

HASBRO

ANTI-RETALIATION POLICY

Purpose

Hasbro is committed to maintaining a work environment that is free of harassment, intimidation, retaliation, and discrimination. To maintain such an environment, it is essential to promote an atmosphere where employees are comfortable raising questions, concerns, or issues without fear of retaliation. This policy is intended to communicate to employees the protections provided by Hasbro to both promote a retaliation-free environment and to promptly address retaliatory conduct in the event that it occurs.

Definitions

“Protected Activity” occurs when an employee in good faith makes a complaint, raises a concern, provides information, or otherwise assists in an investigation or proceeding regarding any conduct (or the omission of any conduct) that the employee reasonably believes to be in violation of Hasbro’s Code of Conduct or policies, or applicable laws, rules or regulations. Examples of Protected Activity include, without limitation, an employee reporting, providing information, or assisting in an investigation relating to potential:

- Discrimination or harassment;
- Fraud;
- Unethical or unprofessional business conduct;
- Non-compliance with Hasbro’s policies and/or procedures, including Hasbro’s Code of Conduct;
- Real or potential threats to Hasbro workers or the public’s health and/or safety;
- Violations of local, state or federal laws and regulations;
- Other illegal or improper practices or policies.

“Retaliation” occurs when an employer takes an adverse action against an employee because they engaged in a Protected Activity.

“Adverse Actions” include, but are not limited to:

- Demotion;
- Suspension;
- Termination;
- Failure to hire or consider for hire or promotion;
- Failure to give equal consideration in making employment decisions or to make impartial employment recommendations;
- Adversely impacting working conditions or otherwise denying any employment benefit to an employee;
- Creating a hostile or intimidating work environment.

Policy Statement

Hasbro does not tolerate retaliation against anyone for raising or helping to address an ethics or compliance concern, for seeking advice about a business practice, decision or action, for cooperating in an investigation of a potential violation of ethics or compliance, or for engaging in any other Protected Activity. Hasbro considers acts of retaliation to be acts of misconduct. Hasbro prohibits retaliation even if an employee's concerns or information are not confirmed following an investigation. Employees who engage in Protected Activity remain subject to the same standards of performance and conduct as other employees.

Obligation to Report Concerns

Hasbro relies upon its employees to raise questions or concerns so that it can take appropriate action. Reports of suspected improper or wrongful activity will be treated confidentially, and employees have the choice to report concerns anonymously. If submitting a concern anonymously, it is important to provide sufficiently detailed information regarding the subject matter of the concern and identify potential witnesses to enable Hasbro to effectively investigate and address the concern.

Hasbro takes all claims of retaliation very seriously, and such claims will be reviewed promptly and investigated. If an employee believes he or she has either witnessed retaliation, been personally retaliated against, or that any other violation of this policy has occurred, or an employee has questions concerning this policy, they should immediately contact their manager, the Human Resources Department, or the Legal Department, call one of the Hasbro Helpline telephone numbers, or email one of the Hasbro Legal Compliance email addresses. Further information is available in Hasbro's Code of Conduct.

- Hasbro Helplines
 - Within the US/Canada: +1-800-9-HELP-44
 - APAC: +852 2737 7392
 - Other Locations: +44-20-8744-6222
- Hasbro Legal Compliance Email Addresses
 - APAC: apac.compliance@hasbro.com
 - Other Locations: compliance@hasbro.com

Consequences of Policy Violation

Any Hasbro employee who retaliates against an employee, or who otherwise violates this policy, is subject to disciplinary action, up to and including termination of employment.