

Hasbro Ethical Sourcing Guide for Licensees

NOVEMBER 2022



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Our Commitment

Treating people fairly—with dignity and respect is a core value at Hasbro and we require that our licensees and licensee suppliers manufacture Hasbro-branded products (“Licensed Articles”) in accordance with the highest ethical standards and in safe, fair and legal working conditions as established in the [Hasbro Global Business Ethics Principles](#) (see [Appendix A](#)).

Licensees will be invited to participate in, or listen to a recording of, a Hasbro Ethical Sourcing on-boarding session to orient you to this process. This document is meant to be a helpful resource to guide you through the Hasbro Ethical Sourcing Program and supersedes all previous manuals, guides, and similar materials relating to the subject matter described herein.

Hasbro reserves the right, in its sole discretion, and at any time, to request further Ethical Sourcing related information and require licensees to adhere to additional guidelines.

All licensees are required to adhere to the Hasbro Ethical Sourcing Program

Licensees may use only Hasbro Ethical Sourcing approved factories



3 Key Elements for Ethical Sourcing Compliance

1



**Licensee
Responsibility**

2



**Factory
Approval**

3



**Remediation
and Follow-up**



Licensee Responsibility

Licensees play a critical role in implementing compliance with social and environmental standards in their supply chain. By adopting a Code of Conduct and implementing policies and procedures related to factory selection, compliance monitoring and remediation, licensees can contribute greatly to improved factory social and environmental performance.

It is imperative that you have sufficient resources dedicated to social compliance and that your management team members are actively involved in the oversight of compliance.



1. COMMIT

Ensure your company Code of Conduct (CoC) is aligned with the [Hasbro Global Business Ethics Principles](#) (see [Appendix A](#)), Zero Tolerance and Critical Issues ([Appendix E](#)), and Manufacturing Country Guidance ([Appendices C and D](#)). Provide suppliers, subcontractors and agents with your CoC as early as possible for factories producing Licensed Articles.



2. ENGAGE

Include compliance as part of your factory selection and contracting process by establishing high expectations of compliance performance, monitoring identified issues and helping to implement improvements. Immediately notify Hasbro of any credible allegations of forced labor or other Zero Tolerance issues at final assembly factories or other suppliers at any stage of the supply chain for Licensed Articles.



3. MONITOR

Monitor supplier compliance through review of previous customer social compliance audit reports, licensee and agent direct audits and training of suppliers to implement effective management systems. Cooperate with Hasbro in connection with Hasbro's ethical sourcing efforts, including by promptly responding to inquiries regarding the source of materials and parts used in Licensed Articles.

Licensee Ownership

Licensees that can demonstrate effective social compliance programs, including rigorous audits and remediation process, may be eligible for our licensee ownership program. This program would waive timely audit report upload in exchange for semi-annual factory compliance reporting.

Helpful Resource:

[BSR Good Practices for Complying with Licensors' Social and Environmental Requirements](#)





Factory Approval

Licensees must use **only Hasbro-approved factories** for the final assembly of Licensed Articles. Before beginning production at any final assembly facilities, the licensee must work with the Hasbro Product Development Team to seek approval of each factory via Hasbro's Brainbase Product Approval System.

In Brainbase, licensees must disclose factories that they will be producing in, submit factory social compliance audit reports and obtain Hasbro's approval prior to beginning production, ([see Appendix B](#)).

STEP 1 DISCLOSE FACTORY



Disclose **factory name** and address from a Hasbro Permitted Sourcing Country (see [Appendix C](#)) in Brainbase. Please also see [Appendix D](#) for further information on Manufacturing Country Guidance. Promptly notify your Hasbro Ethical Sourcing contact if a factory name or location changes or if you need to deactivate a factory. Hasbro also reserves the right to request the names and addresses of material sub-suppliers, including cotton, PVC or aluminum.

STEP 2 SUBMIT AUDIT REPORT



Factories in Permitted Countries ([see Appendix C](#)): Submit a social compliance audit report (in English only) following the below criteria:

- **Recent:** Conducted within last 12 months
- **Credible source:** Conducted by a reputable third-party or brand/retailer auditor, including programs such as Amfori BSCI, Sedex SMETA and SA 8000.
- **Informative:** Detailed and comprehensive information

If Hasbro rejects the report, you may be asked to send an additional audit report or conduct a Hasbro Ethical Sourcing audit using a Hasbro Auditor Resource, ([see Appendix F](#)).

Factories in low-risk countries ([see Appendix C](#)): Submit a Hasbro Factory Self-Assessment Questionnaire (SAQ), ([see Appendix I](#)). Based on Hasbro's review of the SAQ, the factory may be required to submit an acceptable social compliance audit report.

STEP 3 CONFIRM FACTORY APPROVAL



Confirm the factory is approved by checking factory status in Brainbase, which status will be **"Approved"** or **"Approved with conditions"**.

If Hasbro Zero Tolerance (ZT) issues ([see Appendix E](#)) are identified, the factory will not be approved for production. If the factory was previously approved, the approval will be revoked immediately and no new production orders may be placed for Licensed Articles. The licensee must wait at least 12 months before seeking re-approval of the factory.



Remediation and Follow-up

Licensees must cooperate with Hasbro to ensure that factories address any issues and concerns raised from an audit or other source of information. This includes the requirement for licensees to engage with factories on identified non-compliances and help guide factories to complete a Corrective Action Plan (CAP), specifying the remediation plan for all compliance issues.

1. CAP

A CAP should detail the factory action item for improvement, identify the root cause of the problem, specify the immediate and long-term plans for compliance as well as set a timetable for completing these actions. These documents should be retained by the licensee and submitted to Hasbro upon request.

2. Critical Issues

If Hasbro Critical issues ([see Appendix E](#)) are identified, the factory will be conditionally approved for 120 days, pending verification of remediation by submission of a new audit from the same program or audit firm. If a sufficient report is not submitted within 120 days, the factory is no longer approved for production.

3. 12-Month Approval

All factory approvals expire after 12 months and the licensee must submit a new full audit report on an annual basis for Hasbro re-review and approval.

Spot Checks

Hasbro (or its representative) has the right, with or without prior notice, to conduct spot checks of licensee factories, as noted in Principle 11 of the [Hasbro Global Business Ethics Principles](#), ([see Appendix A](#)).

**Thank you for your
partnership
and collaboration!**



1 Engage with factory on CAP/ remediation starting with Root Cause Analysis.

2 If Hasbro Critical issues identified; upload an updated audit report on Brainbase within 120 days.

3 Submit a new social compliance audit every 12 months to maintain Hasbro production approval.

What is Root Cause Analysis (RCA)?

Identifying the root cause of a problem and fixing it at its origin is the best way to achieve a permanent solution. A root cause analysis involves asking how and why the problem occurred so you can get to the root of the issue.

Common root causes of non-compliance include: no one responsible, no policy or procedure, no training, no enforcement and lack of knowledge or understanding. RCA tools to use include the “5 Whys” and the “Fishbone Diagram.”

For more information or assistance, please contact the Hasbro Ethical Sourcing team.

Appendices



Hasbro Global Business Ethics Principles

Hasbro, Inc., together with its subsidiaries and affiliates (“Hasbro”), strives to conduct its business in accordance with high ethical and business standards, and seeks to have its vendors, suppliers and licensees conduct themselves in the same manner. Hasbro has long recognized concerns about the quality and character of working conditions around the world, including the United States. We are continually striving to improve the working environment for those involved in the production of our toys, games and licensed consumer products.

Hasbro wants its consumers to have confidence that products manufactured by Hasbro, or its vendors, suppliers and licensees, are produced in accordance with the principles set forth herein and are not made under inhumane or exploitative conditions. Implementation of the Global Business Ethics Principles enables Hasbro to ensure that manufacturing facilities involved in the production of Hasbro products (“Facilities”) understand and adhere to Hasbro’s requirements in this area. Participation in this program and adherence to the Principles is mandatory for all Facilities.

1. Forced Labor

The use of forced, bonded, prison, indentured or compulsory labor in the production or manufacture of Hasbro products is prohibited. This includes modern forms of slavery, human trafficking, compulsory overtime or withholding personal papers, work permits, personal identification, or compensation. It is prohibited for factories to allow or require workers to pay employer or labor agent recruitment or other fees to obtain their employment. Workers shall not be subject to unreasonable restrictions of movement.

2. Child Labor

The use of child labor is prohibited. No person shall be employed in a factory that produces or manufactures any Hasbro product at an age younger than sixteen*, or younger than the age for completing compulsory education in the country of manufacture where such age is higher.

3. Wages and Benefits

Facilities must comply with all applicable national and local wage laws, including minimum and overtime wage laws, or shall be consistent with the prevailing industry wage standards, if higher. Wages should be paid in a timely manner and wage deductions shall not be used as a disciplinary measure. Employee benefits shall be provided in accordance with national and local requirements.

* Workers under sixteen may be considered on a case-by-case basis when hired in accord with International Labor Organization (ILO) Convention 138.

4. Working Hours

A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days, except in unusual or emergency situations. All overtime work must be voluntary.

5. Health and Safety

Facilities shall ensure that all employees have a healthy and safe environment, including in dormitories, where provided. Hasbro expects all Facilities to promote an awareness of health and safety issues to their employees including issues surrounding fire prevention, emergency evacuation, proper use of safety equipment, basic first-aid and the proper use and disposal of hazardous waste materials. Facilities must provide reasonable accommodation to pregnant/nursing women to ensure a healthy and safe environment.

6. Abuse; Discrimination

Facility employees shall be treated with dignity and respect. No employee shall be subject to abuse, cruel or unusual disciplinary practices or discrimination in employment or hiring on the grounds of race, religion, origin, political affiliation, union membership, sexual preference, age, gender or pregnancy.

7. Communication of Principles

Facilities will communicate these Principles to employees in an appropriate oral and written fashion and will undertake efforts to educate employees about these Principles on a periodic basis as well as ensure that workers have an effective mechanism to report grievances, without fear of retaliation. Factory workers can report work-related concerns anonymously and without fear of retaliation by emailing Hasbro's hotline at: EthicalSourcing@hasbro.com.

8. Acceptance of Advantages

Hasbro will not tolerate Facilities who do not conduct business in an ethical and proper manner or who use bribes, kickbacks or provide gifts, favors, or services to gain a competitive advantage with Hasbro.

9. Environmental Impact

Hasbro maintains a commitment to sound environmental programs and practices and encourages the reduction and recycling of waste. Facilities must comply with all applicable laws relating to the environment and dispose of toxic materials in a controlled and safe manner. To that end, Hasbro seeks to conduct business with Facilities who are equally dedicated to pursuing continuous efforts to improve the compatibility of its operations with the environment.

10. Freedom of Association and Collective Bargaining

Hasbro recognizes all employees' right to choose [or not] to affiliate with legally sanctioned organizations or associations and to bargain collectively without unlawful interference, discrimination, retaliation or harassment.



11. Monitoring and Right to Terminate

Hasbro shall have the right to conduct periodic on-site visits of working and living conditions, including unannounced audits of production records and practices and of wage, hour and payroll information maintained by Facilities, to review and ensure compliance with the Principles. Hasbro retains the right, in its sole discretion, to terminate its relationship with a vendor, supplier or licensee facility in violation of the Principles; however, Hasbro will endeavor to work with Facilities to promptly address any problems discovered in the course of its review or audit. Hasbro will require the implementation of an acceptable written corrective action plan for any problems found during an audit. Failure to address items in the corrective action plan may result in termination of the business relationship.

12. Certification and Prohibition of Unauthorized Subcontracting

Hasbro will require a written statement from Facilities of compliance with these Principles. Unauthorized subcontracting is strictly prohibited and grounds for termination.

13. Compliance with Applicable Laws

Facilities will comply with the national laws of the country in which they are conducting business, any local laws, regulations or standards applicable to their business and the industry standards which have been established in their location; provided, however, in the event of any conflict between the provisions of any of the preceding laws, regulations, or standards and the provisions of this document, then the provision containing the higher standards shall prevail.

Hasbro, as a member of global toy associations and the Responsible Business Alliance (RBA), strongly supports and endorses multi-industry efforts to improve factory working conditions. While Hasbro will retain the right to conduct its own audits, participation in the RBA social compliance program, including regular audits by an approved third-party auditor, will generally be sufficient.

The [RBA Code of Conduct](#) is hereby incorporated by reference; in the event of a conflict, the stricter standard applies.



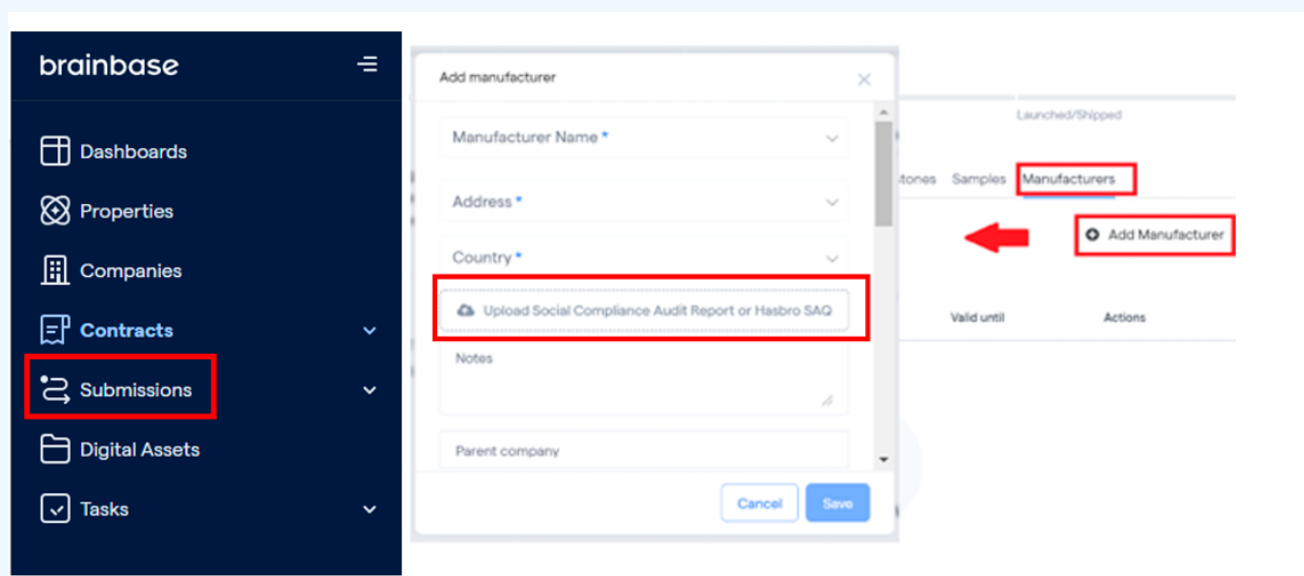
Brainbase Guidance

1. REQUEST APPROVAL: DISCLOSE FACTORY AND UPLOAD REPORT

A factory (also known as manufacturer) must be assigned to each physical product submission in Brainbase before it can proceed to the production stage. Previously disclosed factories may be selected from the **Manufacturer's list**. The submission must also be assigned to Ethical Sourcing.

a. Add Factory and Upload Report

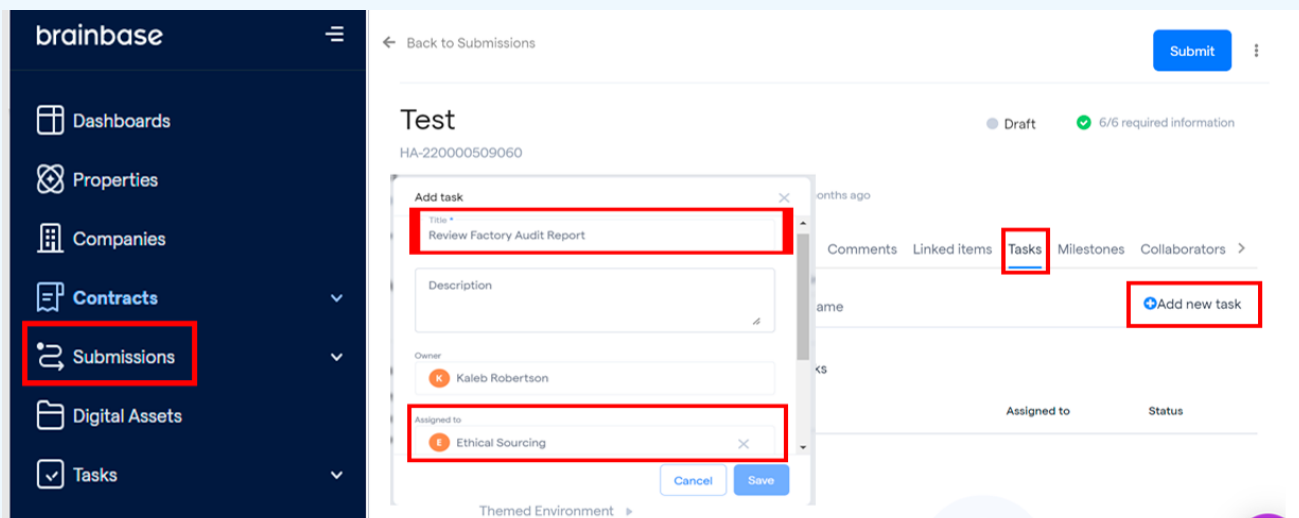
Go to **Submissions** > Click on **Manufacturers** > Click **Add Manufacturer** > Input **Manufacturer Name** > Select the name that matches and ensure the factory address is correct > If the name of the factory does not appear, create a new factory by typing in the **Manufacturer Name and Address** > Click **Upload Social Compliance Audit Report or Hasbro SAQ** > Attach **factory social compliance report** > Complete **other required fields on the form (indicated by a blue asterisk)** > Click **Save**.



- Disney FAMA letters, certification documents, and CAPs are not accepted in lieu of detailed audit reports.
- When uploading audit reports, the report and file name must be in English and have no special characters (i.e. Japanese, Vietnamese, Chinese characters).
- Please provide proper name for the factory audit report file using the format, "Factory name - Report Type - Audit Date."

b. Assign to Ethical Sourcing for approval

On the submissions page: Click **Add New Task** > Input **Title**, such as “Review Factory Audit Report”, and add a **Description** when necessary with important details > Input and Assign to **Ethical Sourcing** > Click **Save**.



The screenshot shows the Brainbase interface with the 'Add task' modal open. The 'Title' field is filled with 'Review Factory Audit Report'. The 'Assigned to' dropdown is set to 'Ethical Sourcing'. The 'Add new task' button is highlighted in the top right corner of the modal. The background shows the 'Test' submission page with a 'Draft' status and '6/6 required information'.

Once a new audit report is uploaded to Brainbase, a **Task** must be assigned to **Ethical Sourcing** for review.

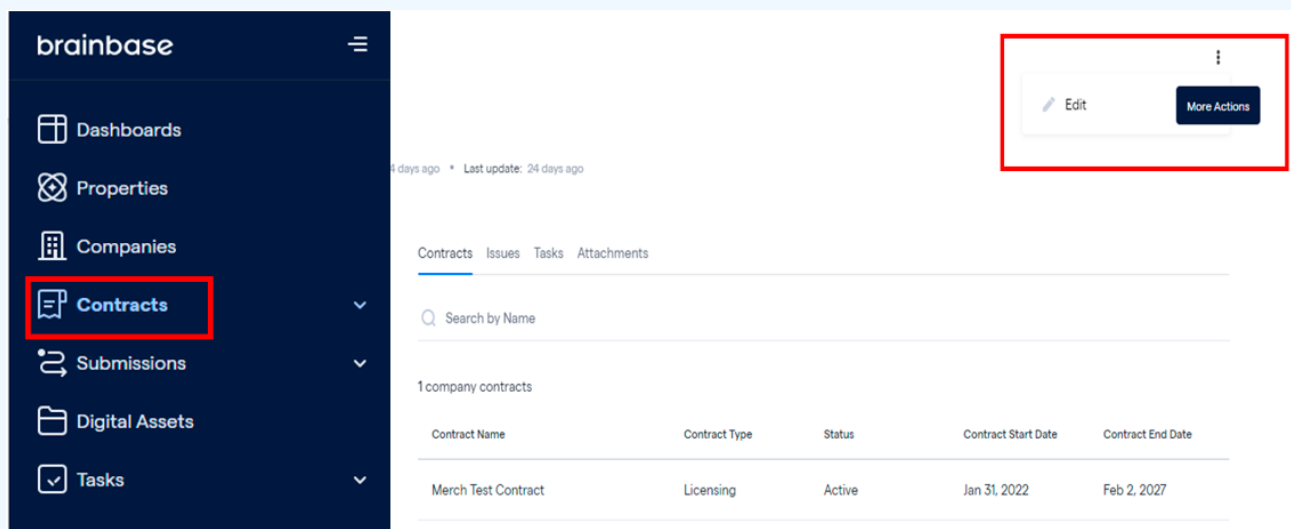
** If a submission does not require Ethical Sourcing approval (based on product or licensee), Ethical Sourcing will select **Not Doing** and no further review will be needed.

2. MAINTAIN APPROVAL: UPLOAD NEW AUDIT REPORT UPON EXPIRATION

The licensee should engage with the factory to remediate issues and then upload a new audit report every 12 months or upon factory expiration if it is an earlier date, (within 120 days for factories with Critical Issues and every 12 months for other factories).

a. Upload New Audit Report

Go to **Contracts** > Click **Manufacturers** on the associated contract > Click **Edit** > Click **Upload Social Compliance Audit Report or Hasbro SAQ** > Attach **factory social compliance audit report** > Complete the **other required fields on the form (indicated by a blue asterisk)** > Click **Save**.



The screenshot shows the Brainbase interface with the 'Contracts' page. The 'Contracts' menu item is highlighted in the sidebar. The 'Edit' button is highlighted in the top right corner of the contract details section. The background shows a table of contracts with columns for Contract Name, Contract Type, Status, Contract Start Date, and Contract End Date.

Contract Name	Contract Type	Status	Contract Start Date	Contract End Date
Merch Test Contract	Licensing	Active	Jan 31, 2022	Feb 2, 2027

b. Assign to Ethical Sourcing for approval

Click **Tasks** > Click **Add new task** > Input **Title** such as “Review Factory Audit Report”, and add a **Description** when necessary with important details > Input and Assign to **Ethical Sourcing** > Click **Save**.

3. CONFIRM FACTORY APPROVAL

Confirm that Hasbro Ethical Sourcing has approved the factory by checking the factory status under **Manufacturer Status** and keep your notification settings for manufacturers as “All Notifications” or “Email Notifications.”

- a. Approved:** A factory has been approved for production and factory is authorized to produce until noted expiration date, one year from last audit date. If orders are planned for after the expiration date; a new audit should be submitted.
- b. Approved with Conditions:** A factory is approved for production on a conditional basis pending remediation of identified critical issues, noted in **Issues** tab, to be demonstrated by a follow-up audit within 120 days.
- c. Not Approved:** A factory has been reviewed by Ethical Sourcing but is not authorized to process new orders due to an expired/unacceptable/missing audit report or the identification of a Hasbro Zero Tolerance or repeat Hasbro Critical issues. The specific Zero Tolerance or Critical Issue(s) can be found in the **Issues** tab. If Ethical Sourcing rejects the factory, the licensee should add a new factory to the submission for approval and assign a Task to Ethical Sourcing.
- d. Expired:** If a new audit report is not submitted and approved before the expiration date of the past approval, the factory will be listed as expired and will be unable to process new orders until a new report is submitted and approved. When uploading a new report for review, be sure to assign a **Task** to Ethical Sourcing.
- e. Pending:** The factory is still being reviewed by Ethical Sourcing.

For all additional questions and tutorials:

Go to **Digital Assets > Hasbro Training Material > Hasbro Training Documentation > Ethical Sourcing Reference Documents**



Appendix C

Hasbro Permitted Countries

Albania	Brunei Darussalam*	Finland*	Kazakhstan
American Samoa*	Bulgaria	France*	Kenya
Andorra*	Burkina Faso	French Guiana*	Kiribati
Anguilla*	Cambodia**	Gambia	Kosovo
Antigua and Barbuda*	Canada*	Georgia	Kuwait
Argentina	Cape Verde*	Germany*	Kyrgyz Republic
Armenia	Cayman Islands*	Ghana	Latvia*
Aruba*	Channel Islands*	Greece	Lesotho
Australia*	Chile*	Greenland*	Liechtenstein*
Austria*	China	Grenada	Lithuania*
Azerbaijan	Colombia**	Guam*	Luxembourg*
Bahamas*	Costa Rica*	Guatemala	Macao SAR*
Bahrain	Côte d'Ivoire	Guyana	Malawi
Bangladesh**	Croatia*	Haiti**	Malaysia
Barbados*	Cyprus*	Honduras	Maldives
Belarus***	Czech Republic*	Hong Kong SAR*	Malta*
Belgium*	Denmark*	Hungary*	Marshall Islands
Belize	Dominica*	Iceland*	Martinique*
Benin	Dominican Republic	India	Mauritius*
Bermuda*	Ecuador	Indonesia	Mexico
Bhutan*	Egypt, Arab Rep.**	Ireland*	Micronesia, Fed. Sts
Bolivia	El Salvador	Israel*	Moldova
Bosnia and Herzegovina	Estonia*	Italy*	Monaco*
Botswana*	Ethiopia**	Jamaica	Mongolia
Brazil	Eswatini	Japan*	Montenegro
	Fiji	Jordan	Morocco

*Indicates Low-Risk Countries in which we can review a Hasbro Factory SAQ in lieu of audit reports.

**Only produce in and source from factories in the Better Work program. For factories that are not eligible for Better Work program, Hasbro may accept other assessments/audits that meet our criteria on page 5 of the Licensee Guide.

***New requests for approval of factories is paused.

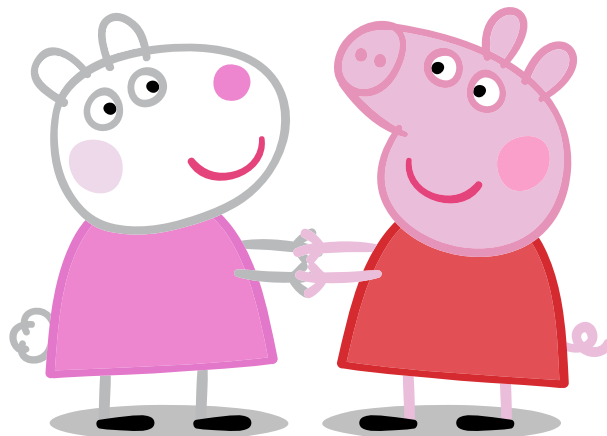
Namibia	Puerto Rico	South Africa	Tuvalu
Nauru	Qatar*	South Korea*	Uganda
Nepal	Réunion*	Spain*	Ukraine
Netherlands*	Romania	Sri Lanka	United Arab Emirates*
New Zealand*	Russian Federation***	St. Kitts and Nevis*	United Kingdom*
Nicaragua**	Rwanda	St. Lucia*	United States****
Niger	Samoa*	St. Vincent and the Grenadines*	Uruguay*
North Macedonia	San Marino*	Suriname	Vanuatu
Norway*	São Tomé and Príncipe	Sweden*	Vietnam
Oman	Saudi Arabia	Switzerland*	Virgin Islands (U.S)*
Pakistan**	Senegal	Taiwan*	West Bank and Gaza
Palau	Serbia	Tanzania	Zambia
Panama	Seychelles	Thailand	
Papua New Guinea	Sierra Leone	Timor-Leste	
Paraguay	Singapore*	Tonga	
Peru	Slovak Republic*	Trinidad and Tobago	
Philippines	Slovenia*	Tunisia	
Poland*	Solomon Islands	Turkey	
Portugal*			

*Indicates Low-Risk Countries in which we can review a Hasbro Factory SAQ in lieu of audit reports.

**Only produce in and source from factories in the Better Work program. For factories that are not eligible for Better Work program, Hasbro may accept other assessments/audits that meet our criteria on page 5 of the Licensee Guide.

***New requests for approval of factories is paused.

****Within the United States, New York City and Los Angeles are considered High-Risk locations which require an audit report submission.



Manufacturing Country Guidance



Prohibited Countries

The following countries are prohibited from manufacturing Licensed Articles due to corruption, security, human rights issues or other risks:

- Afghanistan
- Algeria
- Angola
- Burundi
- Cameroon
- Central African Republic
- Chad
- Comoros
- Congo, Democratic Republic
- Congo, Republic
- Cuba
- Djibouti
- Equatorial Guinea
- Eritrea
- Gabon
- Guinea
- Guinea Bissau
- Iran
- Iraq
- Laos
- Lebanon
- Liberia
- Libya
- Madagascar
- Mali
- Mauritania
- Mozambique
- Myanmar
- Nigeria
- North Korea
- Somalia
- South Sudan
- Sudan
- Syria
- Tajikistan
- Togo
- Turkmenistan
- Uzbekistan
- Venezuela
- Yemen
- Zimbabwe

Bangladesh Guidance

Due to the known risks of sourcing in Bangladesh, licensee factories in Bangladesh must be in good standing with the RMG Sustainability Council (RSC) based on recent audit reports and corrective action plans (CAP) in order to verify compliance in addition to comprehensive social compliance reports. If a factory does not have a recent RSC report or CAP to share, it must submit a recent Structural, Electrical and Fire Safety report from a credible audit company.

Turkmenistan Cotton Ban

Hasbro is aware of reports concerning the widespread, systematic use of forced adult and child labor for the harvesting of cotton in Turkmenistan, the 9th largest cotton producers/exporters in the world. In addition, as of May 2018, US Customs and Border Protection issued a formal ban on the importation to the US of “all Turkmenistan cotton or products produced in whole or in part with Turkmenistan cotton.” For these reasons, **Hasbro licensees are prohibited from knowingly using cotton from Turkmenistan** for Licensed Articles and should have a due diligence process in place to demonstrate compliance.

Hasbro Zero Tolerance and Critical Issues

Hasbro Zero Tolerance Issues

Zero Tolerance issues are those which represent **severe impact** to individual rights, life safety and/or Hasbro's corporate reputation. For a period of 12 months following the termination of a factory for Zero Tolerance issues, licensee will be prohibited from seeking approval.

- Bribery
- Unauthorized Subcontracting
- Denial of Access
- Child Labor
- Forced Labor
- Immediate Life-Threatening Health, Safety and/or Environmental Issues
- Systemic Abuse and/or Harassment
- Non-payment of minimum wage
- No valid Business License

Hasbro Critical Issues

Critical issues are those which represent a **negative impact** to individual rights, life safety and/or Hasbro's corporate reputation.

They align with the Responsible Business Alliance Code of Conduct. These issues should be immediately addressed if identified in Licensee manufacturers. Licensees shall develop a corrective action plan with the manufacturer and demonstrate effective remediation to be verified in a follow-up audit in order to maintain approval.

Forced labor

- Workers paying recruitment, hiring or other fees;
- Workers restricted from voluntary employment termination or penalized when given notice;
- No contract/conditions communicated prior to employment;
- Contract substitution for materially worse conditions;
- Personal documents are involuntarily held or access is denied when requested;
- Workers are restricted to movement with severe threat;
- Employees are fined or penalized for refusing to work overtime.

Child labor

- No process to ensure age documentation is correct;
- Young workers found doing hazardous work, night or overtime work.



Wages and Benefits

- Workers are not allowed time off for illness or maternity with valid medical certificate or do not receive legal maternity benefits;
- Workers being paid below minimum wage or delayed wage payments;
- Payment of government or regulatory deductions have not been made or paid on time;
- Incorrect legally required employer contributions paid;
- Social insurance at 100% (China: Injury, accident insurance covered at least 80%);
- Inconsistency is found in payroll/time records.

Working Hours

- Working hours are more than 60 hours/week (systemic or > 40% of workers) or more than 72 hours/week (> 15% of workers) or more than 84 hours/week (any worker);
- No rest day after every 6 consecutive days of work, between 6-12 days (systemic or > 40% of workers) or more than 12 days (> 5% of workers) or more than 24 days (any worker).

Abuse and Discrimination

- Verified inhumane treatment reported without action taken by factory management;
- Verbal or physical abuse by supervisors or management;
- Management discriminates in a structured way that causes significant harm to a protected class;
- Factory actively retaliates against worker;
- Employees selected for interviews by auditors were coached or intimidated by management;
- Migrant employees receive lower wages for the same job held by local employees;
- Employees were punished for participating in union activities;
- Employees were dismissed for participating lawfully in a labor strike.

Health, Safety, and Environment

• Occupational Safety

- Imminent risk of loss of life, or limb;
- Insufficient risk assessment and management of chemical safety;
- Appropriate PPE is not worn and there is immediate risk to workers;
- Dormitory shared with production building/warehouse, or vice versa.

• Emergency Preparedness

- Lack of, or inadequate firefighting equipment, automatic detection system, alarm or notification system;
- No risk assessment AND no emergency response plan;
- Insufficient number of required emergency exits and/or evacuation/exit signs are not installed, insufficiently powered, do not function properly, obstructed or not visible. (systemic or 3 minor issues);
- Emergency exits are blocked, not easily opened, or lacking easy access;
- No emergency evacuation drill held in last 12 months or more;
- PPE is not in good condition, sufficient, visible or easily accessible.

• Occupational Injury and Illness

- Lack of medical emergency personnel or procedures.

• Machine Safeguarding

- Worker operate machine unsafely with immediate risk of life or limb.

• Sanitation, Food, and Housing

- Dormitory/Apartment and/or Canteen/kitchen is unsafe with immediate risk of loss of facility, life or limb.

• Environmental

- Environmental conditions are evident that could cause imminent negative impact on workers or the community.

Hasbro Auditor Resources



AUDIT FIRM	SCOPE	NAME	EMAIL
Arche Advisors	Australia, Americas, China, Europe	David Vargas	david.vargas@archeadmins.com
Elevate	Europe	Alessandra Fabbri Oguzhan Karpuzoglu Dilara Ocal	alessandra.fabbri@elevatelimited.com oguzhan.karpuzoglu@elevatelimited.com dilara.ocal@elevatelimited.com
	North America	Ayari Flores Lourdes Rodriguez	aflores@elevatelimited.com lourdes.rodriguez@elevatelimited.com
	South America	Magalli Sanchez Oriana Castillo	msanchez@elevatelimited.com oriana.castillo@elevatelimited.com
Footprints CSR	Bangladesh, China, India, Indonesia, Japan, Malaysia, Pakistan, Philippines, Sri Lanka, Taiwan, Vietnam and other countries remotely	Saif Khan	saif.khan@footprintscsr.com
Key of Sustain	Turkey	Atilla Cilesiz	atilla@keyofsustain.com
Openview	Bangladesh, Brazil, Cambodia, China, Hong Kong, India, Indonesia, Laos, Macao, Pakistan, Philippine, Taiwan, Thailand, Turkey and Vietnam	Suki Lin	suki.lin@openviewservice.com
Social Compliance Service Asia (SCSA)	Bangladesh, China, Hong Kong, India, Indonesia, Japan, Macao, Malaysia, Singapore, Taiwan, Thailand, and Vietnam	Samuel Wong	samuel.wong@scsagroup.com
		Mickey Ng	micky.ng@scsagroup.com
Velar	Argentina, Brazil, Chile, Colombia, Ecuador, El Salvadore, Guatemala, Mexico, Peru, USA	Oxfander Ramirez	oramirez@VeLaR-intl.com

NOTE: Subject to change in Hasbro's sole discretion

Hasbro Ethical Sourcing Contacts

SCOPE	NAME	EMAIL
General	Hasbro Ethical Sourcing	ethicalsourcingcompliance@hasbro.com
Licencees based in: Africa, Europe, Middle East, North and South America	Kaleb Robertson	kaleb.robertson@hasbro.com
Licencees based in: Asia Pacific and India	Katrina Liang	katrina.liang@ap.hasbro.com
Licencees Ownership	Echo Hou	echo.hou@ap.hasbro.com



Frequently Asked Questions

1. Which factories need to be disclosed to Hasbro through Brainbase?

Only final assembly factories must be disclosed to Hasbro through **Brainbase** for Ethical Sourcing approval. This includes both owned and third-party manufacturers.

2. Our factory was recently audited, do we still need to conduct a social compliance audit for Hasbro?

To avoid duplication of efforts, Hasbro will often accept audits conducted within the twelve months prior to the intended production start date. The Hasbro Ethical Sourcing team will evaluate submitted audit reports on a case-by-case basis to determine whether the audit is acceptable for review and subsequent approval. Criteria for acceptance is based on the audit date, whether the audit was conducted by a reputable auditor and provides detailed and comprehensive information regarding factory working conditions in Hasbro's sole discretion.

3. How long does it take to get factories approved?

The length of time it takes for a factory to achieve approval varies. Ethical Sourcing review of a factory cannot begin until an audit report is uploaded. After a new audit report is uploaded in **Brainbase**, we strive to review and process it within 48 hours, but it may take up to five (5) business days.

It is advised to begin the approval process as soon as possible since the time period for approval can vary depending on a factory's initial level of compliance.

Factories new to auditing or at a lower level of compliance may take several months to reach an acceptable level of compliance.

4. Does the audit report need to be uploaded into each record that has the factory assigned?

A valid audit report needs to be uploaded only once in the companies section. As long as a valid audit is in the 'child' record of the manufacturer and the factory is approved it can be associated with one or multiple submissions.

5. What happens if the factory is approved but then expires before production begins?

Licensees must monitor factory compliance year-round and submit updated social compliance audit reports in **Brainbase** once approval expires (after 12 months or 120 days following the identification of Hasbro Critical issues).

6. Why isn't anyone reviewing my uploaded documents?

Please always double check and make sure you assigned a Task back to "Ethical Sourcing". If you upload new ethical sourcing-related documents but do not assign Task, the Ethical Sourcing team will not know new documents were already uploaded and, therefore, review of your documents will be delayed.

Appendix I

Hasbro Factory Self-Assessment Questionnaire

Licensee Name:

Facility Name:

Date of Self Assessment:

All questions must be answered sufficiently to be considered for approval.

FACTORY-LEVEL SOCIAL RESPONSIBILITY

Factory Information & Contact

- 1 Company Name:
- 2 Factory Name (Business License Name):
- 3 Factory Address:
- 4 Factory City:
- 5 Factory State or Province:
- 6 Factory Country:
- 7 Factory Postal Code:
- 8 Please note what products are produced at this factory:
- 9 During the last 12 months, were there any public demonstrations, protests, or adverse media reports involving your factory's operations or business conduct?

Workforce Profile

- 1 How many people are employed onsite at your factory?
- 2 How many male workers, including both local and foreign migrant workers (please exclude supervisors/executive/management/professional) are employed at your factory?
- 3 How many female workers including both local and foreign migrant workers (please exclude supervisors/executive/management/professional) are employed at your factory?

Young Workers

- 1 How many male and female student, intern and apprentice workers are employed at your factory?
 - 2 Does the factory employ workers younger than 15 or local legal age, if higher?
 - 3 How many workers employed at your factory between the ages of 15 and 18?
 - 4 Do any young workers perform night work, hazardous jobs, or are they exposed to risks from chemicals, machinery, tools or excessive cold, heat, or noise?
-

Contract Workers

- 1 Does your factory use third-party workforce recruiters to provide foreign or migrant workers?
 - 2 Please specify how many third-party workforce recruiting agencies are used.
 - 3 How many male and female indirect, contract or dispatch workers are employed at your factory (both local and foreign, persons not under a direct contract to the factory and not management level)?
 - 4 How many indirect, contract, or dispatch workers are migrant workers? Which countries of origin are these workers representing?
-

Migrant Workers

- 1 How many female and male migrant workers are employed at your factory? Please exclude supervisors/executive/management/professional.
 - 2 List the number of foreign migrant workers by nationality.
 - 3 Main languages spoken by workers: (including migrant workers). Please exclude supervisors/executive/management/professional.
-

Forced Labor

- 1 Are workers free to resign from their employment at any time without penalty, giving reasonable notice?
 - 2 Are any of the workers under bond, debt, or other obligation to the factory or to labor brokers?
 - 3 Are workers free to leave the factory and related dormitories during non-working hours and at the end of their shift?
 - 4 Does the factory (or labor broker) withhold worker ID cards or passports?
 - 5 Are workers required to deposit money prior to or during employment?
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Thank you.

