



**Hillshire**  
BRANDS

**Global  
Standards**  
*for*  
**Business  
Partners**



**Hillshire**  
BRANDS

Hillshire Brands believes in doing business with those business partners—including suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants—who embrace and demonstrate high standards of ethical business behavior.

The following *Global Standards for Business Partners* define the minimum requirements for Hillshire Brands' business partners.

## **Product Quality and Safety**

Hillshire Brands has a fundamental responsibility to ensure that consumers can trust the safety and quality of its products.

Business partners are expected to provide goods and services that meet or exceed all government and all agreed upon quality and safety standards. Any threats to product safety must be immediately reported to Hillshire Brands.

## **Employment Practices**

Hillshire Brands has a strong commitment to treating its employees fairly and with dignity and respect. We believe in doing business with business partners who share this commitment, and we expect business partners to comply with all applicable employment laws and to support fundamental human rights for all people.

## **Our expectations include:**

### **Child Labor**

Business partners will not employ individuals in violation of the local mandatory school age, or under the legal employment age where they operate. Moreover, in no case will business partners employ non-family workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.

### **Compensation**

Business partners will, at a minimum, comply with applicable wage and hour laws and regulations, including those relating to minimum wages.

### **Discrimination**

Business partners will not discriminate based on personal characteristics or beliefs. Hillshire Brands will favor those business partners who provide equal opportunity to all.



### **Forced Labor**

Business partners will not use forced or involuntary labor whether bonded, prison or indentured, including debt servitude.

### **Freedom of Association and Collective Bargaining**

Business partners will respect the right of employees to exercise their lawful right of free association. Similarly, business partners will recognize the lawful rights of their employees to choose or not choose collective bargaining representation.

### **Safety and Health**

Business partners will operate a safe and healthy work environment for their employees. Where applicable, this also applies to housing and eating facilities.

### **Workplace harassment or abuse**

Business partners will not subject employees to physical, verbal, sexual, or psychological harassment, or use corporal or physical punishment to discipline employees.

## Working hours

Business partners will comply with all applicable laws and regulations regarding working hours.

## Environment

Hillshire Brands believes in doing business with business partners who share its commitment to protecting the quality of the environment through sound environmental management.

Business partners are expected to comply with all applicable environmental laws.

Hillshire Brands will favor business partners who seek to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations.

## Conflicts of Interest

Hillshire Brands expects business decisions to be made in the best interest of the company.

Any situation that creates or appears to create a conflict between personal interests and the interests of Hillshire Brands must be avoided.

## Anti-corruption

Hillshire Brands strictly abides by all applicable laws relating to anti-corruption, including the Foreign Corrupt Practices Act, and expects business partners to act in a similar manner.

Business partners are strictly prohibited from paying or accepting bribes or engaging in corrupt practices in order to advance Hillshire Brands' business interests. This includes, directly or indirectly, offering, promising to pay or authorizing the payment of money or anything of value to local government officials, political parties, party officials, candidates for political office, or officials of public international organizations (like the World Bank) in an effort to influence any official decision that would assist Hillshire Brands in obtaining or retaining business, or securing any improper commercial advantage. If you have questions, please consult with your Hillshire Brands contact or the Business Practices Department.

## Gifts, Favors and Entertainment

Gifts, favors and entertainment are not needed in order to conduct business with Hillshire Brands and may lead or appear to lead to a conflict of interest.

In many industries and countries, gifts, favors and entertainment are used to strengthen business relationships. No gift should be provided or accepted if it will obligate or appear to obligate the recipient.

Gifts or entertainment may be provided if they are reasonable complements to business relationships, or of modest value, and, in any event, not against the law or Hillshire Brands policy. Hillshire Brands employees may not accept gifts, favors and entertainment valued at more than \$250USD in any year from the same company. Hillshire Brands policy expressly prohibits the following situations for Hillshire Brands employees:

- Requesting or soliciting personal gifts, favors, entertainment or services.
- Exploiting their position to solicit vendors, including financial institutions, to provide individual preferential treatment in pricing, terms or loans.
- Accepting or providing bribes or kickbacks.
- Receiving cash or cash equivalents.
- Being provided with lavish or excessive gifts and entertainment.
- Being entertained at clubs or organizations that discriminate on the basis of race, color, gender, national origin, religion, or sexual orientation.
- Being entertained at sexually oriented establishments, such as “gentlemen’s clubs,” “strip bars” or “brothels.”
- Being entertained in a manner that places them at a risk of physical harm.





## Confidential Information

Business partners are expected to safeguard Hillshire Brands' confidential information by keeping it secure, limiting access to those individuals who have a need to know the information in order to do their jobs, and avoiding discussion of confidential information in public areas, for example on planes, in elevators and on mobile phones.

Hillshire Brands' confidential information may not be disclosed as it provides Hillshire Brands a competitive advantage. Examples of confidential information include trade secrets, detailed sales and profit figures, new product or marketing plans, research and development ideas or information, manufacturing processes, personnel information, price lists, trade investment, and information about potential acquisitions, divestitures and investments. The obligation to preserve Hillshire Brands' confidential information may be ongoing, even after the relationship ends.

Hillshire Brands will respect and safeguard the confidential information of our business partners.

## Fair Competition and Antitrust

Hillshire Brands believes in free and open competition, and strictly abides by all applicable fair competition and antitrust laws.

Business partners are expected to comply with all applicable laws and regulations regarding fair competition and antitrust.

## Accuracy of Business Records

Business partners are expected to record and report information accurately and honestly.

Business partners are expected not to hide, fail to record, or make false entries in connection with any business records. All records, including financial and operational records are expected to accurately reflect transactions, payments and

events, to be filed in a timely fashion, and to conform to any requirements of Hillshire Brands made known to business partners.

## Other Legal Requirements

Business partners are expected to comply with all applicable laws not otherwise set forth in these *Standards*. When used in these *Standards*, “applicable laws” include all applicable local, state, provincial, and national laws, codes, rules and regulations as well as all applicable treaties.

## Communication

We expect our business partners to communicate these *Standards* to their employees and business partners, and for their employees and business partners to adhere to them.

## Monitoring and Compliance

Business partners are expected to notify Hillshire Brands immediately if they become aware of any non-compliant practices by themselves, their employees and their business partners, and are further expected to promptly develop and implement plans or programs to correct any such practices. Business partners should also be aware of the fact that Hillshire Brands engages in various monitoring activities to confirm compliance with these *Standards*, including conducting its own and independent third-party inspections and audits.

## Our Expectation

We expect all business partners to live up to these *Standards* and do the right thing. Hillshire Brands employees use the following “Mirror Test” as their guide. We encourage business partners to use our “Mirror Test” as well.

A business partner’s failure to observe and abide by these may result in Hillshire Brands ceasing to do business with it.

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# OUR MIRROR TEST

## Is it **Legal**?

If it's not legal, don't do it. It's that simple.

## What will others **Think**?

If you were to explain your actions to your manager, your mother, or the news media, could you justify what you have done? How about to the people affected by your actions?

## Is it **Right**?

How does your conscience feel?  
What would a trusted friend say?

## Do the Right Thing!

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## Questions or Concerns

Hillshire Brands strongly encourages any business partner who feels pressured by a Hillshire Brands employee or another business partner to violate these *Standards* to contact Hillshire Brands' Business Practices Department immediately.

In Summary, we expect all business partners to:

- Comply with the law.
- Do the right thing.
- Communicate concerns about inappropriate business practices promptly to us.

Living up to these responsibilities will help create continued success for Hillshire Brands and its valued business partners.



Sean Connolly  
Chief Executive Officer  
The Hillshire Brands Company



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