible Pulp and Paper Sourcing Policy |

#### GRI 304: Biodiversity 2016

<table>
<thead>
<tr>
<th>GRI Standard</th>
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<th>2022 Hershey Response</th>
</tr>
</thead>
</table>
| 304-1        | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | Hershey 2022 ESG Report:  
  - Environment: Biodiversity (data), page 88  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  Requirement omitted: Size of operational site. Reason for Omission: We consider the requests relating to size of company properties to be confidential. Explanation of Omission: We consider the requests relating to size of company properties to be confidential. |
| 304-2        | Significant impacts of activities, products, and services on biodiversity | Hershey does not yet comprehensively track value chain-wide biodiversity impacts.  
  Hershey 2022 ESG Report:  
  - Cocoa: Cocoa For Good, pages 25-26  
  - Environment: Acting on Climate Change, pages 65-66  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  - Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
  See also:  
  - Palm Oil Grievance Log |
| 304-3        | Significant impacts of activities, products, and services on biodiversity | Hershey does not yet comprehensively track value chain-wide biodiversity impacts.  
  Hershey 2022 ESG Report:  
  - Cocoa: Cocoa For Good, pages 25-26  
  - Environment: Acting on Climate Change, pages 65-66  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  - Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
  See also:  
  - Palm Oil Grievance Log |
| 304-4        | Habitats protected or restored | Hershey does not yet comprehensively track value chain-wide biodiversity impacts.  
  Hershey 2022 ESG Report:  
  - Cocoa: Cocoa For Good, pages 25-26  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  See also:  
  - No Deforestation Policy |
| 304-4        | IUCN Red List species and 2016 national conservation list species with habitats in areas affected by operations | Hershey 2022 ESG Report:  
  - Environment: IUCN Red List Species (data), page 89  
  - Environment: The Power and Importance of Biodiversity, pages 76-77  
  See also:  
  - No Deforestation Policy |
## EMISSIONS

### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
</tr>
</thead>
</table>
| GRI 305: Emissions 2016 | 305-1 | Direct (Scope 1) GHG emissions | Accountability for managing ESG and sustainability at the management level resides with our Chief Sustainability Officer, who reports to our Chief Supply Chain Officer. Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: GHG Emissions (data), page 82 |
| | 305-2 | Energy indirect (Scope 2) GHG emissions | Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: GHG Emissions (data), page 82 |
| | 305-3 | Other indirect (Scope 3) GHG emissions | Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: GHG Emissions (data), page 82 |
| | 305-4 | GHG emissions intensity | Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: GHG Emissions (data), page 82 |
| | 305-5 | Reduction of GHG emissions | Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: GHG Emissions (data), page 82 |
| | 305-6 | Emissions of ozone-depleting substances (ODS) | Hershey 2022 ESG Report:  
• Environment: Air Quality (data), page 85 |
| | 305-7 | Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions | Hershey 2022 ESG Report:  
• Environment: Air Quality (data), page 85 |

### EFFLUENTS AND WASTE

### Disclosures on Material Topics 2021

<table>
<thead>
<tr>
<th>GRI Standard</th>
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</tr>
</thead>
</table>
| GRI 305: Emissions 2016 | 3-3 | Management of Material Topics | Hershey 2022 ESG Report:  
• Environment: Acting on Climate Change, pages 65-66  
• Environment: Innovating Waste Solutions, page 78  
• Making Good for Our Future, pages 4-10  
• Our Company: Our ESG Governance, pages 12-14 |
| | 3-5 | Management of Material Topics | See also:  
• 2022 TCFD Report  
• Code of Conduct  
• Environmental Policy |
### GRI 306: Waste 2020

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>306-1</td>
<td>Waste generation and significant waste-related impacts</td>
<td>No impact generated by any significant actual or potential waste-related impacts. Our sites manage the waste generated according to local regulations.</td>
</tr>
</tbody>
</table>
| 306-2 | Management of significant waste-related impacts | Hershey 2022 ESG Report:  
- Environment: Innovating Waste Solutions, page 78 |
| 306-3 | Waste generated | Hershey 2022 ESG Report:  
- Environment: Innovating Waste Solutions, page 78  
- Environment: Waste Management (data), page 87 |
| 306-4 | Waste diverted from disposal | Hershey 2022 ESG Report:  
- Environment: Innovating Waste Solutions, page 78  
- Environment: Waste Management (data), page 87 |
| 306-5 | Waste directed to disposal | Hershey 2022 ESG Report:  
- Environment: Innovating Waste Solutions, page 78  
- Environment: Waste Management (data), page 87 |

### Supplier Environmental Assessment 2016

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>308-1</td>
<td>New suppliers that were screened using environmental criteria</td>
<td>Hershey uses standard contract language in its template agreements that requires suppliers to adhere to our Supplier Code of Conduct, which outlines our expectations with respect to environmental issues.</td>
</tr>
<tr>
<td>308-2</td>
<td>Negative environmental impacts in the supply chain and actions taken</td>
<td>We continue to enroll high-risk suppliers into our Responsible Sourcing Supplier Program. Assessing environmental impact is part of the program's due diligence.</td>
</tr>
</tbody>
</table>

### Material Topics

- Responsible Sourcing  
- Deforestation

### Disclosures on Material Topics 2021

- Cocoa: Cocoa For Good, pages 25-26  
- Cocoa: Protecting the Environment, pages 35-37  
- Environment: Acting on Climate Change, pages 65-66  
- Making Good for Our Future, pages 4-10  
- Our Company: Our ESG Governance, pages 12-14  
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
- Responsible Sourcing and Human Rights: Sourcing Our Priority Ingredients and Materials, Palm Oil, page 57

### See also:

- Cocoa  
- Environmental Policy  
- No Deforestation Policy  
- Responsible Palm Oil Sourcing Policy  
- Responsible Pulp & Paper Sourcing Policy  
- Supplier Code of Conduct

### GRI 308: Supplier Environmental Assessment 2016

<table>
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<td>308-2</td>
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</table>

### See also:

- Supplier Code of Conduct

### Responsible Sourcing and Human Rights: How We Responsibly Source Goods and Services, pages 52-53  
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
- Responsible Sourcing and Human Rights: Sourcing Our Priority Ingredients and Materials, Palm Oil, page 57
Disclosures on Material Topics 2021

### EMPLOYMENT

**3-3 Management of Material Topics**
We have HR policies for each region in which we operate, which may vary based on local laws and regulations.

Our HR Leadership team is responsible for reviewing all HR-related policies and our management approach regularly to ensure they provide an appropriate framework for the company and its employees on standards of behavior and other requirements consistent with Hershey’s practices and local requirements.

**Hershey 2022 ESG Report:**
- Making Good for Our Future, pages 4-10
- Our Company: Our ESG Governance, pages 12-14
- Our People, pages 90-109

**See also:**
- Code of Conduct

-----

**GRI 401: Employment**

**401-1 New employee hires and employee turnover**

Hershey 2022 ESG Report:
- Our People: Our Progress: Employee Turnover (data), page 109
- Our People: Our Progress: New Employees Hired (data), page 108

**401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees**

The benefits Hershey provides vary depending on location and are based, in part, on local requirements with which we comply. See 202-2 for our definition of significant locations of operation.

Hershey 2022 ESG Report:
- Our People: Employee Well-being and Development, pages 93-94

**See also:**
- 2022 Form 10-K, page 77
- Hershey Careers: Benefits

**401-3 Parental leave**

We adhere to all relevant laws and regulations for maternity and paternity leave globally. Outside of the U.S. individual instances of parental leave are monitored; however, they are not aggregated. There are no specific plans to aggregate this data.

Hershey 2022 ESG Report:
- Our People: Care Systems & Flexibility, page 94
- Our People: Our Progress: Parental Leave (data), page 107

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**LABOR/ MANAGEMENT RELATIONS**

**Disclosures on Material Topics 2021**

**3-3 Management of Material Topics**

In our unionized environments, specific grievance procedures are documented in each of the respective collective bargaining agreements. In our non-unionized environments, similar dispute-resolution mechanisms are in place for employees. Specifically, in the United States, this includes a formal peer-review program where manufacturing employees can appeal certain employment decisions to the Plant Manager or to a panel of their peers.

Our HR department and Legal department are responsible for evaluating the handling of labor/management relations.

**Hershey 2022 ESG Report:**
- Making Good for Our Future, pages 4-10
- Our Company: Our ESG Governance, pages 12-14
- Our People: Engaging With Unions, page 94

**See also:**
- 2022 Form 10-K, page 97
- Code of Conduct
- Corporate Governance
- Ethics & Compliance: Hershey’s Concern Line
- Hershey’s Commitment to Human Rights

**402: Labor/Management Relations 2016**

**402-1 Minimum notice periods regarding operational changes**

We provide notification periods for significant changes. The exact length of time varies by the significance of the change. In unionized environments, we would meet and review with the labor representatives ahead of time.

**GRI-FP3**

Percentage of working time lost due to industrial disputes, strikes and/or lockouts, by country

No working time was lost due to industrial disputes, strikes and/or lockouts in 2022.
<table>
<thead>
<tr>
<th>GRI Standard</th>
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<th>GRI Disclosure</th>
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<tbody>
<tr>
<td><strong>OCCUPATIONAL HEALTH AND SAFETY</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Disclosures on Material Topics 2021 | 3-3 | Management of Material Topics | Hershey 2022 ESG Report:  
• Making Good for Our Future, pages 4-10  
• Our Company: Our ESG Governance, pages 12-14  
• Our People: Safety First, page 92  
See also:  
• Code of Conduct  
• Supplier Code of Conduct |
| GRI 403: Occupational Health and Safety 2018 | 403-1 | Occupational health and safety management system | Hershey 2022 ESG Report:  
• Our People: Safety First, page 92 |
| | 403-2 | Hazard identification, risk assessment, and incident investigation | Hershey uses job hazard assessment and analysis tools to conduct risk assessments for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization. Our new Environmental, Health and Safety (EHS) information management system (SAP) allows workers to report work-related hazards and hazardous situations. Any incidents that occur are reported on our internal SAP database, which collects and tracks EHS data from our sites worldwide.  
If an injury is involved, once the employee has received any required treatment the supervisor and witnesses perform a root-cause analysis so that learnings can be incorporated into our processes and improvements can be implemented into our approach.  
Hershey 2022 ESG Report:  
• Our People: Safety First, page 92  
See also:  
• Code of Conduct |
| | 403-3 | Occupational health services | Hershey 2022 ESG Report:  
• Our People: Safety First, page 92 |
| | 403-4 | Worker participation, consultation, and communication on occupational health and safety | The majority of Hershey manufacturing plants have health and safety committees that are made up of employees from across the site.  
Quarterly engagement activities are conducted at each manufacturing facility to increase participation and consultation in the site health and safety programs.  
Hershey 2022 ESG Report:  
• Our People: Safety First, page 92 |
| | 403-5 | Worker training on occupational health and safety | Hershey 2022 ESG Report:  
• Our People: Safety First, page 92 |
| | 403-6 | Promotion of worker health | Hershey 2022 ESG Report:  
• Our People: Employee Well-being and Development, pages 93-94  
• Our People: Safety First, page 92 |
| | 403-7 | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | Hershey 2022 ESG Report:  
• Our People: Employee Well-being and Development, pages 93-94  
• Our People: Safety First, page 92 |
| | 403-8 | Workers covered by an occupational health and safety management system | Hershey 2022 ESG Report:  
• Our People: Safety First, page 92 |
| | 403-9 | Work-related injuries | Hershey 2022 ESG Report:  
• Our People: Safety First, page 92  
• Our People: Safety (data), page 109  
Reason for Omission: We consider the remaining requests of this indicator to be confidential.  
Explanation of Omission: We consider the remaining requests of this indicator to be confidential. |
| | 403-10 | Work-related ill health | We had zero work-related deaths from ill health in 2022.  
Hershey 2022 ESG Report:  
• Our People: Safety First, page 92  
• Our People: Safety (data), page 109  
Requirement omitted: a. ii–iii, b. ii-iii, c. i–ii  
Reason for Omission: We consider the remaining requests of this indicator to be confidential.  
Explanation of Omission: We consider the remaining requests of this indicator to be confidential. |
### TRAINING AND EDUCATION

#### GRI 404: Training and Education 2016

<table>
<thead>
<tr>
<th>GRI Standard</th>
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</tr>
</thead>
<tbody>
<tr>
<td>404-1</td>
<td></td>
<td>Average hours of training per year per employee</td>
</tr>
<tr>
<td>404-2</td>
<td></td>
<td>Programs for upgrading employee skills and transition assistance programs</td>
</tr>
<tr>
<td>404-3</td>
<td></td>
<td>Percentage of employees receiving regular performance and career development reviews</td>
</tr>
</tbody>
</table>

**Disclosures on Material Topics 2021**

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<tr>
<td>3-3</td>
<td></td>
<td>Management of Material Topics</td>
</tr>
</tbody>
</table>

**2022 Hershey Response**

- Our Chief Human Resources Officer has strategic oversight over Hershey’s HR policies and talent management.
- **Hershey 2022 ESG Report:**
  - Making Good for Our Future, pages 4-10
  - Our Company: ESG Governance, pages 12-14
  - Our People: Employee Well-being and Development, pages 93-94

#### GRI 405: Diversity and Equal Opportunity 2016

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>405-1</td>
<td></td>
<td>Diversity of governance bodies and employees</td>
</tr>
<tr>
<td>405-2</td>
<td></td>
<td>Ratio of basic salary and remuneration of women to men</td>
</tr>
</tbody>
</table>

**Disclosures on Material Topics 2021**

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</table>

**2022 Hershey Response**

- **Hershey 2022 ESG Report:**
  - Our People: Lead Today, Create Tomorrow, page 91
  - Our People: More Pathways to GROW, pages 100-101
  - Our People: Employee Well-being and Development, pages 93-94

See also:
- Hershey Careers: Benefits
- 2022 Form 10-K, page 7
- 2023 Proxy Statement: The Hershey Company Purpose and Values—Our Shared Goodness Promise—Our People, page 15
- Board of Directors
- Code of Conduct
- Corporate Governance
- Equal Employment Opportunity (EEO) Policy
- EEO-1 Report
- Supplier Code of Conduct
- Supplier Diversity Program

**See also:**
- 2023 Proxy Statement: The Hershey Company Purpose and Values—Our Shared Goodness Promise—Our People, page 15
## NON-DISCRIMINATION

### Disclosures on Material Topics 2021

<table>
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<tr>
<th>GRI Standard</th>
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</tr>
</thead>
</table>
| NON-DISCRIMINATION | 3-3 | Management of Material Topics | We expect all managers to maintain a safe, respectful and inclusive climate in accordance with our company values and behaviors. Managers are expected to promptly report any concerns or allegations of discrimination or harassment. Failure to do so may result in disciplinary action. All corporate employees are required to take our Discrimination and Harassment and Code of Conduct training every other year. All corporate new hires complete this training during on-boarding. Our manufacturing employees are required to take the Code of Conduct training every other year, while certifying annually that they have read the Code of Conduct and that they understand and agree to abide by its requirements. Both trainings provide in-depth information around education and awareness of, and responsiveness to, discriminatory situations.
We expect all employees who feel they may have experienced or witnessed discrimination to immediately report the incident(s) to their manager, another manager, HR or the Concern Line. Vendors or contractors can use the same methods for reporting. We monitor all employee issues through our compliance-reporting measures and documentation. This monitoring helps us determine any additional training or resources that may be needed. |

### GRI 406: Non-Discrimination 2016

| 406-1 | Incidents of discrimination and corrective actions taken | During 2022, in the U.S., Hershey did not have judicial or administrative determinations that it had committed any incidents of discrimination. At our operations in countries outside of the U.S., discrimination is treated differently under legal and cultural norms. These differences create challenges in collecting specific information to constitute a response to this disclosure. We have no record of any judicial or administrative findings of incidents of discrimination at any of our locations. |


| 407-1 | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Hershey recognizes and respects our employees’ right to freedom of association and to collective bargaining within federal and local laws and regulations. In 2022, Hershey educated employees in Malaysia and Stuarts Draft on their rights regarding union representation as part of union-organizing campaigns at those locations. We maintain a Supplier Code of Conduct that sets forth our expectations of suppliers and contractors regarding key business practices, including the rights of workers to freedom of association and collective bargaining. |

## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

### Disclosures on Material Topics 2021

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<tr>
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<th>2022 Hershey Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</td>
<td>3-3</td>
<td>Management of Material Topics</td>
<td>Our HR department and Legal department are responsible for the evaluation of the management of freedom of association and collective bargaining.</td>
</tr>
</tbody>
</table>


| 407-1 | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Hershey recognizes and respects our employees’ right to freedom of association and to collective bargaining within federal and local laws and regulations. In 2022, Hershey educated employees in Malaysia and Stuarts Draft on their rights regarding union representation as part of union-organizing campaigns at those locations. We maintain a Supplier Code of Conduct that sets forth our expectations of suppliers and contractors regarding key business practices, including the rights of workers to freedom of association and collective bargaining. |

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### CHILD LABOR

#### MATERIAL TOPICS: CHILD LABOR; HUMAN RIGHTS (SUPPLY CHAIN)

**Disclosures on Material Topics 2021**  
3-3 Management of Material Topics

**Hershey 2022 ESG Report:**  
- Cocoa, pages 24-41  
- Making Good for Our Future, pages 4-10  
- Our Company: Our ESG Governance, pages 12-14  
- Responsible Sourcing and Human Rights, pages 42-63

**See also:**  
- Child Labor Monitoring and Remediation System  
- Cocoa  
- Hershey’s Commitment to Human Rights  
- No Deforestation Policy  
- Palm Oil Grievance Process  
- Responsible Palm Oil Sourcing Policy  
- Responsible Pulp and Paper Sourcing Policy  
- Responsible Sourcing Program Guidebook  
- Statement Against Slavery & Human Trafficking  
- Supplier Code of Conduct  
- UNGPRF Report

**GRI 408: Child Labor 2016**  
408-1 Operations and suppliers at significant risk for incidents of child labor

**Hershey 2022 ESG Report:**  
- Cocoa: Cocoa For Good, page 25-26  
- Making Good for Our Future, pages 4-10  
- Making Good for Our Future: Progress Towards Our Priority Goals, page 9  
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43  
- Responsible Sourcing and Human Rights: 2022 Non-compliance issues by category (data), page 62

**See also:**  
- Child Labor Monitoring and Remediation System  
- Cocoa  
- Hershey’s Commitment to Human Rights  
- Palm Oil Grievance Log  
- Statement Against Slavery & Human Trafficking

### FORCED OR COMPULSORY LABOR

#### MATERIAL TOPIC: HUMAN RIGHTS (SUPPLY CHAIN)

**Disclosures on Material Topics 2021**  
3-3 Management of Material Topics

**Hershey 2022 ESG Report:**  
- Cocoa, pages 24-41  
- Making Good for Our Future, pages 4-10  
- Our Company: Our ESG Governance, pages 12-14  
- Responsible Sourcing and Human Rights, pages 42-63

**See also:**  
- Child Labor Monitoring and Remediation System  
- Cocoa  
- Embedding Responsible Recruitment and Employment  
- Ethics & Compliance: Hershey’s Concern Line  
- Hershey’s Commitment to Human Rights  
- Palm Oil Grievance Process  
- Responsible Palm Oil Sourcing Policy  
- Responsible Pulp and Paper Sourcing Policy  
- Responsible Recruiting & Employment Policy  
- Responsible Sourcing Program Guidebook  
- Statement Against Slavery & Human Trafficking  
- Supplier Code of Conduct  
- UNGPRF Report
### GRI 409: Forced or Compulsory Labor 2016

#### 409-1
Operations and suppliers at significant risk for incidents of forced or compulsory labor

**Hershey 2022 ESG Report:**
- Cocoa: Cocoa For Good, pages 25-26
- Making Good for Our Future, pages 4-10
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51
- Responsible Sourcing and Human Rights: 2022 Non-compliance issues by category (data), page 62

**See also:**
- Child Labor Monitoring and Remediation System
- Cocoa
- Hershey’s Commitment to Human Rights
- Palm Oil Grievance Log
- Responsible Palm Oil Sourcing Policy
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking

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### GRI Standard Reference Disclosure 2022 Hershey Response

![Table](https://example.com/table.png)

### Rights of Indigenous Peoples

#### Disclosures on Material Topics 2021

#### 3-3
Management of Material Topics

**Hershey 2022 ESG Report:**
- Making Good for Our Future, pages 4-10
- Our Company: Our ESG Governance, pages 12-14
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- Corporate Governance
- Hershey’s Commitment to Human Rights
- Responsible Palm Oil Sourcing Policy
- Responsible Pulp and Paper Sourcing Policy
- Supplier Code of Conduct

### GRI 411: Rights of Indigenous Peoples 2016

#### 411-1
Incidents of violations involving rights of indigenous peoples

In 2022, The Hershey Company identified 3 palm oil grievances involving the rights of indigenous peoples.

**See also:**
- Palm Oil Grievance Log

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### Human Rights Assessment

#### Material Topics: Human Rights (Supply Chain), Farmer Livelihoods

#### Disclosures on Material Topics 2021

#### 3-3
Management of Material Topics

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Our Company: Our ESG Governance, pages 12-14
- Making Good for Our Future, pages 4-10
- Responsible Sourcing and Human Rights, pages 42-63

**See also:**
- Code of Conduct
- Corporate Governance
- Ethics & Compliance: Hershey’s Concern Line
- Hershey’s Commitment to Human Rights
- Joining Forces to Protect Human Rights
- Procedures For Submission And Handling Of Complaints Regarding Compliance Matters
- Responsible Sourcing Supplier Program
- Supplier Code of Conduct
- UNGPRF Report
GRI 412: Human Rights Assessment 2016

412-1 Operations that have been subject to human rights reviews or impact assessments

- Hershey 2022 ESG Report:
  - Cocoa: Cocoa For Good, pages 25-26
  - Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
  - Responsible Sourcing and Human Rights: Responsible Sourcing, page 51

See also:
- Hershey’s Commitment to Human Rights
- Statement Against Slavery & Human Trafficking

412-2 Employee training on human rights policies or procedures

- Hershey 2022 ESG Report:
  - Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

See also:
- Code of Conduct
- Hershey’s Commitment to Human Rights
- Human Rights Due Diligence: Mandatory Employee Training
- Statement Against Slavery & Human Trafficking

412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

- Hershey 2022 ESG Report:
  - Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
  - Responsible Sourcing and Human Rights: How We Responsibly Source Goods and Services, pages 52-53

See also:
- Corporate Governance
- Hershey’s Commitment to Human Rights
- Responsible Sourcing Supplier Program
- Supplier Code of Conduct

GRI Standard Reference GRI Disclosure 2022 Hershey Response

LOCAL COMMUNITIES

Disclosures on Material Topics 2021

3-3 Management of Material Topics

- Hershey 2022 ESG Report:
  - Community, pages 117-124
  - Making Good For Our Future, pages 4-10
  - Our Company: Our ESG Governance, pages 12-14
  - Responsible Sourcing and Human Rights: Responsible Sourcing, page 51
  - Youth, pages 110-116

GRI 413: Local Communities 2016

413-1 Operations with local community engagement, impact assessments, and development programs

- Hershey 2022 ESG Report:
  - Community, pages 117-124
  - Youth, pages 110-116

See also:
- Community Impact

413-2 Operations with significant actual and potential negative impacts on local communities

- Hershey 2022 ESG Report:
  - Cocoa, pages 24-41
  - Environment, pages 64-89
  - Making Good For Our Future: Our ESG Approach and Priorities, page 8
  - Responsible Sourcing and Human Rights, pages 42-63

See also:
- Palm Oil Grievance Log
**SUPPLIER SOCIAL ASSESSMENT**

**MATERIAL TOPIC: RESPONSIBLE SOURCING; HUMAN RIGHTS (SUPPLY CHAIN)**

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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</thead>
<tbody>
<tr>
<td>GRI 414: Supplier Social Assessment 2016</td>
<td>414-1</td>
<td>New suppliers that were screened using social criteria</td>
<td>All Hershey commercial contracts include language that requires suppliers to adhere to our Supplier Code of Conduct, which outlines our expectations with respect to social issues.</td>
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<td>Hershey 2022 ESG Report:</td>
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<td>• Responsible Sourcing and Human Rights, pages 42-63</td>
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<td>• Responsible Sourcing and Human Rights: How We Responsibly Source Goods and Services, pages 52-53</td>
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<td>• Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43</td>
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<td>• Responsible Sourcing and Human Rights: Our Progress, pages 58-63</td>
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<td>• Statement Against Slavery &amp; Human Trafficking</td>
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<td>• Supplier Code of Conduct</td>
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<td>414-2</td>
<td>Negative social impacts in the supply chain and actions taken</td>
<td>Assessing social impact is part of Hershey’s Responsible Sourcing Supplier Program due diligence.</td>
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<td>Hershey 2022 ESG Report:</td>
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<td>• Responsible Sourcing and Human Rights, pages 42-63</td>
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<td>• Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43</td>
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<td>• Responsible Sourcing and Human Rights: Our Progress, pages 58-63</td>
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<td>• Responsible Sourcing and Human Rights: 2022 Non-compliance issues by category (data), page 42</td>
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<td>• Palm Oil Grievance Log</td>
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**PUBLIC POLICY**

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<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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<tbody>
<tr>
<td>GRI 415: Public Policy 2016</td>
<td>415-1</td>
<td>Political contributions</td>
<td>Hershey 2022 ESG Report:</td>
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<td>• Our Company: Lobbying and Transparent Policy, page 13</td>
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<td>See also:</td>
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<td>• Advocacy Expenditure Reports</td>
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<td>• Code of Conduct</td>
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<td>• Political Action Committee Annual Report 2022</td>
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### CUSTOMER HEALTH AND SAFETY

#### MATERIAL TOPICS: FOOD SAFETY AND QUALITY; NUTRITION AND HEALTH

**Disclosures on Material Topics 2021**

<table>
<thead>
<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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<tbody>
<tr>
<td>GRI 416: Customer Health and Safety 2016</td>
<td>416-1</td>
<td>Assessment of the health and safety impacts of product and service categories</td>
<td>100% of our products are designed and produced under a “hazard analysis and risk-based preventive controls” approach.</td>
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<td>Hershey 2022 ESG Report:</td>
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<td>• Our Company: Excellence in Food Safety, pages 18-19</td>
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<td>• Our Company: Our ESG Governance, pages 12-14</td>
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<td>• 2022 Form 10-K, pages 4-6</td>
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<td>• Code of Conduct</td>
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<td>• Packaging Supplier Quality Expectations Manual</td>
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<td>• Supplier Code of Conduct</td>
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<td>• Supplier Quality Expectations Manual</td>
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<td>416-2</td>
<td>Incidents of non-compliance concerning the health and safety impacts of products and services</td>
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<tr>
<td>GRI-FP5</td>
<td>Percentage of production volume manufactured in sites certified by an independent third-party according to internationally recognized food safety management system standards</td>
<td>Hershey 2022 ESG Report:</td>
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<td>• Our Company: Food Safety (data), page 23</td>
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<td>GRI-FP6</td>
<td>Percentage of total sales volume of consumer products, by product category, that are lowered in saturated fat, trans fats, sodium and added sugars</td>
<td>Hershey 2022 ESG Report:</td>
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<td>• Our Company: Food Safety (data), page 23</td>
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<td>• Our Company: Nutrition and Health (data), page 23</td>
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<tr>
<td>GRI-FP7</td>
<td>Percentage of total sales volume of consumer products, by product category, that contain increased nutritious ingredients like fiber, vitamins, minerals, phytochemicals or functional food additives</td>
<td>Hershey 2022 ESG Report:</td>
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<td>• Our Company: Food Safety (data), page 23</td>
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<td>• Our Company: Nutrition and Health (data), page 23</td>
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#### MARKETING AND LABELING

**Disclosures on Material Topics 2021**

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<th>GRI Standard</th>
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<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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<tbody>
<tr>
<td>3-3</td>
<td>Management of Material Topics</td>
<td>Our Consumer Relations department reviews and answers all consumer-related questions and concerns about the ingredients and labeling on our products. It also proactively reviews social media posts and engages with individual consumers to ensure our labeling and marketing practices align with their expectations.</td>
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<td>Hershey 2022 ESG Report:</td>
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<td>• Making Good for Our Future, pages 4-10</td>
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<td>• Our Company: Excellence in Food Safety, pages 18-19</td>
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<td>• Our Company: Marketing Responsibly, page 20</td>
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<td>See also:</td>
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<td>• Children’s Food and Beverage Advertising Initiative: The Hershey Company Pledge</td>
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<td>• Corporate Governance</td>
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<td>• Hershey Frequently Asked Questions, Nutrition</td>
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<td>• SmartLabel™</td>
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<td>• The Ingredients Inside your Favorite Hershey Products</td>
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### GRI 417: Marketing and Labeling 2016

<table>
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<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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</thead>
</table>
| **417-1** Requirements for product and service information and labeling | | | Hershey 2022 ESG Report:  
- Our Company: Marketing Responsibly, page 20  
- Our Company: Satisfying Consumer Needs, page 17  
See also:  
- Hershey Position Statement on GMO Disclosures  
- Hershey Frequently Asked Questions, Nutrition  
- SmartLabel™  

#### Incidents of non-compliance concerning product and service information and labeling

In 2022, there were no material noncompliances with labeling laws or regulations.

#### Incidents of non-compliance concerning marketing communications

In 2022, there were no material noncompliances with marketing codes.

### CUSTOMER PRIVACY

#### Disclosures on Material Topics 2021

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<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
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</table>
| **3-3** Management of Material Topics | | | Hershey 2022 ESG Report:  
- Making Good for Our Future, pages 4-10  
- Our Company: Our ESG Governance, pages 12-14  
See also:  
- Code of Conduct  
- Hershey Website Privacy Policy  

#### GRI 418: Customer Privacy 2016

<table>
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<tr>
<th>GRI Standard</th>
<th>Reference</th>
<th>GRI Disclosure</th>
<th>2022 Hershey Response</th>
</tr>
</thead>
</table>
| **418-1** Substantiated complaints concerning breaches of customer privacy and losses of customer data | | | Hershey has not received any substantiated complaints concerning breaches of customer privacy.  

### ANIMAL WELFARE

#### Disclosures on Material Topics 2021

<table>
<thead>
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<th>GRI Standard</th>
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| **3-3** Management of Material Topics | | | Hershey 2022 ESG Report:  
- Making Good for Our Future, pages 4-10  
- Our Company: Our ESG Governance, pages 12-14  
See also:  
- Farm Animal Welfare Position  

#### Animal Welfare

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<th>GRI Standard</th>
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<th>2022 Hershey Response</th>
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</table>
| **GRI-FFP2** Policies and practices on antibiotic, anti-inflammatory, hormone, and/or growth promotion treatments, by species and breed type | | | Animal Welfare  
- Dairy Sourcing  
- Farm Animal Welfare Position  

### BUSINESS OPERATIONS AND SUPPLY CHAIN RESILIENCE

#### Disclosures on Material Topics 2021

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| **3-3** Management of Material Topics | | | Hershey 2022 ESG Report:  
- Cocoa, pages 24-41  
- Environment: Acting on Climate Change, pages 65-66  
- Environment: Water Stewardship in Our Supply Chain, pages 74-75  
- Making Good for Our Future, pages 4-10  
- Our Company: A Bold Strategy For Growth, pages 15-18  
- Our Company: Excellence in Food Safety, pages 18-19  
- Our Company: Our ESG Governance, pages 12-14  
- Responsible Sourcing and Human Rights, pages 62-63  