



HERSHEY



Sharing Goodness for

25
YEARS



2019 GRI CONTENT INDEX

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The data in this report relates to the period from January to December 2019, unless otherwise stated. For a detailed explanation of the indicators, visit the GRI website: [globalreporting.org](https://www.globalreporting.org)

This content index accompanies our [2019 Sustainability Report](#) and has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Comprehensive option.

All standards are the 2016 version except where noted in the GRI standard column.

The final three disclosures listed (Future of Retail, Innovation, and Business Continuity/Disaster Recovery) are material issues for The Hershey Company that are not covered by GRI.



General disclosures 2019

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Organization profile	102-1	Name of the organization	2019 Form 10-K			
	102-2	Activities, brands, products, and services	The Big Picture p. 8 Business p. 14 2019 Form 10-K We are not aware of any of our products being banned in any markets where we operate and distribute.			
	102-3	Location of headquarters	19 E Chocolate Avenue, Hershey PA			
	102-4	Location of operations	2019 Form 10-K			
	102-5	Ownership and legal form	2019 Form 10-K			
	102-6	Markets served	2019 Form 10-K			
	102-7	Scale of the organization	Our Performance pp. 61–63 2019 Form 10-K			
	102-8	Information on employees and other workers	Our 2019 Goodness Highlights p. 8 Our Performance pp. 61–63 2019 Form 10-K See GRI Appendix 102–8 p. 47 We do not have a significant portion of activities performed by workers who are not employees. There are not significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b and 102-8-c. Our Human Resources analytics team manages employment data and is able to calculate these metrics.			
	102-9	Supply chain	2019 Form 10-K Business pp. 18–35			
	102-10	Significant changes to the organization and its supply chain	2019 Form 10-K Business pp. 18–21			
	102-11	Precautionary Principle or approach	Proxy Statement: Board Role in Risk Oversight			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	102-12	External initiatives	Hershey is part of the following sustainability-related initiatives: CocoaAction, World Cocoa Foundation, Roundtable on Sustainable Palm Oil (RSPO), AIM-PROGRESS, Cocoa Livelihoods Program, International Cocoa Initiative, Cocoa Forest Initiative, United Nations Global Compact, Bonsucro, CEO Action for Diversity & Inclusion™ and Paradigm for Parity, Rainforest Alliance, Fair Trade USA, People +Work Connection Platform, National Organization on Disability Look Closer national hiring campaign.			
	102-13	Membership of associations	See GRI Appendix 102-13 p. 48			
Strategy	102-14	Statement from senior decision-maker	The Big Picture: A Message from Michele Buck p. 5			
	102-15	Key impacts, risks, and opportunities	The Big Picture: A Message from Michele Buck p. 5 The Big Picture: Our Challenges p. 6 2019 Form 10-K			
Ethics and integrity	102-16	Values, principles, standards, and norms of behavior	Hershey Code of Conduct Supplier Code of Conduct Governance & Approach: Being a Responsible & Ethical Business p. 10			
	102-17	Mechanisms for advice and concerns about ethics	Governance & Approach: Being a Responsible & Ethical Business p. 10 Hershey Code of Conduct Hershey Concern Line Compliance Complaints Corporate Governance			
Governance	102-18	Governance structure	Governance & Approach: Governing Sustainability p. 10 2019 Form 10-K Corporate Governance Board of Directors Committees & Charters			
	102-19	Delegating authority	Governance & Approach: Governing Sustainability p. 10 2019 Form 10-K Corporate Governance			
	102-20	Executive-level responsibility for economic, environmental, and social topics	Governance & Approach: Governing Sustainability p. 10 The Chief Supply Chain Officer reports directly to the Board, has overall responsibility for the Sustainability program and is supported by the Vice President of Corporate Communications and Sustainability.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	102-21	Consulting stakeholders on economic, environmental, and social topics	Governance & Approach: Governing Sustainability p. 10 <u>Proxy Statement, Stockholder and Interested Party Communications with Directors</u> Our Board of Directors hears from external stakeholders through our executive management team, or specific stakeholders brief the Board directly. The Sustainability team, led by the Vice President of Corporate Communications and Sustainability, brief the full Board on ESG issues at minimum once per year and as other topical discussions are needed. Other ESG issues such as employee engagement survey findings and sourcing activities in West Africa are also separate yearly topics for the full Board.			
	102-22	Composition of the highest governance body and its committees	Hershey’s Board consists of 42% women and 58% men, and 8% racial minorities. Michele Buck is the only executive director on the Hershey Board of Directors; the rest are non-executive directors. Three of our directors are also directors for The Hershey Trust Company, our largest shareholder. Governance & Approach: Being a Responsible & Ethical Business p. 10 Our Progress p. 63 <u>Board of Directors</u> <u>Corporate Governance Guidelines</u> <u>Committees & Charters</u> <u>Proxy Statement, Our Director Nominees and Governance Highlights, Director Independence</u> <u>Management & Charters</u>			
	102-23	Chair of the highest governance body	Michele Buck is the Chairman of the Board, President and Chief Executive Officer for the Hershey Company. Ms. Buck is responsible for all day-to-day global operations and commercial activities of the Company. Having served at the Company for more than 14 years and as an executive in the consumer packaged goods industry for more than 30 years, Ms. Buck is a valuable contributor to the Board in the areas of marketing, consumer products, strategy, supply chain management and mergers and acquisitions. Her presence in the boardroom also ensures efficient communication between the Board and Company management. <u>Board of Directors</u>			
	102-24	Nominating and selecting the highest governance body	<u>Corporate Governance</u> <u>Corporate Governance Guidelines</u> <u>Proxy Statement, Our Director Nominees</u>			
	102-25	Conflicts of interest	<u>Corporate Governance Guidelines</u> <u>Hershey Code of Conduct</u> <u>Related Person Transaction Policy</u>			
	102-26	Role of highest governance body in setting purpose, values, and strategy	Governance & Approach: Being a Responsible & Ethical Business p. 10 <u>Corporate Governance Guidelines</u>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
102-27	Collective knowledge of highest governance body	Corporate Governance Guidelines, Ongoing Education Governance & Approach: Governing Sustainability, p. 10. Our Board is annually briefed on our Shared Goodness Promise progress and made aware of the most important emerging sustainability trends, risks and opportunities.				
102-28	Evaluating the highest governance body's performance	Members of our Board of Directors were not evaluated with respect to the Shared Goodness Promise strategy in 2019.				
102-29	Identifying and managing economic, environmental, and social impacts	Governance & Approach: Being a Responsible & Ethical Business p. 10 Our materiality and saliency assessments inform our Shared Goodness Promise strategy, and include input of external stakeholders. Corporate Governance Guidelines				
102-30	Effectiveness of risk management processes	The Finance & Risk Management Committee review Hershey's management of all types of risks including economic, social and environmental. Corporate Governance Guidelines Finance and Risk Management Committee Charter				
102-31	Review of economic, environmental, and social topics	The Board of Directors reviews our Shared Goodness Promise risks and opportunities and management approach once a year.				
102-32	Highest governance body's role in sustainability reporting	Michele Buck reviews and approves the Shared Goodness Promise Report and the material topics covered.				
102-33	Communicating critical concerns	Governance & Approach: Being a Responsible & Ethical Business p. 10 Proxy Statement, Stockholder and Interested Party Communications with Directors				
102-34	Nature and total number of critical concerns	In 2019, there were no critical concerns that required reporting to the Ethical Business Practices Committee or the Audit Committee. Critical concerns are generally reported through our Human Resources department, the Legal department and/or the Concern Line, a third-party monitored, independent service available 24/7 to employees, business partners and other parties for reporting concerns via phone or the Internet. All reported concerns are reviewed and managed by the Ethics & Compliance department. Critical concerns, if any, are also reported to the Ethical Business Practices Committee, which is composed of members of senior management reporting directly to the CEO. The Ethical Business Practices Committee also serves as a steering committee for the oversight and coordination of compliance-related activities. Critical concerns are also escalated to the Audit Committee, as required by our Procedures for Submission and Handling of Complaints Regarding Compliance Matters. Issues reported to the Concern Line cover a wide array of topics, including leadership style, general labor practices, employment-related concerns and requests for general advice.				

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	102-35	Remuneration policies	<p><u>Corporate Governance Guidelines</u> <u>2019 Form 10-K</u> <u>Proxy Statement, Executive Compensation Highlights, Non-Employee Director Compensation, Compensation Discussion and Analysis</u></p> <p>The performance criteria in our remuneration policies for our Board of Directors and senior executives does not currently include objectives for environmental or social topics.</p>			
	102-36	Process for determining remuneration	<u>Proxy Statement, Compensation Discussion & Analysis</u>			
	102-37	Stakeholders' involvement in remuneration	<u>Proxy Statement, Compensation Discussion & Analysis</u>			
	102-38	Annual total compensation ratio	<u>Proxy Statement, CEO Pay Ratio Disclosure</u>			
	102-39	Percentage increase in annual total compensation ratio		Entire disclosure.	Confidentiality constraints.	The salary of the highest-paid individual in each country is confidential. The Hershey Company does not track or measure the highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country.
Stakeholder engagement	102-40	List of stakeholder groups	<p>Governance & Approach: Material Issues p. 11</p> <p>Employees</p> <p>Consumers</p> <p>Investors</p> <p>Retailers</p> <p>Suppliers and Business Partners</p> <p>NGOs</p> <p>Communities where we Operate</p> <p>Government & Policymakers</p>			
	102-41	Collective bargaining agreements	<u>2019 Form 10-K</u>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	102-42	Identifying and selecting stakeholders	Governance & Approach: Material Issues p. 11 Business: Responsible Sourcing p. 19 Embedding Human Rights p. 20 We engage directly and indirectly with many of our stakeholders. We engage with those stakeholders who either have influence or control over our business and/or are impacted by our operations across our value chain either directly or indirectly.			
	102-43	Approach to stakeholder engagement	Governance & Approach: Material Issues p. 11 Business: Responsible Sourcing p. 19 Business: Embedding Human Rights p. 20 Examples of stakeholder engagement can be found throughout our 2019 Sustainability Report. We engage with stakeholders including partner non-profit organizations, the Milton Hershey School, customers, investors and member organizations in the development of the report preparation process. This includes collaborating on content and review of materials by partners. External stakeholders are also engaged as part of our materiality and saliency assessments.			
	102-44	Key topics and concerns raised	The Big Picture p. 4 Business: Embedding Human Rights p. 20			
Reporting practice	102-45	Entities included in the consolidated financial statements	<u>2019 Form 10-K</u>			
	102-46	Defining report content and topic boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	102-47	List of material topics	Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	102-48	Restatements of information	Since April 2019, there have not been any material restatements or corrections issued on information given in any of our previous financial reports.			
	102-49	Changes in reporting	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Hershey conducts its materiality assessment every few years. There have been no changes to our material issues or boundaries for 2019.			
	102-50	Reporting period	This report covers the 2019 calendar year.			
	102-51	Date of most recent report	14 May 2019			
	102-52	Reporting cycle	Annual			
	102-53	Contact point for questions regarding the report	<u>jbeckman@hersheys.com</u>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	102-54	Claims of reporting in accordance with the GRI Standards	Governance & Approach p. 64 This report has been prepared in accordance with the GRI Standards: Comprehensive option.			
	102-55	GRI content index	Hershey 2019 GRI Content Index (this PDF).			
	102-56	External assurance	We did not receive any external assurance for this report. We will have our 2019 Scope 1 and Scope 2 Greenhouse Gas Emissions independently verified by the Climate Registry after report publication.			

Economic

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Economic performance						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Continued global competitiveness and profitability ensure that we are economically sustainable in the long term. This allows us to continue to pay the salaries of our employees, pay taxes, pay suppliers, and support the Milton Hershey School and other social investments. Our Board of Directors, CEO and management teams are directly responsible for the economic performance and global competitiveness of the company. The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 2019 Form 10-K			
	103-2	The management approach and its components	Corporate Governance Guidelines 2019 Form 10-K			
	103-3	Evaluation of the management approach	Corporate Governance Guidelines 2019 Form 10-K			
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	2019 Form 10-K Our Performance p. 61			
	201-2	Financial implications and other risks and opportunities due to climate change	The Big Picture: Our Challenges p. 6 Planet: Managing our Impact on Climate Change pp. 37–42 Environmental Policy CDP Climate 2.2c			
	201-3	Defined benefit plan obligations and other retirement plans	2019 Form 10-K For Hershey's 401(k) Plan, the company match is 100 percent on the first one percent contributed by employees and 70 percent on the next five percent contributed by employees. In total, Hershey provides a 4.5 percent company match on six percent employee contributions.	Entire disclosure outside of the U.S.	Information unavailable.	Outside of the U.S. there is substantial variation among retirement and defined benefit plans in each country. The administration of these plans is monitored, however the details of these plans are not reported in alignment with the requirements of this disclosure. There are no specific plans to report these data.

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	201-4	Financial assistance received from government	<p>2019 Form 10-K</p> <p>The only government financial assistance we received in 2019 was in relation to equity investments qualifying for federal historic and energy tax credits, and the Federal Research & Development Credit. In addition, during 2019 Hershey received an investment tax credit for our investment in a biomass facility at the West Hershey plant. We do not receive any other material governmental financial assistance. The financial assistance received is from the U.S. Federal Government. No government owns Hershey shares.</p>			

Market presence

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>2019 Form 10-K</p> <p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Material Issues Across Our Value Chain pp. 44–46</p>			
	103-2	The management approach and its components	<p>2019 Form 10-K</p>			
	103-3	Evaluation of the management approach	<p>Corporate Governance Guidelines</p>			
GRI 202: Market presence 2016	202-1	Ratios of standard entry level wage by gender compared to local minimum wage		Entire disclosure.	Information unavailable.	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	<p>59.26% (16 local employees/27 total external hires at significant locations).</p> <p>'Senior management' is defined as individuals hired as Sr. Manager and above (up to Senior Vice President within the C-Suite).</p> <p>'Local' is defined as a permanent resident at time of hire in one of the following locations in the USA: Pennsylvania, New Jersey, New York, Ohio, West Virginia, Virginia, Maryland, District of Columbia and Delaware.</p> <p>'Significant locations of operation' is defined as the following locations: 19 East Chocolate Ave, 19 East Office, 100 Crystal A Dr, 200 Crystal A Dr Data Center, Amplify 19 East Office, Hazleton Plant, HCW Visitors Center, Loveland (Kroger), Reese Plant, Sales Co 19E Office, Sales Co Loveland (Kroger), Sales Co Office Northeast, Stuarts Draft Plant, Technical Center, West Hershey Plant and Y&S Lancaster Plant.</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Indirect Economic Impacts						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Business: Responsible Sourcing, Cocoa For Good pp. 19–35</p> <p>Children & Youth: Nourishing Young Minds pp. 53–54</p> <p>Communities pp. 56–60</p> <p>SDG Index</p> <p>Material Issues Across Our Value Chain pp. 44–46</p> <p>The global nature of our business has a significant impact on local job creation and commerce both directly and indirectly through our supply chain. Through our operations, we support other businesses, encouraging economic activity in local communities, tax strategy, local investments and other indirect economic impacts in manufacturing locations. Our global presence helps us to access new markets and achieve our growth strategy. Furthermore, acting responsibly and sustainably in these communities protects our license to operate, manages reputational risks, and strengthens our supply so that we may continue to operate in these communities for many years to come.</p>			
	103-2	The management approach and its components	<p>Business: Responsible Sourcing, Embedding Human Rights, Partnering for Better Palm Oil, Cocoa For Good pp. 19–35</p> <p>Planet pp. 36–42</p> <p>Children & Youth: Nourishing Young Minds pp. 53–54</p> <p>Communities pp. 56–60</p> <p>Governance & Approach: Being a Responsible & Ethical Business p. 10</p>			
	103-3	Evaluation of the management approach	<p>Both our Shared Goodness Promise strategy and our Cocoa For Good strategy, launched in 2018, include related goals and programs. Through Cocoa For Good, we will invest \$500 million by 2030 in our cocoa-growing communities and share more goodness across our value chain. Pillars in both strategies incorporate programs that support the local needs where we operate. Examples of these pillars include:</p> <p>Children & Youth: Nourishing Young Minds pp. 53–54</p> <p>Business: Responsible Sourcing, Cocoa For Good pp. 19–35</p> <p>Planet pp. 36–42</p> <p>Communities pp. 56–60</p> <p>SDG Index</p> <p>Supplier Code of Conduct</p> <p>Governance & Approach: Being a Responsible & Ethical Business p. 10</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 203: Indirect economic impacts 2016	203-1	Infrastructure investments and services supported	<p>Business: Cocoa For Good pp. 25–35 Communities p. 60</p> <p>In 2019, Hershey supported the development of community infrastructure projects in many of the communities where our employees live and work. In Hershey, Pennsylvania Hershey contributed \$1 million to support the addition of three new floors to the Penn State Children’s Hospital, the only Level One trauma center for children between Philadelphia and Pittsburgh, which is expected to begin new occupancy in the fall of 2020. Hershey is also supporting the planning and construction of a new Derry Townships Community Center, with a \$1 million grant, with ground-breaking expected in mid-2020. Hershey also supported a multi-year grant to fund the expansion of the community center in Robinson, Illinois. In our supply chain, Hershey supports infrastructure projects in the cocoa communities that support our business; in 2019 our funding supported classroom renovation and the construction of latrines and teacher living quarters.</p> <p>We also support regional infrastructure development through employee volunteerism. Hershey professionals volunteer their time and expertise as part of Partners in Food Solutions, which provides pro-bono consulting to companies in Africa, on projects such as factory infrastructure that lead to more jobs and economic growth.</p>			
	203-2	Significant indirect economic impacts	<p>Children & Youth: Nourishing Young Minds pp. 53–54 Business: Responsible Sourcing, Cocoa For Good pp. 19–35 Communities pp. 56–60</p> <p><u>SDG Index</u> See 203-1 above</p>			

Procurement Practices

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>Business: Responsible Sourcing p. 19 Cocoa For Good pp. 25–35 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46</p> <p><u>Responsible Sourcing</u> Responsible supply chain practices are essential for being able to create high-quality delicious snacks that our consumers crave and ensuring a continuous supply now and in the future. High-quality ingredients come from happy farmers and their communities who are able to support themselves and their families.</p>			
	103-2	The management approach and its components	<p>Business: Responsible Sourcing, Embedding Human Rights, Partnering for Better Palm Oil, Cocoa For Good pp. 19–35</p> <p><u>Responsible Sourcing</u> <u>Supplier Code of Conduct</u> <u>Sustainable Sugar Sourcing Policy</u> <u>Responsible Palm Oil Sourcing Policy</u> <u>Pulp and Paper Sourcing Policy</u> <u>Farm Animal Welfare Position</u> <u>Human Rights Policy</u> <u>Environmental Policy</u></p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-3	Evaluation of the management approach	Governance & Approach: pp. 9–12 Our responsible sourcing practices are guided by our Supplier Code of Conduct , our company sustainability strategy The Shared Goodness Promise , and our Cocoa For Good Strategy . Also, our overall commodity procurement programs are reviewed monthly by a committee comprised of the CEO, CFO, CSO and leaders of our commercial teams. Corporate Governance			
GRI 204: Procurement practices 2016	204-1	Proportion of spending on local suppliers	Business: Responsible Sourcing p. 19 While we do not have a local-sourcing policy, we source from local suppliers wherever feasible. We consider cost, projected timeliness of fulfillment, past experience, material quality and safety and, in applicable cases, material certification.	a, b	Confidentiality constraints.	Specific spend data are not reported due to commercial sensitivity.
	G4-FP1	Percentage of purchased volume from suppliers compliant with company's sourcing policy	Business: Responsible Sourcing p. 19 One hundred percent of our purchased volume comes from suppliers who are required to adhere to the provisions of our Sourcing Policy and Supplier Code of Conduct.			
	G4-FP2	Percentage of purchased volume which is verified as being in accordance with credible, internationally recognized responsible production standards, broken down by standard	Business: Responsible Sourcing p. 19 Our Performance pp. 61–62 Responsible Sourcing In 2019, 51 percent of food ingredients sourced (by cost) were certified to third-party environmental and/or social standards. Representative standards include: Fair Trade USA, Rainforest Alliance, RSPO, and Bonsucro.	Purchase volume by standard.	Confidentiality constraints.	Information regarding breakdown of purchases that are verified by responsible production standards is not reported due to commercial sensitivity.

Anti-corruption

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Governance & Approach: Being a Responsible & Ethical Business p. 10 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Governance & Approach: Being a Responsible & Ethical Business p. 10 Hershey Code of Conduct Supplier Code of Conduct			
	103-3	Evaluation of the management approach	Any anti-corruption issues that arise would be reported to and overseen by the Ethical Business Practices Committee (EBPC) as part of its mandate for overseeing the Ethics and Compliance department. In 2019, no adjustments were made to our approach to anti-corruption. Corporate Governance Hershey Code of Conduct			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	As part of our quarterly Disclosure Committee process, we assess 100 percent of our business operations for risks related to corruption. Each quarter, representatives from every business function are required to certify, among other things, whether they have knowledge of, or concerns relating to, corruption or potential corruption. Any issues reported are reviewed and assessed by our Ethics and Compliance department. In 2019, no significant corruption risks were identified or reported to the EBPC through this or any other process.			
	205-2	Communication and training about anti-corruption policies and procedures	Anti-corruption training is provided to every employee, officer and director of our company every other year as part of our required Code of Conduct training. In years when training is not provided, every employee, officer and director of our company is required to certify that they have read the Code of Conduct (including the anti-corruption provisions contained therein) and that they understand and agree to abide by the requirements. All suppliers receive our Supplier Code of Conduct and are expected to adhere to all provisions therein. Anti-corruption is addressed on p. 5 of our Supplier Code of Conduct.			
	205-3	Confirmed incidents of corruption and actions taken	There were no confirmed incidents of corruption in 2019. Accordingly, no employees were dismissed or disciplined for corruption. In addition, no contracts with business partners were terminated or not renewed due to violations related to corruption and no public legal cases regarding corruption were brought against the organization or its employees during the reporting period.			

Anti-competitive behavior

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 <u>Hershey Code of Conduct</u> Material Issues Across Our Value Chain pp. 44–46 At Hershey we do not tolerate anti-competitive behavior and this is clearly stated in our Code of Conduct. We expect our business partners and suppliers to do the same.			
	103-2	The management approach and its components	Governance & Approach: Being a Responsible & Ethical Business p. 10 <u>Hershey Code of Conduct</u> <u>Supplier Code of Conduct</u> <u>Compliance Complaints</u> Our Chief Counsel for Anti-Trust as well as our Global Trade and Customs Compliance and Ethics & Compliance departments are responsible for overseeing our management approach.			
	103-3	Evaluation of the management approach	Our Global Trade and Customs Compliance department, alongside our Ethics & Compliance department and our Chief Counsel for Anti-Trust ensures compliance with our trade practices and reviews our approach regularly. No changes have been made as a result of the review and, in 2019, there were no instances of material non-compliance with regulations that would cause Hershey to amend its approach. <u>Corporate Governance</u>			
GRI 206: Anti-competitive behavior 2016	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No instances of material non-compliance with regulations concerning anti-trust regulation occurred in 2019. Governance & Approach: Being a Responsible & Ethical Business p. 10			

Environmental

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Materials						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Planet: Exploring Sustainable Packaging p. 41 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Planet: Our 25 by 25 Progress p. 37 Exploring Sustainable Packaging p. 41 Governance & Approach: Governing Sustainability p. 10 We have saved 23,612,000 pounds of packaging cumulatively since the 2015 baselines, putting us at approximately 94% of our goal. This progress was driven by re-designing existing packaging for sustainability improvements such as light-weighting and eliminating materials.			
	103-3	Evaluation of the management approach	Planet: Our 25 by 25 Progress p. 37, Exploring Sustainable Packaging p. 41 Governance & Approach: Governing Sustainability p. 10 Corporate Governance			
GRI 301: Materials 2016	301-1	Materials used by weight or volume	2019 weight of materials used by renewable and non-renewable are reported for Hershey's North American operations, co-manufacturers, and co-packers. See GRI Appendix 301-1 p. 49 65 percent of packaging is sustainably sourced renewable virgin material.			
	301-2	Recycled input materials used	In 2019, 22 percent of our packaging in North America was post-consumer recycled material.	Entire disclosure outside of North America.	Information unavailable.	Recycled input materials are not currently tracked outside of North America. There are no specific plans to report these data.
	301-3	Reclaimed products and their packaging materials	Hershey does not currently reclaim products or packaging.			
Energy						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Planet: Our 25 by 25 Progress p. 37 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Reducing our energy consumption is a core part of Hershey's Shared Planet strategy and is critical in tackling climate change. Please note our energy data covers our manufacturing plants only.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-2	The management approach and its components	Planet: Our 25 by 25 Progress p. 37; A New Standard for Environmental Health & Safety p. 38 Governance & Approach: Governing Sustainability p. 10 Environmental Policy Hershey Code of Conduct			
	103-3	Evaluation of the management approach	Governance & Approach: Governing Sustainability p. 10 Planet: A New Standard for Environmental Health & Safety p. 38 Environmental Policy			
GRI 302: Energy 2016	302-1	Energy consumption within the organization	See GRI Appendix 302-1 p. 50 EPA conversion factors used. We did not purchase any renewable energy credits in 2019.			
	302-2	Energy consumption outside of the organization		Entire disclosure.	Information unavailable.	We have committed to the Science Based Targets Initiative which includes calculating our Scope 3 emissions. We are still in the process of calculating our baseline and our focus on this issue will be in terms of GHG emissions rather than energy consumption.
	302-3	Energy intensity	In 2019, our energy intensity ration was 0.48 MWh per lb of product. This figure only represents energy usage at our manufacturing plants. Energy related to fuel, electricity, and heating is included.			
	302-4	Reduction of energy consumption	Overall we did not see a decrease in energy consumption between 2018 and 2019; however we did see modest reductions in energy usage related to propane, motor gasoline and biogas. Hershey's 2019 energy consumption is available in Appendix 302-1 p. 49			
	302-5	Reductions in energy requirements of products and services	See 302-3 and 302-4. The energy intensity ratio of our products decreased slightly from 2018 to 2019, from 0.483 MWh/1,000 lbs of products in 2018 to 0.48 MWh/1,000 lbs of products. This reflects that although our overall energy usage went up it was exceed by the increase in production of our products.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Water						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Planet: Our 25 by 25 Progress p. 37, Protecting our Water Supply p. 39 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Planet: Our 25 by 25 Progress p. 37, Protecting our Water Supply p. 39 Our Performance pp. 61–63 Environmental Policy			
	103-3	Evaluation of the management approach	Governance & Approach: Governing Sustainability p. 10 Corporate Governance			
GRI 303: Water 2018	303-1	Interactions with water as a shared source	Planet: Protecting our Water Supply p. 39 Our Performance p. 62			
	303-2	Management of water discharge-related impacts	We comply with minimum water quality standards for the quality of effluent discharge established by law for each location where Hershey operates. The profile of the receiving waterbody was considered to the extent required by local laws.			
	303-3	Water withdrawal	Our Performance p. 62 Planet: Protecting our Water Supply p. 39 Total water use: 2,647.82 megaliters i., ii. Percentage water withdrawal from ground: 20.94 percent. Please see forthcoming 2019 CDP submission for breakdown of surface water and groundwater. iii. We do not withdraw any sea water. iv. Percentage purchased water: 79.06 percent. v. We do not consume third-party water. Our El Salto and Monterrey (Mexico) manufacturing plants are located in water-stressed areas. El Salto total water consumption: 159.9 megaliters, of which approximately 100 percent was groundwater and a <i>de minimis</i> portion was purchased water. Monterrey total water consumption: 382.8 megaliters, of which 61 percent was groundwater and 39 percent was purchased water. All withdrawn water is freshwater.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	303-4	Water discharge	<p>Our Performance p. 62</p> <p>Planet: Protecting our Water Supply p. 39</p> <p>Total water discharge: 1,939 megaliters</p> <p>Water discharge from water-stressed areas: 201.15 megaliters</p> <p>This constitutes our El Salto and Monterrey plants. All of Monterrey's water discharge is treated and used for irrigation on the operation's campus. 35 percent of El Salto's water discharge is treated and used for irrigation on the operation's campus, the remainder is discharged to the Santiago River basin.</p> <p>Other water discharge: 1,738.19 megaliters</p> <p>This volume is sent to publicly owned treatment works.</p> <p>We do not have any priority substances of concern for which discharges are treated.</p> <p>Please see our 2019 CDP submission, once released.</p>			
	303-5	Water consumption	<p>Our Performance p. 62</p> <p>Planet: Protecting our Water Supply p. 39</p> <p>Total water consumption: 2,647.82 megaliters</p> <p>Our El Salto and Monterrey plants are both in water-stressed areas. Together these two sites withdrew and used 542.72 megaliters of water.</p> <p>We have not identified water storage as having a significant water-related impact.</p> <p>See response to 303-3 for more details.</p>			

Emissions

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>Planet: Managing our Impact on Climate Change pp. 37–42</p> <p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Material Issues Across Our Value Chain pp. 44–46</p>			
	103-2	The management approach and its components	<p>Planet: Managing our Impact on Climate Change pp. 37–42</p> <p>Governance & Approach: Governing Sustainability p. 10</p> <p>Environmental Policy</p> <p>Hershey Code of Conduct</p> <p>The Senior Vice President, Chief Supply Chain Officer is responsible for managing issues around climate change, and oversight is provided by the Board.</p>			
	103-3	Evaluation of the management approach	<p>Governance & Approach: Governing Sustainability p. 10</p> <p>Corporate Governance</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	<p>134,112 MT</p> <p>Our Performance p. 62</p> <p>Planet: Managing our Impact on Climate Change pp. 37–42</p> <p>Data methodologies used include The Climate Registry: General Reporting Protocol, and we used the global warming potential for CO₂ from the IPCC Fifth Assessment Report (AR5-100 year).</p> <p>Scope 1 emissions are from the use of natural gas, jet gasoline, motor gasoline, and propane in our operations. Emissions cover all owned operations except our Malaysia plant. Base year for our Scope 1 emissions was 2015. Our Scope 1 and 2 emissions in 2015, which was when we set our 25 by 25 goal, totaled 347,939 MT. Only CO₂ was included in our calculation. Our calculation does not include biogenic CO₂ emissions.</p> <p>Our Scope 1 emissions will be third-party verified against the Climate Registry’s General Verification Protocol, but are not verified as of the time of publishing this report.</p> <p>We have re-baselined our emissions so as to include the emissions from our Brazilian manufacturing plant.</p> <p>We use the control approach to consolidating our emissions. There is no significant difference between operational control and financial control across our operations.</p>			
	305-2	Energy indirect (Scope 2) GHG emissions	<p>207,816 MT</p> <p>Our Performance p. 62</p> <p>Planet: Managing our Impact on Climate Change pp. 37–42</p> <p>Indirect Scope 2 emissions cover the emissions from purchases of electricity for Hershey-owned and operated sites (excluding Malaysia). Only CO₂ was included in our calculation. Base year for our Scope 2 emissions was 2015. Our Scope 1 and 2 emissions in 2015, which was when we set our 25 by 25 goal, totaled 347,939 MT. Our calculation does not include biogenic CO₂ emissions.</p> <p>Data methodologies used include The Climate Registry: General Reporting Protocol, and we used the global warming potential for CO₂ from the IPCC Fifth Assessment Report (AR5-100 year).</p> <p>Our Scope 2 emissions will be third-party verified against the Climate Registry’s General Verification Protocol, but but are not verified as of the time of publishing this report.</p> <p>We have re-baselined our emissions so as to include the emissions from our Brazilian manufacturing plant.</p> <p>We use the control approach to consolidating our emissions. There is no significant difference between operational control and financial control across our operations.</p> <p>Presently we only use the location-based methodology for calculating and disclosing Scope 2 emissions.</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	305-3	Other indirect (Scope 3) GHG emissions	We are currently in the process of developing a new climate change strategy in line with the requirements of the Science Based Targets initiative that will encompass our Scope 3 emissions. We are in the process of measuring our Scope 3 baseline, which will be 2018.	Present year's data and full baseline.	Information unavailable.	We are in the process of measuring our Scope 3 baseline and have not yet collected all data for the reporting year to be able to report 2019 numbers. We have committed to the Science Based Targets initiative, which includes calculating our Scope 3 emissions.
	305-4	GHG emissions intensity	Our Performance p. 62 Planet: Managing our Impact on Climate Change pp. 37-42 Only CO ₂ was included in our calculations.			
	305-5	Reduction of GHG emissions	1.73 percent reduction in absolute GHG emissions and 13 percent reduction in GHG intensity versus 2015 achieved (Inclusive of Scope 1 and 2). Scope 2 is where the majority of our reductions took place. Scope 1 emissions have increased since our baseline year. Planet: Our 25 by 25 Progress p. 37, Managing our Impact on Climate Change pp. 37-42 Our Performance p. 62 Only CO ₂ was included in our calculations. 2015 is our baseline year for our 25 by 25 commitments. Data methodologies used include The Climate Registry: General Reporting Protocol, and we used the global warming potential for CO ₂ from the IPCC Fifth Assessment Report (AR5-100 year).			
	305-6	Emissions of ozone-depleting substances (ODS)		Entire disclosure.	Not applicable.	We do not emit a significant amount of ozone-depleting substances. As such, we do not consider these emissions material to our business and we therefore do not monitor or report them.
	305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	NO _x : 77.82 MT SO _x : 2.38 MT VOC: 190.32 MT CO: 77.77 MT Particulate Matter: 49.06 MT Our Performance p. 62 Data methodologies used include The Climate Registry: General Reporting Protocol. Global warming potential for NO _x , SO _x , VOC and PM used from the IPCC Fifth Assessment Report (AR5-100 year).	a. iii, v	Not applicable.	POPs and HAPS are not material to our business and we therefore do not track them.

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Effluents and waste						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Planet: Our 25 by 25 Progress p. 37, Working Towards Zero Waste to Landfill p. 40 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Our effluents and waste data cover all Hershey manufacturing plants, excluding distribution centers and corporate offices.			
	103-2	The management approach and its components	Planet: Our 25 by 25 Progress p. 37, Working Towards Zero Waste to Landfill p. 40 Governance & Approach: Governing Sustainability p. 10 Environmental Policy			
	103-3	Evaluation of the management approach	Governance & Approach: Governing Sustainability p. 10 Planet: A New Standard for Environmental Health & Safety p. 38			
GRI 306: Effluents and waste 2016	306-1	Water discharge by quality and destination	Our Performance p. 62 Planet: Protecting our Water Supply p. 39 In 2019, Hershey totaled 1,959 megaliters of water discharge. All water discharge is planned. See response to 303-4.			
	306-2	Waste by type and disposal method	Our Performance p. 62; Working Towards Zero Waste to Landfill p. 40 Total hazardous waste in 2019: 19.39 metric tons. All hazardous waste was transported nationally off-site to permitted treatment, storage and disposal facilities. Total weight of non-hazardous weight in 2019 by disposal method: 49,753 metric tons • 84.4 percent of waste is recycled (16,918 MT) or sent to stock feed (25,080 MT). • 15.6 percent of waste is trash (8,548 MT) of which 2,708 MT is sent to landfill and 5,047 MT is sent to incineration. 155 MT of waste were composted at our Brazilian manufacturing plant. Disposal methods were determined by a combination of regional infrastructure and the make-up of the waste stream.			
	306-3	Significant spills	In 2019, Hershey reported no significant spills of fuels, waste, chemicals, or other materials.			
	306-4	Transport of hazardous waste	All (19.39 metric tons) hazardous waste is transported off-site to permitted treatment, storage and distribution facilities. No hazardous waste is shipped abroad.			
	306-5	Water bodies affected by water discharges and/or runoff	No water bodies or habitats are significantly impacted by our water discharge or runoff.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)

Environmental Compliance

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Business: Responsible Sourcing p. 19; Partnering for Better Palm Oil p. 24; Cocoa For Good pp. 25–35 Planet: A New Standard for Environmental Health & Safety p. 38 At Hershey, we expect all of our suppliers to comply with our Supplier Code of Conduct and global sourcing policies, which set forth compliance with environmental criteria.			
	103-2	The management approach and its components	Governance & Approach: Governing Sustainability p. 10 Business: Responsible Sourcing p. 19; Partnering for Better Palm Oil p. 24; Cocoa For Good pp. 25–35 Planet: Managing our Impact on Climate Change pp. 37–42, Planting Tomorrow's Forests p. 42 Environmental Policy Supplier Code of Conduct			
	103-3	Evaluation of the management approach	Governance & Approach: Governing Sustainability p. 10 Business pp. 13–35 Planet pp. 36–42 Cocoa For Good Environmental Policy Supplier Code of Conduct			
GRI 307: Environmental compliance 2016	307-1	Non-compliance with environmental laws and regulations	During 2019, we did not identify any non-compliance with environmental laws and/or regulations that would give rise to significant fines or sanctions.			

Supplier Environmental Assessment

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 From our review of our environmental strategy, we know that the majority of our environmental impacts are within our ingredients' and materials' supply chains. That's why we have specific responsible sourcing guidelines for key ingredients such as pulp and paper, responsible palm oil, sugar and cocoa. It's also why, in March 2018, we launched our Cocoa For Good strategy, which commits \$500 million to help cocoa communities and preserve natural ecosystems. Furthermore, Hershey committed in January 2019 to the Science Based Targets initiative (SBTi) to set a science-based greenhouse gas reduction goal that will be inclusive of our value chain.			
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GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-2	The management approach and its components	<p>Governance & Approach: Governing Sustainability p. 10 Business: Responsible Sourcing p. 19; Partnering for Better Palm Oil p. 24; Cocoa For Good pp. 25–35 Planet: Managing our Impact on Climate Change pp. 37–42, Planting Tomorrow’s Forests p. 42</p> <p>Cocoa For Good Supplier Code of Conduct Environmental Policy</p>			
	103-3	Evaluation of the management approach	<p>Governance & Approach: Governing Sustainability p. 10 Business: Responsible Sourcing p. 19; Partnering for Better Palm Oil p. 24; Cocoa For Good pp. 25–35 Planet: Managing our Impact on Climate Change pp. 37–42, Planting Tomorrow’s Forests p. 42</p> <p>Cocoa For Good Environmental Policy Supplier Code of Conduct</p>			
GRI 308: Supplier environmental assessment 2016	308-1	New suppliers that were screened using environmental criteria	<p>All Hershey commercial contracts include language that require suppliers to adhere to our Supplier Code of Conduct which outlines our expectations with respect to environmental issues. In 2019, no new suppliers were screened using environmental criteria.</p>			
	308-2	Negative environmental impacts in the supply chain and actions taken	<p>We evaluated all of our Tier 1 raw material and packaging suppliers as well as co-manufacturers, co-packers and licensees. We then developed a prioritized list for further supplier due diligence, which will include assessing environmental impact, as part of our newly revised Responsible Sourcing Supplier program to launch in 2020.</p> <p>We monitor and investigate actors in our palm oil supply chain about whom we’ve received allegations of potential negative environmental impacts. Updates about these actors, descriptions of allegations raised and the status of the monitoring and investigation of these potential or actual environmental impacts can be reviewed on our Palm Oil Grievance Log, updated quarterly.</p>			

Social

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Employment						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	People pp. 43–49 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	People pp. 43–49 Our Shared Goodness Promise p. 7 Governance & Approach pp. 9–12 Hershey Code of Conduct We have human resources policies for each region in which we operate, based on variances in local laws and regulations.			
	103-3	Evaluation of the management approach	People pp. 43–49 Our HR Leadership team is responsible for reviewing all HR-related policies and our management approach annually to ensure they are fit for purpose. Corporate Governance			
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	See GRI Appendix 401-1 p. 51			
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	People: The Hershey Employee Experience pp. 44–49 2019 Form 10-K The benefits Hershey provides vary depending on location and are based on local human resources laws and regulations with which we comply. See 202-2 for our definition of significant locations of operation.			
	401-3	Parental leave	See GRI Appendix: 401-3 p. 52, U.S. only. We adhere to all relevant laws and regulations for maternity and paternity leave globally.	Entire disclosure outside of the U.S.	Information unavailable.	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.

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)

Labor/Management Relations

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	People pp. 43–49 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	People pp. 43–49 <u>Hershey Code of Conduct</u> <u>Human Rights Site</u> <u>Concern Line</u> In our unionized environments, specific grievance procedures are documented in each of the respective collective bargaining agreements. In our non-union environments, similar dispute resolution mechanisms are in place for employees. Specifically, in the U.S., 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.			
	103-3	Evaluation of the management approach	Our Human Resources department and Legal department are responsible for evaluating the management of labor/management relations. <u>Corporate Governance</u>			
GRI 402: Labor/management relations 2016	402-1	Minimum notice periods regarding operational changes	We do provide notification periods. The exact length of time varies by the significance of the change. In all union environments, we would meet and review with the labor representatives ahead of time. Exact times are not specified in Collective Bargaining Agreements.			
	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 2019.			

Occupational Health and Safety

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Planet: A New Standard for Environmental Health & Safety p. 38 People: Prioritizing the Safety of Our People p. 49 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Planet: A New Standard for Environmental Health & Safety p. 38 People: Prioritizing the Safety of Our People p. 49 <u>Hershey Code of Conduct</u>			
	103-3	Evaluation of the management approach	Planet: A New Standard for Environmental Health & Safety p. 38 People: Prioritizing the Safety of Our People p. 49 <u>Corporate Governance</u>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 403: Occupational health and safety 2018	403-1	Occupational health and safety management system	Planet: A New Standard for Environmental Health & Safety p. 38 People: Prioritizing the Safety of Our People p. 49 During 2019, we raised the bar for the environmental performance of our manufacturing facilities and implemented our new Environmental Health & Safety (EH&S) management system. The system has been modeled on the leading ISO 14001 and 45001 standards and we intend to have it rolled out to all our facilities within a reasonable time frame over the next several years. We're especially proud of the fact that, in several cases, this new Hershey standard commits us to a more environmentally robust approach than local legislation.			
	403-2	Hazard identification, risk assessment and incident investigation	Hershey uses job hazard assessment and analysis tools to conduct risk assessments for employees and workers who are not employees but whose work and/or workplace is controlled by the organization. Our Environment, Health and Safety (EH&S) team is responsible for coordinating and overseeing the process within our manufacturing plants. Our manufacturing employees participate and help lead the risk assessments. Results of risk assessments and corrective actions may be incorporated into Hershey's Process Operating Guidelines. Our new EH&S information management system (SAP) allows workers to report work-related hazards and hazardous situations. Workers also have access to safety work order forms and safety suggestion forms in all operations. Hazards submitted to the management system or through forms initiate the process for appropriate EH&S team members to investigate the hazard, capture information and take corrective actions. Every employee is empowered to take immediate action for people safety regardless of role, title or responsibility. Any incidents that occur are reported on our internal SAP database, which collects and tracks our EH&S data from our sites worldwide. Incidents are reported to a supervisor and then the facility safety manager. 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. We continue to review our strategy annually and revise it based on progress and gaps identified through internal audits, surveys and investigations. <u>Hershey Code of Conduct</u>			
	403-3	Occupational health services	Our manufacturing sites conduct compliance-mandated screenings and health and wellness screenings for employees. Hershey's corporate occupational health group provides guidance on occupational health screening programs to our manufacturing sites.			
	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. As part of our continual improvement process, we are developing guidelines for the sites to follow in order to standardize EH&S committees and to maximize employee engagement on these committees.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	403-5	Worker training on occupational health and safety	<p>Our sites provide all compliance-mandated training to affected employees. We also provide other health and safety training that may not be required, such as off-the-job safety topics.</p> <p>We are developing internal Hershey trainings that will standardize the delivery of required training across all sites, and training will be tracked centrally.</p> <p>During the course of 2020, we will be developing a training matrix that lists all safety topics, the frequency of training required, relevant personnel to be trained or to manage training and what resources the training requires, such as online classes or in-person demonstrations.</p>			
	403-6	Promotion of worker health	<p>Hershey is proud to offer a competitive suite of benefits to facilitate workers' access to medical and healthcare services, including:</p> <ul style="list-style-type: none"> • Medical coverage • Dental and vision • Life insurance • Disability benefits <p>Our employees have access to wellness events throughout the year. Examples of wellness events that occurred in various operations in 2019 include flu vaccine programs, biometric screening, blood pressure checks and health fairs. Some Hershey operations, like our Brazil plant, host tailored wellness events, including a yellow fever vaccine campaign.</p>			
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	People: Prioritizing the Safety of Our People p. 49			
	403-8	Workers covered by an occupational health and safety management system	People: Prioritizing the Safety of Our People p. 49	Entire disclosure.	Information unavailable.	<p>We are in the process of updating our occupational health and safety management system and are unable to disclose details about workers covered by that system until updates are complete.</p> <p>We expect to be able to report on this disclosure once the system is updated.</p>

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	403-9	Work-related injuries	See GRI Appendix: 403-9 p. 53 Our rates have been calculated on a 200,000 hours worked basis. We meet all regulatory record-keeping and reporting requirements for work-related injuries. Our statistics include all workers who are not employees but whose work is controlled by our organization. We do not track metrics for contractors. However, we do use our external partner, ISN, to provide us with injury data for high-risk contractors used at our facilities.	a.ii, a.iv, b, c International commercial operations.	Confidentiality constraints.	We consider the remaining requests of this indicator to be company confidential.
	403-10	Work-related ill health	We had zero work-related deaths from ill health in 2019.	a.ii-iii, b.ii-iii, c	Confidentiality constraints.	We consider work-related ill health to be confidential information.

Training and Education

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 People: The Hershey Employee Experience pp. 44–49 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Hershey's Learning & Development program provides skills and role-based training for all salaried and hourly employees at our offices and manufacturing sites. <u>Hershey Code of Conduct</u> Hershey partners with students at The Milton Hershey School to not only identify highly diverse top talent but to work with our top talent to develop them into future leaders.			
	103-3	Evaluation of the management approach	People: The Hershey Employee Experience pp. 44–49 Our Senior Vice President, Chief Human Resources Officer has strategic oversight over Hershey's human resources policies and talent management. <u>Corporate Governance</u>			
GRI 404: Training and education 2016	404-1	Average hours of training per year per employee	Appendix 404-1 p. 54			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	404-2	Programs for upgrading employee skills and transition assistance programs	<p>Hershey’s Learning & Development program provides skills and role-based training for all salaried and hourly employees at our offices and manufacturing sites.</p> <p>Office-based employees have access to learning from our Learning Catalogue, which covers the following topical areas: Leadership, Professional Development, Finance, Marketing, Research & Development, Sales, Supply Chain and Workplace Productivity. Each topical area is managed by a Learning Manager. In addition, role-based onboarding curricula are provided for individuals moving into key roles.</p> <p>Manufacturing-based employees are offered specific training on Lean Manufacturing, Quality, Food Safety, Environmental Health and Safety and role-based Operational Training.</p> <p>All Hershey office- and manufacturing-based employees go through new hire orientation programs.</p> <p>Hershey also offers a tuition refund program to all full-time U.S.-based employees in good standing who wish to pursue education that is mutually beneficial to the company and the employee. Hershey will reimburse up to \$6,500 for allowable tuition expenses within a calendar year, less applicable federal, state and local taxes. There is no limit on the number of courses or credits within the reimbursement amount.</p> <p>Transition assistance provided for those qualified due to Job Elimination & Involuntary (performance) is: severance based on years of service; OHIP payout prorated for the following year based on the month the employee exited; COBRA benefits including company subsidy for eligible weeks of severance; six-month career transition for Director and above (Challenger Gray & Christmas); three-month career transition for Senior Manager and below (Lee Hecht Harrison); 401-K; unused prorated vacation.</p> <p>Assistance provided to those who qualify due to Voluntary & Involuntary (conduct) is: unused prorated vacation; COBRA (unsubsidized); 401-K.</p> <p>Individuals who retire voluntarily do not receive outplacement assistance.</p>			
	404-3	Percentage of employees receiving regular performance and career development reviews	One hundred percent of our salaried employees receive regular performance and career development reviews.			

Diversity and Equal Opportunity

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>People: Better Together—Diversity & Inclusion at Hershey pp. 47–48</p> <p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Material Issues Across Our Value Chain pp. 44–46</p>			
	103-2	The management approach and its components	<p>People pp. 43–49</p> <p>Governance & Approach: Being a Responsible & Ethical Business p. 10</p> <p>Our Performance p. 63</p> <p>Hershey Code of Conduct</p> <p>Board of Directors</p> <p>We are an equal opportunity employer as outlined in our Equal Employment Opportunity (EEO) Policy.</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-3	Evaluation of the management approach	People pp. 43–49 <u>Equal Employment Opportunity (EEO) Policy</u> <u>Board of Directors</u> <u>Corporate Governance</u>			
GRI 405: Diversity and equal opportunity 2016	405-1	Diversity of governance bodies and employees	The Board has 12 directors, all of whom have significant professional experience. All are over the age of 50. There are five women and one hispanic male on the Board, representing a composition of 50 percent diverse Board members. Governance & Approach: Being a Responsible & Ethical Business p. 10 Our Performance p. 63 Appendix 405-1 p. 55			
	405-2	Ratio of basic salary and remuneration of women to men	People: Better Together—Diversity & Inclusion at Hershey pp. 47–48 Across our U.S.-salaried workforce, on an aggregate basis, women earn \$0.99 for every \$1.00 men earn. For purposes of reporting gender pay equity for GRI, we consider the U.S. to be our only significant location of operations.			

Non-discrimination

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 People pp. 43–49 Material Issues Across Our Value Chain pp. 44–46 <u>Equal Employment Opportunity (EEO) Policy</u>			
	103-2	The management approach and its components	<u>Hershey Code of Conduct</u> 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. Accordingly, all officers, directors, and employees are required to take our Discrimination and Harassment and Code of Conduct policy training every other year. In years when the Code of Conduct training is not provided, every employee, officer and director of our company is required to certify that they have read the Code of Conduct and that they understand and agree to abide by the requirements. Both trainings provide in-depth information around education and awareness of, and responsiveness to, discriminatory situations. In addition, we have an Inappropriate Conduct in the Workplace policy that all employees have access to. In 2018, we enhanced our Anti-Harassment and Discrimination training to be better aligned with current workplace and social issues. During 2019 the new training was distributed in the U.S. and internationally.			
	103-3	Evaluation of the management approach	<u>Hershey Code of Conduct</u> <u>Equal Employment Opportunity Policy</u> <u>Corporate Governance</u> 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 standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 406: Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	<p>During 2019, in the U.S., Hershey did not have judicial or administrative determinations that it had committed any incidents of discrimination.</p> <p>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. Having said that, we have no record of any judicial or administrative findings of incidents of discrimination at any of our locations.</p>			

Freedom of Association and Collective Bargaining

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>People pp. 43–49</p> <p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Material Issues Across Our Value Chain pp. 44–46</p>			
	103-2	The management approach and its components	<p>People: Engaging with Unions p. 46</p> <p>Our Performance p. 63</p>			
	103-3	Evaluation of the management approach	<p>Our Human Resources department and Legal department are responsible for the evaluation of the management of freedom of association and collective bargaining.</p> <p>Corporate Governance</p>			
GRI 407: Freedom of association and collective bargaining 2016	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<p>Hershey recognizes and respects our employees' right to freedom of association and to collective bargaining within federal and local laws and regulations. Hershey did not have operations in FY2019 in which the right to exercise freedom of association and collective bargaining were at risk.</p> <p>We do maintain a Supplier Code of Conduct that sets forth our expectations of suppliers and contractors in regard to key business practices, including the right of employees to freely associate. To our knowledge, Hershey did not have any suppliers in FY2019 under whom the right to exercise freedom of association and collective bargaining were at risk.</p> <p>Supplier Code of Conduct</p>			

Child Labor

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>Business: Responsible Sourcing p. 19; Embedding Human Rights pp. 20–23; Cocoa For Good pp. 25–35</p> <p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Material Issues Across Our Value Chain pp. 44–46</p> <p>Cocoa For Good</p> <p>Human Rights Site</p> <p>Child Labor Monitoring and Remediation System</p>			
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GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-2	The management approach and its components	Business pp. 19–21, 25–33 Governance & Approach: Being a Responsible & Ethical Business p. 10 <u>Child Labor Monitoring and Remediation System</u> <u>Human Rights Site</u> <u>Supplier Code of Conduct</u> <u>Cocoa For Good</u>			
	103-3	Evaluation of the management approach	Business pp. 19–21, 25–33 Governance & Approach: Being a Responsible & Ethical Business p. 10 <u>Child Labor Monitoring and Remediation System</u> <u>Human Rights Site</u> <u>Supplier Code of Conduct</u> <u>Cocoa For Good</u> <u>Corporate Governance</u>			
GRI 408: Child labor 2016	408-1	Operations and suppliers at significant risk for incidents of child labor	The Big Picture: Our Challenges p. 6 Business: Responsible Sourcing p. 19; Embedding Human Rights pp. 20–23; Cocoa For Good pp. 25–35 <u>Human Rights Site</u> <u>Cocoa For Good</u> <u>Child Labor Monitoring and Remediation System</u>			

Forced or Compulsory Labor

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Business pp. 19–35 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 <u>Cocoa For Good</u> <u>Human Rights Site</u> <u>Child Labor Monitoring and Remediation System</u>			
	103-2	The management approach and its components	Business pp. 19–21, 25–33 Governance & Approach: Being a Responsible & Ethical Business p. 10 <u>Child Labor Monitoring and Remediation System</u> <u>Human Rights Site</u> <u>Supplier Code of Conduct</u> <u>Cocoa For Good</u> <u>Hershey's Commitment to Responsibly Sourced Palm Oil</u>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-3	Evaluation of the management approach	Business pp. 19–21, 25–33 Governance & Approach: Being a Responsible & Ethical Business p. 10 Child Labor Monitoring and Remediation System Human Rights Site Supplier Code of Conduct Cocoa For Good Palm Oil Facts			
GRI 409: Forced or compulsory labor 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	The Big Picture: Our Challenges p. 6 Business pp. 19–35 Human Rights Site Cocoa For Good Hershey's Commitment to Responsibly Source Palm Oil Child Labor Monitoring and Remediation System			

Rights of Indigenous Peoples

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Business: Embedding Human Rights pp. 20–23 The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Human Rights Site			
	103-2	The management approach and its components	Business: Embedding Human Rights pp. 20–23 The Big Picture pp. 4–8 Material Issues Across Our Value Chain pp. 44–46 Human Rights Site			
	103-3	Evaluation of the management approach	Business: Embedding Human Rights pp. 20–23 Human Rights Site Corporate Governance Governance & Approach: Being a Responsible & Ethical Business p. 10			
GRI 411: Rights of indigenous peoples 2016	411-1	Incidents of violations involving rights of indigenous peoples	The Hershey Company did not identify any incidents of violations involving rights of indigenous peoples in FY2019.			

Human Rights Assessment

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Business: Embedding Human Rights pp. 20–23 Material Issues Across Our Value Chain pp. 44–46 Human Rights Site			
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GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-2	The management approach and its components	<p>Business: Embedding Human Rights pp. 20–23</p> <p>Human Rights Site</p> <p>Hershey Code of Conduct</p> <p>Supplier Code of Conduct</p> <p>Corporate Governance</p> <p>Compliance Complaints</p> <p>Concern Line</p> <p>Our first Human Rights Saliency assessment in 2018, conducted in line with the UN Guiding Principles Reporting Framework and with the assistance of an independent third party, included the desk-based research and review of relevant internal policies and procedures across all of the manufacturing operations of Hershey in the U.S., Canada, Mexico, Brazil, India, China and Malaysia.</p> <p>In 2020 we will continue to engage with key stakeholders to elevate our work to promote human rights across Hershey’s entire value chain and in the CPG industry. Our 2020 goals are: expand work to address child labor in cocoa as part of our comprehensive Cocoa For Good strategy; formally integrate human rights into supply chain due diligence, and conduct employee training and awareness sessions (train 100 percent of our procurement professionals on human rights by 2021).</p>			
	103-3	Evaluation of the management approach	<p>Governance & Approach: Being a Responsible & Ethical Business p. 10</p> <p>Human Rights Site</p> <p>Corporate Governance</p> <p>Verité Blog</p>			
GRI 412: Human rights assessment 2016	412-1	Operations that have been subject to human rights reviews or impact assessments	<p>Business: Embedding Human Rights pp. 20–23</p> <p>Human Rights Site</p> <p>Corporate Governance</p> <p>Using the human rights due diligence tool we developed with Verité, we evaluated all of our Tier 1 raw material and packaging suppliers as well as co-manufacturers, co-packers and licensees. We then developed a prioritized list for further supplier due diligence as part of our newly revised Responsible Sourcing Tier 1 Supplier program. We also mapped and collected data on all our direct labor service providers globally to begin work on new standards and expectations around responsible recruitment.</p> <p>We also we undertook commodity and country risk reports for soy, sugar, Malaysia, India and Brazil.</p>			
	412-2	Employee training on human rights policies or procedures	<p>Hershey Code of Conduct: Upholding Human Rights</p> <p>Human Rights Site</p> <p>In 2019, we developed an e-learning module that covers the UNGPs, Hershey’s salient issues, and how to be an advocate for human rights, as well as basic considerations for purchasing practices. The training is mandatory for all global procurement professionals across Hershey and is strongly encouraged for leaders in functions like manufacturing, legal and human resources, as well as certain commercial functions. The goal is to train 100 percent of procurement professionals to complete the training by 2021. We also promote the training in new employee orientation. We do not yet have data concerning how many hours of training were given or what percentage of employees undertook the training.</p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	All Hershey commercial contracts include language that requires suppliers to adhere to our Supplier Code of Conduct which outlines our expectations with respect to our salient human rights issues. In addition, our Responsible Sourcing Supplier program requires enrolled suppliers' formal review and acknowledgement of and alignment with the code. <u>Supplier Code of Conduct</u> <u>Human Rights Site</u> <u>Corporate Governance</u>			

Local Communities

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Children & Youth pp. 50–55 Business pp. 19–21, 25–33 Communities pp. 56–60 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Our Shared Goodness Promise p. 7 Children & Youth pp. 50–55 Business pp. 19–21, 25–33 Communities pp. 56–60			
	103-3	Evaluation of the management approach	Governance & Approach: Governing Sustainability p. 10 Children & Youth pp. 50–55 Business pp. 19–21, 25–33 Communities pp. 56–60 <u>Corporate Governance</u>			
GRI 413: Local communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	All Hershey operations have implemented local community engagement and development programs based on local communities' needs. In 2019, we continue to work closely within each of our local communities to identify key focus areas for our philanthropy as well as identify key volunteering opportunities for employees. Examples of local community engagement and development programs across Hershey operations and in our supply chain communities can be seen throughout our Sustainability Report.			
	413-2	Operations with significant actual and potential negative impacts on local communities	<u>SDG Index</u> Hershey does not have any operations that have had an actual negative impact on local communities. We aim to mitigate any potential negative impacts from our operations on local communities. For example, our manufacturing plants in El Salto and Monterrey (Mexico) have been rated by the WRI Aqueduct tool to have high risk for future water stress. More details of how we have managed these risks can be found at Planet: Protecting our Water Supply p. 39			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)

Supplier Social Assessment

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Business: Responsible Sourcing, Partnering for Better Palm Oil, Embedding Human Rights, Cocoa For Good pp. 19–35 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Business pp. 13–35 Responsible Sourcing Supplier Code of Conduct			
	103-3	Evaluation of the management approach	Business pp. 13–35 Corporate Governance			
GRI 414: Supplier social assessment 2016	414-1	New suppliers that were screened using social criteria	All Hershey commercial contracts include language that requires suppliers to adhere to our Supplier Code of Conduct which outlines our expectations with respect to our salient human rights issues. In 2019, no new suppliers were screened using social criteria.			
	414-2	Negative social impacts in the supply chain and actions taken	We evaluated all of our Tier 1 raw material and packaging suppliers as well as co-manufacturers, co-packers and licensees. We then developed a prioritized list for further supplier due diligence, which will include assessing social impact, as part of our newly revised Responsible Sourcing Supplier program to launch in 2020. We monitor and investigate actors in our palm oil supply chain about whom we've received allegations of potential negative social impacts. Updates about these actors, descriptions of allegations raised and the status of the monitoring and investigation of these potential or actual social impacts can be reviewed on our Palm Oil Grievance Log , updated quarterly. In 2018, as a result of non-compliance with our No Deforestation, No Peat, No Exploitation (NDPE) commitment, three palm oil producers were removed from our palm oil supply chain.			

Public Policy

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Governance & Approach pp. 9–12 Material Issues Across Our Value Chain pp. 44–46 2019 PAC Report			
	103-2	The management approach and its components	Governance & Approach: Lobbying & Transparent Policy p. 12 2019 PAC Report Advocacy Expenditure Reports Lobbying Disclosure Act Database			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	103-3	Evaluation of the management approach	<p>The company's advocacy activities are targeted and aligned on an ongoing basis with our company's strategy and approved by the relevant members of the Executive Committee.</p> <p>Voluntarily donated employee PAC contributions are used to support federal and Pennsylvania political candidates who share our company values. Contributions are approved by a committee of employees from across the company and are distributed in equal amounts to both Democrats and Republicans.</p> <p><u>Corporate Governance</u></p>			
GRI 415: Public policy 2016	415-1	Political contributions	<p><u>2019 PAC Report</u></p> <p><u>Advocacy Expenditure Reports</u></p>			

Customer Health and Safety

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	<p>The Big Picture pp. 4–8</p> <p>Governance & Approach: Material Issues p. 11</p> <p>Business: No Compromise on Food Safety p. 15</p> <p>Material Issues Across Our Value Chain pp. 44–46</p>			
	103-2	The management approach and its components	<p>Business: pp. 13–35</p> <p>Our Performance pp. 61–63</p> <p><u>2019 Form 10-K</u></p> <p><u>Hershey Code of Conduct</u></p> <p><u>Packaging Supplier Quality Expectations Manual</u></p> <p><u>Supplier Quality Expectations Manual</u></p> <p><u>Supplier Code of Conduct</u></p>			
	103-3	Evaluation of the management approach	<p>Business: No Compromise on Food Safety, Offering Innovation, Choice & Transparency pp. 15–16</p> <p><u>Corporate Governance</u></p>			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
GRI 416: Customer health and safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	<p>In 2019, our Quality and Regulatory Compliance team implemented and executed activities to ensure compliance with the final U.S. FDA Food Safety Modernization Act (FSMA) rule, "Mitigation Strategies to Protect Food Against Intentional Adulteration." This rule is aimed at preventing intentional adulteration from acts intended to cause wide-scale harm to public health, including acts of terrorism targeting the food supply.</p> <p>Our Supplier Quality Management team, leveraging additional resources assigned in 2018, worked diligently to further a preventive and predictive approach to supplier quality management. The team leveraged a robust ingredient and supplier risk evaluation tool to align on verification audit frequency of all suppliers. With the additional resources the team was able to strengthen our auditing program to ensure verification assessments as part of the approval process for all suppliers, and adherence to surveillance audit frequency for approved suppliers. The team continues to gain first-hand knowledge of suppliers, programs and capabilities to focus resources on food safety and quality opportunities in a preventive approach.</p> <p>During 2019 The Hershey Company volunteered to participate in the FDA's pilot post FSMA Two Tier inspection process. During this pilot inspection the investigators reviewed critical FSMA-required corporate level programs such as Supplier Verification and Recall Management, and subsequently reviewed management of these rules and implementation and execution of preventive control rules on the manufacturing floor. Participation in this program confirmed our readiness and compliance with the FDA's FSMA regulations.</p>			
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	In 2019, there were no recalls or market withdrawals of any Hershey products globally.			
	GRI-FP5	Percentage of production volume manufactured in sites certified by an independent third party according to internationally recognized food safety management system standards	One hundred percent of Hershey wholly owned facilities are Global Food Safety Initiative certified. Globally, 87 percent of our suppliers (by count) are GFSI certified. Those not certified tend to represent a very small portion of our ingredient spend as they often are either contingency suppliers in case we need a back-up from our traditional supplier, or provide low volume specialty ingredients. For example, in our North American operations, 99.92 percent of our ingredients are procured from GFSI-certified suppliers (by cost of ingredients).			
	GRI-FP6	Percentage of total sales volume of consumer products, by product category, that are lowered in saturated fat, trans fats, sodium and added sugars	Note: Hershey does not use trans fat in any products.	Entire disclosure.	Confidentiality constraints.	Information regarding breakdown of sales by product category and specific ingredients is not reported due to commercial sensitivity.

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	GRI-FP7	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		Entire disclosure.	Confidentiality constraints.	Information regarding breakdown of sales by product category and specific ingredients is not reported due to commercial sensitivity.

Marketing and Labeling

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	Responsible labeling and transparency regarding the ingredients in our snacks and responsible marketing to children is an absolute must at Hershey. It helps to ensure our consumers can make informed decisions for their lifestyles and families. The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Business: Offering Innovation, Choice & Transparency, Marketing Responsibly pp. 16–17 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Business: Offering Innovation, Choice & Transparency, Marketing Responsibly pp. 16–17 SmartLabel™ Sharing What's Inside Children's Food and Beverage Advertising Initiative: The Hershey Company Pledge			
	103-3	Evaluation of the management approach	Our Consumer Relations department reviews and answers all consumer-related questions and concerns about the ingredients and labeling on our snacks. It also proactively reviews social media, and engages individual consumers as well as retail partners to ensure our transparency, labeling, and marketing practices align with their expectations. Corporate Governance			
GRI 417: Marketing and labeling 2016	417-1	Requirements for product and service information and labeling	The U.S. Regulatory Compliance team worked to update product labels to comply with the Food and Drug Administration Revision of the Nutrition and Supplement Facts Label and Serving Size Rules. These updates to nutrition and serving size information ensure that consumers have access to the information they need to make informed decisions about the foods they eat. The team is on track to have all label revisions completed in accordance with the FDA's expectations for compliance.			
	417-2	Incidents of non-compliance concerning product and service information and labeling	There have been no material non-compliances with labeling laws or regulations.			
	417-3	Incidents of non-compliance concerning marketing communications	There have been no material non-compliances with laws or regulations governing marketing communications.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Customer Privacy						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Governance & Approach: Data Protection & Privacy p. 12 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Governance & Approach: Data Protection & Privacy p. 12 Hershey Code of Conduct Hershey Website Privacy Policy			
	103-3	Evaluation of the management approach	Hershey Website Privacy Policy Corporate Governance			
GRI 418: Customer privacy 2016	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.			
Socioeconomic Compliance						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	We believe in being compliant with laws and regulations in the social and economic areas where Hershey has operations. This is why we commit to being an ethical and responsible business. We expect our business partners and suppliers to do the same. The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Governance & Approach: Being a Responsible & Ethical Business p. 10 Hershey Code of Conduct Supplier Code of Conduct Compliance Complaints Human Rights Site			
	103-3	Evaluation of the management approach	Corporate Governance			
GRI 419: Socioeconomic compliance 2016	419-1	Non-compliance with laws and regulations in the social and economic area	We had no material fines or non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area.			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
Animal Welfare						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46 Farm Animal Welfare Position Hershey is dedicated to a transparent supply chain and we have a long history of safe and high-quality consumer products. Farm animal welfare is a key priority with respect to sourcing animal protein (dairy, egg and meat) ingredients. Our farm animal welfare position is that the ingredients supplied to Hershey will meet or exceed our high-quality standards. Hershey does not own any animals and we work with our suppliers to uphold the Five Freedoms of animal rights.			
	103-2	The management approach and its components	Farm Animal Welfare Position			
	103-3	Evaluation of the management approach	Farm Animal Welfare Position Corporate Governance			
	GRI-FP12	Policies and practices on antibiotic, anti-inflammatory, hormone, and/or growth promotion treatments, by species and breed type	Farm Animal Welfare Position			
Future of Retail (Non-GRI)						
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	2019 Form 10-K Retail Expertise Digital Commerce Strategy Innovation			
	103-3	Evaluation of the management approach	Digital Commerce Strategy Innovation Our Chief Customer Officer is responsible for leading Hershey’s customer-focused organization across all North America business segments, retail channels and global customers. Our Chief Digital Commerce Officer is leading the company’s future course with a holistic shopper-first digital framework. Corporate Governance			

GRI standard	Disclosure	GRI disclosure	Cross reference or answer	Identified omission		
				Part(s) omitted	Reason(s) for omission(s)	Explanation for omission(s)
	Future of Retail	Policies, strategies and initiatives related to the future of retail	Retail Expertise Digital Commerce Strategy Innovation Corporate Governance			

Innovation (Non-GRI)

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Business: Offering Innovation, Choice & Transparency, Marketing Responsibly pp. 16–17 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Business: Offering Innovation, Choice & Transparency p. 16 2019 Form 10-K Innovation			
	103-3	Evaluation of the management approach	Corporate Governance Innovation			
	Innovation within the snacking industry	Policies, strategies and initiatives related to innovation within the snacking industry	Business: Offering Innovation, Choice and Transparency p. 16 Our Performance pp. 61–63 Innovation			

Business Continuity/Disaster Recovery (Non-GRI)

GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundaries	The Big Picture pp. 4–8 Governance & Approach: Material Issues p. 11 Governance & Approach: Staying Secure, Transparent & Resilient p. 12 Material Issues Across Our Value Chain pp. 44–46			
	103-2	The management approach and its components	Governance & Approach: Staying Secure, Transparent & Resilient p. 12 2019 Form 10-K Our Enterprise Risk Management process quantifies the risk our company faces from each identified factor by building a scale influenced by the potential impact as well as the likelihood that the risk will come to bear on our company.			
	103-3	Evaluation of the management approach	Our Enterprise Risk Management (ERM) and Materiality process identifies risk, informs senior leaders and the Board and gives our organization the ability to mitigate and manage these risks. Our governance model empowers business units to identify risks that they face so that they can bring these to the attention of various stakeholders across the company. Our senior leaders serve as “owners” of these risks and provide our Board of Directors with regular updates on how the company is managing the risks. Corporate Governance			
	Business Continuity/ Disaster Recovery	Policies, strategies and initiatives related to business continuity and disaster recovery	Our Enterprise Risk Management process quantifies the risk our company faces from each identified factor by building a scale influenced by the potential impact as well as the likelihood that the risk will come to bear on our company.			

Hershey’s material issues across our value chain

		Key: • Moderate •• Significant ••• Major				
Material issues	Definition	Farmers	Tier 1 suppliers	Hershey	Customers	Consumers
Climate Change	Greenhouse gas (GHG) reduction and mitigation, carbon regulation, climate adaptation planning, carbon offsets, sustainable operations and transportation emissions including refrigerants, agricultural emissions, indirect emissions, climate change impacts on supply chain, especially related to agriculture. Using the Hershey brand to advocate for climate-positive policies.	•••	•••	•••	•••	••
Ecosystems	Protection of ecosystems, for example: protecting forests and areas of high conservation value; protection of species habitat, such as palm oil and orangutan habitats; sustainable agriculture, such as soil health and responsible use of fertilizer, chemicals, and pesticides; biodiversity; deforestation; and land and forestry management. Subissues: Deforestation Biodiversity Land and forestry management Responsible use of fertilizers and chemicals/pesticides	•••	•••	•••	••	••
Packaging	Initiatives to reduce material consumption related to packaging; increase recyclability of packaging materials; promote recycling of used packaging materials by customers; safety and quality of packaging; utilizing more sustainable packaging and alternatives to plastic. Including consumer concerns on slack-fill: packaging that does not allow the consumer to fully view its contents will be considered to be filled in a misleading way if it contains nonfunctional slack-fill, or there is a difference between the actual capacity of packaging and the volume of product contained.	•	••	•••	•••	•••
Human Rights	Ensuring the respect and protection of salient human rights across the value chain. Subissues: Labor relations Labor conditions and standards Migration Food security Living wage Indigenous rights	•••	•••	•••	•••	••
Child Labor	Combating the employment of children across the value chain, including work that deprives children of their childhood, is mentally, physically, socially or morally dangerous, and interferes with their schooling.	•••	•••	•••	••	••
Nutrition, Ingredients, & Product Transparency	The impact that Hershey’s products have on consumer nutrition, including health and wellness impacts, such as obesity and diabetes. Includes portion control, ingredient transparency (particularly regarding artificial flavorings, sugar, salt, fat reductions, preservatives, additives), policies and practices for communicating ingredients and nutritional information to consumers, front-of-pack. Subissues: Consumer wellness Alternative proteins	•	••	•••	•••	•••
Food Safety	Food quality and safety policies and procedures, including prevention of intentional adulteration, food safety standards and regulations, recalls, quality certifications such as GFSI facilities, food traceability, Product Excellence Program. Evolving food safety practices with emerging food risks.	•••	•••	•••	•••	•••

Key: • Moderate •• Significant ••• Major

Material issues	Definition	Farmers	Tier 1 suppliers	Hershey	Customers	Consumers
Consumer Engagement on Sustainability	Engaging and educating consumers on impact, areas of focus, initiatives and programs related to sustainability.	••	•••	•••	•••	•••
Farmer livelihoods	Supporting farmer livelihoods through training on good agricultural practices such as soil health to improve yields, working with farming communities to support young farmers, entrepreneurship, supporting a living wage and sustainable livelihoods through asset strengthening and resilience, ensuring food security for farmers in Hershey's value chain, strengthening business and agricultural practices. Subissues: Land rights, title and tenure Smart farming Living wage	•••	•••	•••	••	••
Responsible Sourcing	Management of and adherence to Supplier Code of Conduct, supply chain transparency and disclosure, supplier audits, sustainable supply chain policies, supplier diversity, supplier due diligence, practices to ensure supply chain continuity. Sourcing of virgin materials, including pulp, paper and palm oil, sustainable cocoa in a way that supports responsible agricultural practices and sourcing from reputable certification schemes such as Fairtrade and UTZ.	•••	•••	•••	••	••
Ethical Business	Anti-corruption, bribery, anti-trust, ethics training, codes of conduct and whistle-blower protection, general compliance with all relevant laws, policies, and regulations. Board composition, independence of Board committees and leadership, anti-takeover measures, Board and executive compensation (including CSR performance as part of individual compensation for executives). Subissues: Ethical conduct Corporate governance Regulatory compliance Changing regulatory landscape Transparency	•••	•••	•••	•••	•••
Global Competitiveness	Global economic and financial conditions, as well as geopolitical changes influencing these conditions, ability to compete internationally in fast-growing markets, industry success, seasonality, company strategy for global growth, changes in consumer behavior affecting financial conditions.	••	•••	•••	•••	••
Financial Health	Hershey's economic position and slowing growth, mergers and acquisition activity, fluctuations in commodity prices, protection and ownership of trademarks, service marks and license agreements and access to capital.	••	••	•••	••	•
Energy	Energy sourcing and conservation, energy costs, energy efficiency measures, including renewable energy. Includes proactive engagement on RE100 and other initiatives on renewable energy.	•	•••	•••	•••	••
Water	Water sourcing, use, conservation and recycling, water pollution and treatment, water risk assessments, discharge of effluents and minimization of wastewater and other effluents, water as a human right/WASH (Water Sanitation and Hygiene), water use and conservation in the supply chain.	•••	•••	•••	••	••
Waste	Waste management, food waste, zero waste to landfill, circular economy, waste minimization (both hazardous and nonhazardous), efforts to increase recycling rates at production and office facilities, proper care and disposal of hazardous waste.	•••	•••	•••	•••	••
Air Pollution	Non-GHG air emissions, air quality measurement, NOx, SOx and particulate matter, toxics, mercury, ammonia pollution, nitrogen compounds.	••	••	••	••	••

Key: • Moderate •• Significant ••• Major

Material issues	Definition	Farmers	Tier 1 suppliers	Hershey	Customers	Consumers
Employee Experience	Employee satisfaction, job security, wages and benefits, quality of work environment and company culture, work-life balance, employee wellness programs and employee confidence in company direction. Attracting and retaining employees, professional development, succession planning, workforce retention. Subissues: Employee engagement Employee opportunity	•	•	•••	•	••
Workplace Health & Safety	Occupational health and safety performance and policies, safety standards (ISO 22000, OSHA), health and safety training, compliance with health and safety, fair labor, and OSHA regulations, safety of drivers and others in transportation roles.	••	•••	•••	••	••
Diversity & Inclusion	Employee, management and Board diversity and inclusion (including gender, age and ethnicity), equal pay, creating a culture of openness and inclusivity, diversity inclusion programs, nondiscrimination policy, veteran hiring.	••	•••	•••	•••	••
Supporting Communities	Community engagement and interaction in Hershey's direct operations, including outreach, strategic community investments (both financial and nonfinancial, including the Milton Hershey School), social innovation, job creation, commerce, local investments and other indirect economic impacts in manufacturing locations. Subissues: Community relations Community investment Local economic impacts	•	•	•••	••	••
Responsible Marketing	Advertising and marketing campaigns appropriate for targeted age group and audience, mindfulness of cultural norms, diversity and inclusion, equity and respect, advertising standards and advertising to children, age-appropriate marketing messages, consumer messaging that adheres to internal and industry guidelines, compliance with all marketing standards and regulations in local markets. Subissue: Advertising to children	•	•	•••	•••	•••
Data Protection & Privacy	Compliance with data protection and privacy laws, cybersecurity, protection of consumer, business partner and employee data.	•	•	••	•••	•••
Transparent Policy & Lobbying	Transparency of political contributions and lobbying efforts, including participation through industry organizations, engagement with policy-makers.	•	•	••	••	•
Animal Welfare	Treatment and origin of livestock and livestock products, feeding practices, cage-free eggs, humane slaughter, use of antibiotics and growth/artificial hormones, animal welfare impacts in the supply chain.	•••	•••	•••	••	•••
Innovation	Innovation of new products as a result of changing consumer preferences, inventing new products from food waste, including healthier and more nutritious snacking opportunities, technology and operational practices, 3D-printed food, personalized nutrition, new category innovation/entry, intellectual property development and protection, research and development, "innovation everywhere" mindset, exploring new business models.	•	•	•••	••	••
Business Continuity/ Disaster Recovery	A significant natural event (e.g., hurricane, flooding) that would impact Hershey's ability to continue operating. Includes the risk that Hershey's supply chain does not have the appropriate contingency protocol to continue plant operations, for example.	•••	•••	•••	•••	••
Future of Retail	Online shopping, evolving e-commerce and digital, automated food delivery, food delivery applications and services, QR codes.	•	•	•••	•••	•••

102-8

Total number of Hershey employees by employment contract (permanent and temporary), by gender	Total	Female	Male
Total	16,258	7,835	8,423
Permanent	14,725	6,854	7,871
Temporary	1,533	981	552

Total number of employees by employment contract (permanent and temporary), by region	Permanent	Temporary
Globally	14,725	1,533
United States	8,382	770
Non-US	6,343	763
Asia	1,413	12
Africa	-	-
North America	814	20
Europe	15	-
LAC	4,101	731

Total number of employees by employment type (full-time and part-time), by gender	Total	Female	Male
Total	16,258	7,835	8,423
Full-time	14,718	6,872	7,846
Part-Time	1,540	963	577

102-13

Member Organizations

Leadership & Sustainability	Commerce	Food and Manufacturing Industry Groups	Ethical Sourcing & Sustainable Agriculture	Employee Inclusion & Engagement	Knowledge & Innovation
Sustainable Brands	Council of Better Business Bureau	Center for Food Integrity	World Cocoa Foundation	Thurgood Marshall College Fund	Pennovation Works
Chief Executives for Corporate Purpose	National Confectioners Association	International Food Information Council	International Cocoa Initiative	Human Rights Campaign	Carnegie Mellon University
AIM-PROGRESS	Business Council for International Understanding	Sweetener Users Association	UTZ	Network of Executive Women	Institute for the Future
Ceres	ConMexico	Cocoa Merchants' Association of America	Earthworm Foundation	National Organization on Disability	Knowledge Leadership Council
World Resources Institute (WRI) Corporate Consultative Group	ASHOCO	American Dairy Products Institute	Sedex Information Exchange	Business Group on Health	
Society of Product Licensors Committed to Excellence	American Association of Exporters and Importers	University of Nebraska/Allergen Center	Roundtable on Sustainable Palm Oil (RSPO)	CAHRS	
	Canadian Association of Importers and Exporters	ABIA-Brazilian Association of Food Industries	Dun & Bradstreet	HR Policy Association	
	Association of National Advertisers	ABICAB-Brazil (Choc, Cocoa, Peanut, Candy)	Bonsucro	DiversityInc	
	National Association of Convenience Stores	Food and Drink Federation – FDF UK	Rainforest Alliance Certification	Paradigm for Parity	
	National Association of Manufacturers	ILSI Middle East & North America	Fair Trade USA	People + Work Connect Platform (Accenture)	
	World Federation of Advertisers	CIFTI-FICCI-India	Diversity Information Resources	Minority Corporate Counsel Association	
	American Chamber of Commerce of Mexico	China National Food Industry Association			
	American Malaysian Chamber of Commerce	Food & Consumer Products of Canada			
	American Chamber of Commerce in China	International Chewing Gum Association (ICGA)			
	The American Chamber of Commerce in Canada	ALAIAB			
		ILSI North America			
		Food Information Asia (FIA)			

301-1

Pack type	2019 North America HSY, Co-Pack, Co-Man Pack Type by Weight (lbs)
Non-Renewable	2019 Total
Foil	6,905,153
Flex Film	42,315,007
Rigid Plastics	21,358,514
Total Non-Renewable	70,578,674
Renewable	2019 Total
Corrugate and Merchandise	156,286,541
Paperboard (folding carton)	55,182,770
<i>CRB (recycled)</i>	27,408,948
<i>CUK</i>	4,327,680
<i>SBS</i>	23,446,142
Cupstock	4,433,148
Total Renewable	215,902,459
Total	286,481,132*

* Subtotals shown do not add to the complete total due to rounding.

302-1**Direct energy consumption**

Fuels	MWh in 2019	Megajoules in 2019
Propane	383.84	1,381,824.00
Natural gas	638,731.35	2,299,432,850.13
Distillate fuel oil No. 2	2,151.27	7,744,572.00
Motor gasoline	919.88	3,311,568.00
Biogas	24,764.00	89,246,566.28
Electricity consumed	484,270.09	1,743,372,327.60
Total	1,151,220.43	4,144,489,708.01

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

	Age Group						Gender		Region					
	<18	18-24	25-34	35-44	45-54	55+	Male	Female	Asia	Africa	N. America	Europe	LAC	Oceania
a. Total number and rate of new employee hires during January 1, 2019–December 31, 2019	178	2,286	1,821	826	398	226	2,527	3,208	299	0	1,871	1	3,564	0
	111.95%	125.95%	48.03%	23.30%	11.48%	6.49%	30.00%	40.94%	20.98%	0	18.74%	6.67%	73.76%	0
b. Total number and rate of employee turnover during January 1, 2019–December 31, 2019	136	2,140	1,794	924	456	467	2,504	3,413	289	0	1,788		3,840	0
	85.53%	117.91%	47.32%	26.06%	13.15%	13.42%	29.73%	43.56%	20.28%	0	17.91%	0.00%	79.47%	0

401-3**Parental leave**

	TOTAL	Female	Male
Entitled to parental leave	106	41	65
Took intermittent	12	0	12
Took continuous	67	33	34
# of employees who did not elect	27	8	19
Returned to work after parental leave	105	40	65
Return to work rate	99%	98%	100%

403-9**Global employees**

	Metric	2019 Figures	2019 Target	% Improvement vs. Target	Prior Year End	% Improvement vs. Prior Year End
i.	Fatalities	0	0.00	0.00	0.00	0
iii.	TRIR rate	1.36	1.29	-5%	1.48	8%
	OR number of cases	209.00			229.00	
v.	Hours worked	30,840,683.00			30,847,554.00	
	DART rate	1.02	0.91	-12%	1.11	8%
	DART number of cases	157.00			171.00	
	LWDC rate	0.51	0.39	-31%	0.55	7%
	LWDC number of cases	79.00			85.00	

404-1**Average hours of training per year per employee**

Average hours of training that the organization's employees have undertaken during the reporting period, by: i. gender; ii. employee category	TOTAL	Female	Male
Total	8.4	7.1	9.7
Full-time	8.8	7.5	10.1
Part-time	2.8	2.6	3.1

Note:

This captures the training hours logged through Hershey's Learning & Development program. These hours do not account for outside team or individual training programs not offered through Hershey's centralized system.

405-1

Diversity of employees

Percentage of employees per employee category in each of the following diversity categories:		Grand Total	Gender		Management						Executive						Senior Leader		
			Female	Male	Management			Non-Management			Executive			Non-Executive					
					Female	Male	Sub-Total	Female	Male	Sub-Total	Female	Male	Sub-Total	Female	Male	Sub-Total	Female	Male	Sub-Total
Total			47.86%	52.14%	36.57%	63.43%	12.21%	49.43%	50.57%	87.79%	28.57%	71.43%	0.09%	47.88%	52.12%	99.91%	31.86%	68.14%	-
POC /Non-POC**	POC	20.08%	20.33%	19.90%	12.86%	13.23%	13.09%	21.34%	21.01%	21.15%	25.00%	22.20%	23.08%	20.30%	19.90%	20.08%	22.37%	10.63%	14.41%
	Non-POC	79.92%	79.67%	80.10%	87.14%	86.77%	86.91%	78.66%	78.99%	78.85%	75.00%	77.80%	76.92%	79.70%	80.10%	79.92%	77.63%	89.38%	85.59%
Age*	Under 30 years old	23.52%	25.00%	22.17%	12.31%	5.65%	8.08%	26.30%	25.05%	25.67%	0.00%	0.00%	0.00%	25.00%	22.20%	23.54%	0.00%	0.00%	0.00%
	30-50 years old	44.94%	44.08%	45.73%	68.67%	66.21%	67.11%	41.55%	42.15%	41.85%	25.00%	40.00%	35.71%	44.10%	45.70%	44.95%	68.09%	57.71%	61.02%
	Over 50 years old	31.53%	30.92%	32.09%	19.02%	28.15%	24.81%	32.15%	32.78%	32.47%	75.00%	60.00%	64.29%	30.90%	32.10%	31.50%	31.91%	42.29%	38.98%

* Globally

** US Only