ELECTRONIC COMMUNICATIONS AND INTERNET
APPROPRIATE USE

PURPOSE

The purpose of this Policy is to define the acceptable use of The Hershey Company Electronic Mail Services (E-mail), Instant Messaging, Internet, Video and other electronic communications technology.

SCOPE

This Policy applies to all employees, contractors, consultants, temporary employees, and other workers at The Hershey Company, including those workers affiliated with third parties who have access to Hershey’s networks, systems, or information, except as prohibited by law.

POLICY

1. All electronic communications services, including Internet access, are provided for Hershey legitimate business uses. Any unauthorized use of the Internet is strictly prohibited. Unauthorized use includes, but is not limited to, connecting, posting or downloading pornographic material; engaging in computer “hacking” and other related activities; attempting to disable or compromise the security of information contained on the Company’s computers or otherwise using the Company’s computers in a manner which interferes with their business purpose.

2. Personal Use - These systems may be used for non-destructive, incidental personal use consistent with the company’s Discriminatory Harassment policy, Code of Ethical Business Conduct, Social Media Guidelines and any other policies. Personal use of these systems for the solicitation or prospect for any employee's personal commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations is prohibited.
3. All systems (hardware and software) are Hershey property. All messages and data composed, sent, received or stored on these systems are, and remain, the property of Hershey or, depending on their nature, Hershey’s business partners. They are not the private property of the employee.

4. All electronic communications and Internet usage must conform with Hershey’s Values.

5. All electronic communications and Internet usage must conform with Hershey’s Code of Ethical Business Conduct.

6. All electronic communications and Internet usage must conform with Hershey’s Company Confidential Policy.
   - Users are responsible for the improper and/or inappropriate dissemination of Hershey data.
   - Users are expected to be diligent in securing the dissemination of Hershey data to ensure that only appropriate recipients are able to receive the information.
   - The use of 3rd party messaging services for the communication, storage or dissemination of any Hershey business information is strictly prohibited. Examples include but are not limited to online e-mail, instant messaging, social media and online storage and collaboration.

7. All electronic communications and Internet usage must conform with Hershey’s Discriminatory Harassment Policy.

8. All electronic communications and Internet usage must conform with Hershey’s data classification, retention and protection policies.

9. Electronic communications and Internet usage referring to the company (in written or graphic form) is subject to the company’s Social Media Guidelines.

10. Use of any system to harass or threaten another, or for any other purpose that is in violation of any federal, state, or local laws is strictly prohibited.

11. Misrepresenting, obscuring, suppressing, or replacing a user’s identity on any communication or web service is prohibited.

12. Hershey reserves and intends to exercise the right to review, audit and restrict employees’ use of these systems as part of Hershey’s Monitoring and Audit Policy. Hershey expressly disclaims any information resource users expectation of privacy.

13. All electronic communications are monitored periodically for compliance and are subject to Hershey’s Records Retention Policy.

**E-mail**

- Creating, storing, forwarding or sending any messages that are: profane, vulgar, obscene, offensive, pornographic, harassing, defamatory, discriminatory comments based on sex, race, religion, age, national origin, disability, sexual orientation or other protected traits, invasive of others’ privacy, or chain letters is strictly prohibited.
- Access to E-mail messages or mailboxes other than the user’s own, for any reason, must be authorized by both an employee’s supervisor and Information Security and will be handled on an individual basis.

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• Hershey reserves and intends to exercise the right to review, audit, intercept, access, disclose and use all messages created, received, or sent over its electronic mail system for any purpose. The contents of E mail may be disclosed and used by the Company to protect its rights and/or property without the permission of the employee, in the Company’s discretion.
• The confidentiality of any message should not be assumed. Even when a message is erased, it is still possible to retrieve and read that message. Further, passwords for security do not guarantee confidentiality. All Company-related passwords must be disclosed to the Company or they are invalid and cannot be used.
• Personal email access – Accessing personal email accounts is permitted from Hershey-owned computers so long as such use does not interfere with an employee’s productivity and any such use is consistent with this policy or any other company issued policies.

Instant Messaging

• Employees may only use instant messaging programs that have been approved and provided by the Company. The use of any other instant messaging program is prohibited.
• Creating or sending any messages that are; profane, vulgar, obscene, offensive, pornographic, harassing, defamatory, discriminatory comments based on sex, race, religion, age, national origin, disability, sexual orientation or other protected traits, invasive of others’ privacy, is strictly prohibited.
• All instant messaging is archived and is periodically audited by Information Security for compliance assurance.

Internet

• Hershey reserves the right to block access to sites deemed inappropriate. However, the ability to connect to a specific website does not in itself imply that users of Hershey systems are permitted to visit that site.
• Personal accounts with on-line services (i.e., AOL, CompuServe or other services that use their own software installed locally on the desktop) may be used or accessed from Hershey-owned computers so long as such use does not interfere with an employee’s productivity and any such use is consistent with this policy or any other company issued policies.

Video

• All videos created on Hershey’s networks or systems are subject to Hershey’s Corporate Video Guidelines and the Social Media Guidelines.
• Hershey reserves the right to review any videos prior to uploading onto a Hershey site.
• Creating or sending any videos that are; profane, vulgar, obscene, offensive, pornographic, harassing, defamatory, discriminatory comments based on sex, race, religion, age, national origin, disability, sexual orientation or other protected traits, invasive of others’ privacy, is strictly prohibited.
• Videos should not depict any activity that is unprofessional and disrespectful of others, including to the Company itself, its employees, its customers, and its competitors.

Social Media

• Online activity is subject to Hershey’s confidential data and discriminatory harassment policies, Code of Ethical Business Conduct, and the Social Media Guidelines.
• The use of social media may not interfere with an employee’s work or the work of other employees and may not interfere with the Company’s operations.
• Your postings must not violate any of Hershey’s policies. Among other things, these policies provide that you must not disclose any confidential information of the Company's employees, its customers, or any other third party, through social media or otherwise. Such confidential information includes personally identifiable information regarding other Company employees. Confidential information excludes information concerning wages, hours and conditions of employment unless the employee has responsibility of entering or access to personnel information as part of his or her duties for the Company. These Guidelines are in no way intended to prohibit employees from professionally discussing the terms and conditions of their employment with others through social media or otherwise to prevent employees from engaging in protected activity. In conducting such discussions, however, employees should remain aware of the Company’s policies prohibiting unlawful harassment and discrimination and should comply with these policies. In addition, employees should remain aware that various laws may prohibit dissemination of false or mischaracterized factual information about other people and entities.
• As a Hershey employee, you should be professional and respectful of others, including to the Company itself, its employees, its customers, and its competitors. This means representing yourself on social media as you would in a business setting and using business-appropriate language. It also means not posting statements that are maliciously false, misleading, obscene, defamatory, threatening, offensive, discriminatory, or invasive of others’ privacy. This type of conduct is expressly discouraged by Hershey in social media or any other forum. Sexual harassment and other forms of unlawful discriminatory harassment, such as hostility based on race, gender, sexual orientation or other classes protected by federal, state or local law are strictly forbidden.
• Hershey does not condone the use of social media for any illegal purpose. You must respect copyright, trademark, privacy, financial disclosure, and all other laws. Posting other people’s materials without their permission – such as photographs, articles, or music – may violate such laws. In addition, publicly disclosing confidential information may lead to liability (including personal liability) for insider trading or other violations of securities laws, and also may violate our policies.
• Do not make representations on behalf of Hershey absent express permission. Hershey respects the rights of its employees to express themselves through social media on matters of interest to themselves and the general public. However, you may not post about the Company’s business, including Hershey’s products, services, customer relations, or any other business activities, unless you have received express written consent from Human Resources.
• Although you are not precluded from listing Hershey as your employer (for example, on your LinkedIn page), there cannot be any implication that anything you post represents the views of the Company or attributed to Hershey. Please refrain from providing professional references to others through social media. In addition, you may not use your Company e-mail address or the Company logo in connection with your social media activities, except when engaged in protected concerted activity such as communicating with the public about a labor dispute or a protest about the Company’s terms and conditions of employment.

• The Company reserves the right to restrict access to certain social media sites accessed through Company equipment. If you access social media sites that have not been restricted through Company equipment, Hershey retains the right (but not the obligation) to monitor all files and messages stored on and transmitted through the Company’s computers, handheld devices or networks, as fully described in our policies, to the maximum extent permitted by law. In addition, subject to applicable law, you have no reasonable expectation of privacy on social media accessed through the Company’s computers, handheld devices or networks, even when using a private account.

RESPONSIBILITY

The Senior Vice President, Chief Information Officer is responsible for overall maintenance, communication, and interpretation of this Policy. This Policy shall be supplemented, where necessary, with a more detailed interpretation for specific solutions, sites, or business units. In accordance with Hershey’s Audit and Monitoring Policy, this Policy will be periodically reviewed for applicability and effectiveness and will be modified as the need arises.

COMPLIANCE

Use of Hershey information resources constitutes consent to the terms of this Policy, including monitoring and evaluation of such use. Violation of this or related policies may result in discipline, up to and including immediate termination of employment and/or access to Hershey systems, except as prohibited by law.

NOTE TO DELAWARE EMPLOYEES: Hershey may monitor and/or intercept employee telephone conversations or transmissions, electronic mail or transmissions, or Internet access or usage. Employees acknowledge that they are on notice of this rule when they sign the acknowledgement form that accompanies this policy.