The Hershey Company Human Rights Policy

POLICY

The Hershey Company ("Hershey") is committed to making more moments of goodness, from the consumer all the way to the farmer and beyond. For more than 130 years, Hershey has operated fairly, ethically and sustainably. We have operated our business understanding that we are integral members of the communities where we live and work.

The remarkable and diverse group of people who work for Hershey and the individuals who participate in our value chain are critical to the long-term success of our company. We commit to upholding the principles of equality and non-discrimination, are dedicated to treating all individuals with respect and dignity, and work to use our influence and business relationships to promote the opportunity for all people throughout our value chain to exercise and enjoy their fundamental human rights.

We recognize that social and environmental issues are inherently linked, and that environmental challenges such as climate change, deforestation, and land-use change can exacerbate human rights risks across our value chain, especially for vulnerable and marginalized communities. Addressing these interdependencies is essential to supporting resilient livelihoods, communities, and ecosystems, and informs Hershey's integrated approach to sustainability and human rights. Therefore, we put people at the core of our human rights agenda not just as affected stakeholders, but also as agents of change.

The Hershey Company Human Rights Policy outlines our commitment to respect human rights throughout our value chain and is part of our global sustainability strategy. Specifically, we are committed to upholding human rights and freedoms as defined by the International Bill of Human Rights, including the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social, and Cultural Rights; and The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We implement our policy in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct; and our commitment to the UN Global Compact and the Sustainable Development Goals.

SCOPE OF COMMITMENT

Our Human Rights Policy applies to all employees of The Hershey Company, including part-time and temporary workers, along with contractors and third-party intermediaries. Our commitment to respect human rights also extends to all individuals throughout our supply chain and value chain as we leverage our relationships with our co-manufacturers, co-packers, suppliers, and other business partners to enforce the principles of this policy throughout their

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networks. We also seek opportunities to collaborate with peers to drive additional impact wherever possible.

As a company, we abide by the laws in the markets in which we operate. Where local laws are less stringent than our policies and internationally recognized human rights and employment standards, we adhere to the more stringent policies and standards and expect and support our suppliers, customers, and business partners to follow these standards and principles. We also expect our co-manufacturers, co-packers, and suppliers to share our commitment and standards by adopting equivalent policies and upholding these values within their business operations and, where possible, we work with them to develop the capacity to do so. Our Supplier Code of Conduct and Responsible Recruitment Policy further reinforce and clarify this commitment and requirement.

FOCUS AND SALIENT ISSUES

We are committed to respecting all internationally recognized human rights; our management policies and ongoing procedures cover the breadth of these rights, principles, and related issues. Our approach to human rights starts with understanding how our products, business activities and operations may impact rightsholders, both positively and negatively. We focus on the human rights issues that are most salient[1] to our business - identified via a regular cadence of human rights saliency assessments conducted in accordance with the UNGPs. Our 2025 saliency assessment covered our full value chain including Hershey-owned operations and our upstream and downstream suppliers. Among the broader human rights issues we identified, our most recent saliency process prioritized the following (in alphabetical order):

- **Access to water and sanitation:** Sufficient, safe, acceptable, physically accessible and affordable water for personal use and sanitation services that are safe, physically accessible, and ensure privacy and dignity
- **Child labor**: As defined by the ILO, Child Labor is work that deprives children of their childhood, their potential, and their dignity, and is harmful to their physical and mental development
- **Discrimination**: The risk that individuals or groups experience unequal treatment, barriers, or exclusion based on gender, race or ethnicity, or other protected categories
- **Forced labor**: As defined by the ILO, this includes work or service that is obtained from any person under the threat of penalty and for which the person has not offered himself or herself voluntarily

[1] A company's salient human rights issues are those human rights that stand out because they are at risk of the most severe negative impact through the company's activities or business relationships (UNGP, 2015). The saliency process is particularly important in human rights as it focuses on the risk to rightsholders and people as opposed to the business risk.

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- **Health and safety:** A safe and healthy workplace in both our own business and in our supply chains in line with applicable safety and health laws and in consultation with rightsholders
- **Land rights and acquisition:** Customary land rights, including the fulfillment of respecting rights for Indigenous Peoples, local communities and farmers to give Free, Prior and Informed Consent for acquisition and development
- **Living wage and income:** A wage and or income level that allows all members of the household to afford a decent standard of living[2]
- **Resilient environment:** The impacts of climate change, land-use, and environmental degradation on the resilience and well-being of people and communities

We remain committed to addressing critical linkages between these issues wherever possible. Hershey also recognizes the importance of enabling factors such as policies and procedures, rightsholder engagement, strategic partnerships, and transparency. Specific examples can be found in our Statement Against Slavery and Human Trafficking and our Responsible Business Report.

Finally, Hershey recognizes that other issues may grow in importance over time. We remain steadfast in our commitment to identify these issues and take appropriate actions to respond to potential human rights risks. We leverage our relationships and regular dialogue with external stakeholders to capture these changes and review our focus areas regularly through our sustainability governance process, which is outlined below. We will continue to report publicly on how we action against our salient issues.

IMPLEMENTATION AND COLLABORATION

Our Human Rights Due Diligence (HRDD) process operationalizes our commitment and includes our efforts to proactively assess, identify, prioritize, prevent, and mitigate actual and potential adverse human rights impacts to rightsholders throughout our value chain.[3] Some of the key steps we take in our HRDD process include:

- Communicating our commitment and expectations throughout our value chain via multiple policies and procedures including, but not limited to, our Code of Conduct, Supplier Code of Conduct, Responsible Recruitment Policy, and Living Wage & Income Position Statement[4], all of which are also available publicly on our website.

[2] Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision for unexpected events.
[3] Hershey does not retaliate or permit retaliation against anyone who raises questions or concerns in good faith about corporate activities, and we are committed to investigating these issues thoroughly and providing appropriate responses and remedies.
[4] Additional programs included our health and safety policies, our Discrimination and Harassment Prevention Policy, and agricultural sourcing policies including our Cocoa Key Requirements, Palm Oil Sourcing Policy, Sustainable Sugar Policy, Pulp and Paper Sourcing Policy, and Deforestation & Conversion-Free Policy.

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- Engaging and educating employees and suppliers on human rights issues through training and capacity building.
- Verifying progress and compliance through programs such as our Responsible Sourcing Supplier Program and Responsible Recruitment Programs.
- Investing in programs designed to change some of the fundamental circumstances that contribute to adverse human rights impacts, including partnerships with nonprofit organizations, governments, local community-based organizations and pre-competitive industry collaborations.
- Setting, tracking, and reporting against human rights related efforts as part of our core enterprise Key Performance Indicators (KPIs) including our Child Labor Monitoring & Remediation (CLMRS) system.

We also acknowledge that some groups may be at greater risk of negative human rights impacts due to their vulnerability or marginalization. Therefore, we remain committed to considering, designing, and implementing cross-cutting solutions that support rightsholders across different groups and contexts.

To learn more about the steps we are taking to further our commitments, see our Responsible Business Report, Statement Against Slavery and Human Trafficking, or read about our Cocoa For Good Program and responsible sourcing strategies on our website.

GOVERNANCE AND ACCOUNTABILITY

Operating sustainably and with integrity is fundamental to how Hershey builds trust with consumers, grows its business, and creates positive impact in society. Respect for human rights is an integral part of Hershey's global sustainability strategy.

Pursuant to our Corporate Governance Guidelines, ultimate oversight of sustainability, including human rights, resides with Hershey's Board of Directors. The Board oversees sustainability strategy, priorities, progress, and key risks and opportunities, and receives regular updates from management. Oversight of specific sustainability responsibilities is assigned to relevant Board committees in accordance with their respective charters.

Accountability for sustainability, including human rights, resides with Hershey's Chief Executive Officer and is shared across the Executive Team. The CEO and their direct reports review sustainability strategies, performance, and progress, ensuring alignment with business strategy and approval of sustainability-related investments.

Management-level accountability for sustainability strategy and implementation, including for human rights, is led by the Head of Global Sustainability, who leads the Global Sustainability Team. This team is responsible for developing, implementing, and reporting on Hershey's

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sustainability and human rights programs and works cross-functionally with internal teams and external partners across the value chain.

Hershey maintains a cross-functional Sustainability Steering Committee, composed of business leaders and sustainability subject matter experts, which meets at least quarterly to evaluate sustainability strategy effectiveness, interdependencies, and progress against key goals and performance indicators, including those related to human rights.

Day-to-day oversight of human rights due diligence across Hershey-owned operations and the value chain is supported by the responsible sourcing, cocoa sustainability, legal, and ethics and compliance functions. Together, these teams help identify, prevent, mitigate, and remediate actual and potential human rights impacts, including forced and child labor risks.

Kirk Tanner

President and CEO of The Hershey Company

Approved by The Hershey Company Board of Directors, May 2026

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