### A1  What does the company say publicly about its commitment to respect human rights?

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- 2022 Form 10-K, page 21
- 2023 Proxy Statement: The Hershey Company Purpose and Values, pages 12-16
- Cocoa For Good
- Code of Conduct
- Human Rights Policy
- Environmental Policy
- Hershey's Commitment to Human Rights
- Human Rights Due Diligence
- Human Rights Policy
- Living Wage & Income Position Statement
- No Deforestation Policy
- Responsible Palm Oil Sourcing Policy
- Responsible Pulp & Paper Sourcing Policy
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

### A1.1  How has the public commitment been developed?

**Hershey 2022 ESG Report:**
- Our People: Safety First, page 92
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Cocoa: Cocoa For Good, pages 25-26

**See also:**
- Hershey's Commitment to Human Rights
- Human Rights Due Diligence
- Human Rights Policy
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

### A1.2  Whose human rights does the public commitment address?

**Hershey 2022 ESG Report:**
- 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 Sourcing (Supplier Program) (data), page 60
- Responsible Sourcing and Human Rights: Responsible Recruitment and Employment, pages 48-49

**See also:**
- Cocoa For Good
- Code of Conduct
- Human Rights Due Diligence
- Human Rights Policy
- Living Wage & Income Position Statement
- No Deforestation Policy
- Responsible Palm Oil Sourcing Policy
- Responsible Pulp & Paper Sourcing Policy
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct
## POLICY COMMITMENT

### A1.3 How is the public commitment disseminated?

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- 2023 Proxy Statement: The Hershey Company Purpose and Values, pages 12-16
- Cocoa For Good
- Code of Conduct
- Human Rights Due Diligence
- Human Rights Policy
- Living Wage & Income Position Statement
- No Deforestation Policy
- Our Human Rights Progress
- Responsible Palm Oil Sourcing Policy
- Responsible Paper & Pulp Sourcing Policy
- Responsible Sourcing Supplier Program
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

As part of the verification programs/production of sustainable cocoa, farmer groups in our cocoa supply chain undergo training with dedicated sessions on human rights that focus specifically on eliminating child labor, the worst forms of child labor (WFCL), forced labor and worker conditions — all key elements of our Human Rights commitments and expectations. Each year, the number of farmers trained on child labor is tracked.

In the new Rainforest Alliance/UTZ standard, the Assess and Address system requires the certificate holder to set up an internal committee that manages monitoring and remediation; these committees are trained on all relevant issues as well.

In some cocoa communities, additional information and training sessions are held to educate, sensitize and bring awareness to community members on these issues. These sessions are held in-person and for groups of farmers and community members.

Additionally, other groups such as Village Savings and Loans Associations (VSLAs) are often established with majority female engagement. They create additional awareness and support children’s education and child protection.

The CocoaLink mobile app features customized software that delivers gamified cocoa farming content to young and smartphone-empowered cocoa farmers to provide access to capacity-building information resources that help improve productivity and outputs.

### EMBEDDING RESPECT FOR HUMAN RIGHTS

### A2 How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?

**Hershey 2022 ESG Report:**
- Cocoa: Improving Children’s Well-being, page 34
- Our Company: Our ESG Governance, pages 12-14
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- 2022 Form 10-K, page 21
- 2023 Proxy Statement: The Hershey Company Purpose and Values, pages 12-16
- Human Rights Policy
- Palm Oil Grievance Log
- Palm Oil Grievance Process
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

### A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why?

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

**See also:**
- Hershey’s Commitment to Human Rights
- Human Rights Policy
- Priority Ingredients and Raw Materials
- Responsible Sourcing
- Responsible Sourcing Supplier Program
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct
### A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why?

**Hershey 2022 ESG Report:**
- Our Company: Our ESG Governance, pages 12-14
- Our People: Safety First, page 92
- Cocoa: Eliminating Child Labor, pages 32-33
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- 2022 Form 10K, page 21
- 2023 Proxy Statement: The Hershey Company Purpose and Values, pages 12-16
- Hershey’s Commitment to Human Rights
- Human Rights Policy
- Statement Against Slavery & Human Trafficking

### A2.3 How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?

**Hershey 2022 ESG Report:**
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Taking Actions on Human Rights, pages 45-47

**See also:**
- Code of Conduct
- Human Rights Policy
- Human Rights Progress
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

### A2.4 How does the company make clear in its business relationships the importance it places on respect for human rights?

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- 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 Sourcing Supplier Program (Supplier Program) (data), page 60

**See also:**
- Cocoa For Good
- Cocoa Sourcing
- Embedding Responsible Recruitment and Employment
- Hershey’s Commitment to Human Rights
- Human Rights Due Diligence
- Human Rights Policy
- Palm Oil Sourcing
- Responsible Sourcing Supplier Program
- Statement Against Slavery & Human Trafficking
- Supplier Code of Conduct

### A2.5 What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?

**Hershey 2022 ESG Report:**
- Our People, pages 90-109
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43

**See also:**
- Human Rights Policy
- Human Rights Progress
- Statement Against Slavery & Human Trafficking

### STATEMENT OF SALIENT ISSUES

#### B1 Statement of salient issues: State the salient human rights issues associated with the company’s activities and business relationships during the reporting period.

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Making Good for our Future: Double Materiality, page 7
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Material Issue Definitions, pages 132-133
- Salient Human Rights Issues Definitions, page 134

**See also:**
- Hershey’s Commitment to Human Rights
- Human Rights Policy
- Supplier Code of Conduct
**Section of Framework/Reporting Principle**

**B2** Determination of salient issues: Describe how the salient human rights issues were determined, including any input from stakeholders.

**Hershey 2022 ESG Report:**
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Maintaining Focus on Our Most Salient Human Rights, page 44
- Salient Human Rights Issues Definitions, page 134
See also:
- Hershey’s Commitment to Human Rights
- Human Rights Due Diligence
- Human Rights Policy
- Joining Forces to Protect Human Rights
- Statement Against Slavery & Human Trafficking

**B3** Choice of focal geographies: If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
- Responsible Sourcing and Human Rights: Our Progress, pages 58-63
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51
See also:
- Hershey’s Commitment to Human Rights
- Source Ingredients and Raw Materials
- Responsible Sourcing Supplier Program
- Statement Against Slavery & Human Trafficking

**B4** Additional severe impacts: Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.

**Hershey 2022 ESG Report:**
- Cocoa, pages 24-41
- Our Company: Our ESG Governance, pages 12-14
- Our People: DEI is Good Business, page 96
- Our People: Safety First, page 92
- 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
- Responsible Sourcing and Human Rights: Supplier Program Audit Results (data), page 61

**SPECIFIC POLICIES**

**C1** Does the company have any specific policies that address its salient human rights issues and, if so, what are they?

**Hershey 2022 ESG Report:**
- Cocoa: Goodness Inside Starts With Accountability, pages 27-28
- Our Company: Our ESG Governance, pages 12-14
- Our People: DEI is Good Business, page 96
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43
See also:
- Code of Conduct
- Empowered by Pathways: Embarking on an Equitable Future Together
- Environmental Policy
- Equal Employment Opportunity (EEO) Policy
- Fostering Diversity, Equity and Inclusion
- Health and Safety
- Human Rights Policy
- Living Wage & Income Position Statement
- No Defamation Policy
- Responsible Palm Oil Sourcing Policy
- Responsible Pulp & Paper Sourcing Policy
- Responsible Recruiting & Employment Policy
- Statement Against Slavery & Human Trafficking
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<td>How does the company make clear the relevance and significance of such policies to those who need to implement them?</td>
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<td>STAKEHOLDER ENGAGEMENT</td>
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<td>C2</td>
<td>What is the company’s approach to engagement with stakeholders in relation to each salient human rights issue?</td>
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<tr>
<td>C2.1</td>
<td>How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?</td>
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<td>Hershey 2022 ESG Report:</td>
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<td>C2.2</td>
<td>During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?</td>
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<td>• Community, pages 107-124</td>
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<td>• Environment: Acting on Climate Change, pages 65-66</td>
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<td>• Making Good for Our Future: Our ESG Approach and Priorities, page 8</td>
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<td>• Youth, pages 109-116</td>
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<td>C2.3</td>
<td>During the reporting period, how have the views of stakeholders influenced the company’s understanding of each salient issue and/or its approach to addressing it?</td>
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## Section of Framework/Reporting Principle | 2022 Hershey Response

### ASSESSING IMPACTS

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<th>C3</th>
<th>How does the company identify any changes in the nature of each salient human rights issue over time?</th>
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• Responsible Sourcing and Human Rights: Responsible Sourcing, page 51 |
| See also: | • Hershey’s Commitment to Human Rights  
• Human Rights Policy  
• Statement Against Slavery & Human Trafficking |

| C3.1 | During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they? |
| Hershey 2022 ESG Report: | • Making Good for Our Future: Our ESG Approach and Priorities, page 8  
• Our People: Safety First, page 92  
• Cacao: Eliminating Child Labor, pages 32-33  
• 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: | • Palm Oil Grievance Log |

| C3.2 | During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they? |
| Hershey 2022 ESG Report: | • Cacao: Cocoa For Good, pages 25-26  
• Our People: Safety First, page 92  
• 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: Case Study: Standing up For Workers’ Rights, page 49  
• Responsible Sourcing and Human Rights 2022 Non-compliance issues by category (data), page 62  
• Responsible Sourcing and Human Rights: Supplier Program Audit Results (data), page 61 |
| See also: | • Child Labor Monitoring and Remediation System  
• Cacao For Good  
• Cacao Sourcing  
• Health and Safety  
• Hershey’s Commitment to Human Rights  
• Palm Oil Grievance Log  
• Statement Against Slavery & Human Trafficking |

### INTEGRATING FINDINGS AND TAKING ACTION

| C4 | How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions? |
| Hershey 2022 ESG Report: | • Cocoa: Cocoa For Good, pages 25-26  
• Environment, pages 64-89  
• Our People: Safety First, page 92  
• Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43  
• Responsible Sourcing and Human Rights: Responsible Sourcing, page 51 |
| See also: | • Child Labor Monitoring and Remediation System  
• Cocoa For Good  
• Cacao Sourcing  
• Hershey’s Commitment to Human Rights  
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| C4.1 How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions? | Hershey 2022 ESG Report:  
- Our Company: Our ESG Governance, pages 12-14  
- Responsible Sourcing and Human Rights, pages 42-63  
See also:  
- Hershey’s Commitment to Human Rights  
- Human Rights Due Diligence  
- Human Rights Policy  
- Statement Against Slavery & Human Trafficking |
| C4.2 When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed? | Hershey 2022 ESG Report:  
- Cocoa, pages 24-41  
- Responsible Sourcing and Human Rights: Human Rights Across Our Value Chain, page 43  
See also:  
- Palm Oil Grievance Log  
- Supplier Code of Conduct |
| C4.3 During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue? | Hershey 2022 ESG Report:  
- Cocoa: Cocoa For Good, pages 25-26  
- Environment: Acting on Climate Change, pages 65-66  
- Environment: Innovating Waste Solutions, page 78  
- Environment: Water Stewardship in Our Supply Chain, pages 74-75  
- Making Good for Our Future: Progress Towards Our Priority Goals, page 9  
- Our People: DEI is Good Business, page 96  
- Our People: Safety First, page 92  
- Our People: Lead Today, Create Tomorrow, page 91  
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
See also:  
- 2023 Proxy Statement: The Hershey Company Purpose and Values, page 12  
- Cocoa For Good  
- Cocoa For Good  
- Statement Against Slavery & Human Trafficking |

**TRACKING PERFORMANCE**

| C5 How does the company know if its efforts to address each salient human rights issue are effective in practice? | Hershey 2022 ESG Report:  
- Cocoa: Cocoa For Good, pages 25-26  
- Making Good for Our Future: Progress Towards Our Priority Goals, page 9  
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
See also:  
- Child Labor Monitoring and Remediation System  
- Cocoa For Good  
- Statement Against Slavery & Human Trafficking |
| C5.1 What specific examples from the reporting period illustrate whether each salient issue is being managed effectively? | Hershey 2022 ESG Report:  
- Cocoa: Cocoa For Good, pages 25-26  
- Environment: Acting on Climate Change, pages 65-66  
- Environment: Innovating Waste Solutions, page 78  
- Environment: Water Stewardship in Our Supply Chain, pages 74-75  
- Making Good for Our Future: Progress Towards Our Priority Goals, page 9  
- Our People: Safety First, page 92  
- Our People: Lead Today, Create Tomorrow, page 91  
- Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
See also:  
- Cocoa For Good  
- Hershey’s Commitment to Human Rights  
- Palm Oil Grievance Log  
- Statement Against Slavery & Human Trafficking |
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<td><strong>C6</strong></td>
<td>How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?</td>
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Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
Responsible Sourcing and Human Rights: Case Study: Standing Up For Workers' Rights, page 49  
See also:  
Code of Conduct  
Human Rights Due Diligence  
Human Rights Policy  
Statement Against Slavery & Human Trafficking  
Supplier Code of Conduct |
| **C6.1** | Through what means can the company receive complaints or concerns related to each salient issue? |
See also:  
2023 Proxy Statement: Communications with Directors, page 28  
Child Labor Monitoring and Remediation System  
Ethics & Compliance: Hershey’s Concern Line  
Human Rights Due Diligence  
Palm Oil Grievance Log  
Statement Against Slavery & Human Trafficking |
| **C6.2** | How does the company know if people feel able and empowered to raise complaints or concerns? |
Responsible Sourcing and Human Rights: Responsible Sourcing, page 51  
See also:  
Ethics & Compliance: Hershey’s Concern Line  
Palm Oil Grievance Log  
Statement Against Slavery & Human Trafficking |
| **C6.3** | How does the company process complaints and assess the effectiveness of outcomes? |
| Hershey 2022 ESG Report: | Cocoa, pages 24-41  
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  
See also:  
Ethics & Compliance: Hershey’s Concern Line  
Palm Oil Grievance Log  
Statement Against Slavery & Human Trafficking |
| **C6.4** | During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned? |
See also:  
Responsible Recruiting & Employment Policy  
Statement Against Slavery & Human Trafficking |
| **C6.5** | During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples? |
| 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: Case Study: Standing Up For Workers’ Rights, page 49  
See also:  
Child Labor Monitoring and Remediation System  
Cocoa For Good  
Cocoa Sourcing  
Responsible Sourcing Supplier Program  
Statement Against Slavery & Human Trafficking |